

**CONSULTATION STATEMENT: EMBLETON PARISH  
NEIGHBOURHOOD PLAN**

**CONSULTATION STATEMENT FOR EMBLETON  
PARISH NEIGHBOURHOOD PLAN -  
SUBMISSION VERSION  
2019 – 2036**

October 2019

Embleton Parish Council

# **CONSULTATION STATEMENT: EMBLETON PARISH NEIGHBOURHOOD PLAN**

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# CONSULTATION STATEMENT: EMBLETON PARISH NEIGHBOURHOOD PLAN

## 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, Embleton Parish Council) submit a neighbourhood development plan to the local planning authority, they must also provide a Consultation Statement. Regulation 15(2) describes what is required in a Consultation Statement. This states that a Consultation Statement must:

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

1.2 This Consultation Statement sets out:

- the background to preparation of a neighbourhood development plan for Embleton Parish;
- A timeline of the publicity, engagement and consultation that has helped to shape and inform preparation of the Plan;
- Details of those 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; and
- A description of the changes made to policies as the Plan emerged in response to the pre-submission (Regulation 14) consultation. These details specifically can be found in Appendix C.
- Examples of documents used for consultation, and the relevant analyses of those consultations

1.3 The Statement concludes that the process and techniques involved in seeking community engagement and the outcomes achieved through preparing the Submission Draft Plan were extensive and appropriate to the purpose of the Plan. The extent of engagement is considered by the Parish Council to at least meet the obligations set out in the Regulations.

1.4 This Consultation Statement supports and describes the process of plan making as envisaged through the Localism Act 2011 and the associated Regulations and sets out how it has been applied in Embleton Parish. The

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methods used and outcomes achieved from engagement have resulted in the submission of a plan that, in the opinion of the Parish Council, best meets community expectations expressed during the various stages of plan preparation.

## **2.0 Embleton Parish Neighbourhood Plan – Background**

- 2.1 On 1<sup>st</sup> June 2017, Embleton Parish Council applied to designate the Parish of Embleton as the Neighbourhood Area for the Embleton Parish Neighbourhood Plan.
- 2.2 The consultation period to establish the area designation lasted for 6 weeks. Notices appeared on the Northumberland County Council website. No representations were received. The application by Embleton Parish Council to designate the civil parish of Embleton as a 'neighbourhood area' was approved by Northumberland County Council on 24<sup>th</sup> July 2017.

## **3.0 Consultation and Engagement Timeline**

- 3.1 In the first instance, a Consultation Strategy was adopted by the Parish Council which outlined steps to be undertaken for consultation with the local community during the development of the Neighbourhood Plan (Appendix D). In general terms, local residents and businesses were kept informed about progress through the Neighbourhood Plan website, the Whinstone Times publication distributed to all households in the Parish 6 times a year and through a series of 'drop-in' events held (described below).
- 3.2 The Parish Council have consulted with local businesses, community and voluntary organisations in the Parish, as well as residents and landowners during the plan production. In many cases, due to the size and rural nature of the Parish, the same people may be residents/landowners/business owners/voluntary group members.
- 3.3 The timeline of events in the preparation of the Embleton Neighbourhood Plan are outlined below. There have been 3 stages of consultation, including the statutory Regulation 14 Pre-Submission Consultation stage. There have been extra consultations with local businesses, landowners, and younger people in the parish as part of, and alongside these consultations. The whole process has taken just over 2 years from start to submission draft Plan stage, and the timeline below covers each stage of consultation:

### **First Stage of Consultation:**

- 3.4 The first stage of consultation was to gather information through a series of consultation events. Following the area designation, a consultation stand was provided at the Embleton Church Fete on 2<sup>nd</sup> August 2017, followed by a drop-

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in session held on 9<sup>th</sup> October in the 'Parish Rooms' in Embleton which sought views from the community on what local matters they felt the Plan should address. This drop-in session had boards and information explaining what neighbourhood planning is about and asking people to identify what they did and did not like about the area. These events resulted in the production of a Consultation Event Report, a full copy of which is available on the website, but which is also summarised below.

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

- 3.5 The drop-in event was advertised by a leaflet drop to every household in the Parish and was advertised in the community magazine (The Whinstone Times). 127 people attended; a high proportion for a rural parish with a small population. A planning officer from Northumberland County Council and members of the Neighbourhood Plan Steering Group were at the event to answer questions and queries.
- 3.6 In tandem with this, the Steering Group worked with children at Embleton Primary School to develop a logo for the Neighbourhood Plan and to ask school children questions about what they felt were issues that should be addressed.
- 3.7 At this stage, broad questions were asked:
- What do you think is GOOD about living in Embleton Parish?
  - What do you think is NOT SO GOOD about living and working in Embleton Parish?
  - What are your specific issues or changes you would like to see?
- 3.8 Results of this consultation were analysed as follows:

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Table 1 : “What do you think is GOOD about living and working in Embleton Parish”	
Positives in rank order	Number of comments
<b>Strong community ethos</b>	<b>41</b>
-sense of community	
-friendliness	
-lots going on	
<b>Rural environment</b>	<b>39</b>
-green spaces	
-sea views	
-peace and quiet	
<b>Local facilities</b>	<b>37</b>
-shop, garage, pubs,	
-school	
-play park	
<b>School</b>	<b>18</b>
<b>Size of Village</b>	<b>10</b>
- compact village	
-retain size	
-maintain separate villages	
<b>Surgery</b>	<b>9</b>
<b>Church</b>	<b>7</b>
-toddler group	
<b>Balance permanent : holiday homes</b>	<b>7</b>
<b>Quarry</b>	<b>6</b>
-retain leisure use	

- 3.9 In response to the first question: What is ‘good’ about living in the Parish, there was strong support for the sense of community, community facilities, and the rural environment.
- 3.10 In response to the second question: What is ‘not so good’ about living in the Parish, there was a concern that there are too many holiday homes, and a lack of affordable housing. Concern about the villages ‘spreading’ and the fact that there has been a significant amount of housebuilding in the villages (and planning permissions granted) meant that villagers felt that enough open large-scale open market housing has been granted for now.
- 3.11 Other concerns raised were about transport, rubbish, lack of clinics etc. are not spatial planning matters that can be covered by planning policies and these (alongside other comments) are being dealt with separately by Embleton Parish Council.
- 3.12 Comments about what is ‘not so good’ are shown on the table on the next page:

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Table 2 : “What do you think is NOT SO GOOD about living and working in Embleton Parish?”	
Negatives in Ranked Order	Number of comments
<b>Too many holiday homes</b>	25
-centre of village is an empty shell	
-push up prices	
-reduce availability of homes for locals	
<b>Lack of affordable housing</b>	21
-shortage of social housing	
-new houses too expensive for young families/locals	
<b>Dangerous roads</b>	17
-speeding vehicles all areas	
-speeding at Dunstan Steads (4)	
-speeding at Christon Bank (6)	
-footpaths	
-poor visibility at junctions	
-potholes	
<b>Drs not at surgery</b>	16
-lack of clinics locally (baby clinic)	
-cost and timing of public transport to Alnwick or Seahouses for clinics	
-inconvenience of going to Alnwick or Seahouses when ill	
<b>Housing Market Saturation</b>	18
-building new when current not selling	
-building new when properties vacant/derelict	
<b>Transport</b>	11
-lack of bus service to Christon Bank	
<b>Villages Spreading</b>	10
-Danger of Embleton and CB merging into one sprawling village	
<b>Quarry</b>	9
-better maintenance	
-designated use	
-dog toilet	
<b>Building on Green Spaces/Agricultural Land</b>	8
-infill rather than expand	
-no more building on farm land	
<b>Cussins</b>	6
-inconsiderate builders	
-changes of original plans	
<b>Infrastructure</b>	4
-facilities to meet the needs of number of new houses	
<b>Poor Signage</b>	4
-info for visitors	
-toilets and Mandells	
-Too many A frames on the village green	
<b>Parking for beaches</b>	2
<b>Dog Fouling</b>	3
<b>Lack of community in Christon Bank</b>	2

3.13 In response to the final question, with regard to issues affecting residents; a wide variety of issues were raised. The vast majority of these comments related to matters that are outside the control of planning policy for a neighbourhood plan. The matters that were planning matters were taken

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forward alongside other points made, to create a vision, and a set of objectives for the Plan.

3.14 As part of the ongoing early stages of consultation, a series of focus groups were set up to consult on specific areas of the plan:

- A survey was undertaken with local businesses (with 17 out of 18 businesses responding to a questionnaire) and the Tourist Information Board were approached for comments.
- A Sport and Leisure consultation surveyed local leisure providers (including childcare providers).
- Work was ongoing with the local school (following delays due to OFSTED inspection).
- A sub-group was set up to focus on environmental matters, particularly in relation to housing design, and eco-housing policy in the Neighbourhood Plan.
- A sub-group was set up to examine issues with regard to housing need, and commission a housing needs survey.
- Local landowners were consulted with by members of the Steering Group.
- A 'vision and objectives' consultation was drawn together from the responses received from consultation so far.

## Second Stage of Consultation:

3.15 A consultation document on the vision and objectives was sent to every household in the Parish via the Whinstone Times community magazine (May/June 2018). The document and questionnaire were also posted on the Embleton Parish Council website. Collection points for comments on the questionnaire were arranged at points in Embleton and Christon Bank. Online responses were also invited.

3.16 A total of 43 responses were received from residents across the Parish. It was clear that there was broad support for the vision and objectives:

	% Agree	% Disagree	% No comment
Vision	79	2	19
Objective 1	65	7	28
Objective 2	58	0	42
Objective 3	70	9	21
Objective 4	61	2	37
Objective 5	65	0	35
Objective 6	74	19	7



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## Embleton Parish Neighbourhood Plan Vision and Objectives

### ***Vision***

*The rural parish of Embleton will continue to be a thriving and a sustainable place to live, work and visit. We will contribute to the long-term sustainability of our communities by supporting appropriate housing which is accessible to all. We will protect, and where possible enhance, the setting and environment of our parish, the Northumberland AONB, the Heritage Coast and other special and natural places in our Parish.*

### **Objective 1    Sense of Place**

To protect heritage assets and enhance local green spaces, landscapes and views that contribute to the distinct look and feel of Embleton Parish

### **Objective 2    Economic and Community Sustainability**

To support, encourage and protect local businesses and key facilities that contribute positively to the rural charm and characteristics of Embleton so that it can thrive as a sustainable community

### **Objective 3 Housing**

To support enough affordable and principle occupancy housing to meet the objectively assessed needs for the Parish. Any future housing will be of high quality design and environmentally sensitive and sympathetic to the historic landscape and natural surroundings.

### **Objective 4 Community and Visitor Facilities**

To protect, improve and, as appropriate, develop, year round community and recreational facilities for the benefit of residents and visitors alike.

### **Objective 5 Protecting and Enhancing our Environment**

To encourage and support environmentally sustainable land use projects that enhance and protect the environment that makes Embleton special, and ensures that there is a positive Environmental legacy for future generations.

### **Objective 6 Settlement boundaries**

To establish settlement boundaries for the Parish which retain the distinct feel and individuality of Christon Bank, Dustan Steads and Embleton and strongly discourage development outside these boundaries.

*Figure 1: Extract from Vision and Objectives consultation*

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## **Third Stage of Consultation – Housing Needs Survey (March 2018)**

As a response to a significant number of comments made with regard to housing needs and affordable housing, a Housing Needs Survey was commissioned and undertaken by Community Action Northumberland. This survey involved a questionnaire sent to every household in the Neighbourhood Area, asking them about their housing needs. The full document is available on the website:

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

- 3.17 The summary of findings was inconclusive, with a conclusion that it is difficult to conduct a survey of this nature in such a small geographical area. The report found that there were 11 households in 'need', but not all of them were in need of affordable housing. There did not appear to be a significant affordable housing need locally, with only one person registered on the Council's 'Homefinder' system, and actively looking for accommodation. This could be due to the fact that an affordable housing scheme has recently been built in the village. Also, the recently approved development at Creighton Place has also included an element of affordable housing. The need identified in the survey did not appear to reflect the need that there was felt to be in the community.

## **Fourth Stage of Consultation (Revised Vision, Objectives, Policy Areas and Settlement Boundaries) 3-week consultation (May 2018)**

- 3.18 Following work done to revise the vision and objectives (following the previous consultation), as well as to present policy areas for the Plan, a final informal consultation stage was held. This included consultation on proposed settlement boundaries for Embleton and Christon Bank.
- 3.19 A number of residents and landowners attended Steering Group meetings (9<sup>th</sup> May and 20<sup>th</sup> June) to present their views on settlement boundaries and land allocations.
- 3.20 An advertisement was again placed in the Whinstone Times and an open day was held with maps available for inspection delineating proposed settlement boundaries.
- 3.21 There was some disagreement between people as to where the settlement boundaries should be, largely to do with land ownership and the aspirations of some land owners to develop their land for housing on land outside the proposed settlement boundaries. However, there was a strong desire in the community to protect the AONB designated areas, and to prevent further widespread development in Christon Bank and Embleton.
- 3.22 At this time, the Council advised the Parish that they had 'met' their housing requirement for the whole Plan period. The Parish Council felt that the Plan

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could be more specific about promoting affordable housing on exceptions sites, and restricting new housing to being within the settlement boundary, without compromising on the need to deliver the right amount of housing for the Neighbourhood Area.

## **Final Consultation Stage: Pre-Submission (Regulation 14) Neighbourhood Plan consultation (Jan/Feb and June/July)**

- 3.23 The Pre-Submission Draft Neighbourhood Plan was agreed by the Steering Group and ratified by the full Parish Council. The consultation took place from 7<sup>th</sup> January until 27<sup>th</sup> February 2019 (the consultation period was extended from the original consultation deadline of 20<sup>th</sup> February due to some of the evidence base documents being difficult to find on the website).
- 3.24 A second pre-submission consultation was held in June/July, when it was discovered that there were minor errors between the two sets of maps that had been used in the original Regulation 14 consultation (this did not affect any of the representations that were made on site specific matters). This led to a further Regulation 14 stage consultation, which was undertaken from 19<sup>th</sup> June until 31<sup>st</sup> July 2019; comments were only invited on the specific error. There were no further comments of any substance made during the second consultation but for completeness, the responses to that consultation are included in Appendix C4.
- 3.25 A list of consultees (who were consulted on both Reg. 14 consultations) is contained in Appendix B. The results of these consultations are contained in full in Appendix C.
- 3.26 Notices were placed around the villages to advertise the consultation; notices were placed on the website and individual statutory consultees listed in Appendix A were written to or e-mailed with information about how to view and respond to the plan. Hard copies of the Plan were placed in Creighton Memorial Hall (Embleton), the Church Hall (Christon Bank) and in Mandell's Coffee Pot (Embleton).
- 3.27 During weeks 1 and 4 of the consultation, members of the Steering Group were at the drop-in locations for a total of 8 hours each week to answer any questions. Further sessions were organised for the final week and these were advertised in the Whinstone Times.

## **4.0 Responses to Pre-Submission Draft Plan**

### **Statutory Consultees' Responses:**

- 4.1 There were a number of responses from Statutory Consultees (identified in the list in this document). Many of them related to minor changes or additions to policy wording and criteria. These responses are listed fully in Appendix C1.

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- 4.2 Responses were received from the National Farmers Union, Historic England, the Coal Authority, Natural England, Highways England, National Grid and Northumberland County Council. Many of the suggestions made by Northumberland County Council were incorporated into the final version of the Plan, and meetings took place with officers from the County Council to agree the extent of changes. The comments made by Historic England elicited a number of changes as recommended.
- 4.3 The Theatres Trust also responded, with support for Policy 14. The Primary School responded, as did a local housing provider (who was not consulted as the business is not in the Parish, and the Steering Group were not made aware of the business until the response was received).
- 4.4 Northumberland County Council suggested a significant number of modifications, many of which have been incorporated into the submission draft.

## Landowners Responses

- 4.5 A number of responses were received from local landowners. Most of these were related to the settlement boundaries, and the desire to amend boundaries to include land for development owned by the respondents. George F White responded on behalf of four landowners. The responses were the same, apart from details about the land holding site, and responses have been made accordingly. The main concern (apart from specific site concerns) were the lack of an objectively assessed need, and consideration that the Plan was not 'positively prepared' enough, and that the Plan would 'stifle growth'. Other concerns about some of the criteria in the design policy (e.g. dark skies reference, drainage and amenity criteria) were also objected to.
- 4.6 Lichfields responded on behalf of another landowner. The premise was similar to that presented by George F White; the Plan is not positive enough and does not encourage enough new housing. Again, a specific site was put forward for housing development. Maps of all sites are shown in Appendix C alongside the comments.
- 4.7 R&K Wood Planning responded on behalf of the Diocese of Newcastle, objecting to the inclusion of their land as a Local Green Space, and objecting to the principal occupancy policy.

- 4.8 No changes were made as a response to landowner comments.

## Residents Responses

- 4.9 A large number of responses were received from local residents. The full list of responses received by local residents and local organisations is also contained in Appendix C3. Resident responses have been redacted for privacy purposes.

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- 4.10 The vast majority of responses from residents were supportive of the neighbourhood plan and in particular supportive of the proposed settlement boundaries, Local Green Space designations and protection that would be afforded to the AONB area.
- 4.11 Some minor changes were made to the Plan following these responses. In some cases, comments made were not spatial planning matters, and so the comments were not incorporated into the final document.

## **5.0 Habitats Regulations Assessment Screening Opinion**

- 5.1 A Screening Opinion was sought as to whether Habitats Regulations Assessment would be required. The Plan was screened 'in' for Habitats Regulations Assessment, due to the proximity of the Plan area to designated sites, and the fact that the Plan was supporting infill development by defining settlement boundaries.
- 5.2 The result of the HRA was the recommendation to include mitigation in some of the policies in the Neighbourhood Plan. Policies 1, 5, 12 and 13 were amended to incorporate a paragraph which requires developers to contribute to the Northumberland Coastal Mitigation Service (or provide alternative mitigation of demonstrable effectiveness).

## **6.0 Strategic Environmental Assessment and Screening Opinion**

- 6.1 A Screening Opinion was also sought as to whether a Strategic Environmental Assessment would be required. This was sought from Northumberland County Council, and the conclusion, initially, was that no SEA would be required. However, following the Plan being screened 'in' for Habitats Regulations Assessment it became necessary to carry out a full SEA. The Environmental Report was produced by Northumberland County Council on behalf of the Steering Group and was consulted on by the Parish Council for a period of 4 weeks, ending on 24<sup>th</sup> October.
- 6.2 Three responses were received to that consultation.
- Historic England responded to say they had no detailed comments to make on the environmental report. They drew attention to Historic England's guidance on the SEA process.
  - Highways England responded to say they had no comment.
  - The Marine Management Organisation responded with information about the MMO, but no comments specifically on the Environmental Report.

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## 7.0 Conclusions

- 7.1 The Submission Plan is the outcome of over two years of continuous community engagement in various forms as outlined in this statement. It comprises a set of locally specific planning policies intended to guide development management decisions on planning applications so that they better reflect the communities' expectations concerning controls and support for new development in the Parish.
- 7.2 The Parish Council believe that the Submission Plan 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 Report 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 completes the range of tasks undertaken to demonstrate 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.



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## **APPENDICES:**

### **APPENDIX A: LIST OF BODIES CONSULTED**

### **APPENDIX B: LETTER SENT OUT AT PRE-SUBMISSION CONSULTATION STAGE**

### **APPENDIX C: RESPONSES TO PRE-SUBMISSION CONSULTATION**

#### **C1: STATUTORY BODIES**

#### **C2: LANDOWNERS**

#### **C3: RESIDENTS**

#### **C4: RESPONSES TO SECOND REG.14 CONSULTATION (SETTLEMENT BOUNDARY MAPS)**

### **APPENDIX D: ENGAGEMENT STRATEGY**

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## APPENDIX A: LIST OF STATUTORY BODIES CONSULTED

### Neighbourhood Plan Consultation Bodies:

Consultation Body	Organisation	Contact
<b>Local Planning Authority</b>	Northumberland County Council	Elizabeth Sinnamon (Interim Head of Planning Services), Northumberland County Council, County Hall, Morpeth, Northumberland, NE61 2EF Tel: 01670 625542 Email: <a href="mailto:elizabeth.sinnamon@northumberland.gov.uk">elizabeth.sinnamon@northumberland.gov.uk</a>
		David English (Planning Manager, Neighbourhood Planning and Infrastructure), Northumberland County Council, County Hall, Morpeth, Northumberland, NE61 2EF Tel: 01670 623619 Email: <a href="mailto:david.english@northumberland.gov.uk">david.english@northumberland.gov.uk</a>
<b>The Coal Authority</b>	The Coal Authority	Planning and Local Authority Liaison, The Coal Authority, 200 Lichfield Lane, Berry Lane, Mansfield, Nottinghamshire, NG18 4RG Email: <a href="mailto:planningconsultation@coal.gov.uk">planningconsultation@coal.gov.uk</a>
<b>Homes England</b>	Homes England	Homes England, St George's House, Kingsway, Team Valley, Gateshead, NE11 0NA Email: <a href="mailto:enquiries@homesengland.gov.uk">enquiries@homesengland.gov.uk</a>
<b>Natural England</b>	Natural England	Consultation Service, Natural England, Hornbeam House, Electra Way, Crewe Business Park, Crewe, CW1 6GJ Email: <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>
<b>The Environment Agency</b>	The Environment Agency	Planning Consultations, Environment Agency, Tyneside House, Skinnerburn Road, Newcastle Business Park, Newcastle upon Tyne, NE4 7AR Email: <a href="mailto:planning.nane@environment-agency.gov.uk">planning.nane@environment-agency.gov.uk</a>
<b>Historic Buildings and Monuments Commission for England</b>	Historic England	Historic England, 41-44 Sandgate, Newcastle upon Tyne, NE1 3JF Email: <a href="mailto:e-neast@HistoricEngland.org.uk">e-neast@HistoricEngland.org.uk</a>
<b>Network Rail Infrastructure Limited</b>	Network Rail Infrastructure Limited	Network Rail Infrastructure Limited, George Stephenson House, Toft Hill, York, Y01 6JT <a href="mailto:townplanning.LNE@networkrail.co.uk">townplanning.LNE@networkrail.co.uk</a>



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<b>Highways England</b>	Highways England	Asset Development Team – Yorkshire and North East, Highways England, Lateral, 8 City Walk, Leeds, LS11 9AT Email: <a href="mailto:planningYNE@highways-england.co.uk">planningYNE@highways-england.co.uk</a>
<b>Relevant Primary Care Trust</b>	NHS Northumberland Clinical Commissioning Group	NHS Northumberland Clinical Commissioning Group, County Hall, Morpeth, Northumberland, NE61 2EF Tel.: 01670335161 Email: <a href="mailto:norccg.enquiries@nhs.net">norccg.enquiries@nhs.net</a>
<b>Any person who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority</b>	Avonline	Avonline, 42 Ashton Vale Road, Ashton Vale, Bristol, BS3 2AX Tel.: 0117 953 1111 Email: <a href="mailto:info@avonline.co.uk">info@avonline.co.uk</a>
	British Telecommunications Plc.	British Telecommunications Plc, Openreach Newsites PP 4AB, 21-23 Carliol Square, Newcastle CTE, Newcastle upon Tyne, NE1 1BB
	Briskona	<a href="mailto:enquiries@briskona.com">enquiries@briskona.com</a>
	CTIL (Cornerstone Telecommunications Infrastructure Limited) Acting on behalf of Vodafone and O2	Cornerstone Telecommunications Infrastructure Limited, EMF Enquiries, Building 1330 – The Exchange, Arlington Business Park, Theale, Berkshire, RG7 4SA Email: <a href="mailto:EMF.Enquiries@ctil.co.uk">EMF.Enquiries@ctil.co.uk</a>
	EE	Alex Jackman, Corporate and Financial Affairs Department, EE, The Point, 37 North Wharf Road, London, W2 1AG Email: <a href="mailto:public.affairs@ee.co.uk">public.affairs@ee.co.uk</a>
	Three	Jane Evans, Three, Great Brighams, Mead Vastern Road, Reading, RG1 8DJ Email: <a href="mailto:jane.evans@three.co.uk">jane.evans@three.co.uk</a>
	Virgin Media Limited	Virgin Media Limited, Unit 2, Network House, New York Way, New York Industrial Park, Newcastle upon Tyne, NE27 0QF  Virgin Media Limited (Head Office), 270 & 280 Bartley Way, Bartley Wood Business Park, Hook, Hampshire, RG27 9UP
	Wildcard Networks	Wildcard Networks, Reliance House, Skinnerburn Road, Newcastle upon Tyne, NE4 7AN <a href="mailto:info@wildcard.net.uk">info@wildcard.net.uk</a>
	Arqiva	Email: <a href="mailto:community.relations@arqiva.com">community.relations@arqiva.com</a>
	Openreach	<a href="mailto:newsitereceptionedinburgh@openreach.co.uk">newsitereceptionedinburgh@openreach.co.uk</a>

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<b>Any person to whom the electronic communications code applies</b>	CTIL (Cornerstone Telecommunications Infrastructure Limited) Acting on behalf of Vodafone and O2	Cornerstone Telecommunications Infrastructure Limited, EMF Enquiries, Building 1330 – The Exchange, Arlington Business Park, Theale, Berkshire, RG7 4SA Email: <a href="mailto:EMF.Enquiries@ctil.co.uk">EMF.Enquiries@ctil.co.uk</a>
	EE	Alex Jackman, Corporate and Financial Affairs Department, EE, The Point, 37 North Wharf Road, London, W2 1AG Email: <a href="mailto:public.affairs@ee.co.uk">public.affairs@ee.co.uk</a>
	Three	Jane Evans, Three, Great Brighams, Mead Vastern Road, Reading, RG1 8DJ Email: <a href="mailto:jane.evans@three.co.uk">jane.evans@three.co.uk</a>
<b>Any person to whom a licence has been granted under section 6(1)(b) and (c) of the Electricity Act 1989.</b>	Northern Powergrid	Northern Powergrid, Records and Information, Manor House, Station Road, Penshaw, Houghton le Spring, County Durham, DH4 7LA
	National Grid	National Grid, National Grid House, Warwick, Warwickshire, CV34 6DA Email: <a href="mailto:box.landandacquisitions@nationalgrid.com">box.landandacquisitions@nationalgrid.com</a>  Amec Foster Wheeler E&I UK, Gables House, Kenilworth Road, Leamington Spa, Warwickshire, CV32 6JX Email: <a href="mailto:n.grid@amecfw.com">n.grid@amecfw.com</a>
<b>Any a person to whom a licence has been granted under section 7(2) of the Gas Act 1986.</b>	Northern Gas Networks	Northern Gas Networks, 1100 Century Way, Thorp Business Park, Colton, Leeds, LS15 8TU
<b>Sewerage undertaker</b>	Northumbrian Water Limited	Katherine Dobson, Planning Team Leader, Northumbrian Water Limited, Leat House, Pattinson Road, Washington, Tyne and Wear, NE38 8LB <a href="mailto:katherine.dobson@nwl.co.uk">katherine.dobson@nwl.co.uk</a> 0191 419 6767
<b>Water undertaker</b>	Northumbrian Water Limited	Katherine Dobson, Planning Team Leader, Northumbrian Water Limited, Leat House, Pattinson Road, Washington, Tyne and Wear, NE38 8LB <a href="mailto:katherine.dobson@nwl.co.uk">katherine.dobson@nwl.co.uk</a> 0191 419 6767
<b>Marine Management Organisation</b>	Marine Management Organisation	Stakeholder & Networks Officer, Marine Management Organisation, PO Box 1275, Newcastle upon Tyne, NE99 5BN Email: <a href="mailto:consultations.mmo@marinemanagement.org.uk">consultations.mmo@marinemanagement.org.uk</a>
<b>Adjoining local authorities</b>	All local authorities, including parish councils, that adjoin the neighbourhood area	Parish council contact details are available from the Northumberland County Council website <a href="http://www.northumberland.gov.uk/Councillors/Parish-Town.aspx">http://www.northumberland.gov.uk/Councillors/Parish-Town.aspx</a> Rennington Parish Council <a href="mailto:renningtonpc@gmail.com">renningtonpc@gmail.com</a> Craster Parish Council <a href="mailto:parishcouncil@crastercommunity.org.uk">parishcouncil@crastercommunity.org.uk</a>

## CONSULTATION STATEMENT: EMBLETON PARISH NEIGHBOURHOOD PLAN

<b>Voluntary Bodies some or all of whose activities benefit all or any part of the neighbourhood area</b>		Low-Newton-by-the-Sea Parish Council <a href="mailto:clerk.newtonbytheseapc@gmail.com">clerk.newtonbytheseapc@gmail.com</a> Embleton Primary School <a href="mailto:Melissa.gilroy@vincentedwards.northumberland.sch.uk">Melissa.gilroy@vincentedwards.northumberland.sch.uk</a> Embleton Guides <a href="mailto:cornall@btinternet.com">cornall@btinternet.com</a> Embleton Football Club <a href="mailto:alisoun.carss@btinternet.com">alisoun.carss@btinternet.com</a> Embleton Cricket Club (as above) Embleton Mothers Union <a href="mailto:littledavejoan1@btinternet.com">littledavejoan1@btinternet.com</a>
<b>Bodies which represent the interests of different religious groups in the neighbourhood area</b>		Holy Trinity Church – Embleton <a href="mailto:vicar@btinternet.com">vicar@btinternet.com</a> Embleton Parochial Church Council <a href="mailto:christinehunter1@btinternet.com">christinehunter1@btinternet.com</a> Diocese of Newcastle <a href="mailto:p.robinson@newcastle.anglican.org">p.robinson@newcastle.anglican.org</a> and <a href="mailto:i.beswick@newcastle.anglican.org">i.beswick@newcastle.anglican.org</a> Christon Bank Methodist Church (via The Lindisfarne Circuit) <a href="mailto:lindisfarnecircuit@hotmail.com">lindisfarnecircuit@hotmail.com</a> and Jackie <a href="mailto:wright445@hotmail.com">wright445@hotmail.com</a>
<b>Bodies which represent the interests of different racial, ethnic or national groups in the neighbourhood area</b>		
<b>Bodies which represent the interests of persons carrying on business in the neighbourhood area</b>		
<b>Bodies which represent the interests of disabled persons in the neighbourhood area</b>		

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

# CONSULTATION STATEMENT: EMBLETON PARISH NEIGHBOURHOOD PLAN

## APPENDIX B: COPY OF CONSULTATION LETTER DETAILING WHERE AND WHEN TO RESPOND

### EMBLETON PARISH COUNCIL

All Neighbourhood Planning Statutory Consultation Bodies for Embleton Parish via e-mail (Virgin Media and Northern Gas Networks via Royal Mail).

7 January 2019

To whom it may concern,

#### **Embleton Parish Neighbourhood Plan**

#### **Neighbourhood Planning (General) Regulations 2012: Regulation 14 consultation and publicity**

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

You are identified by the Parish Council as a consultation body whose interests may be affected by the policies contained in the Draft Plan for the purposes of the Regulations. I am therefore writing to consult you about the Draft Plan. Any comments you may wish to make about the Draft Plan must be made in writing. 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 being invited on the Draft Plan for a period of not less than six weeks, commencing **5.00pm on January 7<sup>th</sup> 2019** and ending at **9.00pm on Wednesday 20<sup>th</sup> February 2019**.

The Draft Plan and supporting documents can be viewed on the Embleton Parish Council website at: [www.northumberlandparishes.uk/embleton/documents](http://www.northumberlandparishes.uk/embleton/documents)

Or at the following locations:

- **Creighton Memorial Hall, Embleton** on Wednesday January 9<sup>th</sup> and every subsequent Monday and Wednesday from 5.00pm until 9.00pm.
- **Mandells Coffee Pot, Embleton** on Wednesday 9<sup>th</sup> January and every subsequent Monday and Wednesday from 10.00am – noon.
- **Church Hall, Christon Bank** on Tuesday January 8<sup>th</sup> and every subsequent Tuesday from 10.00am – noon and on Friday 11<sup>th</sup> January and every subsequent Friday from 5.00pm – 7.00pm.
- For those who are unable to read the Plan via the internet or at the above locations, hard copies are available on short term loan from Chris German on 01665 571044.

Representations may be made by:

- email to [embletonneighbourhood@yahoo.com](mailto:embletonneighbourhood@yahoo.com)
- by leaving comments in the boxes provided at the viewing locations.
- by writing to the Embleton Parish Clerk at: 36 Christon Bank Village, Christon Bank, Alnwick, Northumberland, NE66 3EY.

We would be pleased to receive any written representations you may wish to make on the Plan and supporting documents **before 9.00pm on Wednesday 20<sup>th</sup> February 2019**.

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

Yours sincerely,

**Terry Howells - Chair, Embleton Parish Council**

# CONSULTATION STATEMENT: EMBLETON PARISH NEIGHBOURHOOD PLAN

## APPENDIX C1: PRE-SUBMISSION CONSULTATION RESPONSES: STATUTORY BODIES (SCHEDULE 1)

Name	Response	Comment
Coal Authority	<p>As you will be aware the Neighbourhood Plan area lies within the current defined coalfield.</p> <p>According to the Coal Authority Development High Risk Area Plans, there are recorded risks from past coal mining activity in the area including; 19 mine entries and potential historic unrecorded coal mine workings at shallow depth.</p> <p>However, it is noted that the Neighbourhood Plan does not propose to allocate any sites for future development and on this basis we have no specific comments to make.</p>	Noted.
Highways England	<p>We have undertaken a review of the Neighbourhood Plan and despite the absence of an up to date adopted Local Plan to guide local level neighbourhood planning, we have no particular concerns with the policies and provisions within the Neighbourhood Plan. Within Section 2, Issues and Themes; Population and Housing, the Neighbourhood Plan identifies the proposed future housing provision within the parish. This has been informed from the emerging Local Plan for Northumberland, which identifies a requirement for Embleton Parish for 65 dwellings over the 20-year plan period (2016 – 2036). It is stated that the housing allocation has been met, and exceeded, resulting in an over-provision of housing in the Neighbourhood Plan area. Although the Neighbourhood Plan permits further housing in terms of Principle Residence Housing, including change of use to the same, and Rural Exception Sites and Community Led Housing it is recognised that only the potential for small scale sites are identified. In the absence of any substantive proposals in terms of housing and other provisions with the Neighbourhood Plan and mindful of the distance from the SRN, no major consequence at the SRN is envisaged. Therefore, Highways England offer no objection to the Neighbourhood Plan. Highways England would seek consultation on any development that may influence this position in</p>	Noted.

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>terms of development coming forward in the Embleton area and the potential for cumulative impact at the SRN junctions, not only with regard to development in the Embleton area but also that coming forward in Alnwick itself. Consideration should be given to how this potential cumulative impact shall be addressed either within the plan or by the Local Planning Authority.</p>	
Historic England	<p><b>Detailed comments</b></p> <p>I welcome the vision, objectives and policies of the draft plan in so far as they affect our area of interest. It is clear the community has worked hard on preparing the plan, and I would like to congratulate you on its content so far. I have the following comments to make:</p> <ul style="list-style-type: none"> <li>• I recommend changing <b>Objective 2</b> to read “protect the significance of heritage assets and...”.</li> <li>• In <b>Policy 4</b>, reference to the AONB Design Guide is welcome.</li> <li>• In <b>Policy 5I</b>, including wording to allow potential heritage at risk to be tackled is welcome.</li> <li>• I am pleased <b>Policy 6</b> links back to evidence in the adopted conservation area character appraisal. The policy’s title should be changed to “affecting” rather than “within”. Mentioning specific aspects to which development should respond is welcome, as is the opportunity taken to include heritage assets where enhancement is to be encouraged (I note these are not yet shown on the proposals map). The policy’s second sentence is unlikely to be in accordance with the legislation as it only requires a “positive contribution” rather than allowing development to leave character unharmed. In I, I recommend changing “context” to “significance”. When addressing significant views, I recommend considering advice in <i>HE Good Practice Advice in Planning 3 – The Setting of Heritage Assets</i>: <a href="https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/">https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</a>.</li> </ul>	<p>Noted with thanks.</p> <p>Changes incorporated.</p> <p>Noted.</p> <p>Noted</p> <p>Noted. Title changed.</p> <p>Noted. Additional reference to leaving character ‘unharmed’ has been added to the policy. ‘Significance’ has been added to the policy.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<ul style="list-style-type: none"> <li>I am pleased in <b>Policy 7</b> that you have taken advantage of the opportunity to recognise historically significant land in Local Green Space designations.</li> <li>I am concerned that the evidence for <b>Policy 8</b> is not accurate or complete. You have rightly recognised that your plan is an important opportunity to include a positive strategy for non-designated heritage assets (NDHAs), such as buildings, monuments, sites, places, areas or landscapes that are important to the local community for their heritage value but are not statutorily designated. If identifying these, your plan should include enough information to set out the elements that make them special so they can be appropriately conserved and enjoyed; the draft does not yet achieve this. I am concerned that Appendix A does not set out how the evidence on these assets was gathered other than linking it to the adopted character appraisal; in doing so, other assets which could be locally significant, eg. Landscapes outside the settlements, may have been missed. I am also concerned that no information on the assets' significance to be protected has been included. It should include brief discussion of the nature and significance of the assets rather than just a list of names. It should also include a statement that they should not be seen as exhaustive because other non-designated heritage assets may be identified in the future, particularly unknown below-ground archaeology which can only be identified once discovered. Including such a policy is welcome in principle but a fuller, more clear evidence base is needed. To assist with this, we publish <i>HE Advice Note 7 – Local Heritage Listing</i>: <a href="https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7">https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7</a> which you should consider. A good comparator plan for what you want to achieve is the Bredon Neighbourhood Plan, Worcestershire, which is featured as a case study on our website: <a href="https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/neighbourhood-plan-case-studies/">https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/neighbourhood-plan-case-studies/</a>. This should help you achieve appropriate evidence and policy wording. Note, to avoid any confusion, in the policy wording and in Appendix A you should change</li> </ul>	<p>Noted with thanks.</p> <p>Noted. Additional evidence is to be provided with the submission plan.</p>



## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>“listed” to “identified” or “set out”, and “list” to “set” or “assets” as appropriate.</p> <ul style="list-style-type: none"> <li>In <b>Policy 12</b>, I recommend adding “or setting” after “character and appearance”.</li> </ul> <p>In the Glossary, I recommend copying from the NPPF the definitions for “historic environment”, “conservation” and “significance” and in the process familiarising yourself with them. These terms are crucial to applying your policies to protect and enhance the historic environment.</p>	<p>Noted – addition made.</p> <p>Noted – glossary amended.</p>
National Grid	<p>An assessment has been carried out with respect to National Grid’s electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines, and also National Grid Gas Distribution’s Intermediate and High-Pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p>	<p>Noted.</p>
Natural England	<p>Natural England welcomes plan policy 1 and 2, which take into account impacts on the Northumberland Coast AONB and Heritage Coast. We also welcome policy 3 on habitats and species. Please note that the correct legislation with regards to the Habitats Regulations is the ‘Conservation of Habitats and Species Regulations 2017 (as amended)’ and not 2010. This should be amended in para 5.8 and policy 3. In line with NPPF paras 170b and 174b, the plan should identify and pursue opportunities for securing measurable net gains for biodiversity. We therefore advise to include within the policy an intention to seek net gains within the neighbourhood area. Within policy 4 on design, we welcome the consideration of impacts on dark skies.</p>	<p>Noted with thanks.</p> <p>Noted, and amended.</p> <p>Noted. An additional criteria has been added to Policy 4 to secure measurable net gains. Noted with thanks.</p>
National Farmers Union	<p>Farming delivers many public goods and benefits to parishes such as Embleton, and within your plan, you acknowledge the prevalence of the rural farming community within the parish. It is encouraging that</p>	<p>Noted. There is support for rural businesses and in particular for farm</p>



## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>Embleton's plan policy seeks to support proposals for farm diversification, which are integral to meet new opportunities such as, inter alia, business units or tourism. In addition we would see some of the key priorities for farms to include (not in order of priority)</p> <ol style="list-style-type: none"> <li>1. The ability for the next generation to take on management of farms and to support this through the provision of affordable housing to allow succession – as touched on in your mention of the need for essential rural worker dwellings.</li> <li>2. Developing renewable energy which meets the needs of the farm and are appropriate to the location and renewable resources available.</li> <li>3. Access to high-speed broadband.</li> </ol>	diversification proposals in the Plan.
Vincent Edwards Primary School	<p>I have two important comments on the neighbourhood plan which I write in my capacity as Chairman of the Governors of Embleton School. These are my personal views and not necessarily endorsed by the other governors who may well respond separately. The first relates to Vincent Edwards School which is rightly seen as a major asset to the village. In the report it is referred to as a First School. It is now a Primary School (Policy 14 and the picture of the school show this error) It is a small school which has been under threat of closure but is once again thriving with sufficient children to make it sustainable. However a sufficient supply of children requires a sufficient number of young people living in the catchment area who will send their children to the school. The school has an innovative curriculum including one day each week when all pupils are taught on the beach and in the dunes and utilise the Golf House. This is attracting interest from outside of the catchment area and could lead to an even stronger and more viable school. The school will also utilise the old Quarry/nature reserve as part of their outdoor school. The second point is linked. In order to keep the school viable we need to attract and retain young parents to live in the village. This requires appropriate housing to rent at a reasonable cost as well as affordable housing. I note that a survey in the village showed only 5 people who would like an affordable home in the village. I believe this to be an</p>	<p>Noted.</p> <p>The plan seeks to support the provision of affordable housing.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	underestimate. For many years there has been a lack of such housing and young people have had to move out of the village often into Alnwick and other surrounding areas. The need for 5 affordable homes takes no account of those who have grown up locally, had to move out because of lack of accommodation, and who would like to move back to their roots and families. There is abundant evidence up and down the Northumberland coast that a school is absolutely essential to the future vibrancy and survival of a village. If the school closes then over the next 10 to 15 years most of the amenities of the village disappear and the village becomes full of holiday homes. The neighbouring villages of Craster and Beadnell are good examples of this.	
Theatres Trust	The Trust is supportive of the strong support and protection afforded to the parish's community facilities through Policy 14, including the Creighton Memorial Hall which facilitates local theatre and musical performances.	Noted with thanks.
William Robertson Homes	Not consulted, but nevertheless sent the following:  The proposed plan states that a Housing Needs Survey was carried out by a local charity. The conclusion is "implied" that "in the region of" five affordable homes are needed over a period of seventeen years. As the chairman of a private housing association of fifteen properties, four of them in Embleton, I would like it to be noted that at no point was the charity consulted as to any future needs. We would therefore seek clarification and evidence of the methodology process as part of a further period of public consultation.	Noted. The Plan does support the provision of affordable housing, and the Housing Needs Survey has not changed any aspect of the Plan. The survey was available on the PC website.

### NORTHUMBERLAND COUNTY COUNCIL RESPONSE

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Reference	Comments, Observations or Issues	
<b>Northumberland County Council</b>	<b>County Council Housing and Public Protection Service</b>	
<b>General comments</b>	Support the overall vision for the plan and the five objectives. Housing is fundamental to delivering sustainable communities and cuts across all of the objectives. The proposed policies should help to sustain the local community well into the future, which is important for Embleton Parish and Northumberland as a whole.	Support noted.
<b>Pg. 15 Policy 1: Sustainable Development</b>	Welcome this policy noting that it should help sustain the local community in the long-term.	Support noted.
<b>Pg. 19 Policy 4: High quality and sustainable design</b>	Welcome this policy noting that it should help deliver good quality housing that is sympathetic to the surrounding area and buildings. The requirement to explore opportunities for renewable energy and to minimise energy consumption will reduce housing costs for occupants, thereby reducing the incidence of fuel poverty.	Support noted.
<b>Pg. 21 Policy 5: Settlement Boundaries</b>	Welcome this policy noting that rural exception sites for affordable housing and the re-use of redundant buildings as principal residence housing should help deliver housing for local people and sustain the local community.'	Support noted.
<b>Pg. 23 Policy 7: Local Green Space</b>	Welcome this policy noting that having green spaces close to homes is important for the health and wellbeing of residents.	Support noted.
<b>Pg. 26 Policy 9: Business and Employment</b>	Welcome this policy. There is a recognised strong link between housing and employment. Supporting the provision of new or expanding businesses and home working will support the need for existing and new housing.	Support noted.
<b>Policies 10, 11, 12, 13</b>	Welcome these policies noting that collectively these policies will reduce the growth in the number of holiday homes, provide more homes that are affordable to local people and encourage the delivery of community led	Support noted.

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Reference	Comments, Observations or Issues	
	housing. This will reduce the need for local people to move further afield to find affordable housing and sustain the local community.	
<b>Pg. 33 Policy 15: Pedestrian and cycle routes</b>	Welcome this policy noting that the provision of new cycle and pedestrian routes will improve accessibility to housing and residents' health and wellbeing.	Support noted.
	<b>County Council Public Health and Wellbeing Team</b>	
<b>General comments</b>	Recognise the high proportion of second homes and the detrimental effects this can have on communities. The large number of older people identified in the Plan should impact decisions made around housing, transport and new / planned upgrades to public rights of way.	Noted.
	Access to public transport for both residents and for tourists in the area, and the promotion of local services, is limited. New development is likely to add further strain on public transport.	Noted.
	The Plan highlights various improvements in public rights of way – these have the potential to better connect communities and create additional flow of walking & cycling traffic which may benefit the area.	Noted.
<b>Pg. 15 Policy 1: Sustainable Development</b>	Supports the notion of principal residence dwellings, local employment opportunities and expanded business premises.	Support noted.
<b>Pg. 21 Policy 5: Settlement Boundaries</b>	Support bullet points a, b and c which seem to provide viable ways to 'recycle' current buildings for re-use for businesses or as principal residence housing.	Support noted.

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Reference	Comments, Observations or Issues	
<b>Pg. 23 Policy 7: Local Green Space</b>	Support the protection of Green Space (unless its use adds value to the community.'	?
<b>Policies 10 and 13</b>	Support these policies which should help to address the detrimental effects secondary / holiday homes seem to be having on communities both economically and from a community cohesion perspective.	Support noted.
<b>Pg. 33 Policy 15: Pedestrian and cycle routes</b>	Support the three proposed route extensions which could yield benefits to the area	These have been amended following landowner comments indicating some of these links could not be made available.
	<b>County Council Strategic Estates Team</b>	
<b>Pg. 23 Policy 7: Local Green Space</b>	Raise concern in relation to the allocation of the Vincent Edwards playing field as Local Green Space. Whilst it may be that the School agrees use of the playing field by others, the County Council's view as landowner is that it is an operational part of the school and, as such, any use is at the school's discretion. The County Council also has the opportunity to exercise control over the use of its land, without there being any presumption of recreational use being acceptable. The County Council would therefore dispute that there is recreational value to the local community that supports allocation as Local Green Space.	Noted. However, this recreational space is valued by the local community. Additional evidence has been added to the evidence base about the value of this and other LGS in the Neighbourhood Area.
<b>Pp 23-24, paras 5.32-33 and Policy 8 Non-designated Heritage Assets</b>	Raised concern in relation to the potential local listing of the Quarry House. The County Council owns this land and is currently looking to dispose of the Quarry House site. A sale has been agreed to redevelop the site for residential use. The buyers planning application is expected to be submitted before the end of February. Given the seriously dilapidated state of the building, the site has been fenced off for public safety. Any listed status could seriously affect plans to redevelop the site, which could lead to it being a long-term safety issue and detrimental to the appearance of the	Noted. References to Quarry House have been removed.

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Reference	Comments, Observations or Issues	
	local area. As landowner, the County Council objects to any protected status being given to these buildings if that would cause difficulties in making the site safe, attractive and useful again.	
	<b>County Council as Local Planning Authority</b>	
<b>Pg.5 'What consultation has taken place?'</b>	Makes reference to a 'Community Consultation Statement'. This should be modified to reflect terminology used in the relevant Regulations which require submission of a 'Consultation Statement' alongside the Plan	Noted.
<b>Pg. 6 Para 1.6</b>	Last line should refer to the correct appendix (i.e., currently Appendix B)	Noted.
<b>Pg. 6 Para 1.7</b>	NPPF updated in February 2019. Need to update references as necessary, or perhaps modify to remove specific references which may date the Plan should further changes be made to NPPF.	Noted.
<b>Pg. 7 Para 1.11</b>	May be helpful to make reference here to the need for Habitats Regulations Assessment (HRA). This will need to be updated to reflect progress once screening for SEA and HRA are complete.	Noted. Add in additional information.
<b>Pp 8-10 Issues and Themes</b>	The issues seem to be lost in the text. It would be useful if they were made clearer, e.g. in a separate bullet pointed list.	No change.
<b>Pg. 8 Para 2.2</b>	This indicates a need for '...more housing for local people and young families...'. This statement seems to be slightly at odds in setting the scene for policies proposed in the Plan. We would question whether this implies a more 'pro-growth' Neighbourhood Plan than is actually being proposed. It may be better to express the intentions of the Plan in relation to directing any new development to areas within defined settlement boundaries and supporting affordable housing as 'rural exception' sites. We would suggest revisiting how the intentions of the Plan are finally	Slight change made.

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Reference	Comments, Observations or Issues	
	expressed in the submission version of the Plan, recognising the extent of current commitments which is clearly significant in the context of both need and demand – see further comments on Para 2.6 below.	
<b>Pg. 8 Para 2.5</b>	Error: the housing figure for Embleton Parish set out in the Northumberland Local Plan-Publication Draft is <b>30</b> (see Policy HOU3).	Noted. Changes made.
<b>Pg. 8 Para 2.6</b>	<p>The first sentence of this paragraph is misleading as it suggests a ceiling on housing numbers. For this reason we would suggest the wording is changed to:</p> <p><i><b>The recent rate of house building in the Parish and the extent of current housing development commitments means that this figure will be exceeded. A proportion of this housing has been sold for second homes. More information on this is contained in the ‘Background Housing Evidence Paper’ which forms part of the evidence base for the Plan.</b></i></p>	<p>Revised wording to be incorporated with some changes. <i><b>“The recent rate of house building in the Parish, and the extent of current housing development commitments means that this figure will be exceeded. A significant proportion of this new housing is not in principle occupation. More information on this is contained in the ‘Background Housing Evidence Paper’ which forms part of the evidence base for the Plan.”</b></i></p>
<b>Pg. 9 Para 2.11</b>	This paragraph should be a final sentence to Para 2.10 since it appears to relate to that subject.	Agreed.
<b>Pg.9 Para 2.12</b>	It would be helpful to explain who considered a number of buildings ‘worthy of listing’. This matter is touched on in other comments regarding the proposed local list of non-designated heritage assets.	The Parish Council.

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Reference	Comments, Observations or Issues	
<b>Pg. 9 Para 2.14</b>	As the official terminology has changed this should read: <b><i>“There is also a locally important LWGS (Local Wildlife and Geological Site) in the quarry area of Embleton village.”</i></b> This feature is not shown on the Policies Map. It appears only as a proposed Local Green Space and is noted as being within the AONB.	Agreed. Change incorporated.
<b>Pg. 9 Paras 2.16 and 2.17</b>	These cover procedural matters and are not particularly related to the ‘Issues and Themes’ for the Plan. Any reference to these procedural matters should appear elsewhere in the Plan, possibly as an extension to Paras 1.10 and 1.11 on Pg. 7.	Noted. This section has been moved (and amended) to another section of the Plan.
<b>Pg. 9 Para 2.15</b>	This seems superfluous and unhelpful since the Plan does not look to allocate any sites for development. Recommend delete this paragraph.	Noted. Paragraph deleted.
<b>Pg. 10 Para 2.20</b>	The last sentence appears to be unhelpful in the context of the purpose of the Plan, and is questionable in the context of national policy and guidance which expects great weight to be given to the conservation and enhancement of the landscape and scenic beauty in Areas of Outstanding Natural Beauty. Whilst the source is appreciated, it is uncertain what value this adds in explaining the issues, particularly when read alongside Para 2.21 which clearly indicates that the same study has been used to describe settlement boundaries beyond which development will be restricted.	The group have made changes to this section in response to other comments.
<b>Pg. 10 Para 2.22</b>	This section expresses the view that a key principle of good design is that it should reflect the local vernacular. This is a limited interpretation of what might constitute good design and national policy and guidance supports innovative design. The Plan ought to recognise this matter.	Noted. No change.
<b>Pg. 10 paras 2.23-2.26 (and</b>	There is mixing of terminology regarding the existing development plan which is confusing:	Noted.



## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Reference	Comments, Observations or Issues	
<b>various places in the Plan</b>	<p>E.g. Para 2.23 “Embleton village is recognised as a ‘sustainable village centre’ in the Alnwick LDF Core Strategy (October 2007).” But in para 2.26 “Christon Bank is recognised in the Local Plan as a ‘Local Needs Centre””</p> <p>We understand that both of the above references are to the same document (i.e. the Alnwick LDF Core Strategy). To avoid confusion, the same reference should be used throughout the Plan.</p>	
<b>Pg. 10 paras 2.23-2.26</b>	<p>While the Neighbourhood Plan needs to be in general conformity with strategic policies in the existing development plan, it is worth noting that Embleton village will, in the Publication version of the emerging Northumberland Local Plan, be classified as a Service Village. The emerging document states:</p> <p>“Service Villages generally have a school or a shop, and population of a size considered likely to maintain the viability of such services into the future. They have a reasonable level of public transport to enable residents to access some higher level services without the reliance upon private transport. A settlement’s status is not reliant upon one specific criterion, and may be influenced by its close proximity to other settlements.”</p> <p>Christon Bank is not given any particular status in the emerging Northumberland Local Plan.</p> <p>It may be useful to recognise this emerging policy and the extent to which the Neighbourhood Plan has had some regard to these classifications.</p>	Noted. No change. This will be covered in the BCS.
<b>Pg. 10 Para 2.29</b>	This statement does not appear to sit well under the heading of ‘Transport’ and shows no link to that topic.	Paragraph has been moved to ‘vision and objectives’ page.
<b>Pg. 11. The Vision</b>	The Vision makes reference to supporting ‘appropriate housing’ which is ‘accessible to all’. The terms seem slightly uncertain and would be open to	Noted. Amendments to the vision are made.

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Reference	Comments, Observations or Issues	
	interpretation. We would question whether the Vision could be clearer in terms of what is thought to be ‘appropriate’. The Plan clearly concentrates on supporting housing to meet local needs and that which would be permanently occupied by people living in the Parish. There are no policies in the Plan which are particularly about ‘accessible’ housing. Again, it is uncertain whether this reference is to physical accessibility or financial accessibility (i.e. affordable). Principal residency housing certainly is unlikely to be financially ‘accessible to all’. Perhaps the meaning and intention of the Vision could be reviewed to make it more direct.	
<b>Pp. 11 and 12</b>	Various grammatical errors in expression in the text below the Objectives.	Noted.
<b>Pg. 13 Para 4.1</b>	For clarity, it would be helpful to explain that development proposals will be assessed against all relevant policies in the development plan, not just those in the Neighbourhood Plan.	Noted. Addition made.
<b>Pg.12 Objective 4</b>	It is incorrect to refer to ‘...objectively assessed needs...’. This should be modified to remove reference to this term which has specific meaning in the context of strategic planning policies for housing needs associated with a Local Planning Authority area.	‘objectively assessed’ has been removed.
	Check consistency in policy names. The names differ in different parts of the Plan, e.g., Policy 2 title is ‘Landscapes and Seascapes’ on pages 11 and 14, but the words ‘in the Neighbourhood Area’ appear on pages 15 and 16 (in Policy box title). We recommend removing references to ‘...in the Neighbourhood Area.’ Generally from the Plan since the Plan applies only to that geographic area. See also Policy 4 (High quality and sustainable design, or ‘Design in New Development’)	Noted. No change to ‘in the Neighbourhood Area’ references.
<b>Pg. 14 Para 5.1</b>	The Plan does not seem to particularly ‘...secure principal occupancy housing to help re-build sustainable communities...’. This seems a little too	Noted. No change.

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Reference	Comments, Observations or Issues	
	positive in the context of what the policies in the Plan are actually seeking to achieve. We would suggest revisiting this to reflect the intention to allow development inside settlement limits, which are tightly drawn to protect the countryside and important landscapes; and to support limited exceptions beyond settlement boundaries, principally for affordable housing to meet local needs.	
<b>Pg.14. Para 5.4</b>	The Plan does not create policies that support ‘...opportunities for people to live at their place of work...’.	This is contained in Policy 9. No change.
<b>Pg.14 Para 5.6</b>	It is recommended that reference is made to terms used in Para 172 of NPPF regarding the need to give great weight to conserving and enhancing landscape and scenic beauty in the AONB.	Add in new definition from NPPF.
<b>Pg. 15 Policy 1</b>	<p>Recommend delete ‘Within the Neighbourhood Area...’ at start of Policy 1. This is superfluous text.</p> <p>Bullet point b should be modified to reflect national policy and to ensure it is consistent throughout the Plan in the context of supporting affordable housing. We are concerned that it may be unclear in relation to the scale of affordable housing that may be supported and would recommend redrafting to:  <b>‘b. affordable housing either within the settlement boundaries defined on the Policies Maps or as small scale ‘rural exception sites’ on the edge of Embleton Village and Christon Bank’</b></p> <p>Bullet point f should be modified to delete reference to ‘...where these also benefit the local community.’ This limitation does not exist in national policy and does not reflect the intention of Para 83I of NPPF.</p> <p>Paragraph 2 addresses major development in both the AONB and Heritage Coast but the approach to each (as outlined in NPPF) is slightly different.</p>	<p>No change.</p> <p>Paragraph b already says this.</p> <p>‘particularly’ has been added into the paragraph.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Reference	Comments, Observations or Issues	
	<p>We would suggest a separate paragraph for 'Heritage Coast' as per NPPF para 173:</p> <p><b><i>Major development proposals within the Heritage Coast will not be supported unless they are compatible with its special character.</i></b></p> <p>We would also suggest clarifying paragraph on AONB in line with NPPF para 172:</p> <p><i>Major development in the Northumberland Coast AONB and Heritage Coast will not be supported except in exceptional circumstances and where it can be demonstrated to be in the public interest. <b>Consideration of such applications will include an assessment of:</b></i></p> <p><b><i>a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;</i></b></p> <p><b><i>b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and</i></b></p> <p><b><i>c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.</i></b></p>	<p>Agreed, but note paragraph 173 which only applies where Heritage Coast is not already in an AONB.</p> <p>Not considered necessary as the higher level of protection (or test) is already set for the AONB (see para 172).</p> <p>No change. This is a verbatim repeat of NPPF which is not considered necessary within the policy.</p>
Pg. 15	<p>It would be helpful to explain in a little more detail in the supporting text the various terms used in Policy 2, particularly the Northumberland Landscape Character Assessment (2010); the National Character Areas; and Historic Landscape Characterisation. It would then be helpful to explain the source of the five particular characteristics described as bullets a) to e) in Policy 2. Each relevant document and background information should be referenced in the background evidence list and should be made accessible electronically (this will assist an Examiner). It may also be relevant to consider making reference to the AONB report on Landscape Sensitivity</p>	<p>Agreed. More detail to be added. Reference to evidence base docs added.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Reference	Comments, Observations or Issues	
	(from 2013) as part of Policy 2. This is listed in the background evidence at Appendix B to the Plan.	
<b>Pg. 16 Policy 2: Landscapes and Seascapes</b>	We would suggest reviewing the first paragraph to ensure its meaning is clear. All development proposals will be 'within' and are likely to affect a landscape character area. It may be helpful to review the wording having regard to Paragraph 127I of NPPF which requires development to be '...sympathetic...' etc.	No change. This is the same wording as the recently examined North North'd Coast NP which has a similar policy on landscapes and seascapes; the wording was considered to be appropriate for that document, and passed examination with no recommendations for changes, so seems a good basis on which to word a similar policy here.
<b>Pg. 17 Policy 3</b>	Comments on Policy 3 will be provided through the Habitats Regulation Assessment screening process or through an Appropriate Assessment if it is advised that one is required.	Noted.
<b>Pg. 17 Para 5.14</b>	It is unclear where '...here...' is in this context. Need to clarify if this comment relates to the Parish or just to Christon Bank.	The reference is about Christon Bank. Sentence has been moved to clarify.
<b>Pg. 17</b>	Need to have consistency throughout the Plan on policy titles.	Noted.
<b>Pg. 18 Para 5.16</b>	Check correct reference and title of documents regarding dark skies – different reference given in Appendix B, needs to be corrected.	Noted.
<b>Pg. 19 Policy 4: High quality and</b>	Recommend delete '...in the Neighbourhood Area...' from first sentence.	No change.

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Reference	Comments, Observations or Issues	
<b>sustainable design</b>	<p>Bullet point a) – we would question whether access is a particular design matter in this context, i.e. does access have a particular local context and character, and if so, where is that described? Perhaps need to include an additional bullet point regarding safe and convenient access which would be a design related matter.</p> <p>Final sentence suggest delete ‘..., this will include incorporating...’ and replace with ‘...<b>development should have regard to...</b>’</p>	<p>Noted. The word ‘safe’ has been added into criteria ‘a’.</p> <p>No change. It is considered that ‘incorporating’ is a preferable term.</p>
<b>Pg. 20 Para 5.20</b>	<p>Error: The indicative scale of housing proposed for the Neighbourhood Area in the publication version of the emerging Northumberland Local Plan is now 30 dwellings over the whole plan period.</p> <p>Is it necessary to say that the settlement boundaries have been drawn to allow some space for new housing to meet any further need over the Plan period? This is not accurate. The Plan effectively limits new housing development to that on windfall sites within defined settlement limits, and elsewhere only be specific exception.</p>	<p>Noted.</p> <p>All new development will be on windfall sites as no land is allocated for housing. No change.</p>
<b>Pg. 20 Para 5.22</b>	<p>Policies in the Plan do not allow for ‘...small infill sites...’. There is no reference in any policy to this term. This should be modified to refer to ‘...windfall sites...’ which would be more accurate.</p>	<p>Any site within the settlement boundary will be ‘infill’. It doesn’t have to be allocated to be classed as infill. No change.</p>
<b>Pg. 20 Para 5.26</b>	<p>The Plan does not support ‘...100% affordable housing provision...’. This implies not limit on the scale or location of affordable housing. The Plan makes provision for small scale rural exception sites for affordable housing in accordance with national policy. This paragraph should be modified to give greater clarity on this matter.</p>	<p>The reference to 100% is removed.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Reference	Comments, Observations or Issues	
<b>Pg. 21 Policy 5: Settlement Boundaries</b>	<p>We support the intentions of this policy as a means of managing development. However, when read in conjunction with Policy 9 on Business and Employment it appears to duplicate and confuse the extent of support for different forms of development.</p> <p>Bullet points b, c, d and e relate to residential development and their purpose should be made clearer in order to better reflect national policy, in particular the way policy is expressed at Para 79 of NPPF. Policy 5 omits reference given in NPPF to supporting subdivision of existing residential dwellings.</p> <p>It may be more appropriate to incorporate bullet point f (tourism development) into Policy 9. It may also be appropriate to consider how proposals for new or expanded community facilities should be addressed through policy in the Neighbourhood Plan</p> <p>We would be pleased to support the Parish Council and Steering Group in looking to redraft Policies 5 and 9 to better reflect national policy and guidance prior to submission. As currently drafted we would have concerns regarding the extent to which these policies meet the basic conditions.</p>	<p>Noted, Steering Group have made significant changes to policies 5, 9 and 1 following comments from other consultees.</p>
<b>Pg. 22 Policy 6: Development within Conservation Area</b>	<p>We would recommend reviewing the wording of the first sentence in the context of the duty imposed on the Local Planning Authority through s72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. This requires particular action in respect of buildings or land <i>in</i> a conservation area. Policy 6 as drafted relates to development affecting, and therefore potentially outside the Embleton Village Conservation Area. Whilst we appreciate the intention of the policy, we would question whether this policy exceeds national policy and statute in respect of the tests to be applied to such development.</p>	<p>Noted. Policy has been amended to reflect comments by Historic England, which are very similar to these comments.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Reference	Comments, Observations or Issues	
	For clarity, the buildings listed in the penultimate paragraph need to be located geographically by reference to maps or documents, perhaps in an appendix to the Plan.	Noted. Additional information provided at the end of the Plan.
<b>Pg. 23 Para 5.30</b>	Typos: semi colon should be after 'serves' (before and) semi colon should be after 'wildlife' (before and)	Noted.
<b>Pg. 23 Policy 7: Local Green Space</b>	<p>The proviso in the second paragraph is too broad and is not aligned with NPPF guidance on 'special circumstances'. We suggest replacing the original paragraph with:  <b><i>'Development of the land will not be permitted other than where very special circumstances can be demonstrated. Very special circumstances will not exist unless the potential harm to the Local Green Space by reason of inappropriateness, and other harm, is clearly outweighed by other considerations.'</i></b></p> <p>It would be helpful in the supporting text to refer to the management of Local Green Spaces being consistent with that of Green Belts. This would reflect national policy set out at Para 101.</p>	The wording has been altered slightly but it is considered unnecessary to repeat national policy verbatim to this extent.
<b>Pg. 24, Policy 8: Non-designated heritage assets</b>	<p>Error: Para 5.32 states that these assets are defined on the policies map – they are not.</p> <p>Error: The buildings listed in Appendix A do not all originate in the Conservation Area Appraisal, as stated in the text.</p> <p>We have some concerns about the expressions used in support of this proposed policy, particularly and reference to 'lists' or 'listing'. The concern is that Policy 8 and the supporting document is attempting to offer some</p>	<p>Noted.</p> <p>Noted.</p> <p>Historic England have already raised this, and changes have been made.</p>



## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Reference	Comments, Observations or Issues	
	<p>greater degree of protection to the assets identified in the list and report attached at Appendix A.</p> <p>We would recommend that the report currently attached at Appendix A is removed from the Plan and hosted elsewhere. Policy 8 should be modified to make reference only to non-designated heritage assets. The report should remain as a stand-alone document. It does not confer ‘local-listing’ status on those assets it describes since this would require a more rigorous process which would have to involve the County Council and would be expected to include independent verification of opinions expressed about the value of the assets. Currently the report is not attributed to any person or organisation. Para 5.33 of the Plan recognises that there are other historic buildings that could be added to the list over time. For this reason alone it would make more sense to keep that document separate from the Plan.</p> <p>We recommend modifying Policy 8 to read as follows:  <b>‘Development, including renovation or alterations affecting any non-designated heritage asset or its setting should be sensitively designed having regard to the scale of any harm or loss and the significance of the heritage asset including its archaeological, historic and architectural interest and its setting.’</b></p> <p>Supporting text should then be modified to include reference to the location of the report on non-designated assets.</p>	<p>Noted. Report will be a stand alone document, with the list remaining in Appendix A.</p> <p>We realise this. The reference to local-listing is in case the council, in the future, decides to locally list buildings.</p> <p>The Policy has been drafted carefully to be read in a similar fashion to other policies that have been through examination in the area. It is considered that the current wording is appropriate.</p>
<b>Pg. 26 Policy 9: Business and Employment</b>	<p>First paragraph provides support without limitation or restriction for example in the context of amenity or highway safety impact.</p> <p>Second paragraph is contrary to NPPF, para 83, which states that policies should enable ‘the sustainable growth and expansion of <b>all types of</b></p>	<p>Noted. Reference to ‘which require a rural location’ has been removed.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Reference	Comments, Observations or Issues	
	<p><b>business</b> in rural areas...’ It is therefore unreasonable to seek to apply a policy only to business that requires a rural location.</p> <p>It would be appropriate to address the caveats set out in Para 84 of NPPF in this policy.</p> <p>We have identified the potential overlap between Policy 5 and Policy 9 above. We would be pleased to support the Parish Council and Steering Group in looking to redraft Policies 5 and 9 to better reflect national policy and guidance prior to submission. As currently drafted we would have concerns regarding the extent to which these policies meet the basic conditions.</p>	<p>Noted. The Steering Group have re-drafted policy 9 and policy 5.</p>
<p><b>Pg. 27 Para 5.40</b></p>	<p>Reference to ‘other evidence’ – unclear whether this refers to census data or other evidence not cited in preceding paragraphs.</p> <p>We would suggest that greater clarity should be given in the last sentence which currently does not refer to any limitations on the location of new Principal Residence housing. This is limited to development within the defined settlement boundaries and only by express exception elsewhere as defined in other policies in the Plan.</p>	<p>Local evidence has been gathered to survey recently sold dwellings in Creighton Place. This will be made clear.</p> <p>Not needed. No change.</p>
<p><b>Pg. 27 Paras 5.38-5.41</b></p>	<p>We would suggest that the ‘Northumberland Local Plan Draft Plan for Regulation 18 Consultation Second and Holiday Homes Technical Paper, July 2018’ is used to support policy 10. This paper shows that the proportion of household spaces with no residents increased between 2001-2011, and council tax records show a significant number of second homes in the parish (2016).</p> <p><a href="https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/Planning-and-Building/planning%20policy/Studies%20and%20Evidence%20Reports/Hou">https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/Planning-and-Building/planning%20policy/Studies%20and%20Evidence%20Reports/Hou</a></p>	<p>Additional paragraph added to refer to detail contained in the second homes report.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Reference	Comments, Observations or Issues	
	<a href="#">sing%20Studies/Technical%20Papers%20for%20Housing/NCC-Second-and-Holiday-Homes-Technical-Paper.pdf</a>	
<b>Pg. 28 Policy 10: Principal Residence Housing</b>	<p>The steering group may wish to consider and be explicit either in the policy or in the supporting text about how the policy will operate, how it might be enforced and how residents can demonstrate that they are complying with the policy.</p> <p>In helping with considering this matter we have provided an extract from the St Ives Neighbourhood Plan which has been ‘made’ and has also successfully withstood legal challenge. Policy H2 of the St Ives Plan is as follows:</p> <p><i>‘The condition or obligation on new open market homes will require that they are occupied only as the primary (principal) residence of those persons entitled to occupy them. Occupiers of homes with a Principal Residence condition will be required to keep proof that they are meeting the obligation or condition, and be obliged to provide this proof if/when Cornwall Council requests this information. Proof of Principal Residence is via verifiable evidence which could include, for example (but not limited to) residents being registered on the local electoral register and being registered for and attending local services (such as healthcare, schools etc.).’</i></p> <p><a href="https://www.cornwall.gov.uk/media/23576572/final-st-ives-area-ndp-proposal-with-examination-and-cc-amendments-clean-final.pdf">https://www.cornwall.gov.uk/media/23576572/final-st-ives-area-ndp-proposal-with-examination-and-cc-amendments-clean-final.pdf</a></p>	<p>Additions have been made to the policy.</p>
<b>Policy 11</b>	<p>Policy 11 does not specify the type of affordable housing required as required by Para 62 of NPPF where a need has been identified. National policy supports delivery of affordable housing on site. It is noted that the supporting paper states ‘there is not a significant identified need for affordable housing locally’ (4.2). Supporting text suggests a need to focus</p>	<p>Noted. Policy 11 is to be amended to reflect the high value area.</p> <p>Noted. Additional text to be added to support the policy in</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Reference	Comments, Observations or Issues	
	<p>on affordable housing to buy, but is unclear about any need for affordable housing to rent.</p> <p>It may be helpful to consider whether the policy should reflect the difference between expectations on the scale of development that would trigger the need for affordable housing in designated rural areas (including AONBs), given that part of the AONB is within the settlement boundary for Embleton. This could be set at a lower threshold of 5 dwellings. This approach is described in para 63 of NPPF.</p> <p>It may also be helpful to provide some commentary on the likelihood of any new residential schemes for market housing breaching the 10 or 5 dwelling threshold, having regard to other policies in the Plan.</p> <p>We can advise that evidence published in support of the emerging Northumberland Local Plan, particularly Policy HOU6 (Housing Viability Areas) would expect the provision of 25% affordable housing. Policy 11 could be modified to reflect this current position.</p>	<p>relation to HOU6 in the emerging Local Plan.</p> <p>A more specific reference to the AONB threshold and to the quarry site (which is the only place where housing is likely to come forward in the AONB and SB) has been added.</p> <p>Noted. Policy amended to reflect the LSOA assessments.</p>
<b>Pg. 28 Para 5.46</b>	Formatting issues	Noted.
<b>Pg. 28 Para 5.48</b>	<p>This text is repeated in subsequent policy. For simplification, para 5.48 could be deleted and replaced by an additional sentence at the end of para 5.47:</p> <p>‘Any scheme for a rural exception site must demonstrate design principles that minimise the impact on the character and setting of adjacent settlements and the beauty of the surrounding landscape’</p>	Sentence incorporated.
<b>Pg. 29 Para 5.49</b>	In the second sentence it would be helpful to explain which policies in the ‘local plan’ had been used to restrict permanent occupancy of converted buildings.	Noted. Additional reference made.

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Reference	Comments, Observations or Issues	
<b>Pg. 29 Policy 13</b>	Recommend delete ‘...within the Neighbourhood Area...’ from second line.	No change.
<b>Pg. 32 Policy 14</b>	For clarity and ease of use, the assets should be referenced as per the Policies Map.	Noted. Numbering introduced.
	Reference to the term ‘...strongly resisted...’ should be removed. There should be no distinction given to the relative ‘strength’ of a planning policy. It is sufficient to state that the loss would be resisted.	Noted.
	The last sentence should have limitations. As currently drafted it gives support to new facilities anywhere and whatever their impact.	Noted.
<b>Pg. 33 Policy 15: Pedestrian and cycle routes</b>	We support the inclusion of sustainable transport themes within the Plan.	Noted.
<b>Pp. 35 – 37</b>	Recommend deleting the small scale versions of the Policies Maps. These are so small that they would be useless in any practical application. The Policies Maps are an integral part of the Neighbourhood Plan and will be available as such.	Noted. But they are considered to be useful within the body of the document to give reference to readers.
<b>Pg. 39</b>	There is no indication in the methodology or elsewhere about who carried out this survey and assessment, what qualifications they may have to undertake the work and to reach conclusions on the merit of the assets identified, and no indication about how the proposed list was tested and validated independently. We have recommended that the document should be stored elsewhere, perhaps on the Parish Council website, and that the Plan makes reference to the document without including it in a planning policy.	Noted. The work was carried out by the NP working group on behalf of Embleton Parish Council.

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Reference	Comments, Observations or Issues	
<b>Pg. 49 Appendix B</b>	It would be helpful (for the Examiner and other consultees) to create hyperlinks to each of the evidence base documents as part of this appendix.	Noted.
<b>Pg. 50 Appendix C</b>	This assessment should be a stand-alone document and should not form part of the Plan – it is part of the evidence base that justifies the Local Green Space designation. The text is too small to read and is unhelpful in its current form.	Noted. A revised version is being drafted and will be linked to the Plan.
<b>Pg. 52 Glossary</b>	Recommend use government definition of Asset of Community Value: <b><i>‘A building or land, whose current or recent use furthers the social wellbeing and interests of the local community.’</i></b>  <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6069/1987150.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6069/1987150.pdf</a>	Noted.
<b>Pg. 53 Glossary</b>	Add ‘open space’ to definition of community facilities (NPPF, para 92)	? Not sure why?
<b>Pg. 53 Glossary</b>	Remove ‘candidate’ from definition of European Site.	Noted
<b>Pg. 55 Glossary</b>	Principal Residence Housing Typo: delete ‘is that’	Noted
<b>Pg. 55 Glossary</b>	Special Areas of Conservation – Use the NPPF definition:  <b><i>‘Areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites’</i></b>	Noted
<b>Pg. 55 Glossary</b>	Special Protection Areas – Use the NPPF definition:  <b><i>‘Areas classified under regulation 15 of the Conservation of Habitats and Species Regulations 2017 which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds’</i></b>	Noted
<b>Pg. 56 Glossary</b>	SuDS Typo: ‘runooff’ should read ‘run-off’	Noted

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Reference	Comments, Observations or Issues	
<b>Pg. 56 Glossary</b>	Question the inclusion of 'superfast broadband' as this term is not used in the Plan.	Noted
<b>Additional comment</b>	We would suggest including a separate list of abbreviations and any acronyms used.	Noted



## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

### APPENDIX C2: Consultation Responses from Pre-submission Consultation Embleton Neighbourhood Plan: Landowners and other interested parties:

Name	Response	Comment
Richard Manners (another submission is included with GFW representing)	<p>Under no circumstances am I going to allow any public right of way on my land that is not already a public footpath. I am referring to my stretch of land that joins the lay by at the north end of the village however just presume this is the case for any land my family own at North Farm Embleton.</p> <p>Paragraph 5.3 of the Neighbourhood Plan says local affordable housing needs in the region of five households. This document has not been published for scrutiny by the parish council or as part of the consultation process. Whilst I acknowledge the need for affordable housing in the Plan area and supports its provision through the Neighbourhood Plan, without publishing the evidence, the delivery of only five affordable units within the Plan area over the next 17 years is a bit crazy as in my opinion we are trying to help young local families. This fails to meet the basic tests required by a Neighbourhood Plan as it is not clear whether the delivery of five affordable homes will contribute towards sustainable development by ensuring the right type of homes are available.</p> <p>In order to address this issue, the full report from the Housing Needs Survey should be published as part of a further period of public consultation, so that the method and the conclusions in respect of this key element of the Plan can be effectively take forward correctly.</p> <p>I also think tourist parking or lack of it should be reviewed if things carry on as we are with visitors we are going to have a massive lack of parking for walkers and tourists.</p>	<p>Noted.</p> <p>This document was available on the Parish Council website. A copy has now been placed on the NP website as well and is available for public viewing.</p> <p>The Plan supports the provision of affordable housing through rural exceptions sites (and community-led housing).</p>
George F White on behalf of Mr Grahamslaw	<p>INTRODUCTION</p> <p>George F. White (Planning and Development) have been instructed by Mr G Grahamslaw (the 'Client') to submit representations on their behalf to the Pre-Submission Consultation Draft of the Embleton Parish Neighbourhood Plan 2019 – 2036, hereafter referred to as 'the Plan'.</p>	

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
George F White on behalf of Mr Grahamslaw	<p>These comments have considered the Plan and supporting evidence and assessed compliance against the National Planning Policy Framework (February 2019) ('NPPF') specifically paragraph 182. The comments have regard to whether the Plan meets the 'basic conditions' and other matters as set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990, applied to Neighbourhood Plans by Section 38A of the Planning and Compulsory Purchase Act 2004.</p> <p>Comments are provided in response to the content of the Plan where these are relevant to the Client's interests.</p> <p>We would like to be kept informed and notified about the progression of the Plan, further stages of consultation, amendments or making of the Plan by way of email (lauradixon@georgefwhite.co.uk). We would also like the opportunity to discuss the matters raised in this submission in further detail.</p> <p><b>BACKGROUND</b></p> <p>The main comments of this representation relate to:</p> <ul style="list-style-type: none"> <li>• Amendments to the settlement boundary of Christon Bank; and</li> <li>• Other relevant comments</li> </ul> <p>Our Client has significant land holdings to the north and east of Christon Bank. These representations primarily relate to sites consisting of agricultural land on the north eastern edge of Christon Bank. The Sites are identified in the Strategic Housing Land Availability Assessment as;</p> <ul style="list-style-type: none"> <li>○ Site 0356a – Name: East of New Bungalow; and</li> <li>○ Site 0356b – Name: North of New Bungalow.</li> </ul>	<p>Site 0356a is already included in the settlement boundary.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
<p>George F White on</p>	<div data-bbox="374 279 1538 1134" data-label="Figure"> <p>The figure is a map titled 'SHLAA Extract' showing a settlement boundary in Embleton Parish. The map includes several labeled areas: 'Priest's Moor' at the top, 'East Plantation' on the left, 'Old Wood' below it, 'Coldharbour' at the bottom left, and 'Lime Works' at the bottom right. A central area is labeled 'Embleton Bank'. Various sites are marked with numbers in white boxes: 0205, 0293, 0294, 9274, 9264, 9266, and 9263. Two specific sites are highlighted with arrows and labels: '0356b' points to a red-shaded area, and '0356a' points to a green-shaded area. The map also shows roads and other geographical features.</p> </div> <p>Figure 1: SHLAA Extract (Accessed NCC February, 2019)</p> <p>These representations seek the inclusion of sites 0356a and 0356b within the settlement boundary for Christon Bank through the Neighbourhood Plan Process.</p>	<p>One of the sites put forward is already included in the settlement boundary which will deliver 13 houses and already has planning permission. (Site 0356a).</p> <p>See earlier comments.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
behalf of Mr Grahamslaw	<p>Site reference 0356b is 1.99 ha and the SHLAA states potential for up to 10 no. dwellings.</p> <p>Site 0356a is 0.83 ha and has planning permission for 13 no. dwellings, reference 16/03510/FUL. The site which has planning permission is partly located within the settlement boundary.</p> <p>The sites proposed for residential development are considered to be of a scale and character appropriate to the settlement, however if necessary, phasing could be introduced or amendments to the site boundary given the Clients land holding surrounding the site to either increase or reduce the site or to provide an alternative means of access.</p> <p>The sites would be developed as an appropriate extension to the existing village either in whole or in part through a phased development. Design and materials would be of a high quality representative of the local area. The scale of the development would be commensurate to Christon Bank and would include family dwellings, affordable housing for rent and smaller scale properties suitable for older persons.</p> <p>In sites are well contained as a result of their surrounding with the B6347 comprising a southern boundary along with the residential properties of Horsley Place. Further, to the east of the site is the adopted highway which connections Christon Bank with Brunton and Doxford whilst to the west is the East Coast Main Railway Line. To the north is open agricultural land.</p> <p>The SHLAA indicates the sites have a combined capacity for approximately 23 units. It is proposed that a suitable form of development would be brought forward in excess of this figure, between 30 and 40 dwelling however phases taking account of the site size, shape and the density of residential development in the vicinity would be required. The Site can gain easy access to utility services required to support residential development.</p>	<p>The area that has planning consent is located within the settlement boundary.</p> <p>The SHLAA is not a policy document. The housing requirement for Embleton Parish of 30 dwellings has been met and exceeded.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>The sites are adjacent to Horsley Place and include a recent planning approval at Christon Bank and would form a logical extension to the village. The sites would be accessed through the recent planning approval which has made provision for an appropriate vehicle and pedestrian access along with access into the land to the north. There are no public rights of way implications within the Site. The scale of the development which could be accommodated on the Site is such that the volume and number of additional traffic movements could be accommodated on the existing highways network.</p> <p>There are no known constraints to development.</p> <p>Our Client can confirm that both of the Sites, either in their entirety or part are available for development, free from known constraints which would prejudice development, and can demonstrate that the Sites are suitable, available, achievable, and therefore deliverable within the Plan period.</p> <p>Christon Bank is a sustainable settlement, located in the north east of Northumberland, close to the Northumberland Coastline. It is well connected by road via connections to the A1 to the main settlement of Alnwick to the south, and settlements of Embleton to the west and Seahouses to the north east, respectively all of which offer a range of services, facilities and employment opportunities. The village is easily accessible from the A1 only 2.5 miles to the west and connected by 'B' roads. There is access to public transport with bus stops located in Christon Bank and the main east coast railway accessed via Chathill Train Station only 3 miles to the north. Christon Bank is located in a sustainable settlement cluster, where services and facilities are shared by smaller villages to enhance and maintain the service offering. Services and facilities in the village include a local pub (The Blink Bonny Inn), a village shop, a post office and bus stop and local bus service. The site is closely related to Embleton, which has a first school, doctors, church, village hall, petrol station, play and open space, public houses, restaurants, hotel, post office and golf club.</p>	<p>Christon Bank is not considered to be a sustainable settlement, having limited services and facilities. This is reflected in the Alnwick LDF Core Strategy which refers to it as a 'local needs' centre, rather than as a 'service village'.</p> <p>It is accepted that some development here will contribute to the sustainability of Embleton, but the recent planning permission for 13 houses, and a number of other recently implemented</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>REPRESENTATIONS</p> <p>The Plan indicates that it has used evidence base documents from the emerging Local Plan process; however some of these documents are documents which have been superseded by the current Regulation 19 Consultation process for the Northumberland Local Plan.</p> <p>The Plan also sites Census 2010 data in Section 2. Issues and Themes, which is almost 10 years out of date and is not a true reflection of the current population, or national population projections.</p> <p>The background evidence papers state that 80 no. residential dwellings have been approved, or completed, since 1 April 2016. There is no evidence provided to state that all of the planning approvals are likely to be implemented.</p> <p>In regards to the above it is likely that some aspects of the Plan will be superseded by the emerging Northumberland Local Plan. Therefore, the Plan needs to be sufficiently flexible to respond positively and rapidly to change, to be able to provide a plan led approach to meet the objectively assessed needs of the Plan area, whilst following the approach of a presumption in favour of sustainable development.</p> <p>The Plan needs to demonstrate that it has been positively prepared and reflects the best available and up to date evidence base/s. It is considered that the Plan has not utilised the most up to date and available information.</p> <p>Vision and Objectives</p>	<p>permissions mean that Christon Bank has already accommodated a significant amount of new development</p> <p>It may be almost 10 years out of date, but it is the only reliable data available until the next census.</p> <p>It is reasonable to assume the majority of approvals will be implemented.</p> <p>The Plan does not need to demonstrate it is meeting OAN. It has to (if allocating land for housing) deliver the identified Housing Requirement over the Plan period. This is up to date information provided by Northumberland County Council based on their housing projections.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>Our Client generally supports the Vision and Objectives of the Plan. However, there is concern over Objective 4: Housing.</p> <p>The wording of Objective 4 states that ‘enough affordable and Principle Residence housing to meet the objectively assessed needs for Embleton Parish’. In reference to the above (paragraphs 3.1 – 3.4) the objectively assessed need (‘OAN’) in the Plan area is questioned based on whether the most available and up to date data to support the suggested objectively assessed need has been utilised.</p> <p>Further, the word ‘enough’ suggests a restrictive approach to planning for housing growth in the Plan area. This is not in accordance with the NPPF (paragraph 11) which states that ‘plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;’. The NPPF (paragraph 16, part b) also states that plans should be positively prepared. The use of restrictive objectives or policies prevent the Plan from being positively prepared and unlikely to be able to respond to any rapid change.</p> <p>The OAN is a minimum requirement, and is not a ceiling to residential development. The NPPF (paragraph 60) states that the OAN is for determining the minimum number of homes needed. The Northumberland SHLAA demonstrates various sites on the edge of (but outwith the proposed) settlement boundary of Christon Bank and these sites could provide for deliverable housing sites within the Plan period.</p> <p>Proposed Policy 1: Sustainable Development</p> <p>The term ‘Neighbourhood Area’ is not defined in the Plan. The referenced term should be included at the references list at the end of the Plan.</p> <p>Our Client broadly supports the principles of sustainable development; however, the restriction on major development in the Northumberland Coast AONB and Heritage Coast not is not supported. The objection is due to the wording including a restrictive</p>	<p>The reference to ‘OAN’ has been removed. The correct term is now ‘housing requirement’ which has been defined by NCC.</p> <p>It is considered that the plan has been positively prepared, in light of the constraints that exist in the Plan area. Paragraph 11 does not apply to areas that have an impact on areas identified in Footnote 6 (AONBs, protected sites)</p> <p>The term ‘Neighbourhood Area’ is reasonably self-explanatory.</p> <p>Support noted.</p> <p>Noted. However, the Plan is in line with national planning policy</p>



## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>element of the proposed policy. Further, it does not allow the Plan to respond to any rapid change in future.</p> <p>There has been major development in the Northumberland Coast AONB, which has been designed appropriately and has been given planning consent in line with National and Local Planning Policy, demonstrating that the AONB can accommodate major development.</p> <p>The Plan should be positively prepared and flexible enough to respond to any future change/s in line with the NPPF (paragraphs 11 and 16), and at present it restricts major development in the AONB, which might be required in the future, if there are a change of circumstances, which the plan is not equipped to be respond to.</p> <p>Major development in the AONB or Heritage Coast coul be required, and if any development was designed sensitively and in the most appropriate location, it could be appropriate development. This part of the policy requires amendments, and it is suggested that it should concentrate on the sensitive design of any development in the AONB or Heritage Coast, and could be better placed in proposed policy 4.</p> <p>Proposed Policy 4: Design in New Development</p> <p>The term ‘Neighbourhood Area’ is not defined in the Plan. The referenced term should be included at the references list at the end of the Plan.</p> <p>Our Client generally supports the need for high quality, sensitive design in all types and scales of development. It is supported that the design process should be explicitly demonstrated in all applications.</p> <p>Our Client has concerns regarding part d of the proposed policy. The concerns are that depending on the scale of development there may be no need to incorporate drainage</p>	<p>with regard to the level of protection to be afforded to AONBs.</p> <p>This approach is in line with National Planning Policy. To take an alternative approach would mean the Plan would fail to meet the basic conditions.</p> <p>Support noted.</p> <p>No change.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>information at planning stage. Therefore, this part of the policy requires amendments, to reflect National and Local requirements.</p> <p>Our Client has concerns over parts e and f of the proposed policy and the level of information that will be required to demonstrate these issues (light pollution and loss of light or overshadowing). Although these elements are to be considered in any planning application; however, there is no suggestion in the proposed policy or accompanying text, as currently worded, what would be considered as an acceptable or proportionate level of information to demonstrate these criteria. If these elements can be justified through appropriate design, this needs to be explicit in the Plan. It would be an unfair burden to require all planning applications in the Plan area to require sunlight and other surveys, which might not be required, and the information supplied with each application should be proportionate to each application made.</p> <p>The wording of the proposed policy should be amended to address the above concerns and ensure the required design information submitted with planning applications is proportionate to each application.</p> <p>Proposed Policy 5: Settlement Boundaries for Christon Bank and Embleton Village</p> <p>Our Client objects to the settlement boundaries as currently proposed.</p> <p>Paragraph 5.19 states that the ‘definition of settlement boundaries has involved ensuring that enough land is provided for new housing over the plan period’. The wording of the definition of settlement boundaries, as currently proposed, is restrictive in approach and not in accordance with the NPPF (paragraphs 11 and 16). Plans should be positive towards development and sufficiently flexible to change.</p> <p>Paragraph 5.22 states that the focus of the settlement boundary for Embleton is to retain the boundary already designated in the Alnwick Local Plan, and only allow for small infill sites. The Alnwick Local Plan was designated in 1997, over 20 years ago, and the settlement should be able to provide growth, as the population expands and changes.</p>	<p>Noted, but no change.</p> <p>There is no explicit requirement for sunlight surveys.</p> <p>No change.</p> <p>Noted.</p> <p>Please see earlier comments. Housing requirement has been met, and the plan does support exceptions sites and infill development.</p> <p>The settlement boundary has been made larger to accommodate development proposals at Creighton Place.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>Restricting growth to a settlement boundary which was designated over 20 years ago is likely to stagnate the settlement and means that the Plan has not been prepared with the objective of achieving sustainable development, it is not positive, or aspirational and therefore not in accordance with the NPPF (paragraph 16).</p> <p>Paragraph 5.24 states that the settlement boundary for Christon Bank has been tightly drawn around the settlement apart from accommodating for a recently approved 13 no. unit residential scheme. The planning application reference for the referenced site is 16/03510/FUL. However, the settlement boundary for Christon Bank does not include the full area of the approved site and it does not adjoin the highway. The settlement boundary should include the site in line with planning permission, as at present it is incorrect. The Plan as written acknowledges that the settlement boundary for Christon Bank has been tightly drawn and therefore has not been prepared with the objective of achieving sustainable development, it is not positive, or aspirational and is also not in accordance with the NPPF (paragraph 16).</p> <p>The settlement boundaries as currently proposed are drawn tightly around the settlements of Embleton and Christon Bank on the basis that over 80 no. dwellings have commenced development or been given planning permission since 1 April 2016, and this is more than the OAN of the Plan area. There is no evidence provided within the Plan or evidence base documents to suggest that all of the 80 no. approved dwellings, in the Plan area, will be implemented and completed in the Plan period. Therefore, restricting the settlements to tightly drawn boundaries could limit other suitable and potentially required sites coming forward, if some of the permitted sites do not deliver.</p> <p>The OAN of any Plan area is ‘to determine the minimum’ number of homes needed’ (NPPF, paragraph 60). The Plan has not sought to grow the sustainable settlements but seeks to restrict residential development to a minimum, and could stifle future development of sustainable settlements.</p>	<p>The tight settlement boundary will contribute to sustainable development by focussing development in those areas that are most appropriate. Christon Bank is not a sustainable settlement and has already accommodated a significant amount of new development.</p> <p>See previous comments with regard to OAN.</p> <p>See previous comments with regard to OAN.</p>

# EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>There is potential throughout the Plan period for a possible change in circumstances, which could affect the OAN of the Plan area. Possible changes might include:</p> <ul style="list-style-type: none"> <li>• Revised population projections;</li> <li>• Amended housing need assessment methodology; or</li> <li>• The potential for National and Local Planning Policy updates, which could be in contrast to the policies in the Plan.</li> </ul> <p>The Plan needs to be sufficiently flexible to be able to respond to any of these, or other, rapid changes, in line with the NPPF (paragraph 11). The settlement boundaries are tightly drawn and do not allow for any responsive or reactive changes.</p> <p>The settlement boundaries, as currently proposed, need to be reassessed to ensure further consideration is given to suitable sites, as demonstrated in the SHLAA, which could ensure sustainable growth of both Embleton and Christon Bank. It is essential that sufficient growth of both settlements continue in the right locations and to prevent settlements, which are currently sustainable, from becoming stagnated.</p> <p>The settlement boundaries for Embleton and Christon Bank can recognise the intrinsic character and beauty of the countryside in the Plan area, without the need to restrict any further development of the settlements. The Plan process should look to identify appropriate sites for development, which would guide development to the most appropriate locations to ensure that the Plan area meets the objectives of sustainable development and does not create stagnation of sustainable settlements for future generations.</p> <p>The settlement boundaries for Embleton and Christon Bank need to be amended to accommodate potential for future rapid changes and provide sustainable growth. The SHLAA demonstrates available sites, which could deliver within or beyond the Plan period and could be included within the proposed settlement boundaries.</p>	<p>Repetition of points made earlier – see earlier responses.</p>          <p>Repetition – see earlier responses.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>The settlement boundaries do not allow for sustainable growth and require amendments.</p> <p>Proposed Policy 6: Development within Embleton Village Conservation Area</p> <p>Our Client supports the principle of well-designed development appropriate to Embleton Conservation Area; however, the wording of the policy as currently proposed requires amendments.</p> <p>The wording of the proposed policy states that any development affecting Embleton Conservation Area or its' setting will need to preserve or enhance the character or appearance of the area; however this is not in accordance with the NPPF (paragraphs 193 – 196). When considering the potential impacts of any development, which could affect a designated heritage asset, consideration needs to be given to the significance of the asset, and the degree of any harm. A proposed development could lead to enhancement, preservation or harm, harm is a scale and the scale of any harm needs to be weighed against the public benefits of any development. Therefore, the policy should be updated to reflect this approach. Not all development, which causes harm, should be refused.</p> <p>The wording of the proposed policy in regards to specific elements, which should be assessed as part of any application, is a welcome addition to the proposed policy to understand the most valuable aspects of Embleton Conservation Area and its setting and to allow Applicants to assess these features as part of any future planning applications.</p> <p>Proposed Policy 11: Affordable Housing Contributions</p> <p>Our Client suggests that this policy should be amended, and that the contributions sought for affordable housing should be requested in line with the emerging Local Plan. The wording of this policy should be updated, to reflect the Regulation 19 Consultation Document for the Northumberland Local Plan.</p>	<p>There have been some amendments to this policy, on the advice of Historic England. The policy as worded does not say that all development that causes harm will be refused.</p> <p>Support noted.</p> <p>The affordable housing contributions sought are in line with those in the emerging Local Plan.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

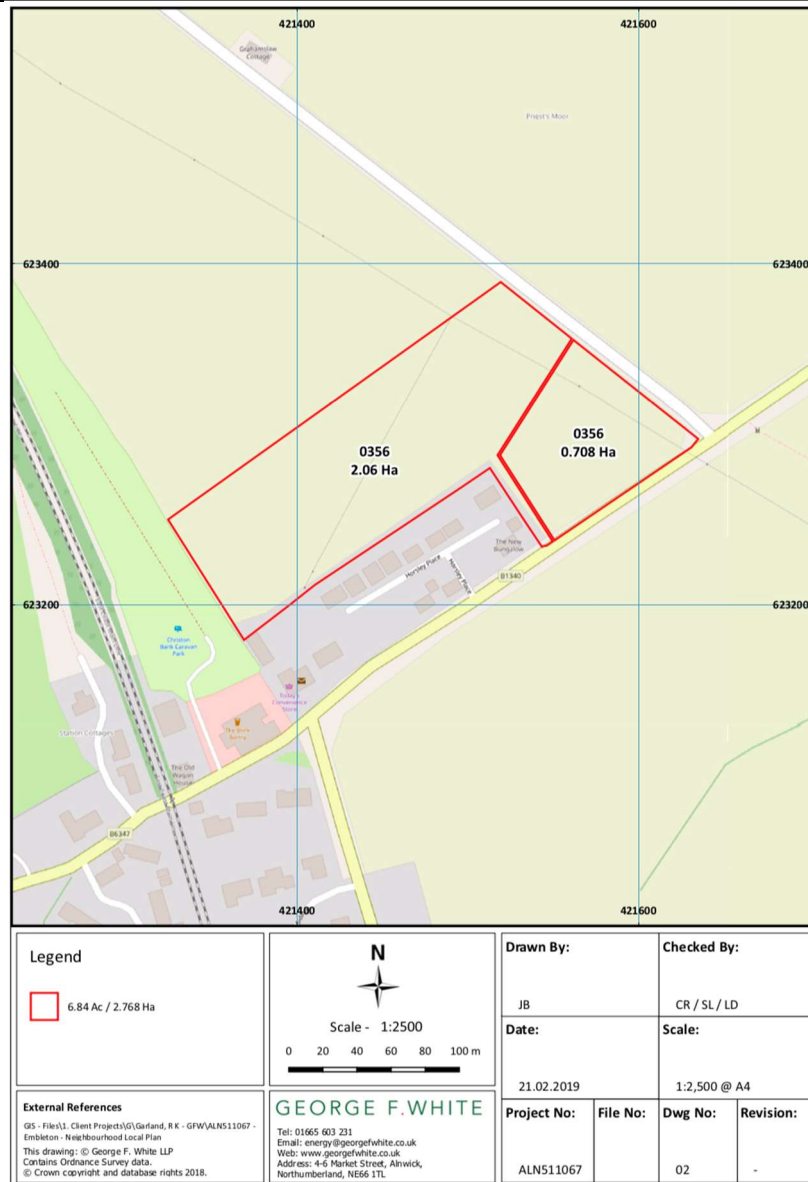
Name	Response	Comment
	<p>Proposed Policy 12: Rural Exception Sites and Community Led Housing</p> <p>Our Client supports the principle of providing rural exception sites on the edges of settlement boundaries; however has concerns over the term small-scale, this is not defined in the NPPF or the Plan. Therefore, it is unclear on the scale of sites, which could be considered acceptable in line with the Plan. Further clarification is requested and it is suggested that the settlement boundaries are reconsidered on this basis.</p> <p>It is likely that any proposals for rural exception sites would need to include an element of market housing to facilitate the provision of affordable housing.</p> <p>The principle of allowing built development, although it should be sensitive to the existing settlements and surrounding environments, on the edge of settlement boundaries suggests that development outside of settlement boundaries would be considered acceptable in some locations. We would suggest that this is further cause to reconsider the settlement boundaries as identified in the Plan and in line with proposed policy 5.</p> <p>Proposed Policy 13: Change of Use from Holiday Use to Principle Residence Housing</p> <p>Our client supports the removal of holiday let occupancy restrictions in the Plan area; however, the need for all applications, which seek to remove occupancy conditions, to be replaced with a Principle Residence Housing occupancy condition, as defined in the Plan, does not comply with the NPPF.</p> <p>Applications for the removal of holiday let occupancy conditions, which would comply with Local and National Planning Policy, allowing an open market dwelling/s should still have the ability to remove the occupancy condition without a further condition imposed. However, those properties, which are currently subject to a holiday let occupancy restriction, but would not comply with National and Local Planning Policy for the occupancy restriction to be removed should be subject to a further occupancy condition,</p>	<p>Rural exception sites are by definition small-scale. Please see the glossary in the Plan (and the NPPF) for the definition.</p> <p>This reasoning is not clear or understood.</p> <p>There is no reference to this in the NPPF.</p> <p>Not sure how paragraph 77 suggests this approach.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>Principle Residence Housing, which seeks to reflect local needs in the Plan area and in line with NPPF (paragraph 77).</p> <p>SUMMARY</p> <p>Our Client objects the proposed settlement boundary for Christon Bank and suggests that the settlement boundaries policy fails to meet the basic conditions, as is required for a Neighbourhood Plan, as the plan is not in line with National Planning Policy.</p> <p>The Plan should be amended to prevent stagnated settlements for future generations. The Plan as currently proposed fails to be able to react to any rapid changes. Sites 0356a and 0356 should be included in the settlement boundary for Christon Bank.</p> <p>Site Location Plan on next page</p>	<p>Noted. See previous comments.</p> <p>No change.</p>




## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT



# EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
George F White on behalf of Mr Jeffreys	<p>George F. White (Planning and Development) have been instructed by Mr R Jeffreys (the 'Client') to submit representations on their behalf to the Pre-Submission Consultation Draft of the Embleton Parish Neighbourhood Plan 2019 – 2036, hereafter referred to as 'the Plan'.</p> <p>These comments have considered the Plan and supporting evidence and assessed compliance against the National Planning Policy Framework (February 2019) ('NPPF') specifically paragraph 182. The comments have regard to whether the Plan meets the 'basic conditions' and other matters as set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990, applied to Neighbourhood Plans by Section 38A of the Planning and Compulsory Purchase Act 2004.</p> <p>Comments are provided in response to the content of the Plan where these are relevant to the Client's interests.</p> <p>We would like to be kept informed and notified about the progression of the Plan, further stages of consultation, amendments or making of the Plan by way of email (lauradixon@georgefwhite.co.uk). We would also like the opportunity to discuss the matters raised in this submission in further detail.</p> <p>BACKGROUND</p> <p>The main comments of this representation relate to:</p> <ul style="list-style-type: none"> <li>• Amendments to the settlement boundary of Christon Bank; and</li> <li>• Other relevant comments</li> </ul> <p>Our Client has significant land holdings to the north and east of Christon Bank. These representations primarily relate to sites consisting of agricultural land on the north eastern edge of Christon Bank. The Sites are identified in the Strategic Housing Land Availability Assessment as;</p>	<p>Noted. No change. There has been a thorough assessment of the proposed settlement boundary, and thorough consultation.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<ul style="list-style-type: none"> <li>○ Site 0293 – N section of Field S of Springfield; and</li> <li>○ Site 0294 – S section of Field S of Springfield</li> </ul> <p>These representations seek the inclusion of sites 0293 and 0294 within the settlement boundary for Christon Bank through the Neighbourhood Plan Process.</p>  <p style="text-align: center;">Figure 1: SHLAA Extract (Accessed NCC February, 2019)</p> <p>The sites proposed for residential development are considered to be of a scale and character appropriate to the settlement, however if necessary, phasing could be introduced or amendments to the site boundary given the Clients land holding</p>	<p>The SHLAA is not a policy document. The housing requirement for Embleton Parish of 30 dwellings has been met and exceeded. No further housing allocations are therefore proposed in the Neighbourhood Plan,</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>surrounding the site to either increase or reduce the site or to provide an alternative means of access.</p> <p>The sites would be developed as an appropriate extension to the existing village either in whole or in part through a phased development. Design and materials would be of a high quality representative of the local area. The scale of the development would be commensurate to Christon Bank and would include family dwellings, affordable housing for rent and smaller scale properties suitable for older persons.</p> <p>There are no public rights of way implications within either of the Sites. The scale of the development which could be accommodated on the Sites is such that the volume and number of additional traffic movements could be accommodated on the existing highways network.</p> <p>Access would be achievable through existing residential development at Springfield to the south west of the sites.</p> <p>Our Client can confirm that the Sites, either in their entirety or part are available for development, free from known constraints which would prejudice development, and can demonstrate that the Sites are suitable, available, achievable, and deliverable.</p> <p>Christon Bank is a sustainable settlement, located in the north east of Northumberland, close to the Northumberland Coastline. It is well connected by road via connections to the A1 to the main settlement of Alnwick to the south, and settlements of Embleton to the west and Seahouses to the north east, respectively all of which offer a range of services, facilities and employment opportunities. The village is easily accessible from the A1 only 2.5 miles to the west and connected by 'B' roads. There is access to public transport with bus stops located in Christon Bank and the main east coast railway accessed via Chathill Train Station only 3 miles to the north. Christon Bank is located in a sustainable settlement cluster, where services and facilities are shared by smaller villages to enhance and maintain the service offering. Services and facilities in the village include a local pub (The Blink Bonny Inn), a village shop, a post office and bus stop and local bus</p>	<p>Christon Bank is not considered to be a sustainable settlement, having limited services and facilities. This is reflected in the Alnwick LDF Core Strategy which refers to it as a 'local needs' centre, rather than as a 'service village'.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>service. The site is closely related to Embleton, which has a first school, doctors, church, village hall, petrol station, play and open space, public houses, restaurants, hotel, post office and golf club.</p> <p>REPRESENTATIONS</p> <p>The Plan indicates that it has used evidence base documents from the emerging Local Plan process; however some of these documents are documents which have been superseded by the current Regulation 19 Consultation process for the Northumberland Local Plan.</p> <p>The Plan also sites Census 2010 data in Section 2. Issues and Themes, which is almost 10 years out of date and is not a true reflection of the current population, or national population projections.</p> <p>The background evidence papers state that 80 no. residential dwellings have been approved, or completed, since 1 April 2016. There is no evidence provided to state that all of the planning approvals are likely to be implemented.</p> <p>In regards to the above it is likely that some aspects of the Plan will be superseded by the emerging Northumberland Local Plan. Therefore, the Plan needs to be sufficiently flexible to respond positively and rapidly to change, to be able to provide a plan led approach to meet the objectively assessed needs of the Plan area, whilst following the approach of a presumption in favour of sustainable development.</p>	<p>It is accepted that some development here will contribute to the sustainability of Embleton, but the recent planning permission for 13 houses, and a number of other recently implemented permissions mean that Christon Bank has already accommodated a significant amount of new development</p> <p>It may be almost 10 years out of date, but it is the only reliable data available until the next census.</p> <p>It is reasonable to assume the majority of approvals will be implemented.</p> <p>The Plan does not need to demonstrate it is meeting OAN. It has to (if allocating land for housing) deliver the identified Housing Requirement over the Plan period. This is up to date information provided by</p>

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	<p>The Plan needs to demonstrate that it has been positively prepared and reflects the best available and up to date evidence base/s. It is considered that the Plan has not utilised the most up to date and available information.</p> <p>Vision and Objectives</p> <p>Our Client generally supports the Vision and Objectives of the Plan. However, there is concern over Objective 4: Housing.</p> <p>The wording of Objective 4 states that ‘enough affordable and Principle Residence housing to meet the objectively assessed needs for Embleton Parish’. In reference to the above (paragraphs 3.1 – 3.4) the objectively assessed need (‘OAN’) in the Plan area is questioned based on whether the most available and up to date data to support the suggested objectively assessed need has been utilised.</p> <p>Further, the word ‘enough’ suggests a restrictive approach to planning for housing growth in the Plan area. This is not in accordance with the NPPF (paragraph 11) which states that ‘plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;’. The NPPF (paragraph 16, part b) also states that plans should be positively prepared. The use of restrictive objectives or policies prevent the Plan from being positively prepared and unlikely to be able to respond to any rapid change.</p> <p>The OAN is a minimum requirement, and is not a ceiling to residential development. The NPPF (paragraph 60) states that the OAN is for determining the minimum number of homes needed. The Northumberland SHLAA demonstrates various sites on the edge of (but outwith the proposed) settlement boundary of Christon Bank and these sites could provide for deliverable housing sites within the Plan period.</p> <p>Proposed Policy 1: Sustainable Development</p>	<p>Northumberland County Council based on their housing projections.</p> <p>The reference to ‘OAN’ has been removed. The correct term is now ‘housing requirement’ which has been defined by NCC.</p> <p>It is considered that the plan has been positively prepared, in light of the constraints that exist in the Plan area. Paragraph 11 does not apply to areas that have an impact on areas identified in Footnote 6 (AONBs, protected sites)</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

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	<p>The term 'Neighbourhood Area' is not defined in the Plan. The referenced term should be included at the references list at the end of the Plan.</p> <p>Our Client broadly supports the principles of sustainable development; however, the restriction on major development in the Northumberland Coast AONB and Heritage Coast not is not supported. The objection is due to the wording including a restrictive element of the proposed policy. Further, it does not allow the Plan to respond to any rapid change in future.</p> <p>There has been major development in the Northumberland Coast AONB, which has been designed appropriately and has been given planning consent in line with National and Local Planning Policy, demonstrating that the AONB can accommodate major development.</p> <p>The Plan should be positively prepared and flexible enough to respond to any future change/s in line with the NPPF (paragraphs 11 and 16), and at present it restricts major development in the AONB, which might be required in the future, if there are a change of circumstances, which the plan is not equipped to be respond to.</p> <p>Major development in the AONB or Heritage Coast could be required, and if any development was designed sensitively and in the most appropriate location, it could be appropriate development. This part of the policy requires amendments, and it is suggested that it should concentrate on the sensitive design of any development in the AONB or Heritage Coast, and could be better placed in proposed policy 4.</p> <p>Proposed Policy 4: Design in New Development</p> <p>The term 'Neighbourhood Area' is not defined in the Plan. The referenced term should be included at the references list at the end of the Plan.</p>	<p>The term 'Neighbourhood Area' is reasonably self-explanatory.</p> <p>Support noted.</p> <p>Noted. However, the Plan is in line with national planning policy with regard to the level of protection to be afforded to AONBs. The site put forward is not, in any case, within the AONB.</p> <p>This approach is in line with National Planning Policy. To take an alternative approach would mean the Plan would fail to meet the basic conditions.</p>



## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

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	<p>Our Client generally supports the need for high quality, sensitive design in all types and scales of development. It is supported that the design process should be explicitly demonstrated in all applications.</p> <p>Our Client has concerns regarding part d of the proposed policy. The concerns are that depending on the scale of development there may be no need to incorporate drainage information at planning stage. Therefore, this part of the policy requires amendments, to reflect National and Local requirements.</p> <p>Our Client has concerns over parts e and f of the proposed policy and the level of information that will be required to demonstrate these issues (light pollution and loss of light or overshadowing). Although these elements are to be considered in any planning application; however, there is no suggestion in the proposed policy or accompanying text, as currently worded, what would be considered as an acceptable or proportionate level of information to demonstrate these criteria. If these elements can be justified through appropriate design, this needs to be explicit in the Plan. It would be an unfair burden to require all planning applications in the Plan area to require sunlight and other surveys, which might not be required, and the information supplied with each application should be proportionate to each application made.</p> <p>The wording of the proposed policy should be amended to address the above concerns and ensure the require design information submitted with planning applications is proportionate to each application.</p> <p>Proposed Policy 5: Settlement Boundaries for Christon Bank and Embleton Village</p> <p>Our Client objects to the settlement boundaries as currently proposed.</p> <p>Paragraph 5.19 states that the ‘definition of settlement boundaries has involved ensuring that enough land is provided for new housing over the plan period’. The wording of the definition of settlement boundaries, as currently proposed, is restrictive in approach and</p>	<p>Support noted.</p> <p>No change.</p> <p>Noted, but no change.</p> <p>There is no explicit requirement for sunlight surveys.</p> <p>No change.</p> <p>Noted.</p> <p>Please see earlier comments. Housing requirement has been met, and the plan does support exceptions sites and infill development.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>not in accordance with the NPPF (paragraphs 11 and 16). Plans should be positive towards development and sufficiently flexible to change.</p> <p>Paragraph 5.22 states that the focus of the settlement boundary for Embleton is to retain the boundary already designated in the Alnwick Local Plan, and only allow for small infill sites. The Alnwick Local Plan was designated in 1997, over 20 years ago, and the settlement should be able to provide growth, as the population expands and changes. Restricting growth to a settlement boundary which was designated over 20 years ago is likely to stagnate the settlement and means that the Plan has not been prepared with the objective of achieving sustainable development, it is not positive, or aspirational and therefore not in accordance with the NPPF (paragraph 16).</p> <p>Paragraph 5.24 states that the settlement boundary for Christon Bank has been tightly drawn around the settlement apart from accommodating for a recently approved 13 no. unit residential scheme. The planning application reference for the referenced site is 16/03510/FUL. However, the settlement boundary for Christon Bank does not include the full area of the approved site and it does not adjoin the highway. The settlement boundary should include the site in line with planning permission, as at present it is incorrect. The Plan as written acknowledges that the settlement boundary for Christon Bank has been tightly drawn and therefore has not been prepared with the objective of achieving sustainable development, it is not positive, or aspirational and is also not in accordance with the NPPF (paragraph 16).</p> <p>The settlement boundaries as currently proposed are drawn tightly around the settlements of Embleton and Christon Bank on the basis that over 80 no. dwellings have commenced development or been given planning permission since 1 April 2016, and this is more than the OAN of the Plan area. There is no evidence provided within the Plan or evidence base documents to suggest that all of the 80 no. approved dwellings, in the Plan area, will be implemented and completed in the Plan period. Therefore, restricting the settlements to tightly drawn boundaries could limit other suitable and potentially required sites coming forward, if some of the permitted sites do not deliver.</p>	<p>The settlement boundary has been made larger to accommodate development proposals at Creighton Place.</p> <p>The tight settlement boundary will contribute to sustainable development by focussing development in those areas that are most appropriate. Christon Bank is not a sustainable settlement and has already accommodated a significant amount of new development.</p> <p>See previous comments with regard to OAN.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>The OAN of any Plan area is ‘to determine the minimum’ number of homes needed’ (NPPF, paragraph 60). The Plan has not sought to grow the sustainable settlements but seeks to restrict residential development to a minimum, and could stifle future development of sustainable settlements.</p> <p>There is potential throughout the Plan period for a possible change in circumstances, which could affect the OAN of the Plan area. Possible changes might include:</p> <ul style="list-style-type: none"> <li>• Revised population projections;</li> <li>• Amended housing need assessment methodology; or</li> <li>• The potential for National and Local Planning Policy updates, which could be in contrast to the policies in the Plan.</li> </ul> <p>The Plan needs to be sufficiently flexible to be able to respond to any of these, or other, rapid changes, in line with the NPPF (paragraph 11). The settlement boundaries are tightly drawn and do not allow for any responsive or reactive changes.</p> <p>The settlement boundaries, as currently proposed, need to be reassessed to ensure further consideration is given to suitable sites, as demonstrated in the SHLAA, which could ensure sustainable growth of both Embleton and Christon Bank. It is essential that sufficient growth of both settlements continue in the right locations and to prevent settlements, which are currently sustainable, from becoming stagnated.</p> <p>The settlement boundaries for Embleton and Christon Bank can recognise the intrinsic character and beauty of the countryside in the Plan area, without the need to restrict any further development of the settlements. The Plan process should look to identify appropriate sites for development, which would guide development to the most appropriate locations to ensure that the Plan area meets the objectives of sustainable development and does not create stagnation of sustainable settlements for future generations.</p>	<p>See previous comments with regard to OAN.</p> <p>Repetition of points made earlier – see earlier responses.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>The settlement boundaries for Embleton and Christon Bank need to be amended to accommodate potential for future rapid changes and provide sustainable growth. The SHLAA demonstrates available sites, which could deliver within or beyond the Plan period and could be included within the proposed settlement boundaries.</p> <p>The settlement boundaries do not allow for sustainable growth and require amendments.</p> <p>Proposed Policy 6: Development within Embleton Village Conservation Area</p> <p>Our Client supports the principle of well-designed development appropriate to Embleton Conservation Area; however, the wording of the policy as currently proposed requires amendments.</p> <p>The wording of the proposed policy states that any development affecting Embleton Conservation Area or its' setting will need to preserve or enhance the character or appearance of the area; however this is not in accordance with the NPPF (paragraphs 193 – 196). When considering the potential impacts of any development, which could affect a designated heritage asset, consideration needs to be given to the significance of the asset, and the degree of any harm. A proposed development could lead to enhancement, preservation or harm, harm is a scale and the scale of any harm needs to be weighed against the public benefits of any development. Therefore, the policy should be updated to reflect this approach. Not all development, which causes harm, should be refused.</p> <p>The wording of the proposed policy in regards to specific elements, which should be assessed as part of any application, is a welcome addition to the proposed policy to understand the most valuable aspects of Embleton Conservation Area and its setting and to allow Applicants to assess these features as part of any future planning applications.</p> <p>Proposed Policy 11: Affordable Housing Contributions</p>	<p>Repetition – see earlier responses.</p> <p>There have been some amendments to this policy, on the advice of Historic England. The policy as worded does not say that all development that causes harm will be refused.</p> <p>Support noted.</p>


## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>Our Client suggests that this policy should be amended, and that the contributions sought for affordable housing should be requested in line with the emerging Local Plan. The wording of this policy should be updated, to reflect the Regulation 19 Consultation Document for the Northumberland Local Plan.</p> <p>Proposed Policy 12: Rural Exception Sites and Community Led Housing</p> <p>Our Client supports the principle of providing rural exception sites on the edges of settlement boundaries; however has concerns over the term small-scale, this is not defined in the NPPF or the Plan. Therefore, it is unclear on the scale of sites, which could be considered acceptable in line with the Plan. Further clarification is requested and it is suggested that the settlement boundaries are reconsidered on this basis.</p> <p>Representation to Consultation Document</p> <p>It is likely that any proposals for rural exception sites would need to include an element of market housing to facilitate the provision of affordable housing.</p> <p>The principle of allowing built development, although it should be sensitive to the existing settlements and surrounding environments, on the edge of settlement boundaries suggests that development outside of settlement boundaries would be considered acceptable in some locations. We would suggest that this is further cause to reconsider the settlement boundaries as identified in the Plan and in line with proposed policy 5.</p> <p>Proposed Policy 13: Change of Use from Holiday Use to Principle Residence Housing</p> <p>Our client supports the removal of holiday let occupancy restrictions in the Plan area; however, the need for all applications, which seek to remove occupancy conditions, to be replaced with a Principle Residence Housing occupancy condition, as defined in the Plan, does not comply with the NPPF.</p>	<p>The affordable housing contributions sought are in line with those in the emerging Local Plan.</p> <p>Rural exception sites are by definition small-scale. Please see the glossary in the Plan (and the NPPF) for the definition.</p> <p>This reasoning is not clear or understood.</p> <p>There is no reference to this in the NPPF.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>Applications for the removal of holiday let occupancy conditions, which would comply with Local and National Planning Policy, allowing an open market dwelling/s should still have the ability to remove the occupancy condition without a further condition imposed. However, those properties, which are currently subject to a holiday let occupancy restriction, but would not comply with National and Local Planning Policy for the occupancy restriction to be removed should be subject to a further occupancy condition, Principle Residence Housing, which seeks to reflect local needs in the Plan area and in line with NPPF (paragraph 77).</p> <p>Our Client objects the proposed settlement boundary for Christon Bank and suggests that the settlement boundaries policy fails to meet the basic conditions, as is required for a Neighbourhood Plan, as the plan is not in line with National Planning Policy.</p> <p>The Plan should be amended to prevent stagnated settlements for future generations. The Plan as currently proposed fails to be able to react to any rapid changes. Sites 0293 and 0294 should be included in the settlement boundary for Christon Bank.</p>	<p>Not sure how paragraph 77 suggests this approach.</p> <p>Noted. See previous comments.</p> <p>No change.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment																								
	<div><p><b>Legend</b></p><div><div>0293 (1.657 Ha / 16,568.03 m<sup>2</sup>)</div><div>0294 (1.559 Ha / 15,591.97 m<sup>2</sup>)</div></div><p><b>External References</b></p><p>C:\Users\jamesbrett\Dropbox\Encrypted\GIS\QGIS\11\QGIS Projects\ALN510414\Shapes This drawing: © George F. White LLP Contains Ordnance Survey data. © Crown copyright and database rights 2018.</p><p><b>GEORGE F. WHITE</b> Tel: 01665 603 231 Email: <a href="mailto:enr@georgefwhite.co.uk">enr@georgefwhite.co.uk</a> Web: <a href="http://www.georgefwhite.co.uk">www.georgefwhite.co.uk</a> Address: 4-6 Market Street, Alnwick, Northumberland, NE66 1TL</p><table><tr><td colspan="2"><b>Drawn By:</b></td><td colspan="2"><b>Checked By:</b></td></tr><tr><td colspan="2">JB</td><td colspan="2">CR / SL / LD</td></tr><tr><td colspan="2"><b>Date:</b></td><td colspan="2"><b>Scale:</b></td></tr><tr><td colspan="2">07.03.2018</td><td colspan="2">1:2,500 @ A4</td></tr><tr><td><b>Project No:</b></td><td><b>File No:</b></td><td><b>Dwg No:</b></td><td><b>Revision:</b></td></tr><tr><td>ALN510414</td><td>15</td><td>01</td><td>-</td></tr></table></div>	<b>Drawn By:</b>		<b>Checked By:</b>		JB		CR / SL / LD		<b>Date:</b>		<b>Scale:</b>		07.03.2018		1:2,500 @ A4		<b>Project No:</b>	<b>File No:</b>	<b>Dwg No:</b>	<b>Revision:</b>	ALN510414	15	01	-	
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Appendix A – Site Location Plan

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
George F White on behalf of Mr Thomson	<p>George F. White (Planning and Development) have been instructed by Mr N Thompson (the 'Client') to submit representations on their behalf to the Pre-Submission Consultation Draft of the Embleton Parish Neighbourhood Plan 2019 – 2036, hereafter referred to as 'the Plan'.</p> <p>These comments have considered the Plan and supporting evidence and assessed compliance against the National Planning Policy Framework (February 2019) ('NPPF') specifically paragraph 182. The comments have regard to whether the Plan meets the 'basic conditions' and other matters as set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990, applied to Neighbourhood Plans by Section 38A of the Planning and Compulsory Purchase Act 2004.</p> <p>Comments are provided in response to the content of the Plan where these are relevant to the Client's interests.</p> <p>We would like to be kept informed and notified about the progression of the Plan, further stages of consultation, amendments or making of the Plan by way of email (lauradixon@georgefwhite.co.uk). We would also like the opportunity to discuss the matters raised in this submission in further detail.</p> <p>BACKGROUND</p> <p>The main comments of this representation relate to:</p> <ul style="list-style-type: none"> <li>• Amendments to the settlement boundary of Christon Bank; and</li> <li>• Other relevant comments</li> </ul>	



## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>Our Client has significant land holdings to the south of Christon Bank. These representations primarily relate to a site on the southern edge of Christon Bank. The Site is identified in the Strategic Housing Land Availability Assessment as;</p> <p>Site 0164 – SW of Springfield View</p> <p>These representations seek the inclusion of site 0164 within the settlement boundary for Christon Bank through the Neighbourhood Plan Process.</p> <p>The site to the north, known as Springfield and 0332 in the SHLAA, was previously built out by our Client, and there is known market interest for further dwellings in this location.</p> <p>Site 0164 is located south of Springfield, Christon Bank and would form a logical extension to the village. The site could be accessed via a new access off the B6347 or from the existing access at Springfield View.</p>	<p>The SHLAA is not a policy document. The housing requirement for Embleton Parish of 30 dwellings has been met and exceeded.</p>

# EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<div data-bbox="414 247 1294 893"> </div> <div data-bbox="595 896 1108 919"> <p>Figure 1: SHLAA Extract (Accessed NCC February, 2019)</p> </div> <p data-bbox="360 936 1599 1043">The site is 1.25 ha and the SHLAA states that a further 10 no. dwellings could be accommodated on the site. However, it is likely that the site could deliver approximately 15 no. dwellings.</p> <p data-bbox="360 1085 1619 1375">Christon Bank is a sustainable settlement, located in the north east of Northumberland, close to the Northumberland Coastline. It is well connected by road via connections to the A1 to the main settlement of Alnwick to the south, and settlements of Embleton to the west and Seahouses to the north east, respectively all of which offer a range of services, facilities and employment opportunities. The village is easily accessible from the A1 only 2.5 miles to the west and connected by 'B' roads. There is access to public transport with bus stops located in Christon Bank and the main east coast railway accessed via Chathill Train Station only 3 miles to the north. Christon Bank is located in a sustainable</p>	<p data-bbox="1646 458 2114 564">The site suggested is outside the settlement boundary in and area of open countryside.</p> <p data-bbox="1646 1085 2114 1375">Christon Bank is not considered to be a sustainable settlement, having limited services and facilities. This is reflected in the Alnwick LDF Core Strategy which refers to it as a 'local needs' centre, rather than as a 'service village'.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

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	<p>settlement cluster, where services and facilities are shared by smaller villages to enhance and maintain the service offering.</p> <p>Services and facilities in the village include a local pub (The Blink Bonny Inn), a village shop, a post office and bus stop and local bus service. The site is closely related to Embleton, which has a first school, doctors, church, village hall, petrol station, play and open space, public houses, restaurants, hotel, post office and golf club.</p> <p>The site is suitable, available and deliverable. It is free of constraints and should any site assessments identify any potential issues appropriate mitigation would be proposed as part of the site design. The development of this site would be in keeping with the character of the settlement and local area in accordance with the sustainability principles. The site offers the opportunity for logical development and consolidation of the settlement at a scale appropriate to incremental growth in a rural area which is well connected to nearby towns.</p> <p>REPRESENTATIONS</p> <p>The Plan indicates that it has used evidence base documents from the emerging Local Plan process; however some of these documents are documents which have been superseded by the current Regulation 19 Consultation process for the Northumberland Local Plan.</p> <p>The Plan also sites Census 2010 data in Section 2. Issues and Themes, which is almost 10 years out of date and is not a true reflection of the current population, or national population projections.</p>	<p>It is accepted that some development here will contribute to the sustainability of Embleton, but the recent planning permission for 13 houses, and a number of other recently implemented permissions mean that Christon Bank has already accommodated a significant amount of new development</p> <p>It may be almost 10 years out of date, but it is the only reliable data available until the next census. It is reasonable to assume the majority of approvals will be implemented.</p>

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	<p>The background evidence papers state that 80 no. residential dwellings have been approved, or completed, since 1 April 2016. There is no evidence provided to state that all of the planning approvals are likely to be implemented.</p> <p>In regards to the above it is likely that some aspects of the Plan will be superseded by the emerging Northumberland Local Plan. Therefore, the Plan needs to be sufficiently flexible to respond positively and rapidly to change, to be able to provide a plan led approach to meet the objectively assessed needs of the Plan area, whilst following the approach of a presumption in favour of sustainable development.</p> <p>The Plan needs to demonstrate that it has been positively prepared and reflects the best available and up to date evidence base/s. It is considered that the Plan has not utilised the most up to date and available information.</p> <p>Vision and Objectives</p> <p>Our Client generally supports the Vision and Objectives of the Plan. However, there is concern over Objective 4: Housing.</p> <p>The wording of Objective 4 states that ‘enough affordable and Principle Residence housing to meet the objectively assessed needs for Embleton Parish’. In reference to the above (paragraphs 3.1 – 3.4) the objectively assessed need (‘OAN’) in the Plan area is questioned based on whether the most available and up to date data to support the suggested objectively assessed need has been utilised.</p> <p>Representation to Consultation Document</p> <p>Further, the word ‘enough’ suggests a restrictive approach to planning for housing growth in the Plan area. This is not in accordance with the NPPF (paragraph 11) which states that ‘plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;’. The NPPF (paragraph 16, part b) also states that plans should be positively prepared. The use of restrictive</p>	<p>The Plan does not need to demonstrate it is meeting OAN. It has to (if allocating land for housing) deliver the identified Housing Requirement over the Plan period. This is up to date information provided by Northumberland County Council based on their housing projections.</p> <p>The reference to ‘OAN’ has been removed. The correct term is now ‘housing requirement’ which has been defined by NCC.</p> <p>It is considered that the plan has been positively prepared, in light of the constraints that exist in the Plan area. Paragraph 11 does not apply to areas that have an impact</p>

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	<p>objectives or policies prevent the Plan from being positively prepared and unlikely to be able to respond to any rapid change.</p> <p>The OAN is a minimum requirement, and is not a ceiling to residential development. The NPPF (paragraph 60) states that the OAN is for determining the minimum number of homes needed. The Northumberland SHLAA demonstrates various sites on the edge of (but outwith the proposed) settlement boundary of Christon Bank and these sites could provide for deliverable housing sites within the Plan period.</p> <p>Proposed Policy 1: Sustainable Development</p> <p>The term ‘Neighbourhood Area’ is not defined in the Plan. The referenced term should be included at the references list at the end of the Plan.</p> <p>Our Client broadly supports the principles of sustainable development; however, the restriction on major development in the Northumberland Coast AONB and Heritage Coast not is not supported. The objection is due to the wording including a restrictive element of the proposed policy. Further, it does not allow the Plan to respond to any rapid change in future.</p> <p>There has been major development in the Northumberland Coast AONB, which has been designed appropriately and has been given planning consent in line with National and Local Planning Policy, demonstrating that the AONB can accommodate major development.</p> <p>The Plan should be positively prepared and flexible enough to respond to any future change/s in line with the NPPF (paragraphs 11 and 16), and at present it restricts major development in the AONB, which might be required in the future, if there are a change of circumstances, which the plan is not equipped to be respond to.</p> <p>Major development in the AONB or Heritage Coast could be required, and if any development was designed sensitively and in the most appropriate location, it could be</p>	<p>on areas identified in Footnote 6 (AONBs, protected sites)</p> <p>The term ‘Neighbourhood Area’ is reasonably self-explanatory.</p> <p>Support noted.</p> <p>Noted. However, the Plan is in line with national planning policy with regard to the level of protection to be afforded to AONBs. In any case, this site is not within the AONB.</p> <p>This approach is in line with National Planning Policy. To take an alternative approach would mean the Plan would fail to meet the basic conditions.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

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	<p>appropriate development. This part of the policy requires amendments, and it is suggested that it should concentrate on the sensitive design of any development in the AONB or Heritage Coast, and could be better placed in proposed policy 4.</p> <p>Proposed Policy 4: Design in New Development</p> <p>The term ‘Neighbourhood Area’ is not defined in the Plan. The referenced term should be included at the references list at the end of the Plan.</p> <p>Our Client generally supports the need for high quality, sensitive design in all types and scales of development. It is supported that the design process should be explicitly demonstrated in all applications.</p> <p>Our Client has concerns regarding part d of the proposed policy. The concerns are that depending on the scale of development there may be no need to incorporate drainage information at planning stage. Therefore, this part of the policy requires amendments, to reflect National and Local requirements.</p> <p>Our Client has concerns over parts e and f of the proposed policy and the level of information that will be required to demonstrate these issues (light pollution and loss of light or overshadowing). Although these elements are to be considered in any planning application; however, there is no suggestion in the proposed policy or accompanying text, as currently worded, what would be considered as an acceptable or proportionate level of information to demonstrate these criteria. If these elements can be justified through appropriate design, this needs to explicit in the Plan. It would be an unfair burden to require all planning applications in the Plan area to require sunlight and other surveys, which might not be required, and the information supplied with each application should be proportionate to each application made.</p>	<p>Support noted.</p> <p>No change.</p> <p>Noted, but no change.</p> <p>There is no explicit requirement for sunlight surveys.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>The wording of the proposed policy should be amended to address the above concerns and ensure the require design information submitted with planning applications is proportionate to each application.</p> <p>Proposed Policy 5: Settlement Boundaries for Christon Bank and Embleton Village</p> <p>Our Client objects to the settlement boundaries as currently proposed.</p> <p>Paragraph 5.19 states that the ‘definition of settlement boundaries has involved ensuring that enough land is provided for new housing over the plan period’. The wording of the definition of settlement boundaries, as currently proposed, is restrictive in approach and not in accordance with the NPPF (paragraphs 11 and 16). Plans should be positive towards development and sufficiently flexible to change.</p> <p>Paragraph 5.22 states that the focus of the settlement boundary for Embleton is to retain the boundary already designated in the Alnwick Local Plan, and only allow for small infill sites. The Alnwick Local Plan was designated in 1997, over 20 years ago, and the settlement should be able to provide growth, as the population expands and changes. Restricting growth to a settlement boundary which was designated over 20 years ago is likely to stagnate the settlement and means that the Plan has not been prepared with the objective of achieving sustainable development, it is not positive, or aspirational and therefore not in accordance with the NPPF (paragraph 16).</p> <p>Paragraph 5.24 states that the settlement boundary for Christon Bank has been tightly drawn around the settlement apart from accommodating for a recently approved 13 no. unit residential scheme. The planning application reference for the referenced site is 16/03510/FUL. However, the settlement boundary for Christon Bank does not include the full area of the approved site and it does not adjoin the highway. The settlement boundary should include the site in line with planning permission, as at present it is incorrect. The Plan as written acknowledges that the settlement boundary for Christon Bank has been tightly drawn and therefore has not been prepared with the objective of</p>	<p>No change.</p> <p>Noted.</p> <p>Please see earlier comments. Housing requirement has been met, and the plan does support exceptions sites and infill development.</p> <p>The settlement boundary has been made larger to accommodate development proposals at Creighton Place.</p> <p>The tight settlement boundary will contribute to sustainable development by focussing development in those areas that are most appropriate. Christon Bank is not a sustainable settlement and has already accommodated a significant amount of new development.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>achieving sustainable development, it is not positive, or aspirational and is also not in accordance with the NPPF (paragraph 16).</p> <p>The settlement boundaries as currently proposed are drawn tightly around the settlements of Embleton and Christon Bank on the basis that over 80 no. dwellings have commenced development or been given planning permission since 1 April 2016, and this is more than the OAN of the Plan area. There is no evidence provided within the Plan or evidence base documents to suggest that all of the 80 no. approved dwellings, in the Plan area, will be implemented and completed in the Plan period. Therefore, restricting the settlements to tightly drawn boundaries could limit other suitable and potentially required sites coming forward, if some of the permitted sites do not deliver.</p> <p>Representation to Consultation Document</p> <p>The OAN of any Plan area is ‘to determine the minimum’ number of homes needed’ (NPPF, paragraph 60). The Plan has not sought to grow the sustainable settlements but seeks to restrict residential development to a minimum, and could stifle future development of sustainable settlements.</p> <p>There is potential throughout the Plan period for a possible change in circumstances, which could affect the OAN of the Plan area. Possible changes might include:</p> <ul style="list-style-type: none"> <li>• Revised population projections;</li> <li>• Amended housing need assessment methodology; or</li> <li>• The potential for National and Local Planning Policy updates, which could be in contrast to the policies in the Plan.</li> </ul>	<p>See previous comments with regard to OAN.</p> <p>See previous comments with regard to OAN.</p> <p>Repetition of points made earlier – see earlier responses.</p>



## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>The Plan needs to be sufficiently flexible to be able to respond to any of these, or other, rapid changes, in line with the NPPF (paragraph 11). The settlement boundaries are tightly drawn and do not allow for any responsive or reactive changes.</p> <p>The settlement boundaries, as currently proposed, need to be reassessed to ensure further consideration is given to suitable sites, as demonstrated in the SHLAA, which could ensure sustainable growth of both Embleton and Christon Bank. It is essential that sufficient growth of both settlements continue in the right locations and to prevent settlements, which are currently sustainable, from becoming stagnated.</p> <p>The settlement boundaries for Embleton and Christon Bank can recognise the intrinsic character and beauty of the countryside in the Plan area, without the need to restrict any further development of the settlements. The Plan process should look to identify appropriate sites for development, which would guide development to the most appropriate locations to ensure that the Plan area meets the objectives of sustainable development and does not create stagnation of sustainable settlements for future generations.</p> <p>The settlement boundaries for Embleton and Christon Bank need to be amended to accommodate potential for future rapid changes and provide sustainable growth. The SHLAA demonstrates available sites, which could deliver within or beyond the Plan period and could be included within the proposed settlement boundaries.</p> <p>The settlement boundaries do not allow for sustainable growth and require amendments.</p> <p>Proposed Policy 6: Development within Embleton Village Conservation Area</p> <p>Our Client supports the principle of well-designed development appropriate to Embleton Conservation Area; however, the wording of the policy as currently proposed requires amendments.</p>	<p>Repetition – see earlier responses.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>The wording of the proposed policy states that any development affecting Embleton Conservation Area or its' setting will need to preserve or enhance the character or appearance of the area; however this is not in accordance with the NPPF (paragraphs 193 – 196). When considering the potential impacts of any development, which could affect a designated heritage asset, consideration needs to be given to the significance of the asset, and the degree of any harm. A proposed development could lead to enhancement, preservation or harm, harm is a scale and the scale of any harm needs to be weighed against the public benefits of any development. Therefore, the policy should be updated to reflect this approach. Not all development, which causes harm, should be refused.</p> <p>The wording of the proposed policy in regards to specific elements, which should be assessed as part of any application, is a welcome addition to the proposed policy to understand the most valuable aspects of Embleton Conservation Area and its setting and to allow Applicants to assess these features as part of any future planning applications.</p> <p>Proposed Policy 11: Affordable Housing Contributions</p> <p>Our Client suggests that this policy should be amended, and that the contributions sought for affordable housing should be requested in line with the emerging Local Plan. The wording of this policy should be updated, to reflect the Regulation 19 Consultation Document for the Northumberland Local Plan.</p> <p>Proposed Policy 12: Rural Exception Sites and Community Led Housing</p> <p>Our Client supports the principle of providing rural exception sites on the edges of settlement boundaries; however has concerns over the term small-scale, this is not defined in the NPPF or the Plan. Therefore, it is unclear on the scale of sites, which could be considered acceptable in line with the Plan. Further clarification is requested and it is suggested that the settlement boundaries are reconsidered on this basis.</p>	<p>There have been some amendments to this policy, on the advice of Historic England. The policy as worded does not say that all development that causes harm will be refused.</p> <p>.</p> <p>Support noted.</p> <p>The affordable housing contributions sought are in line with those in the emerging Local Plan.</p> <p>Rural exception sites are by definition small-scale. Please see the glossary in the Plan (and the NPPF) for the definition.</p>


## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>It is likely that any proposals for rural exception sites would need to include an element of market housing to facilitate the provision of affordable housing.</p> <p>The principle of allowing built development, although it should be sensitive to the existing settlements and surrounding environments, on the edge of settlement boundaries suggests that development outside of settlement boundaries would be considered acceptable in some locations. We would suggest that this is further cause to reconsider the settlement boundaries as identified in the Plan and in line with proposed policy 5.</p> <p>Proposed Policy 13: Change of Use from Holiday Use to Principle Residence Housing</p> <p>Our client supports the removal of holiday let occupancy restrictions in the Plan area; however, the need for all applications, which seek to remove occupancy conditions, to be replaced with a Principle Residence Housing occupancy condition, as defined in the Plan, does not comply with the NPPF.</p> <p>Applications for the removal of holiday let occupancy conditions, which would comply with Local and National Planning Policy, allowing an open market dwelling/s should still have the ability to remove the occupancy condition without a further condition imposed. However, those properties, which are currently subject to a holiday let occupancy restriction, but would not comply with National and Local Planning Policy for the occupancy restriction to be removed should be subject to a further occupancy condition, Principle Residence Housing, which seeks to reflect local needs in the Plan area and in line with NPPF (paragraph 77).</p> <p>SUMMARY</p> <p>Our Client objects the proposed settlement boundary for Christon Bank and suggests that the settlement boundaries policy fails to meet the basic conditions, as is required for a Neighbourhood Plan, as the plan is not in line with National Planning Policy.</p>	<p>This reasoning is not clear or understood.</p> <p>There is no reference to this in the NPPF.</p> <p>Not sure how paragraph 77 suggests this approach.</p> <p>Noted. See previous comments.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	The Plan should be amended to prevent stagnated settlements for future generations. The Plan as currently proposed fails to be able to react to any rapid changes. Sites 0164 should be included in the settlement boundary for Christon Bank.	No change.

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment																
	<div><div><div><p>Legend</p><div><div></div><div>0164 (1.250 Ha / 12,495.41 m²)</div></div></div><div><p>External References</p><p>C:\Users\james\Documents\Dropbox\Energy\GIS\0164\0164.shp Project\ALN510414\Shapefiles This drawing: © George F. White LLP Contains Ordnance Survey data. © Crown copyright and database rights 2018.</p></div><div><p><b>GEORGE F. WHITE</b></p><p>Tel: 01665 603 231 Email: energy@georgefwhite.co.uk Web: www.georgefwhite.co.uk Address: 4-6 Market Street, Alnwick, Northumberland, NE66 1TL</p></div><div><table><tr><td>Drawn By:</td><td>Checked By:</td></tr><tr><td>JB</td><td>CR / SL / LD</td></tr><tr><td>Date:</td><td>Scale:</td></tr><tr><td>07.03.2018</td><td>1:2,500 @ A4</td></tr><tr><td>Project No:</td><td>File No:</td></tr><tr><td>ALN510414</td><td>26</td></tr><tr><td>Dwg No:</td><td>Revision:</td></tr><tr><td>01</td><td>-</td></tr></table></div></div></div>	Drawn By:	Checked By:	JB	CR / SL / LD	Date:	Scale:	07.03.2018	1:2,500 @ A4	Project No:	File No:	ALN510414	26	Dwg No:	Revision:	01	-	Appendix A – Site Location Plan
Drawn By:	Checked By:																	
JB	CR / SL / LD																	
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07.03.2018	1:2,500 @ A4																	
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## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
George F White on behalf of Mr Manners	<p><b>INTRODUCTION</b></p> <p>George F. White (Planning and Development) have been instructed by Mr R Manners (the 'Client') to submit representations on their behalf to the Pre-Submission Consultation Draft of the Embleton Parish Neighbourhood Plan 2019 – 2036, hereafter referred to as 'the Plan'.</p> <p>These comments have considered the Plan and supporting evidence and assessed compliance against the National Planning Policy Framework (February 2019) ('NPPF') specifically paragraph 182. The comments have regard to whether the Plan meets the 'basic conditions' and other matters as set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990, applied to Neighbourhood Plans by Section 38A of the Planning and Compulsory Purchase Act 2004.</p> <p>Comments are provided in response to the content of the Plan where these are relevant to the Client's interests.</p> <p>We would like to be kept informed and notified about the progression of the Plan, further stages of consultation, amendments or making of the Plan by way of email (lauradixon@georgefwhite.co.uk). We would also like the opportunity to discuss the matters raised in this submission in further detail.</p> <p><b>BACKGROUND</b></p> <p>The main comments of this representation relate to:</p> <ul style="list-style-type: none"> <li>• <input type="checkbox"/> Amendments to the settlement boundary of Embleton</li> <li>• <input type="checkbox"/> Other relevant comments</li> </ul>	

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>Our Client has significant land holdings to the north of Embleton. These representations primarily relate to one of two sites in our Clients ownership on land to the northern edge of Embleton.</p> <p>The Sites in our Client's ownership are identified in the Strategic Housing Land Availability Assessment as</p> <ul style="list-style-type: none"> <li>• <input type="checkbox"/> <input type="checkbox"/> Site 9395 – Name: Man – 01 Land to the north east of Embleton; and</li> <li>• <input type="checkbox"/> <input type="checkbox"/> Site 9396 – Name: Man – 02 Land to the north east of Embleton.</li> </ul> <p>These representations seek the inclusion of site 9396 within the settlement boundary for Embleton.</p>	

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<div data-bbox="371 240 1319 1107">  </div> <p data-bbox="546 1161 1142 1187"><i>Figure 1: SHLAA Extract (Accessed NCC February, 2019)</i></p> <p data-bbox="360 1313 1585 1382">It should be noted that Site 0356a is subject to planning application 18/00579/FUL with the following description;</p>	<p data-bbox="1644 715 2130 895">The SHLAA is not a policy document. The housing requirement for Embleton Parish of 30 dwellings has been met and exceeded.</p>



## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>• <input type="checkbox"/> 'Erection of 5No dwellings (Amended Description 27.07.2018)'</p> <p>The site proposed for residential development and requested to be included within the settlement boundary for Embleton are considered to be of a scale and character appropriate to the settlement.</p> <p>The site would be developed as an appropriate extension to the existing village. Design and materials would be of a high quality representative of the local area. The scale of the development would be commensurate to Embleton.</p> <p>In terms of site boundaries, site 9396 seeks to infill a small parcel of land adjacent to Quarry House with access taken from the adopted Highway.</p> <p>Embleton is a sustainable settlement, located in the north east of Northumberland, close to the Northumberland Coastline. It is well connected by road via connections to the A1 to the main settlement of Alnwick to the south, and settlements of Seahouses to the north, respectively all of which offer a range of services, facilities and employment opportunities. The village is easily accessible from the A1 to the west and connected by 'B' roads. There is access to public transport with bus stops located in the village and passing the site and the main east coast railway accessed via Chathill Train Station to the north. Embleton is located in a sustainable settlement cluster, where services and facilities are shared by smaller villages to enhance and maintain the service offering.</p> <p>Services and facilities in the village include a first school, doctors, church, village hall, petrol station, play and open space, public houses, restaurants, hotel, post office and golf club. The sites submitted are located to the North and East of existing development and would form a logical extension to the village. The sites would be accessed from the main highway with an existing or improved access provided.</p> <p>Our Client can confirm that the Site, in its entirety or part are available for development, free from known constraints which would prejudice development, and can demonstrate</p>	<p>One of the key issues when re-defining the settlement boundary for Embleton, was to ensure that development did not, insofar as it was possible, encroach into the AONB. This is something that local people felt very strongly about. These sites are all within the AONB.</p> <p>It is accepted that Embleton is, to some extent, a sustainable settlement. It is also, however, very close to a range of internationally protected sites for wildlife. For this reason, it is important to ensure that the right number of houses are provided for. The Housing Requirement given for Embleton Parish is 30 dwellings. More than double that amount have already been built or are committed.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>that the Sites are suitable, available, achievable, and therefore deliverable within the Plan period.</p> <p>REPRESENTATIONS</p> <p>The Plan indicates that it has used evidence base documents from the emerging Local Plan process; however some of these documents are documents which have been superseded by the current Regulation 19 Consultation process for the Northumberland Local Plan.</p> <p>The Plan also sites Census 2010 data in Section 2. Issues and Themes, which is almost 10 years out of date and is not a true reflection of the current population, or national population projections.</p> <p>The background evidence papers state that 80 no. residential dwellings have been approved, or completed, since 1 April 2016. There is no evidence provided to state that all of the planning approvals are likely to be implemented.</p> <p>In regards to the above it is likely that some aspects of the Plan will be superseded by the emerging Northumberland Local Plan. Therefore, the Plan needs to be sufficiently flexible to respond positively and rapidly to change, to be able to provide a plan led approach to meet the objectively assessed needs of the Plan area, whilst following the approach of a presumption in favour of sustainable development.</p> <p>The Plan needs to demonstrate that it has been positively prepared and reflects the best available and up to date evidence base/s. It is considered that the Plan has not utilised the most up to date and available information.</p>	<p>It may be almost 10 years out of date, but it is the only reliable data available until the next census.</p> <p>It is reasonable to assume the majority of approvals will be implemented.</p> <p>The Plan does not need to demonstrate it is meeting OAN. It has to (if allocating land for housing) deliver the identified Housing Requirement over the Plan period. This is up to date information provided by Northumberland County Council based on their housing projections.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>Vision and Objectives</p> <p>Our Client generally supports the Vision and Objectives of the Plan. However, there is concern over Objective 4: Housing.</p> <p>The wording of Objective 4 states that ‘enough affordable and Principle Residence housing to meet the objectively assessed needs for Embleton Parish’. In reference to the above (paragraphs 3.1 – 3.4) the objectively assessed need (‘OAN’) in the Plan area is questioned based on whether the most available and up to date data to support the suggested objectively assessed need has been utilised.</p> <p>Further, the word ‘enough’ suggests a restrictive approach to planning for housing growth in the Plan area. This is not in accordance with the NPPF (paragraph 11) which states that ‘plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;’. The NPPF (paragraph 16, part b) also states that plans should be positively prepared. The use of restrictive objectives or policies prevent the Plan from being positively prepared and unlikely to be able to respond to any rapid change.</p> <p>The OAN is a minimum requirement, and is not a ceiling to residential development. The NPPF (paragraph 60) states that the OAN is for determining the minimum number of homes needed. The Northumberland SHLAA demonstrates various sites on the edge of (but outwith the proposed) settlement boundary of Christon Bank and these sites could provide for deliverable housing sites within the Plan period.</p> <p>Proposed Policy 1: Sustainable Development</p> <p>The term ‘Neighbourhood Area’ is not defined in the Plan. The referenced term should be included at the references list at the end of the Plan.</p> <p>Our Client broadly supports the principles of sustainable development; however, the restriction on major development in the Northumberland Coast AONB and Heritage</p>	<p>The reference to ‘OAN’ has been removed. The correct term is now ‘housing requirement’ which has been defined by NCC.</p> <p>It is considered that the plan has been positively prepared, in light of the constraints that exist in the Plan area. Paragraph 11 does not apply to proposals and policies that have an impact on areas identified in Footnote 6 (AONBs, protected sites)</p> <p>The term ‘Neighbourhood Area’ is reasonably self-explanatory.</p> <p>Support noted.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>Coast not is not supported. The objection is due to the wording including a restrictive element of the proposed policy. Further, it does not allow the Plan to respond to any rapid change in future.</p> <p>There has been major development in the Northumberland Coast AONB, which has been designed appropriately and has been given planning consent in line with National and Local Planning Policy, demonstrating that the AONB can accommodate major development.</p> <p>The Plan should be positively prepared and flexible enough to respond to any future change/s in line with the NPPF (paragraphs 11 and 16), and at present it restricts major development in the AONB, which might be required in the future, if there are a change of circumstances, which the plan is not equipped to be respond to.</p> <p>Major development in the AONB or Heritage Coast could be required, and if any development was designed sensitively and in the most appropriate location, it could be appropriate development. This part of the policy requires amendments, and it is suggested that it should concentrate on the sensitive design of any development in the AONB or Heritage Coast, and could be better placed in proposed policy 4.</p> <p>Proposed Policy 4: Design in New Development</p> <p>The term ‘Neighbourhood Area’ is not defined in the Plan. The referenced term should be included at the references list at the end of the Plan.</p> <p>Our Client generally supports the need for high quality, sensitive design in all types and scales of development. It is supported that the design process should be explicitly demonstrated in all applications.</p>	<p>Noted. However, the Plan is in line with national planning policy with regard to the level of protection to be afforded to AONBs.</p> <p>We are not aware of any examples, and none have been provided.</p> <p>This approach is in line with National Planning Policy. To take an alternative approach would mean the Plan would fail to meet the basic conditions.</p> <p>Support noted.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>Our Client has concerns regarding part d of the proposed policy. The concerns are that depending on the scale of development there may be no need to incorporate drainage information at planning stage. Therefore, this part of the policy requires amendments, to reflect National and Local requirements.</p> <p>Our Client has concerns over parts e and f of the proposed policy and the level of information that will be required to demonstrate these issues (light pollution and loss of light or overshadowing). Although these elements are to be considered in any planning application; however, there is no suggestion in the proposed policy or accompanying text, as currently worded, what would be considered as an acceptable or proportionate level of information to demonstrate these criteria. If these elements can be justified through appropriate design, this needs to be explicit in the Plan. It would be an unfair burden to require all planning applications in the Plan area to require sunlight and other surveys, which might not be required, and the information supplied with each application should be proportionate to each application made.</p> <p>The wording of the proposed policy should be amended to address the above concerns and ensure the required design information submitted with planning applications is proportionate to each application.</p> <p>Proposed Policy 5: Settlement Boundaries for Christon Bank and Embleton Village</p> <p>Our Client objects to the settlement boundaries as currently proposed.</p> <p>Paragraph 5.19 states that the ‘definition of settlement boundaries has involved ensuring that enough land is provided for new housing over the plan period’. The wording of the definition of settlement boundaries, as currently proposed, is restrictive in approach and not in accordance with the NPPF (paragraphs 11 and 16). Plans should be positive towards development and sufficiently flexible to change.</p> <p>Paragraph 5.22 states that the focus of the settlement boundary for Embleton is to retain the boundary already designated in the Alnwick Local Plan, and only allow for small infill</p>	<p>No change.</p> <p>Noted, but no change.</p> <p>There is no explicit requirement for sunlight surveys.</p> <p>No change.</p> <p>Noted.</p> <p>Please see earlier comments. Housing requirement has been met, and the plan does support exceptions sites and infill development.</p> <p>The settlement boundary has been made larger to</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

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	<p>sites. The Alnwick Local Plan was designated in 1997, over 20 years ago, and the settlement should be able to provide growth, as the population expands and changes. Restricting growth to a settlement boundary which was designated over 20 years ago is likely to stagnate the settlement and means that the Plan has not been prepared with the objective of achieving sustainable development, it is not positive, or aspirational and therefore not in accordance with the NPPF (paragraph 16).</p> <p>Paragraph 5.24 states that the settlement boundary for Christon Bank has been tightly drawn around the settlement apart from accommodating for a recently approved 13 no. unit residential scheme. The planning application reference for the referenced site is 16/03510/FUL. However, the settlement boundary for Christon Bank does not include the full area of the approved site and it does not adjoin the highway. The settlement boundary should include the site in line with planning permission, as at present it is incorrect. The Plan as written acknowledges that the settlement boundary for Christon Bank has been tightly drawn and therefore has not been prepared with the objective of achieving sustainable development, it is not positive, or aspirational and is also not in accordance with the NPPF (paragraph 16).</p> <p>The settlement boundaries as currently proposed are drawn tightly around the settlements of Embleton and Christon Bank on the basis that over 80 no. dwellings have commenced development or been given planning permission since 1 April 2016, and this is more than the OAN of the Plan area. There is no evidence provided within the Plan or evidence base documents to suggest that all of the 80 no. approved dwellings, in the Plan area, will be implemented and completed in the Plan period. Therefore, restricting the settlements to tightly drawn boundaries could limit other suitable and potentially required sites coming forward, if some of the permitted sites do not deliver.</p> <p>The OAN of any Plan area is ‘to determine the minimum’ number of homes needed’ (NPPF, paragraph 60). The Plan has not sought to grow the sustainable settlements but seeks to restrict residential development to a minimum, and could stifle future development of sustainable settlements.</p>	<p>accommodate development proposals at Creighton Place.</p> <p>The tight settlement boundary will contribute to sustainable development by focussing development in those areas that are most appropriate. Christon Bank is not a sustainable settlement and has already accommodated a significant amount of new development.</p> <p>See previous comments with regard to OAN.</p> <p>See previous comments with regard to OAN.</p>

# EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>There is potential throughout the Plan period for a possible change in circumstances, which could affect the OAN of the Plan area. Possible changes might include:</p> <ul style="list-style-type: none"> <li>•       □ Revised population projections;</li> <li>•       Amended housing need assessment methodology; or</li> <li>•       The potential for National and Local Planning Policy updates, which could be in contrast to the policies in the Plan.</li> </ul> <p>The Plan needs to be sufficiently flexible to be able to respond to any of these, or other, rapid changes, in line with the NPPF (paragraph 11). The settlement boundaries are tightly drawn and do not allow for any responsive or reactive changes.</p> <p>The settlement boundaries, as currently proposed, need to be reassessed to ensure further consideration is given to suitable sites, as demonstrated in the SHLAA, which could ensure sustainable growth of both Embleton and Christon Bank. It is essential that sufficient growth of both settlements continue in the right locations and to prevent settlements, which are currently sustainable, from becoming stagnated.</p> <p>The settlement boundaries for Embleton and Christon Bank can recognise the intrinsic character and beauty of the countryside in the Plan area, without the need to restrict any further development of the settlements. The Plan process should look to identify appropriate sites for development, which would guide development to the most appropriate locations to ensure that the Plan area meets the objectives of sustainable development and does not create stagnation of sustainable settlements for future generations.</p> <p>The settlement boundaries for Embleton and Christon Bank need to be amended to accommodate potential for future rapid changes and provide sustainable growth. The SHLAA demonstrates available sites, which could deliver within or beyond the Plan period and could be included within the proposed settlement boundaries.</p>	<p>Repetition of points made earlier – see earlier responses.</p>          <p>Repetition – see earlier responses.</p>



## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>The settlement boundaries do not allow for sustainable growth and require amendments.</p> <p>Proposed Policy 6: Development within Embleton Village Conservation Area</p> <p>Our Client supports the principle of well-designed development appropriate to Embleton Conservation Area; however, the wording of the policy as currently proposed requires amendments.</p> <p>The wording of the proposed policy states that any development affecting Embleton Conservation Area or its' setting will need to preserve or enhance the character or appearance of the area; however this is not in accordance with the NPPF (paragraphs 193 – 196). When considering the potential impacts of any development, which could affect a designated heritage asset, consideration needs to be given to the significance of the asset, and the degree of any harm. A proposed development could lead to enhancement, preservation or harm, harm is a scale and the scale of any harm needs to be weighed against the public benefits of any development. Therefore, the policy should be updated to reflect this approach. Not all development, which causes harm, should be refused.</p> <p>The wording of the proposed policy in regards to specific elements, which should be assessed as part of any application, is a welcome addition to the proposed policy to understand the most valuable aspects of Embleton Conservation Area and its setting and to allow Applicants to assess these features as part of any future planning applications.</p> <p>Proposed Policy 11: Affordable Housing Contributions</p> <p>Our Client suggests that this policy should be amended, and that the contributions sought for affordable housing should be requested in line with the emerging Local Plan. The wording of this policy should be updated, to reflect the Regulation 19 Consultation Document for the Northumberland Local Plan.</p>	<p>There have been some amendments to this policy, on the advice of Historic England. The policy as worded does not say that all development that causes harm will be refused.</p> <p>Support noted.</p> <p>The affordable housing contributions sought are in line with those in the emerging Local Plan.</p>




## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>Proposed Policy 12: Rural Exception Sites and Community Led Housing</p> <p>Our Client supports the principle of providing rural exception sites on the edges of settlement boundaries; however has concerns over the term small-scale, this is not defined in the NPPF or the Plan. Therefore, it is unclear on the scale of sites, which could be considered acceptable in line with the Plan. Further clarification is requested and it is suggested that the settlement boundaries are reconsidered on this basis.</p> <p>It is likely that any proposals for rural exception sites would need to include an element of market housing to facilitate the provision of affordable housing.</p> <p>The principle of allowing built development, although it should be sensitive to the existing settlements and surrounding environments, on the edge of settlement boundaries suggests that development outside of settlement boundaries would be considered acceptable in some locations. We would suggest that this is further cause to reconsider the settlement boundaries as identified in the Plan and in line with proposed policy 5.</p> <p>Proposed Policy 13: Change of Use from Holiday Use to Principle Residence Housing</p> <p>Our client supports the removal of holiday let occupancy restrictions in the Plan area; however, the need for all applications, which seek to remove occupancy conditions, to be replaced with a Principle Residence Housing occupancy condition, as defined in the Plan, does not comply with the NPPF.</p> <p>Applications for the removal of holiday let occupancy conditions, which would comply with Local and National Planning Policy, allowing an open market dwelling/s should still have the ability to remove the occupancy condition without a further condition imposed. However, those properties, which are currently subject to a holiday let occupancy restriction, but would not comply with National and Local Planning Policy for the occupancy restriction to be removed should be subject to a further occupancy condition,</p>	<p>Rural exception sites are by definition small-scale. Please see the glossary in the Plan (and the NPPF) for the definition.</p> <p>This reasoning is not clear or understood.</p> <p>There is no reference to this in the NPPF.</p> <p>Not sure how paragraph 77 suggests this approach.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>Principle Residence Housing, which seeks to reflect local needs in the Plan area and in line with NPPF (paragraph 77).</p> <p>SUMMARY</p> <p>Our Client objects the proposed settlement boundary for Embleton and suggests that the settlement boundaries policy fails to meet the basic conditions, as is required for a Neighbourhood Plan, as the plan is not in line with National Planning Policy.</p> <p>The Plan should be amended to prevent stagnated settlements for future generations. The Plan as currently proposed fails to be able to react to any rapid changes.</p> <p>Site 9396 should be included in the settlement boundary for Embleton. The site is a small scale and could provide 5 no. dwellings in a sustainable location. There is currently approved and development to the west of the site.</p>	<p>Noted. See previous comments.</p> <p>No change.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<div><div><div><div>Legend</div><div><div><div></div></div>0.273 Ha / 27,30.39 m2</div></div><div><div>N</div><div>Scale - 1:2500</div><div>0 20 40 60 80 100 m</div></div></div><div><div><div>External References</div><div>05 - Final Client Project (01) Garland, R.R. - GFN/ALN511067 - Embleton - Neighbourhood Local Plan This drawing: © George F. White LLP Contains Ordnance Survey data. © Crown copyright and database rights 2018.</div></div><div><div>GEORGE F. WHITE</div><div>Tel: 01665 603 231 Email: enquiry@georgefwhite.co.uk Web: www.georgefwhite.co.uk Address: 4-6 Market Street, Alnwick, Northumberland, NE66 1TL</div></div><div><div>Drawn By:</div><div>JB</div><div>Date:</div><div>21.02.2019</div><div>Project No:</div><div>ALN511067</div><div>Checked By:</div><div>CR / SL / LD</div><div>Scale:</div><div>1:2,500 @ A4</div><div>Dwg No:</div><div>01</div><div>Revision:</div><div>-</div></div></div></div>	

Appendix A – Site Location Plan

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
Mark Bridgeman via email	<p>I manage the Fallodon Estate, which straddles Embleton and Newton Parishes. I own and farm quite a lot of the land within the plan area, I own a number of residential and agricultural properties and employ 10 FTE (full time equivalent) on the Estate, across the various businesses which include farming, forestry, renewables, residential lettings and tourism.</p> <p>As a local landowner, I was consulted in the early stages of the Neighbourhood Plan (NP) process and gave my input on possible sites for housing, on economic development opportunities, on the environment and how it is managed and improved access.</p> <p>I am happy with much of what is in the plan, particularly around encouraging economic development, protecting the environment and the built heritage and supporting community facilities. However there are a number of elements around the housing needs and sustainable development which I would like changed and would challenge, in particular the site behind the church in Christon Bank</p> <p>1) I don't think you should have removed the site behind the Methodist Church in Christon Bank. When you recently consulted the community through the Winstone Times, 71% were in favour of the initial settlement boundaries (which included this site) and only 7% were against, with 21% making no comment. This has been an allocated site for many years. It would appear that the objective of the settlement boundaries is to stop all further development. While this may suit some people who live in the area there is clearly demand for the right type of housing (see below.)</p> <p>2) Following a favourable pre app with NCC we held a public consultation in April 2018 in the Creighton Hall on this Christon Bank site. This was at the same time as the consultation on extending Creighton Place, which has since been granted planning permission. The scheme is for 7 'Almshouse style' bungalows which will be 'Build to Rent' properties for local people as well as one self-build plot. These would be retained by the Fallodon Estate and only rented to local workers or retirees. The feedback from those that attended was overwhelmingly supportive, both verbally and in the written responses. Across a range of questions 64% were in favour of the proposal and 15% against, with 21% uncertain about specific questions.</p> <p>3) In 5.3 of the NP much weight is placed on the Housing Needs Survey to make the point that there is very little demand for affordable housing. Assuming this is accurate</p>	<p>Comments noted and support welcomed.</p> <p>The NP Steering Group received advice from NCC that to allocate such a large area of land would be likely to result in significant effects on the environment. Also, during the course of the consultation, we were informed that we had already met our housing requirement, and that to plan for significantly more in an unsustainable location was not likely to meet planning policy tests or the Basic Conditions. This large area was therefore amended, and public consultation since that time has revealed an equally high level of support for the revised settlement boundaries.</p> <p>It should be noted that the Plan does still support the delivery of</p>

# EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>this does not pick up those living on the edge of the plan area or, as it stated, those that would like to be in the plan area but can't afford it. At Brunton, a hamlet of 12 houses which is only 2 fields to the North West of the plan area, I know of two different people who have been looking for some time for local affordable housing. This is just by way of example that the demand exceeds the very narrow survey results. The success of the recent affordable housing in Embleton also highlights this point.</p> <p>4) I would like to challenge 5.25 - it is clear that the NP is designed to stop any new development. The reason given is there has been lots of housing approved in the last couple of years, which is true, but that does not mean further housing could not make a positive contribution to sustainable communities in the plan area.</p> <p>5) The whole premise of the NP and the fact that no more market housing would be supported is based on the assessment that only 65 new dwellings are required and this demand has been met. In the emerging Northumberland Local Plan 1,200 houses have been allocated across the northern area, excluding the main hubs. I would argue that if there is demand for housing that contribute to the sustainable communities, it should not be limited to 65 and could have a higher share of the 1,200 from the wider rural area. The NPPF makes clear that the number of houses in a NP should be a minimum not a ceiling. This is an area that is seeing economic growth and there is a clear demand for permanent housing. The plan is for the next 17 years, out to 2036, and drawing the settlement boundary so tightly doesn't allow any flexibility for future demand for housing in the medium term.</p> <p>6) The proposal for houses behind the church in Christon Bank, that was consulted on last April, is for small bungalows for local workers and local people in retirement who want to stay in the community. This need is very evident in the Local Plan research which highlights the need for housing for older people (6.14 on page 119) who want to remain independent and in their community and not have to move. It also explains the need for small properties on a level access for elderly people. The houses being proposed behind the Methodist church in Christon Bank will meet a clear local demand. They will also suit those at the start of their working life, looking to leave home but not able to afford the larger houses which are typically for rent in the area. I think the NP should reconsider this site on this basis and should also consider how it is accommodating the need for elderly people looking to stay in the community.</p>	<p>housing on the edge of settlements through rural exception sites.</p> <p>We accept the limitations of the HNS, but any further up to date evidence could be provided.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>I would like to make one further non-housing suggestion to feed into the draft Policy 9 Business &amp; Employment - I would encourage you to add a short section promoting improved connectivity. As we all know this is crucial in the modern world and we must all do all we can to prevent a rural vs urban divide that means our community is disadvantaged. The plan should encourage improved mobile coverage and this can be done through the NP's attitude to more masts (to help 4G) and future media apparatus which may be required for 5G in the next few years. Likewise the plan should encourage improved broadband connectivity and have a goal of getting fibre to each property during the plan period. (I am happy to help in the wording on this as I have done quite a lot of work on this nationally in my role as Deputy President of the CLA.)</p>	<p>Agree an additional policy has been incorporated to reflect need for improved telecommunications.</p>
<p>Lichfields on behalf of Mr Douglas</p>	<p>Response to Embleton Parish Neighbourhood Plan: Pre-submission Draft Consultation</p> <p>On behalf of our client, Guy Douglas, we write in response to the current consultation on the pre-submission draft (January 2019) of the Embleton Parish Neighbourhood Plan. Mr Douglas owns land to the north of Sea Lane and west of The Villas in Embleton, please see the accompanying Location Plan, and is considering options to sustainably develop the site. The site would represent infill development, is partially screened from views to the east due to the existing dwellings at The Villas, and its development for residential use would help the Plan achieve its aspirations.</p> <p>Embleton Context</p> <p>In order to ensure that Embleton is a vibrant village where local people can afford to live and where businesses can thrive, the Neighbourhood Plan needs to address an ageing population, high average house prices compared to the rest of Northumberland, and a high proportion of second homes within the Parish's housing stock.</p> <p>The 2011 Census shows 33% of residents within the village are aged 65 or over, compared to just 20% of residents being within this age across Northumberland. The Census also shows that just 24% of residents within the village are aged 29 or below, compared to 32% of residents being within this age group across the County. These</p>	<p>The settlement boundaries are defined in the Neighbourhood Plan. Defining settlement boundaries is an important planning tool to deliver sustainable development locally. Northumberland County Council wrote to all parish councils asking if they wished to define their own settlement boundary through the NP process. The settlement boundary is not the same as the Alnwick LDF as it includes land to accommodate at least 39 + 16 new dwellings on the edge of Creighton Place.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>figures show that Embleton has unsustainable demographics, an issue which the Neighbourhood Plan should seek to resolve. Our analysis of the Land Registry's Price Paid Data for 2018 shows that average house prices in Embleton are 17% higher than the average house prices across Northumberland. These higher prices will be a factor in the unsustainable demographics of the village, which the Neighbourhood Plan should also seek to resolve. The high proportion of second homes has been referred to in the Plan itself and the responses received by local residents during previous public consultation. This issue would also contribute to the unsustainable demographics of the village and higher house prices.</p> <p>Providing an appropriate scale of market and affordable homes for working age people is essential for the future of the village and the local community within the Parish.</p> <p>The Embleton Parish Neighbourhood Plan provides an opportunity for local residents and businesses to influence the future of the parish through identifying how and where new development should come forward in order to meet the needs of the Plan area. The National Planning Policy Framework (NPPF) requires emerging Plans to be prepared with the objective of contributing to the achievement of sustainable development and to be prepared positively in a way that is aspirational but deliverable (Paragraph 16). The Neighbourhood Plan should accommodate the required need for housing in the Plan area in order to achieve its aspirations of ensuring sustainable communities in the parish, whilst controlling where this growth is located and how it is brought forward. Without an additional housing allocation, the Neighbourhood Plan will exacerbate existing issues in the local housing market, such as the high house prices and the amount of second homes which reduce availability of homes for young families, which have been raised by residents in previous rounds of consultation. Without providing additional housing allocations the Plan would therefore be contrary to Paragraph 35 of the NPPF which requires Plans to be meet identified housing needs as a minimum.</p> <p>This representation highlights a number of areas where the Neighbourhood Plan, as currently drafted, is ineffective in assisting with addressing these issues and where it</p>	<p>Paragraph 35 is about preparation of Local Plans not Neighbourhood Plans. Rural exceptions site could still be delivered.</p> <p>No change to settlement boundaries</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>may exacerbate these existing problems. This representation also suggests solutions to these issues ensure that the Plan delivers on its aspirations.</p> <p>Objective 1: Sustainable Development</p> <p>Objective 1 of the Neighbourhood Plan is as follows:</p> <p>“To support development that enhances and protects the environment, supports the economy, and helps our communities become more sustainable, whilst ensuring that we protect the assets that make the Embleton Parish special, and ensure there is a positive legacy for future generations.”</p> <p>Mr Douglas broadly supports the intention of this objective, and agrees that new development can deliver a positive impact on the social, environmental and economic objectives for the Parish. However, some Policies within the Plan unjustifiably limit the Plan’s ability to provide social, environmental and economic benefits, which are set out later in this representation. Therefore, Mr Douglas considers that various policies within the Plan are not sustainable for the Parish and do not meet the provisions of Objective 1.</p> <p>Policy 1: Sustainable Development</p> <p>This Policy supports Sustainable Development within the Plan area provided that the proposals accord with a set list of criteria.</p> <p>Paragraph 2 of the NPPF states that sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.</p> <p>Paragraph 11 of the NPPF states that Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that plans should</p>	<p>This presumption does not apply to areas in footnote 6 (including AONBs).</p>



## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.</p> <p>In order to meet the basic conditions test as set out in the Town and Country Planning Act Paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended) the Neighbourhood Plan must align with the provisions of the NPPF, including the above paragraphs, whilst contributing to the achievement of sustainable development.</p> <p>Paragraph 5.1 of the Neighbourhood Plan explains that this Policy seeks to secure Principal Occupancy to help rebuild sustainable communities in the Neighbourhood Plan area, and to support the provision of affordable housing. The site to the west of The Villas would contribute to the delivery of Principal Occupancy dwellings. This is explained in greater detail later in this representation in response to Policies 5 and 10 of the Plan.</p> <p>Paragraph 5.3 of the Plan explains that a Housing Needs Survey (carried out by Community Action Northumberland who are a local charity) ‘implied’ that there was a local affordable housing need ‘in the region of’ five households. This document has not been published for scrutiny as part of the consultation process. Whilst Mr Douglas acknowledges the need for affordable housing in the Plan area and supports its provision through the Neighbourhood Plan, without publishing the evidence, the delivery of only five affordable units within the Plan area over the next 17 years cannot be justified. This fails to meet the basic tests required by a Neighbourhood Plan as it is not clear whether the delivery of five affordable homes will contribute towards sustainable development by ensuring the right type of homes are available.</p> <p>In order to address this issue, the full report from the Housing Needs Survey should be published as part of a further period of public consultation, so that the methodology and the conclusions in respect of this key element of the Plan can be effectively reviewed.</p>	<p>The plan does contribute to the achievement of sustainable development.</p> <p>The Housing Need Survey is available on the Parish Council website.</p> <p>A significant number of affordable homes have already been delivered in the Plan period.</p> <p>The Housing Needs Survey acknowledged that the sample area (i.e. the Parish) is not sufficient to form a clear picture of affordable housing needs. The</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>It is also noted that 21 respondents to the Community Consultation Event in October 2017 highlighted a lack of affordable housing, whilst also citing current house prices in the Plan area being too expensive for local young families. These issues are likely to lead to families leaving the Parish, leading to an adverse impact on the sustainability of Christon Bank and Embleton. The Neighbourhood Plan should address this issue and ensure enough of the right type of housing comes forward in the Plan period to meet the needs of its current and future residents, such as affordable housing, market housing and housing designed for older people.</p> <p>Subject to a review of the Housing Needs Survey, the site to the west of The Villas could make a significant contribution to delivering affordable homes to meet this need if it were brought forward. Potential proposals could include the provision of housing for older people which would meet the existing and future needs of the ageing population of the village.</p> <p>In terms of Sustainable Development, the Neighbourhood Plan does not reflect Embleton's designation in the emerging Local Plan as a Service Village, and the potential for sustainable development that this brings. Policy STP1 of the emerging Northumberland Plan states that Service Villages such as Embleton will provide for a proportionate level of housing and be the focus for investment in rural areas, to support the provision and retention of local retail, services and facilities. Rather than take the opportunity to encourage development which would provide these benefits to local residents and the local economy, the Plan instead seeks to restrict development.</p> <p>Policy 2: Landscape and Seascapes in the Neighbourhood Area</p> <p>This Policy requires proposals within or affecting landscape character areas, such as the views of the coast and views into and out of the Embleton Village Conservation Area, to respect the features of these landscapes. The Policy also attaches great weight to views from Embleton to the coast across the AONB, and views from the coast toward the village.</p>	<p>Steering Group therefore has relied on advice from NCC in the form of the emerging housing documents in support of the Local Plan.</p> <p>The Plan is tested against the existing Alnwick LDF Core Strategy and Local Plan. There are no identified conflicts with the emerging plan. The plan supports infill development within the settlement boundaries.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>Mr Douglas acknowledges the importance of these landscapes to the local community. The careful design of a potential future proposal for the development of the site to the west of The Villas would ensure that it would not have an adverse impact on the views set out above. The site is located between the existing residential dwellings of High Dales to the west and the dwellings at The Villas to the east, with a strong legible boundary of trees and hedgerow to the north and Sea Lane to the south. The site is located on a gentle gradient leading from the coast westward to the centre of the village, with the existing dwellings to the west being prominent when viewed from the coast. The properties at The Villas provide a visual screen when viewing the site from the east, whilst the existing dwellings along High Dales present a backdrop of urban buildings. Therefore, when viewed from the east, a carefully designed development of the site would visually blend in with the existing built form at the eastern edge of the village. Because of the existing buildings at High Dales and the gradient of the land to the east of them, the site would not be seen from the centre of the village when looking at the coast. The gradient of the land would also ensure that the existing views from the properties at High Dales would not be restricted should the site be developed using a carefully designed scheme. It is notable that the Northumberland Coast Area of Outstanding Natural Beauty Landscape Sensitivity and Character Study (2013) identifies Mr Douglas' land interest as an area "less sensitive to new housing development" (Figure 16). Figure 16 shows that no other land around the village was also identified as being less sensitive.</p> <p>Mr Douglas therefore supports the purpose of this Policy, and highlights that his site can deliver carefully designed residential development whilst complying with this Policy.</p> <p>Policy 3: Habitats and Species</p> <p>This Policy sets out the requirements of proposals which affect designated European Sites for protected habitats and species. The Policy also supports proposals that support the biodiversity and community value of Embleton Village Quarry.</p>	<p>Noted, however this site, in the AONB is considered to be highly sensitive in landscape terms. We understand why the objector considers otherwise, as he owns the site and would like to develop it. However, the overwhelming response from local residents was, that this part of the AONB is sensitive, and an important element to the setting of the Embleton Conservation Area, and should not be included in the settlement boundary,</p> <p>This is acknowledged; the report was prepared with a view to potential housing allocations that never took place. Given the scale of delivery, there is no need to impact on the AONB, as there is no housing requirement left to deliver.</p> <p>Noted.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>Mr Douglas agrees with the purpose of this Policy. If the above-mentioned site were to be brought forward for development, a potential scheme would not adversely affect protected species or habitats, and provides an opportunity to deliver ecological enhancements on or off-site. There is scope that, should there be an evidenced need, a potential scheme could lead to the provision of a financial contribution to provide ecological enhancements to the Quarry through a Section 106 agreement if planning consent for a residential scheme was granted.</p> <p>Mr Douglas therefore supports the purpose of this Policy.</p> <p>Policy 4: Design in New Development</p> <p>This Policy requires all new development in the Plan area to incorporate high quality design whilst demonstrating how the proposal meets a set list of criteria.</p> <p>Mr Douglas acknowledges the importance of design to conserve and where an opportunity exists improve the character of the built form of Embleton.</p> <p>However, it is noted that criteria e) of the Policy requires measures to be incorporated which limit the impact of light pollution. It is noted that in respect of impact on amenity, this will already be covered by other Policies in the Local Plan which would sit alongside this Neighbourhood Plan in the Development Plan. It is noted that Policy 3 of the Neighbourhood Plan would ensure that any adverse impact on protected habitats and species would be controlled.</p> <p>The third element of criteria e) is to limit the impact on the ‘intrinsically dark skies’ within the Plan area. Paragraph 5.16 of the Plan refers to the Northumberland International Dark Sky Park Lighting Management Plan published in November 2015. It is noted that the Dark Sky Park does not extend to the Plan area. Because of this its provisions cannot be a material consideration when determining applications within the Plan area. Therefore, the Neighbourhood Plan should not refer to this document as justification for</p>	<p></p> <p>Noted.</p> <p></p> <p>Noted.</p> <p>Noted, however, part e) will remain.</p> <p>Although the Dark Sky Park does not include this area, dark skies are nevertheless highly valued by residents, and are a potential source of economic benefits.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

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	<p>criteria e) of Policy 4, and as such criteria e) becomes redundant as its purpose is already covered by other Policies in the Development Plan.</p> <p>Accordingly, this Policy should be amended to remove criteria e), as it is not justified. Aside from criteria e), Mr Douglas broadly supports the purpose of this Policy.</p> <p>Notwithstanding the above, any future proposals to development the above-mentioned site would be mindful of any impact on nearby dwellings, habitat or species, in accordance with other Policies within this Neighbourhood Plan and the relevant Local Plan.</p> <p>Objective 2: Sense of Place</p> <p>Objective 2 of the Neighbourhood Plan is as follows:          “To protect heritage assets and enhance local green spaces, landscapes and views that contribute to the distinct look and feel of Embleton Parish.”          Mr Douglas broadly supports the intention of this objective, and agrees that new development should seek to protect the valued built and natural environment within the Parish.</p> <p>Policy 5: Settlement Boundaries for Christon Bank and Embleton</p> <p>This Policy refers to the defined Settlement Boundaries shown on the Proposal Maps for Christon Bank and Embleton.</p> <p>The Policy states that “All land outside these settlement boundaries is considered to be ‘open countryside’ for planning purposes.” The Policy also states that outside of the settlement boundaries, development will be restricted to a set list of types of development. Mr Douglas does not support this policy which is at odds with the NPPF, is restrictive and does not allow flexibility to adapt to change which is a core requirement of plan making as set out at NPPF paragraph 11.</p>	<p>No change.</p> <p>Noted.</p> <p>Noted.</p> <p>Please see previous references to the settlement boundary.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>The NPPF promotes a more flexible approach to settlement growth, setting out at Paragraph 16 that: “Plans should:</p> <ul style="list-style-type: none"> <li>a) be prepared with the objective of contributing to the achievement of sustainable development;</li> <li>b) be prepared positively, in a way that is aspirational but deliverable; [...]</li> </ul> <p>Whilst the NPPF expects emerging Plans to identify land where development would be inappropriate, and does not explicitly preclude the inclusion of development boundaries, it does not specify that emerging Plans define settlement boundaries and does not require Plans to preclude development at the edge of a settlement. Rather, the NPPF simply supports sustainable development. Paragraph 16 as set out above clearly shows this. Consequently, Mr Douglas considers the Settlement Boundary policy should be removed from the Neighbourhood Plan. Other Policies and Designations within the Development Plan will ensure that development only takes place in appropriate and sustainable locations.</p> <p>Should a Settlement Boundary remain, Mr Douglas has considerable concerns with the proposed extent of the Settlement Boundary for Embleton, which has been tightly drawn around the existing built form of the village, excluding some existing built form.</p> <p>As detailed above, the Neighbourhood Plan must align with the Local Plan in order to be found sound. The Local Plan does not include a Settlement Boundary policy for Embleton. Table 4.1 of the emerging Northumberland Local Plan acknowledges Embleton as a Service Village. Policy STP1 of the emerging Northumberland Plan states that Service Villages such as Embleton will provide for a proportionate level of housing and be the focus for investment in rural areas, to support the provision and retention of local retail, services and facilities. In order for the Neighbourhood Plan to align with the emerging Local Plan, it will need to accommodate for a proportionate level of housing, which would also support the achievement of Objective 1 of the Neighbourhood Plan.</p> <p>The drafted Settlement Boundary for Embleton is exactly the same as the boundary in the Alnwick District Local Plan, adopted in 1997, some 22 years ago; with the evidence</p>	<p>Rural exceptions sites are supported on the edge of settlements.</p> <p>Noted.</p> <p>This does not mean that a new settlement boundary cannot be defined. That is part of the purpose of Neighbourhood Planning.</p> <p>The settlement boundaries allow for a proportionate amount of</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>base that underpinned it even older. This boundary was not saved by the Secretary of State in 2007, as Policy H3 of the Plan was found to not align with the then-emerging Alnwick Core Strategy and National Policy. The extent of the boundaries across the district, including Embleton's, were based on out-of-date evidence, so it cannot be appropriate to use the same boundary in the Neighbourhood Plan. It is a fundamentally flawed approach for a Neighbourhood Plan that seeks to shape the development of an area to 2036 to include such a restrictive policy that is based on evidence that over a decade ago was found to be out-of-date by the Secretary of State. This demonstrates that the Neighbourhood Plan does not pass the basic conditions as it does not contribute to sustainable development nor conform with the draft Northumberland Local Plan.</p> <p>The drafted Settlement Boundary for Embleton excludes Mr Douglas' land, as well as the existing houses 'The Villas' which were built around 1910. They are located very close to the central points in the village - namely the two pubs and the hotel, as well as the remaining shop / post office and the school. The Villas are therefore an intrinsic part of the village, and, whilst Mr Douglas does not support a Settlement Boundary being proposed through the Neighbourhood Plan, should the Parish Council continue to pursue a Settlement Boundary then Mr Douglas' site and The Villas should be encompassed within it. There is no evidence to demonstrate why either should be excluded, rather the land clearly forms part of Embleton, incorporating dwellings that have been in situ since before many of the buildings that are included within the boundary. This amendment would give the Neighbourhood Plan some flexibility to accommodate sustainable development during the Plan period, in line with Objective 1 and Paragraph 16 of the NPPF.</p> <p>Mr Douglas' site is also the most logical location to extend the boundary as development of the site would constitute infill between the existing dwellings at High Dales to the west and The Villas to the east. It is noted that during the Consultation Event in October 2017, 10 respondents raised concerns regarding Christon Bank and Embleton merging. It is noted that recent an application for housing to the west of Station Road was refused by the County Council on 22 November 2018 for the adverse impact on landscape and being an unacceptable incursion into the open countryside<sup>2</sup>. The potential future</p>	<p>housing to come forward over the Plan period. They are supported by Northumberland County Council who have provided the housing requirement for the Plan period, which has been met (more than two times over). Noted, but we do not agree. The plan is positive about encouraging the right kind of development in the right places.</p> <p>Noted. However, there are many areas that are close to the pub and other services. The landscape constraints are such that this site is not appropriate for new development at this stage.</p> <p>Noted, however, we do not agree.</p>



## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>development of Mr Douglas’ site to the west of the Villas would not have an unacceptable incursion into the open countryside, and would be a logical inclusion within the built extent of Embleton in order to ensure the sustainability of the village and the wider Plan area.</p> <p>Mr Douglas therefore strongly objects to the currently drafted settlement boundary to which this Policy relates, as they are not justified, are not compliant with National Policy, and contradict Objective 1 of the Neighbourhood Plan. The removal of this policy or the inclusion of the The Villas and the land to the west of The Villas within the Settlement Boundary of Embleton would resolve these issues.</p> <p>Objective 3: The Local Economy</p> <p>Objective 3 of the Neighbourhood Plan is as follows:</p> <p>“To support, encourage and protect local businesses and key facilities that contribute positively to the rural charm and characteristics of Embleton Parish so that it can thrive as a sustainable community.”</p> <p>Mr Douglas broadly supports the intention of this objective, and agrees that the Plan should seek to support existing businesses and facilities and encourage new businesses and facilities within the Parish.</p> <p>2 Northumberland planning reference: 18/01014/FUL</p> <p>However, as set out earlier in this representation, some Policies within the Plan unjustifiably limit the Plan’s ability to effectively support and encourage business and facilities, as the Plan restricts development which would help the Parish become more economically and socially sustainable. The Plan looks to restrict rather than provide opportunities for sustainable development which would provide local employment, delivery of infrastructure and provision of tourist facilities.</p>	<p>Noted.</p> <p>Noted</p> <p>Noted.</p>



## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>Objective 4: Housing</p> <p>Objective 4 of the Neighbourhood Plan is as follows:</p> <p>“To support enough affordable and Principal Residence housing to meet the objectively assessed needs for the Parish. Any future housing will be of high quality design and environmentally sensitive and sympathetic to the historic landscape and natural surroundings.”</p> <p>Mr Douglas acknowledges the current issues of second home ownership in the Parish, along with the high house prices within the Parish relative to the rest of Northumberland.</p> <p>However, the Plan does not have the flexibility to provide for this need through the whole of the Plan period, and the prevention of the delivery of homes would lead to the current issues being exacerbated.</p> <p>Policy 12: Rural Exception sites and Community-led Housing</p> <p>This Policy sets out criteria which small-scale proposals for affordable housing on the edge of the settlement boundaries of Christon Bank and Embleton would need to meet.</p> <p>Whilst these criteria are considered effective, Mr Douglas raises concerns with the evidence base behind the Policy. Paragraph 5.47 of the Plan states the following:</p> <p>“Although the Housing Needs Survey carried out in June 2018 did not reveal a significant local housing need, there was nevertheless some affordable local need identified (in the region of 5 households).”</p> <p>As previously covered in this representation, Paragraph 5.3 of the Plan explains that the Housing Needs Survey was carried out by Community Action Northumberland who are a local charity. This document has not been published for scrutiny as part of the consultation process. Whilst Mr Douglas acknowledges the need for the affordable</p>	<p>Noted – see previous comments.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>housing in the Plan area and supports its provision though the Neighbourhood Plan, it is considered that the outcomes of Survey are not definitive enough to be used as justification to plan for the delivery of ‘in the region of’ five affordable units within the Plan area. Because this crucial evidence has not been published, the methodology to come to this vague conclusion cannot be scrutinised, therefore it is also considered that the conclusion of the Survey is not based on proportionate or robust evidence and the Plan-making process had not accorded with Paragraph 35 of the NPPF.</p> <p>In order to address this issue, the full report from the Housing Needs Survey should be published as part of a public consultation, so that the exact conclusions on this key element of the Plan can be effectively interpreted.</p> <p>Should an exact affordable housing need be established, the promoted site to the west of The Villas would help deliver this need.</p> <p>Objective 5: Community Facilities</p> <p>Objective 5 of the Neighbourhood Plan is as follows:</p> <p>“To protect, improve and, as appropriate, develop, year-round community and recreational facilities for the benefit of residents and visitors alike.”</p> <p>Mr Douglas broadly supports the intention of this objective, and agrees that the Plan should seek to support existing community and recreational facilities for the benefit of residents and tourists within the Parish.</p> <p>However, as set out earlier in this representation, some Policies within the Plan unjustifiably restrict development, which in turn would prevent the effectiveness of this Objective as these facilities require a ‘critical mass’ of permanent residents to sustain</p>	<p>See earlier comments on this matter.</p> <p>The Housing Needs Survey was available on the Parish Council website. It has not, in fact, materially altered any proposals in the plan, as it was found to be inconclusive, due to the small area covered (i.e. the Parish).</p> <p>Noted.</p>


## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>them. By preventing the delivery of housing in the Plan area, the Plan in fact endangers the viability of these facilities rather than protect them.</p> <p>Summary</p> <p>Mr Douglas welcomes the opportunity to comment on the Embleton Neighbourhood Plan, however he has a number of significant concerns with the Plan as currently drafted. These are set out within this letter and summarised below:</p> <ol style="list-style-type: none"> <li>1. 1 The Housing Survey which forms part of the Plan needs to be published as part of a public consultation period, so that the methodology of this crucial document can be scrutinised and its conclusions can be interpreted when reading the relevant Policies within the Plan.</li> <li>2. 2 The Settlement Boundaries of Christon Bank and Embleton are not justified and should be removed. If a Settlement Boundary policy is to be retained, this should not be based on an out-of-date Policy in the Alnwick District Local Plan and should be amended to allow for flexibility to meet housing need through the full Plan period.</li> <li>3. 3 Policy 4 needs be amended to remove criteria e), as its reference to Northumberland Dark Sky Park guidance is not justified and is therefore contrary to Paragraph 35 of the NPPF, whilst the remaining elements of the criterion are already covered by other Policies in the Development Plan, making the Policy redundant and therefore in conflict with Paragraph 16(f) of the NPPF.</li> </ol> <p>Mr Douglas' land to the west of The Villas could provide an excellent opportunity to meet the Parish's Principal Occupancy Dwelling need, the need for housing for older people and the affordable housing need during the Plan period, should it be brought forward for development in the future. Embleton requires its settlement boundary to be removed or amended to include a site on its periphery to ensure the Plan is flexible enough to provide sustainable development over the Plan period. Mr Douglas' site to the west of</p>	<p>Noted.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	The Villas represents the most logical location to be developed for residential use during the Plan period.	

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
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## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>Yours sincerely</p> <p>Michael Hepburn</p> <p>Senior Director</p> <p>Copy Guy Douglas</p>	
<p>WYG on behalf of unnamed client in Christon Bank</p>	<div data-bbox="353 608 824 1054" data-label="Image"> </div> <p>Summary (extracts from full document)</p> <p>The NP does not allocate any sites for housing within Christon Bank, considering that the settlement boundary incorporating a recent permission for 13 dwellings on unallocated land is sufficient to meet all identified need across the plan period. This tightly drawn settlement boundary presents very limited scope for development within the settlement boundary and for future expansion.</p> <p>The results of the Vision and Objectives held in May/June 2018 found that 71.4% of the respondents ‘strongly agreed/agreed’ with the proposed settlement boundary delineated on the map contained within the Vision and Objectives consultation. However, despite the high levels of public support for the proposed settlement boundary and the NP Steering Group agreeing to adopt the proposed settlement boundary, the map that has been produced for the Draft Plan consultation (January 2019) has been changed and now excludes our clients land from within the Settlement boundary.</p> <p>The NP acknowledges that the emerging Local Plan for Northumberland has carried out an assessment of the indicative housing requirements for all designated Neighbourhood Plan Areas. The requirement provided by NCC for Embleton Parish is for 65 dwellings over the 20-year plan period (2016 – 2036). However, it also considers that this housing</p>	<p>The NP Steering Group received advice from NCC that to allocate such a large area of land would be likely to result in significant effects on the environment. Also, during the course of the consultation, we were informed that we had already met our housing requirement, and that to plan for significantly more in an unsustainable location was not likely to meet planning policy tests or the Basic Conditions. This large area was therefore amended, and public consultation since that time has revealed an equally high level of support for the revised settlement boundaries.</p> <p>There are high levels of support for the revised settlement boundary.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

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	<p>allocation has been met, and exceeded, resulting in overprovision of housing in the Plan area, conceding that a proportion of this housing has been sold for second homes. It is pertinent to note that the housing requirement is a target figure and not a ceiling figure. This means that sites that represent sustainable development can still come forward for development and be supported by the LPA.</p> <p>Please click here to view the full document: <a href="#">Wyg.pdf</a></p>	
<p>Diocese of Newcastle Upon Tyne (submitted by R&amp;K Wood Planning)</p>	<p>I write with reference to the above and further to the consultation being undertaken on the pre-submission version of the Embleton Parish Neighbourhood Plan. R&amp;K Wood Planning LLP have been instructed by the Diocese of Newcastle upon Tyne to review the draft plan and submit comments on their behalf. We are submitting comments on behalf of the Diocese with reference to their land interest within the village of Embleton and specifically with regard to their land holding at the Glebe field located centrally within the village. In making this submission we will provide both general comments and detailed comments on two particular aspects of the plan, which we feel cannot be supported as proposed, due to their implications in relation to the Diocese aspirations and intentions for their land. The first of these in relation to Policy 7 - Local Green Spaces and the inclusion of the Glebe field (LGS5 under this policy). The second is the introduction under Policy 10 of a principle residents' restriction which would be applied to all new residential development. On both these issues we feel it is necessary to object to the plan as currently proposed.</p> <p>As a context for our comments on the two particular policies referred to above, we consider it useful to briefly outline the details of our client's land and how we consider this sits in the general content and objectives of the draft plan and the stated objectives. The first point which we would make in relation to the plan and the question of housing within the village can be made with reference to paragraph 2.5 of the plan under the heading of Population and Housing. It is noted in paragraph 2.5 that reference is made to a housing requirement during the plan period, having been calculated as 65 dwellings. Paragraph 2.6 goes on to state that this housing allocation has already been met with what is referred to as an overprovision of housing resulting. We consider it is important to highlight that any housing figures in relation to housing provision must always be</p>	<p>Noted. The housing requirement has now been reduced to 30. The Parish Council are aware that this is a minimum figure, and have</p>



## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

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	<p>considered as a minimum and not a maximum. This is clearly established at both national and local level and is consistently highlighted by decision makers. We would invite the Parish Neighbourhood Plan to review many decisions made by Northumberland County Council in which this position has been reaffirmed recently. In this context, it must therefore be noted and adopted within the Neighbourhood Plan that the fact that the required housing provision has already been met should not and cannot be prejudicial to the potential for other new housing to come forward. We have a concern that the plan, as prepared, which flows from this stated position, reflects what appears to be a policy structure which proactively restricts any further new residential development, other than affordable housing on exception sites. We do not consider that this is inappropriate or sustainable context in which the other relevant policies within the plan are framed and we would submit that the plan must acknowledge that any housing provision figures for the parish as calculated by NCC on behalf of the parish are a minimum not a maximum.</p> <p>It is in this context going forward that the Diocese wishes to bring forward development proposals for their land within the village at the Glebe field. This site is centrally located within the village and has an area of approximately 0.4 hectares. Significantly, it represents one of the few opportunities for the delivery of development on a genuine infill site within the village, being bounded on all four sides by existing built development. We consider therefore the site provides a significant opportunity, no longer available elsewhere in the village, for the development of new housing in a location which is both sustainable, accessible and deliverable without resulting in encroachment beyond any proposed settlement boundaries or areas of clearly defined open countryside. On this basis, work is ongoing in relation to the preparation and submission of an application for the development of this site. To illustrate what may be brought forward indicative drawings showing the type of layout and facades that could be delivered are submitted within this letter. Whilst illustrative at this stage these shown the site has the ability to deliver a scheme of high-quality design which is environmentally sensitive and sympathetic to its surroundings in complete compliance with objective 4 of the draft plan. We further consider that the site has the ability to bring forward a different form of smaller scale housing within the village which has the ability to meet a known demand</p>	<p>delivered, and will be delivering, well in excess of this figure over the Plan period.</p> <p>The Plan supports infill development within the settlement boundaries and there are sites available. We do not agree with this point.</p> <p>There are other opportunities for infill, most notably at the Quarry Houses.</p> <p>Noted.</p>



# EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>for smaller high-quality housing capable of being occupied by either first time buyers or people downsizing from larger properties within the village. This form of housing has an important role in not just meeting this demand but also allowing existing large housing stock to be brought to the market of a form which may potentially be suitable for expanding local families. In this context we consider that this site should actually be allocated within the Neighbourhood Plan for housing in order to proactively facilitate its delivery. We would therefore request that in reviewing our consultation submission on the Draft Neighbourhood Plan that consideration be given to modification of the plan in order to include the allocation of our client's land in these terms.</p> <p>Below we set out our concerns in relation to the two policies referred to above which we consider at present demonstrate that the plan is not sound and that aspects of the policies proposed are not sustainable or appropriate. Going forward we would hope that the Neighbourhood Plan group would recognise the issues which we outline and would seek to proactively work with ourselves and other stakeholders to address these matters.</p> <p>Policy 7 - Local Green Spaces</p> <p>With reference to policy 7, we note that under policy 7 it is proposed that our clients land at the Glebe field, adjacent to Embleton village church, ref LGS5 is proposed as local green space. The boundary of this local green space as proposed is confirmed also on inset policy map 2 which forms part of the pre-submission plan. On behalf of</p> <p>the diocese we must object in the strongest terms to this proposed local green space. We do not consider that there is a necessity for this local green space, and further it is not considered that its proposed designation is consistent with the requirements of national policy and the tests that this puts in place. We must also highlight that the proposed designation is also not consistent with existing development plan policy and also emerging development plan policy as set out within the pre-submission draft of the</p>	<p>Noted.</p> <p>Noted. However, the Local Green Space designation is not based on land owner agreement. The Diocese were consulted and notified of the designation.</p>

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	<p>Northumberland Local Plan. We will now set out in more detail the reasons for this conclusion.</p> <p>In relation to national policy contained within the National Planning Policy Framework (NPPF) it is acknowledged that paragraph 99 and 100 provides local communities with the opportunity to identify and protect areas of green space. Paragraph 99 of the NPPF advises that designated land as local green space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Paragraph 100 details that local green space designation should only be used where the green space is a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land.</p> <p>In considering the content of the NPPF, it is also necessary to have full regard to the accompanying guidance contained within National Planning Guidance and in particular the guidance on Open Space, Sports and Recreation Facilities, Public Rights Of Way and Local Green Space. This guidance provides further detail to the content of the NPPF and should be referred to when consideration is being given to any new local green space designation. When considering any designation paragraph 5 ref ID:37/0005/20140306 prescribes that <i>local green space designation is a way to provide special protection against development of green areas of particular importance to local communities</i>. Paragraph 7 ID:37/007/20140306 goes on to clarify how local space designations relate to development. The guidance states that local green space is required to be considered with local planning for sustainable development and that plans must identify sufficient land in suitable locations to meet identified development needs. The paragraph in particular states that local green space designation should not be used in a way that undermines this aim of plan making. On the question of whether all communities can benefit from local green space, paragraph 9 ID:37/009/2014036 advises that <i>local green spaces may be designated where those spaces are</i></p>	<p>The site itself clearly meets the tests set out in the NPPF. It is strongly valued in the local community as a green space in the conservation area. It has known archaeological interest and has a historic function in the village.</p> <p>.</p> <p>Additional evidence to support the designation of the Glebe as a Local Green Space has been provided to accompany the submission version of the Plan.</p> <p>The space is important within the village for tranquillity and provides an important sense of separation between the old and the new. It is identified as an important part of the character of the Conservation Area.</p>

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	<p><i>demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city.</i></p> <p>On the question of what types of green area can be identified as local green space, paragraph 13 ref ID:37/013/20140306 is of particular value. The paragraph advises that the green area will need to meet the criteria set out in paragraph 100 of the NPPF and further states that whether to designate land is a matter for local discretion. The paragraph provides examples however, for when such a designation may be appropriate and it states <i>for example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.</i> On this advice we would highlight in particular the tense in which these examples are provided, as this is particularly important with reference to the proposed designation of our client's land. From the examples provided it is clear that the justification that may be cited, as provided as examples, are all in the present tense i.e. it refers to examples where sports pavilions, boating lakes or structures such as war memorials are located or spaces that provide a tranquil oasis. There is no reference whatsoever to land that may have the potential to achieve these aims in the future. It is clear therefore from this guidance that the expectation is that any green space designation will be justified on the basis of existing benefits that accrue from this land and not future aspirations for a parcel of land. We will refer to this point again with reference to the evidence base for the Neighbourhood Plan.</p> <p>Paragraph 15 ref ID:37/015/20140306 addresses the question of how large local green space can be. Although largely concerned with the question of whether extensive tracks of land can be designated as local green space, it is nevertheless relevant to note the content of this paragraph and particularly the warning that it includes that <i>designations should not be proposed as a 'back door' way to try to achieve what would amount to a new area of green belt by another name.</i> We do consider with reference to the extent of local green space proposed within the Neighbourhood Plan that this warning is relevant to consideration of the Plan as currently proposed.</p>	<p>Noted, and this point is not disputed.</p> <p>We do not agree with this statement. The community in Embleton value this space for many reasons.</p>

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	<p>With reference to national guidance and particularly the question of public access which is relevant to the proposals for our client's land, paragraph 17 ref ID:37/017/20140306 provides guidance on this question. The guidance states that <i>some areas that may be considered for designation as local green space may already have largely unrestricted public access, though even in places like parks there may be some restrictions. However, other land could be considered for designation even if there is no public access (e.g. green areas which are valued because of their wildlife, historic significance and/or beauty)</i>. This guidance is again of particular relevance to consideration of the proposed Embleton Local Green Space designations, as again it is clear from this guidance that the criteria for local green space designation is again framed solely within the present tense. Perhaps of more relevance however is that the guidance clarifies that where public access is not available at present this does not necessarily prejudice local green space being designated however, it provides examples which are quite specific in relation to areas of value in relation to their wildlife, historic significance and/or beauty. As will be referred to subsequently, it is clear from the Local Green Space assessment carried out as part of the Neighbourhood Plan preparation that our client's land is not viewed as providing a contribution in these terms. Finally, with reference to paragraph 17 it can be noted that additional guidance is provided on the actual issue of access and land ownership. The guidance states <i>designation does not in itself confer any rights of public access over what exists at present. Any additional access would be a matter for separate negotiation with land owners, whose legal rights must be respected</i>. This point is particularly important where a local green space is being sought to be designated on the basis of a recreational justification. It is clear from the guidance that a local green space based around one access use does not confer any rights of access over private land where public access does not already exist. This is particularly relevant in this case where, as will be referred to subsequently, it is clear that the neighbourhood plan seeks to designate our clients land on the basis of recreational value. This is notwithstanding the fact that at present there is no recreational use of the land and at no point have our clients granted public access to the land or been approached as a stakeholder within the village about public access to their land.</p>	<p>We acknowledge that the site does not have public access. However, this does not mean that the site is not suitable for its allocation as LGS.</p>

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	<p>This therefore sets out the context of policy at a national level in which any local green space designation must be considered.</p> <p>On this matter it is also informative to look at local plan policy and in this respect the content of the Alnwick District Wide Local Plan 1997 and the Alnwick District Local Development Framework Core Strategy Development Plan Document 2007 must also be referred to. In particular with reference to the adopted local plan, it can be noted that our client's land forms part of a larger site allocated for residential development under the terms of policy H3 of the Local Plan. It is clear therefore that there has always been an expectation that this land would be capable of providing residential development within the centre of the village. Within these plans it has not been the case that the land has ever been proposed as any form of local green space or open public space. This situation is also present within the emerging plan for Northumberland. The Publication Draft Local Plan which was published for consultation on 30<sup>th</sup> January 2019 does not designate our client's land as protected open space under policy INF5. It may be noted however that the local plan does include large tracks of land to the north east and south east of the village within this policy designation and does also include the church and surrounding church yard within this designation. It can be noted that the emerging plan indeed does contain 3 of the areas proposed as local green space within its protected open space policy. We therefore consider that the neighbourhood plan is not consistent with the emerging County Plan in terms of its approach to the protection of open space.</p> <p>Finally, with reference to current policy and evidence base related to the Northumberland Plan it is also useful to make reference to the published Strategic Housing Land Availability Assessment 2018 (SHLAA). Within the latest version of the SHLAA it can be noted that our client's land is identified as suitable for development with the potential to deliver housing within a 6 to 10-year period. Whilst clearly not a planning policy document it is nevertheless an important part of the evidence base within any plan preparation. The continued acknowledgement of this land as a suitable site for residential development also remains consistent with the content of the previous Alnwick District Local Plans. It can be noted therefore that there is in this context an</p>	<p>This policy was not identified as a strategic policy by NCC in the list of strategic policies against which the Plan must be tested to ensure it meets the basic conditions.</p> <p>The SHLAA is not a policy document.</p>

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	<p>inconsistency with both adopted and emerging local plans and their evidence base in respect of the proposal to designate this land as local green space.</p> <p>It is necessary now in looking at the proposed allocation to also examine the published justification for the designation as set out within the neighbourhood plan document. In this respect, it is relevant to examine the local green space assessment that has been carried out and which is published as Appendix C to the Neighbourhood Plan as part of the evidence base in support of its preparation. The information on the assessment of the Glebe land is contained within the published table. Within the published table there are a number of particularly relevant comments which we would highlight. In relation to assessment 2.3 and the question of whether the space feels local in character with a physical, visual and social connection with the area, the assessment concludes <i>the development of Dovecote Close has established an enclosed area which is central to potential community use. There is access from the B1339 which would allow maintenance for use by local community groups.</i> We highlight this point because again this is particularly important in showing that the assessment of this site and its proposed designation is based on a future aspirational use. This is evidenced by the reference to a <i>potential community use</i> and reference to the fact that access <i>would allow</i> i.e. in the future. Assessment 2.4 identifies that the site is in close proximity to the community it serves, and we acknowledge that this is undoubtedly correct and indeed is a further indicator that this is a centrally located, accessible and sustainable development site. Section 2.5 then addresses the NPPF question of whether this space is demonstrably special or holds a particular significance to the local community. On this question, the assessment concludes that <i>the church and associated community groups meeting in the village are central to community cohesion. A developed outdoor space <b>would</b> offer a wider range of social casual opportunities and/or meet the <b>horticultural ambitions</b> expressed by community consultation (allotments)</i> (our emphasis). From this assessment it is clear again that the assessment under Section 2.5 is based on aspirations for future use of the site, this is evidenced by reference to the highlighted text of <i>would</i> and <i>ambitions</i>. Both of these confirm that the Neighbourhood Plan is seeking to argue that this land is demonstrably special on the basis of what it may be in the future,</p>	<p>We note that the designation of this LGS does not confer any rights of access in the future. The community's aspirations are what they are, but they were not put forward as reasons for designating the LGS.</p> <p>The LGS meets the tests set out in the NPPF. It is valued for its historic interest in the centre of the conservation area (with known archaeology), for its role as an open space in the conservation area (and this is referred to in the Conservation Area policy), for its biodiversity value, and for its role as providing a tranquil setting to historic buildings in the village.</p>



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	<p>not what it is now. This, as highlighted with reference to national policy and guidance is not consistent with the tense in which they stipulate that assessments are carried out.</p> <p>With reference to the question of whether the land is demonstrably special to the local community, Section 3.1 addresses the question of whether this is present on the basis of the site's beauty. On this point the conclusion is clear and the evidence document provides the answer of <i>no</i>, that it is not of importance on the basis of beauty. On the question of historic significance, section 3.2 refers to the answer provided in relation to 3.1 i.e. no. Again therefore, the conclusion is that the site has no historic significance. Section 3.3 addresses the question of recreational value and on this point the assessment concludes that <i>of particular value because of the <b>future</b> potential for community recreational development. This has been identified as an opportunity for development during NP consultation.</i> (our emphasis). On this assessment there are two points which we would wish to highlight. It is clear again that in relation to the justification for this proposed designation, this is being promoted on the basis of future potential community use and not existing value to the community. We must conclude again with reference to the national guidance that this is not consistent with the assessments which are required to be undertaken and the thresholds which must be reached with reference to the designation of local green space. It is quite clear with reference to the extracts provided and paragraph 100 of the NPPF that land proposed as local green space must hold (current tense) demonstrable significance to the local community in order for it to be designated as local green space. It is clear that our clients land does not <b>hold</b> this demonstrable significance at the present time. Future aspirations are not sufficient to justify designation as local green space.</p> <p>With reference to section 3.3 we also note that a statement is made that consultation on the neighbourhood plan identified an aspiration of this type for the land. We note this reference but cannot find, having reviewed the published consultation responses on the neighbourhood plan, any direct or indirect reference to our client's land being sought for this purpose. We must therefore question this reference to consultation having identified this demand for our client's land for this purpose?</p>	<p>We accept that future use is not a reason for designation.</p>

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	<p>Sections 3.4 and 3.5 of the assessment address the questions of whether the space is valuable and significant with reference to tranquillity and wildlife and on both of these points the conclusion is no that it is not.</p> <p>Notwithstanding the matters raised above, it is noted from section 4 on the conclusion to this assessment that the land is viewed as space suitable for a local green space designation. For obvious reasons, as set out above, we must question this conclusion. It is also noted with reference to section 4.4 that it is confirmed that no approach to the land owner i.e. the Diocese of Newcastle, has been made. We must therefore in this context also question how a justification for designation of this site as local green space on the basis of future community access can be promoted, when no approach has even been made to the land owners?</p> <p>On the basis of the published local green space assessment, it can be identified that the justification for local green space designation of our clients land is solely on the basis of what is contended to be its recreational value but more importantly on the basis of what is considered to be its recreational value in the future based on aspirations for community use. Whilst we acknowledge that such future uses and aspirations maybe desirable and valuable, with reference to the local green space designation proposed, we do not consider that this is a valid or sound justification for its designation. Most importantly it can clearly be identified with reference to national policy and national guidance that this form of justification is not consistent with the criteria which must be met in order to justify a local green space designation. The threshold for local green space designation is deliberately set at a high level in order to avoid situations as outlined in national policy, where this type of designation is being used as a back-door approach to deliver what is effectively a green belt designation. In this respect, it is incumbent on any neighbourhood plan seeking to designate land as local green space to be able to demonstrate fully that land has an existing and established function or role which allows it to be demonstrated that the land is special to the local community and holds a particular local significance. The Neighbourhood Plan, as proposed, and the evidence base which accompanies it, does not do this and therefore we must conclude that the policy in respect of the proposed inclusion of our client's land is unsound and</p>	<p>We would disagree with this point. The site is a tranquil area within Embleton, which plays a key role in maintaining a sense of openness in the village centre. Given the overgrown nature of the site, it is impossible that it does <i>not</i> have biodiversity value. Meetings have been held with the land owners.</p> <p>Repetition – please see points made earlier.</p>



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	<p>unsustainable. We would therefore request that our client's land is deleted from this policy.</p> <p>Policy 10 – Principle Residence Housing</p> <p>In relation to this proposed policy, our clients also object to the inclusion of this proposed restriction on new residential development. The concept of a restriction on new development to only be capable of being occupied as a principle residence generates a number of issues and concerns which we consider have not been fully taken into account in the preparation of the neighbourhood plan.</p> <p>If we could first address the justification for principle residential housing. We note from paragraphs 5.38 to 5.41 of the plan and with reference to the background housing evidence paper, that the introduction of a principle residential housing restriction is primarily based on the approach being adopted by Northumberland County Council within its emerging local plan and the baseline data that 27% of dwellings within the 2011 census were recorded as containing no residents. Anecdotal evidence relating to the permanent occupancy levels within Crieghton Place is also referred to. As further justification for the introduction of this policy, reference is also made to the introduction of a similar policy within the North Northumberland Coast Neighbourhood Plan Area and within other areas of the country including Cornwall. On this, we would submit that at present we do not consider that this represents sufficient justification for the introduction of a policy of this type within the Embleton Neighbourhood Plan Area.</p> <p>The first reason for this conclusion is that it is not considered that the introduction of this policy is sufficiently justified with clear evidence. Whilst census data from 2011 may demonstrate potential high levels of second ownership at this point in time, it is incumbent as part of the neighbourhood plan preparation to demonstrate that this is a situation which has actually become a problem and has developed over preceding years. With reference to the advice arising from the St Ives Neighbourhood Development Plan it can be seen that the justification for the introduction of a principle residential policy in that case, was evidenced by analysis of how the proportion of second homes has</p>	<p>Please see minutes from meeting held with the landowner and the Parish Council. The landowner already has agreed that there is 'no need' for housing in Embleton, and that the permanent occupancy restriction would seriously hamper their ability to deliver the development.</p>

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	<p>changed as population has grown. In this respect, it is not sufficient therefore to solely refer to a single census as evidence of an evolving problem, as clearly this does not provide any context for assessment of the level of second home ownership during the time period preceding 2011. In order to be fully evidenced it is necessary to be able to observe a long-term view based on a review of not just the 2011 census but also the 2001 and 1991 census. The reason why this is important is clearly linked to what must be considered to be the objective of the policy, which is to safeguard the sustainability of settlements within the neighbourhood plan area and to avoid the situation where a community may be eroded through the amount of properties that are not occupied on a permanent basis. In this case the neighbourhood plan has failed to demonstrate that this is a situation which has evolved recently or indeed that it is actually having an adverse impact on the sustainability of settlements. It would be expected, if such a significant policy is to be properly justified that it would be able to be demonstrated that the proportion of second home ownership has increased when compared to the level of population increase and housing provision within the village. Clearly, if second home ownership levels have not actually changed materially over the preceding 30 years then it is not possible to attribute any changes in the sustainability of the village to second home ownership.</p> <p>In parallel with this analysis it would also be expected that in order to justify the introduction of a policy, evidence would be presented to demonstrate that any excessive levels of second home ownership were having an adverse impact on the social fabric of the communities within the Neighbourhood Plan Area. In this respect, it would be expected that it could be demonstrated through evidence that the second homes market is having a detrimental impact on the sustainability of the villages within the area. This adverse impact on sustainability would be evidenced through factors such as the loss of community facilities such as schools or shops, of the restriction of the provision of services through actions such as seasonal opening only. At present the neighbourhood plan as proposed and the supporting evidence documents provide no evidence to demonstrate that this is the case. At present the evidence to justify the introduction of this policy is effectively limited to a single figure derived from the 2011 census, on the emerging Northumberland Plan and also on the basis of the North Northumberland Local</p>	<p>There are a number of reports which do indeed serve to illustrate the impact second home ownership has on communities. The document produced by NCC (in the evidence base) also refers to this.</p>

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	<p>Neighbourhood Plan being made in 2018. These elements are not considered sufficient to demonstrate an actual evidential basis for the introduction of this policy within the context of the Embleton Neighbourhood Plan Area. In order to be justified it is considered that the policy must be accompanied by a proper evidential base which demonstrates clearly the necessity for such a policy on the basis of the type of historic data and sustainability evidence referred to above. In the absence of such evidence it is not possible to conclude that the introduction of a principle residents housing policy is properly justified or that the introduction of such a policy would actually have the effect of maintaining and enhancing the sustainability of the local communities in question. We therefore conclude that at present insufficient evidence has been provided to justify the introduction of a policy.</p> <p>In conjunction with the necessity for further evidence to justify the introduction of a policy, we must also highlight further considerations which we feel demonstrate that the introduction of a policy is also ill advised on the basis of the potential unintended effects of the policy. In the first instance we would highlight that the introduction of a principle residential policy has a significant impact on the viability of new residential development. It is an accepted fact that the introduction of any form of occupancy restriction on a dwelling has a material impact on the open market value of any such property. Typically, occupancy restrictions of any type have an impact through the reduction of market values by between 20% and 40%. This impact on the market value of any property clearly has an implication for the profit levels of any residential development that may come forward. In our experience and with reference to developments that were being progressed within the North Northumberland Plan Area, the introduction of a principle residential dwelling restrictions applied to all new dwellings has the effect of making some, if not all new residential development unviable.</p> <p>We recognise and acknowledge that a scheme for development of principle occupancy residential development has been brought forward by Cussins Homes to the north of Creighton Plan in Embleton. This, however, is not considered to be a representative example in relation to the viability question as this represents an extension of a recently completed development which has the benefit of key infrastructure installation costs</p>	<p></p> <p>The plan does not intend to support the construction of more second homes, and despite arguments put forward by the agent, this position is held firm. There is a significant amount of evidence provided in the supporting documents with regard to the impact second homes is having on our community, and others along the coast.</p> <p>It seems that this would be a perfect representative example.</p>

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	<p>already having been borne by the completed open market unfettered housing site to the south. Such development could not have come forward were it the case that entirely new main infrastructure costs were also required to be borne by the residential development. We therefore do not consider that the grant of permission for this recent development is inconsistent with our argument. We would also highlight that at present this is only a planning consent and as such viability considerations will be present in respect of whether the development is ultimately constructed.</p> <p>What must also be recognised as well in considering viability is that if, as stated within the rest of the neighbourhood plan, the aspiration is for high quality residential development, better than that which has gone before within villages such as Embleton, there is a necessity for new dwellings to be of a high quality design and constructed from high quality, often traditional materials limited. It is certainly the case with reference to our client's site, being located within the conservation area and close to designated heritage assets, that any proposed development would be required and rightly expected to be of high-quality utilising traditional materials and building techniques. This inevitably diminishes the margins within any development and whilst a limited premium for such housing can be charged, this is not sufficient to offset any reduction in market value that may arise from the presence of a principle occupancy condition. It must also be factored in, with reference to the aspiration for affordable housing, that any market housing that is going to deliver affordable housing must be over the threshold of 10 dwellings. It can be seen that any further reduction in profitability as a result of the provision of affordable housing in conjunction with the presence of a prime occupancy dwelling all but guarantees that new residential development is unviable. We would submit that for new development sites therefore, which require the creation of new infrastructure such as access, drainage etc and the provision of affordable housing, the introduction of a principle residence restriction will mean that new development is certain to be prevented.</p> <p>In making this statement what must be borne in mind again is what the purpose of any principle residential restriction policy is. The purpose of such policies is to rebalance the level of housing within settlements in order to ensure that those settlements are sustainable. Any policy which in effect simply prevents new residential development</p>	

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	<p>does not actually meet that aim. It does not rebalance the situation and instead it simply prevents new development coming forward which could also deliver other beneficial effects such as a provision of associated affordable housing. The introduction of a principle residents' restriction can only have the intended effect it seeks if new development would take place anyway and be of a scale where such restrictions are not critical to viability. This is the situation in relation to the St Ives example where the settlement is far larger than the settlements being considered in this plan. In St Ives there is far greater demand for development and a large local housing market, where development would take place anyway irrespective of the presence of a principle occupancy condition. To illustrate this the St Ives Neighbourhood Plan area include a population of 11,500. The Embleton Plan Area has a population of 672. We would submit that the Embleton Neighbourhood Plan Area is simply not large enough with sufficient local demand for housing present to avoid the situation where such a principle occupancy condition will not actually simply prevent any development taking place.</p> <p>As an illustration of this point, it is informative to look at the levels of housing development which have been proposed within the North Northumberland Neighbourhood Plan Area since the introduction of the principle dwelling restriction. It must be borne in mind that this plan area also has much larger population compared to the Embleton Plan area, having a population of 2937 (2011 census). Analysis has been undertaken of the applications for residential dwellings that have been made within the 3 parishes forming the North Northumberland Neighbourhood Plan Area. This analysis in the period since the plan was made and within the 2 years prior to the plan being made commencing on 10 July 2016. The results of this analysis are shown in the table below.</p> <table><tr><td></td><td>Total Applications</td><td>Housing Applications</td><td>Dwellings (net)</td></tr><tr><td>Applications since plan made on 10 July 2018</td><td>55</td><td>1</td><td>9 (3)</td></tr></table>		Total Applications	Housing Applications	Dwellings (net)	Applications since plan made on 10 July 2018	55	1	9 (3)	<p>We are not sure what this is intended to illustrate. It seems to illustrate that The Northumberland Coast Neighbourhood Plan is indeed successful in preventing second homes being built. Of the 15 and 13 that were built between</p>
	Total Applications	Housing Applications	Dwellings (net)							
Applications since plan made on 10 July 2018	55	1	9 (3)							

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	10 July 2017 – 2018	12	15	44 (38)	2016 and 2018, we assume that a significant number were for second homes. This is a sensitive area, close to protected sites and designated landscapes. It is not appropriate to take the same approach to new housing as one would take in other parts of the County.
	10 July 2016 – 2017	93	13	129 (127)	
	<p>From the table it can be seen that since the plan was made there has in fact been just 1 planning application related to residential dwelling across the whole plan area. This was an application for 9 dwellings albeit that 6 of these were replacement dwellings. Therefore, since the plan was made within the North Northumberland Area there has in fact been a single application which, if granted, would deliver a net increase of just 3 dwellings. Therefore, only 3 dwellings would be brought forward with the primary occupancy restriction in place and such delivery could in no way be considered to be rebalancing the sustainability of these settlements. These figures can be contrasted with the preceding 12 months from 10 July 2017 to 10 July 2018 when there were 15 housing applications, which if granted would have delivered a net increase of 38 dwellings. Within the 12 months prior to that 13 applications were made which would have delivered a net increase of 127 dwellings. It would be expected based on the historic levels of housing applications within the North Northumberland area that in the period since the plan was made there should in fact have been in the region of 7 planning applications for housing with the potential to deliver some 50 or 60 dwellings. This however is clearly not the case. We would submit this fall off in residential development being proposed is a direct consequence of the introduction of a prime occupancy condition. It can be seen therefore that rather than rebalancing housing provision and aiding sustainability within this Neighbourhood Plan area, it is in fact the case that the introduction of such as restriction has instead simply restricted any new development from coming forward. As a further comment on this analysis, it must be borne in mind that within the period in which the planning applications have been reviewed, there has been no material change in planning policy within the Northumberland area, and as such changes in planning policy cannot be cited as a further external factor which may have impacted upon the number of applications being made.</p> <p>We would therefore highlight on the basis of this evidence, that experience within the local area indicates that the policy is not successful in rebalancing the housing provision</p>				



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	<p>within the locality, but it instead simply has the effect of preventing any new development within an area. This is not the purpose of principle residence occupancy policies.</p> <p>A further unintended effect of such a restriction, which prevents development as we have previously highlighted is that it has the potential to adversely impact on the delivery of affordable housing. It is clearly stated within objective 4 of the Neighbourhood Plan and policy 11 that there is an aspiration and expectation for the delivery of affordably housing within the neighbourhood plan area. As we have highlighted with reference to viability, it must be recognised that any proposal to introduce a prime residency restriction will, for the reasons stated, undoubtedly prevent larger schemes coming forward. These larger schemes are the only market schemes which are required to deliver affordable housing and therefore the introduction of such a policy, we consider, would all but guarantee that no larger schemes of 10 or more houses with their associated provision of affordable housing delivery would come forward. The introduction of a principle residency restriction would therefore run contrary to the aspiration and desire for affordable housing delivery within the area.</p> <p>A further unintended effect of the introduction of such a policy is that it does create a 2-tier housing market in which new dwellings developed in the village will have a lower market value than the existing unfettered housing stock, which would pre-date the introduction of any prime occupancy restriction. We consider that such a situation is iniquitous to new home buyers within the Neighbourhood Plan Area and unintentionally places a premium on the value of unfettered existing housing. A further consequence of this is that any new dwellings with a prime occupancy restriction upon them will potentially, due to their reduced market value, have an adverse impact of the owner's ability to move into any other dwelling not also encumbered by such a restriction. The gap in value between a restricted and unrestricted dwelling will be significant. For potential occupiers who, it is envisaged the plan would seek to encourage to live in the village, such as local first-time owners or young local families, this adverse impact would be significant. The effect would be that their ability to move up the housing ladder in future years to anything other than another restricted dwelling would be severely compromised. Clearly the number of houses that are unfettered will always far exceed</p>	<p>We accept there are limitations to how effective the policy can be – see earlier comments – we do however feel this is a positive way to move forward for our area, and is in line with emerging local planning policy in the Northumberland Local Plan, which proposes a policy to restrict all new dwellings to principal occupancy in areas that have over 20% second homes.</p>

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	<p>those with any principle restriction on them and therefore for any local purchasers this would be a long-term disadvantage that would result. We consider that this is a further unintended effect of the introduction of such a policy which has not been fully considered. We particularly feel this is a relevant consideration again because of the very limited size of the settlements involved and the limited amount of housing provision that can come forward. Again, it can be seen that the situation present within the Embleton Neighbourhood Plan Area is very different to that seen within the St Ives example. The St Ives example is a much larger housing market area with a population 17 times larger than Embleton Parish, in which there is far greater movement within the local housing sector, with the consequent ability for development to take place with prime occupancy restrictions upon them which will not have long term adverse impacts either on their purchasers or on the developer's ability to deliver viable schemes. Simply because of the limited scale of the Embleton Neighbourhood Plan Area it is not considered that the introduction of prime occupancy in an area such as this is a realistic and practical proposition.</p> <p>A further unintended effect that would potentially arise through the introduction of such a policy is that it will prevent the delivery of high-quality development. As has been highlighted previously, our client's site is in a sensitive location which dictates the use of high-quality materials etc. This situation is present however in much of the neighbourhood plan area by virtue of some of it being within the AONB. The AONB and the design requirements within it dictate higher quality development and, in this respect, it is considered that any introduction of restriction which limits the market value of a property inevitably impacts upon the quality of the development that can be delivered in terms of its materials and appearance etc. We consider that the introduction of a prime occupancy restriction runs contrary to the plans aims of achieving new high-quality residential development. Again, this is a further unintended consequence of the proposed policy.</p> <p>The final point we would make on the proposed principle residence restriction is that it would also have an adverse impact on the local tourist economy. As proposed a principle residence restriction does not differentiate between the occupation of dwelling</p>	<p>We do not agree that the principal occupancy restriction will restrict high quality development.</p> <p>We do not agree that this will have an adverse impact on the tourist</p>



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	<p>either as a second home or the provision of holiday letting accommodation. Both forms of use would be restricted by any principle residence restriction. It is the case in particular with regard to holiday letting accommodation, that this form of accommodation is an important part of the rural tourist economy within Northumberland. As well as providing income through weekly rental fees, more importantly occupiers of such properties do access and use local services. This is often in the form of utilising local shops and local pubs and restaurants etc. Tourist visitors use of local services such as these therefore has a direct positive impact on the viability of these businesses and their sustainability. This consequently has a beneficial effect on the sustainability of the settlement through assisting in the maintenance of these services. Restrictions on any new development that may be used in this way, with its consequent positive impacts on sustainability therefore run contrary to the objective of ensuring the sustainability and viability of local settlements. We would also highlight that second home ownership should not be viewed in all situations as a negative one. It can be identified that in many cases second home ownership on the Northumberland Coast actually takes the form of people from relatively local locations such as Newcastle who utilise the properties in question on a regular basis on weekends. These second home owners also access widely the local services such as pubs and restaurants and as such contribute significantly on a year round basis to the viability and maintenance of these local services. People occupying second homes in this manner also actively contribute and take part in the local community through attending functions and events such as church services on a Sunday morning. Occupiers of second homes therefore also have the ability to positively contribute to the viability, vitality and sustainability of a settlement. Restrictions on occupancy which prevent this type of interaction within the community are also considered to be a negative unintended consequence. We consider that this evidence further highlights that the introduction of a principle residence restriction, simply based on census data which only identifies empty properties is not sufficiently robust or accurate. We consider that the introduction of a policy of this type may actually have much greater adverse impacts on the sustainability of local settlements such as Embleton and Christon Bank.</p>	<p>economy. The plan supports tourism proposals.</p> <p>Noted; however, it is considered that in this area, nearly 30% holiday home ownership enough.</p>

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	<p>Overall, we consider that the introduction of a principle residence restriction in this case will not deliver the objectives that it seeks. The policy will not rebalance settlements and their sustainability and will in fact simply maintain any existing levels of imbalance if indeed they even exist. We do not consider indeed that sufficient evidence has been brought forward to demonstrate that an issue does exist or what the actual effects of this contended imbalance are. At present therefore we consider that the requirement for the policy and the evidential base for it is not proven and not sufficiently justified and that the potential consequences of such a policy have not been fully considered. In this respect we do not consider that the neighbourhood plan is soundly prepared in this instance and would request the deletion of this policy.</p> <p>Conclusion</p> <p>This letter sets out our submission on behalf of the Diocese of Newcastle in relation to the currently proposed draft Neighbourhood Plan. For the reasons set out we consider that there are significant issues with the plan, as currently proposed, in respect of its approach to new housing development, the excessive restriction of this and the failure to allocate appropriate development site such as our client's land. We would strongly advocate and request that consideration be given to the allocation of our client's land within any revised Neighbourhood Plan and would further request for the reasons stated that the two policies in respect of Local Green Space designation of our client's land and Principle Residence Restrictions be deleted. We hope that our submission is clear and helpful, and we would welcome the opportunity to work proactively with the Neighbourhood Plan group to explore opportunities to resolve these issues prior to revision of the Neighbourhood Plan. We thank you for consideration of these points and look forward to hearing from you in due course.</p> <p>Yours faithfully</p> <p>Robin Wood</p>	<p>Noted. No changes proposed. Further information has been provided in the evidence base about the LGS designation, and the value of the site to the local community.</p>

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### APPENDIX C3: RESPONSES FROM RESIDENTS IN THE NEIGHBOURHOOD AREA

Name	Response	Comment
[REDACTED]	<p>I am writing this email as a firm objection to any proposed development that will be brought in front of the Neighbourhood Plan Committee to extend any boundaries between Highdales and the Villas on Sea lane Embleton.</p> <p>I have owned a bungalow within the Embleton links and Bungalow owner's association for 40 years and have owned and ran a large business called the Sportsman inn, on Sea Lane in Embleton for more than 15 years. I am completely dismayed by the amount of development that has taken place in Embleton and view the current trend of proposals as being completely detrimental to the historic, unique and individual charm that Embleton has to offer.</p> <p>I truly feel that the settlement boundaries of Embleton should not be touched even more so the boundaries that outline the historic views that the AONB has to offer including Castle and Sea and farm views with historic stone walls leading down to the beach.</p> <p>Sea Lane should remain as a Sea Lane.</p> <p>We are seeing changes to the structure of the roads, widening and destroying the fundamentals that these villages were built on all over Northumberland and I think that Embleton needs to protect what it has. Beadnell for example is not the same anymore, they are talking about building a watersport centre in what should have been kept as a historic fishing village. It's completely ruined. I saw a video recently of an advert with Rupert Sutherland on an old Opal Fruit advert of him going down Sea Lane with a surfboard, this was taken 40 years ago. The farms still look the same and the road hasn't altered, this is history and this is why we all love this protected area so much. The Golf course had a revamp 20 years ago by the Little family, but it did so sympathetically by not building a great big club house all protecting and safeguarding the area.</p> <p>When running The Sportsman on Sea lane, the guests were amazed and loved the fact that Northumberland especially Embleton and low Newton by the Sea had kept their identity. They particularly loved the big skies and empty beautiful green fields with white sand beaches. if the skyline changes and the fields are built upon and you can't quite see the beach from what is supposed to be a</p>	Support for settlement boundaries noted.

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	<p>protected AONB then the charm is lost and what are we left with. Another housing estate.</p> <p>The car parking has increased over the years due to more visitors and I regularly see more people park further up the hill along the roadside between Highdales and the Villas. if there is housing developed on this site which would be a complete travesty the traffic would infringe on the golf course and the space at the bottom of Sea lane causing congestion.</p> <p>I firmly believe that the planners need to stand on the top of Sea lane on and look down and admire that amazing space with open fields and realise that any decision made will stay with them for a long time as they hold a big chunk of Embleton's future in their hands. I also believe that Embleton should remain as a village with locals being able to afford property within the designated boundary of the old village. I see that there has been provision made for this. Overall a village should not be changed into a town and due to holiday businesses increasing that should stand firm that the village should not alter.</p> <p>Hope you view this email as a complete individual assessment about the love I have for the area and not in any personal gain.</p>	
	<p>I would like to thank all those who have worked so hard to put this parish neighbourhood plan together. Without doubt this is the result of countless hours of commitment and a massive effort to bring together this important document. I wholeheartedly support the Parish Plan - in particular, the settlement boundaries, the importance of Local Green Spaces and the philosophy and principles of any future housing in the parish. I hope that this new Parish Neighbourhood Plan will give significant weight when any further planning applications may be made so that as far as possible, future developments are primarily for the benefit of the local community.</p> <p>On further reading of the Neighbourhood plan, having been prompted about the following point by my wife, I would like to raise a concern re POLICY 5: SETTLEMENT BOUNDARIES FOR CRISTON BANK AND EMBLETON VILLAGE. Where it talks about the development of "open countryside" outside the settlement boundary, particularly points a), e) and f), I think this is an open invitation for landowners who own land adjacent to the settlement boundary to plan a development that meets these requirements. Maybe even to put forward a development like we have seen in the recent past that in one case, was opposed passionately by so many of the local community and</p>	Support noted.

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	was indeed, not passed by the planning committee. I think this policy needs looking at further otherwise it creates an “open door”.	
[REDACTED]	<p>The above plan has recently been brought to my attention and, as a frequent visitor to Embleton, I should like to voice my support for the proposed plan. I come to the village precisely because it is peaceful and not over-developed like some of the other villages in the area, such as Beadnall. I like the fact that the plan is designed to keep the integrity of the village and that the views of the village from the sea and the walk down to the sea have remained almost unchanged for the ten years or so that I have been spending breaks and holidays there.</p> <p>I also hope that this will mean that the local community can afford to remain living in the village and that the services, such as the local school, will not disappear due to an over abundance of second homes so that it can remain populated by local families.</p> <p>One of the highlights for me is the walk down the lane to the beach and being able to see the open farmland and the wildlife in the surrounding fields, so I am relieved that this is to remain protected under the current proposals and less at risk of being developed which would completely spoil the area.</p>	Support welcomed.
[REDACTED]	I wanted to email my support for the current Embleton neighbourhood plan especially in regard to retaining the existing proposed settlement boundary as I believe that any further increase in the village boundary would increase further the risk of development and in turn spoil the character of the village.	Support welcomed.
[REDACTED]	As a cottage owner at High Dales, Dunstanburgh Terrace.NE66 3XE, I wish to oppose any extension to the east of the eastern boundary. The sea view from my property and Embleton (the top of Sea Lane) is magnificent and any urban development east of the existing boundary line would be detrimental and a blot on the landscape.	Support welcomed.
[REDACTED]	I am writing to give my support to the proposed settlement boundaries particularly with reference to the boundary facing the sea in front of Highdales. I think it is important that we retain the look of the village from the beach as it is and that development is not permitted in the green spaces in front of these boundaries as has happened in other villages. I imagine that it is prime	Support welcomed.

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	<p>development land in terms of someone making a great deal of money for second homes but it would ruin the integrity of the village and I applaud the good sense of the council in trying to retain this.</p> <p>Embleton is a special place which is why it has been voted a top tourist destination and one of the best beaches in the UK. However it is so beautiful because it is small and not overpopulated with second home owners and retains its peace and tranquillity.</p>	
[REDACTED]	<p>I believe the proposed Neighbourhood Plan is a great step forward and provides good and timely guidance for the future management of the Parish.</p> <p>The document confirms that the landscape around the Embleton Parish is highly valued. In addition that the conservation and protection of the Northumberland Coastal Area of Outstanding Natural Beauty AONB and the Northumberland Heritage Site are important to the parish. However, in section 2, Issues and Themes, Landscape and Settlement Boundaries, point 2.2 the last sentence starting “Nevertheless... seems to lend support to potential development in the AONB and thus conflicts with the principles laid out in the plan. My feedback under the consultation process would be to consider removing this sentence from the Plan at this time. I believe this would provide clarify for future Parish management.</p> <p>I appreciate the opportunity to be involved in the Neighbourhood Planning process.</p>	<p>Support welcomed.</p> <p>Point 2.2 is not in the landscape section.</p>
[REDACTED]	<p>Having seen the recent plans to extend the boundaries in the village of Embleton I write to express my wish to support the current draft Neighbourhood plan which would protect the existing boundaries at the East of Embleton village. My reasons for this decision are that it is an important area within an area of outstanding natural beauty and any disruption to this would put the land, local flora and fauna and appearance at risk. I also don't feel there is a need for any additional housing within the village and any additional expansion would be unnecessary and at the cost of local habitats and benefits.</p>	<p>Support welcomed.</p>
[REDACTED]	<p>We have been contacted by [REDACTED] regarding a petition by Mr Guy Douglas to include an area of land next to her property in the Draft Neighbourhood Plan. This planning proposal should under no circumstances be</p>	<p>Noted.</p>

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	<p>allowed. Just because the field is vacant, it doesn't mean it should be built on. The views from Brackenrigg are spectacular and are the sole reason why we come to Embleton. We are sure that many other tourists feel the same. If this proposal is allowed and the development goes ahead we are sure it will have a detrimental effect on the economy of the village. We hope that common sense prevails and the proposal is turned down and the area remains as part of the Area of Outstanding Natural Beauty which it so obviously is.</p>	
<div style="background-color: black; width: 100px; height: 20px;"></div>	<p>The Draft Plan is a well considered proposal which I support subject to the following points:</p> <ol style="list-style-type: none"> <li>1. Housing Numbers: <ol style="list-style-type: none"> <li>1.1. The Settlement Boundary Methodology (March 18 para1.0) identifies Housing Need of 27 units between 2018-2036. It is unclear how that precisely relates to the Background Housing Evidence paper (Housing) which states a Need for 65 Units between 2016 - 2032</li> <li>1.2. The Background Housing Evidence paper confirms that the 65 units (and therefore also the 27) are catered for by the exiting permissions/completions of 80 - therefore a significant oversupply as far ahead as 2036.</li> <li>1.3. These facts alone should remove the need for any further debate over extensions to Settlement Boundaries. If there is no Housing need, the Settlement Boundaries do not need changing</li> </ol> </li> <li>2. Settlement Boundaries <ol style="list-style-type: none"> <li>2.1. The Background Housing Evidence Paper - Settlement Boundaries - says that 'because of the significant housing delivery in recent years ' - i.e. the over provision as set out above - the boundaries have 'been drawn relatively tight'.</li> <li>2.2. Since there is no housing need there is no need to change the boundaries at all. In my view the plan should go further in fully protecting certain boundaries against any future development.</li> <li>2.3. If however the Plan needs to provide some degree of flexibility for development and therefore must consider its settlement boundaries - where is development least or most suited? In respect of Embleton: 1. An extension of the eastern boundary to Embleton village should be avoided at all cost. The area beyond the existing eastern settlement boundary sits within both an AONB and</li> </ol> </li> </ol>	<p>Support welcomed.</p>



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	<p>The Heritage Coast. It is included within the Embleton Village Conservation Area and has a significant visual impact both from and towards the coast. Previous reports refer, quite rightly, to the iconic views to the north through east and to the south. The boundary provides a clearly defined edge to the village both when leaving towards the beach and golf course and when approaching the village from those same locations. 2. The southern and western boundaries should also be preserved - they too provide clear definition (to the West) and with historic and open views on approaches to the village (from the south). 3. To the north there are open fields and if any extension of the settlement boundary were necessary this is the only area that should be considered. Given the limited numbers of units that may be considered - under special circumstances or for affordable housing the small area to the north east corner of the recent development at Creighton Place would seem the least intrusive</p> <p>3. Parking:</p> <p>3.1. Given the increasing popularity of Embleton for day visitors enjoying the village and the coast, consideration should be given to public car parking in designated areas such as is provided in other villages e.g Craster and Seahouses. That would avoid congestion/accident potential on the likes of Sea Lane and the predominantly single track road to the golf course. Increased visitors parking on the village roads contributes to spoiling the iconic views /AONB / Heritage coast etc</p> <p>4. Affordable Housing</p> <p>4.1. I support the need to address the Affordable Housing Need and welcome the proposal that any housing provided should be safeguarded to ensure it is truly affordable</p>	<p>This is a matter which could be considered by the Paris Council outside of the NP process.</p> <p>Support welcomed.</p>
	<p><b>Sustainable Development</b></p> <p>The plan outlines the sustainable development it would like to see within the parish. This includes new and expanded business premises and affordable housing within the 2 settlements of Christon Bank and Embleton Village. The issue of affordable homes is a mute one, as such schemes are open to abuse by unscrupulous buyers and developers who can then maximise profit when they sell and will not meet the objective of making homes affordable for the local</p>	<p>Support noted and welcomed.</p>



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	<p>community. The Plan should be therefore focus on the need to provide affordable rented accommodation for local people. However, it is clear that Northumberland County Council has evaluated and determined that the area required new 65 homes within the parish, between 2016 and 2032. It is however clear that 80 homes have been already approved since 2016. Accordingly, no further housing is required until at least 2032 for local people under the Council's Plan. This should be reflected in the Neighbourhood Plan prevent the building any further homes to preserve the character of the current neighbourhood until 2036. We just need to look along the coast to see the housing scheme that is known as Beadnell, which is now without any character.</p> <p><b>A Sense of Place</b></p> <p>Settlement Boundaries for Christon Bank and Embleton. The objective here is "To protect heritage assets and enhance local green spaces, landscapes and views, that contribute to the distinct look and feel of the village." Protecting the heritage assets and enhancing green spaces, is therefore one of the key objectives of the whole EmbletonParish Neighbourhood Plan. It appears that the boundaries that currently exist have done an effective job at preserving the character of a living and thriving village. Much credit must be given to restricting the expansion of the village and I propose that the settlement boundaries currently in place are now saved as detailed on pages 16 and 17. It is vital that the settlement boundaries are not permitted to be extended or encroach upon the green spaces are to be retained in order to protect the heritage aspects. There is good evidence that "contact with green spaces promotes good health and that participation in regular physical activity generates not only physical but also psychological health benefits improving mental wellbeing". (Proffessor J.Perry, Biological Sciences – University of Essex) "Green spaces have been shown to improve mental functioning, mental health and well-being and may have long lasting psychological benefits, where the benefits of longevity have also been reported". A.C.K. Lee, School of Health &amp; Related Research, University of Sheffield.)</p> <p><b>Landscapes and Seascapes</b></p>	

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	<p>Maintaining the rural character and protecting the landscape is even more important today and the heritage status of the village of Embleton in particular requires to be protected. We are custodians of the parish, and this plan offers us an opportunity to maintain the abundant bio-diversity, wildlife and a heritage coastline where dark skies can also be enjoyed. Our parish and neighbourhood is of significant importance being granted the status with an AONB on our door step, and a heritage coastline that requires to be preserved for future generations. Our landscape is obviously attractive not only us as residents, but to visitors who make a significant contribution to our local economy. I agree that great weight must be given to the conservation of the local landscape including the open green spaces and farmland, providing views from the top of the village all the way down to the coast, and from the coast to the top of the villages. Green spaces must therefore remain green spaces and remain devoid of buildings. Embleton in particular is a very special and unique place, in the Country that deserves and must be protected for future generations. After all, not many communities have the privilege of being in an AONB. One of the greatest assets of Embleton parish is the limited size of the settlements. Small in this case is beautiful. The natural beauty is the reason for us being in the privileged living on the edge of an AONB, one of only 33 in the country. We have a responsibility in our Neighbourhood Plan to protect the heritage of our villages to ensure that our environment is preserved for future generations. There is a real community here, that yes, does have differences of opinions, but we all need to look at the bigger picture and preserve our landscape and villages, as living spaces. We have much to be proud of and as such we need to preserve of landscape and prevent any exploitation of the green spaces, that must remain green. Our, Embleton Parish Neighbourhood Plan, must reflect these principles to influence planners in years to come.</p>	
<div style="background-color: black; width: 50px; height: 20px; margin-bottom: 5px;"></div> <div style="background-color: black; width: 60px; height: 20px;"></div>	<p>I would like to register some comments on the Proposed Neighbourhood plan. Having reviewed the proposed plan I believe that the defined settlement boundaries are fully appropriate and should not be extended any further. There has already been significant development in Embleton over the last few years and further extension of the settlement boundaries would increase the risk of further development which will spoil the beautiful village environment for</p>	<p>Support noted and welcomed.</p>


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	<p>everyone. Every effort should therefore be made to restrict development creeping into the current green areas around the village in order to protect the character and beauty of the village.</p>	
<p><b>[REDACTED]</b></p>	<p>I've just had a quick look at the Embleton Parish Neighbourhood Plan online, it was the summary of the pre-submission plan so not the full version. I think it looks good and generally captures a lot of what local people think and would like to see in the future. I'm particularly impressed with the boundaries for future development that have been clearly defined on the map, a great tool! I have a couple of thoughts/ideas..... Whether these are appropriate for the plan I don't really know?!</p> <p>Environmental Planning: The Environmental side of things looks to focus on standard county council (national) planning obligations when it comes to development, basically doing their duty to protect SSSI's SPAs etc.... This is very important but we might assume that this should happen anyway, regulations ensure that NCC planners are duty bound to do so! This is a 'local' parish plan, how about some focus on 'local' biodiversity interest too. There are species around the parish that could be considered locally important but currently they will slip through the net because they're not associated with the nationally designated sites and the associated regulations that NCC planners are used to dealing with. This is where the neighbourhood plan and its associated planning policies could step in and make a difference. I think this is a great opportunity for the PC to show that it is environmentally aware. Rather than just following the existing NCC policies to protect the big designated sites, we should be aiming to secure gains for local biodiversity out of development too. Perhaps the PC could champion a few species and habitats that are locally important. Just as one example, swifts are in dramatic decline across the UK including the Northumberland coast but they will not be captured or supported by this plan, a simple policy on new builds and renovations of a certain height to include swift nesting bricks as a planning condition could make a difference to our local swift population. A similar approach could be taken for a number of other locally important species, yes build your houses, but also create more habitat for our local bats, offer some tree sparrow nest site schemes, etc. etc. I'd be happy to</p>	<p>Support noted and welcomed.</p> <p>There is reference to the Embleton Quarry, and additional information and seeking of local biodiversity improvements has been added to Policy 4 (securing net gains for biodiversity).</p> <p>Noted. Some of these matters are outside the remit of the NP.</p>

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	<p>work with you/AONB etc to draft a list of species/management guidance if required. Dark Skies/Light Pollution Great to see the importance of local dark skies is mentioned in this plan, it's an amazing environmental feature that is slowly getting eroded with the 'creep' of new development. This 'creep' will often go unnoticed because it is a slow process, but it is happening. I used to look north from our place and see the northern lights, now I just see new LED streetlights! This area is recognised as being important for its dark skies by the AONB, they have some planning influence but it seems that their remit stops in the middle of Embleton somewhere! With this in mind, I feel that we need some really clear parish wide guidance on the use of external lighting and new streetlights associated with developments, renovations etc in order to avoid bringing further unnecessary light pollution to the area. With modern technology there are many ways to avoid and reduce unnecessary light pollution, but without clearly outlining this issue and the options available, developers will be unaware and light pollution will just continue to get worse. Perhaps the issue of light pollution and some clear guidance on lighting requirements could be highlighted (excuse the pun!) more in this document? The beautiful dark starry sky at night is one of the main reasons I chose to live in this area, I'd hate to see it vanish under yet more streetlights and poorly designed house lighting. Again if you would like me to help draft some guidance I'm happy to get involved. I hope that these thoughts are useful.</p>	
<div style="background-color: black; width: 100px; height: 40px;"></div>	<p>I am a non resident but do own a cottage in Embleton but do spend a lot of time there. As a non resident I realise that any views expressed on local matters may not be accepted as relevant.</p> <p>However I feel I had to contact you as I have been told that there are moves afoot to change the village boundary and allow building on the field between Highdales and the "Villas". I feel I have to object to this as the prime farmland between the coast and the village which is relatively unspoilt at the moment offers a natural backdrop to the coastal path and beach. Experience of other developments suggest that once building is allowed it will soon be extended take away the natural beauty of the area.</p>	Noted.

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>I am writing this note to express my objections to a possible change in the village boundary which would then mean that the fields between Highdales and the “Villas” and the coast would then be part of the village and subsequently available for building development. As I understand there is already notice of a plan to build up to 16 dwellings in the field between Highdales and the “Villas” if the boundary is changed.</p> <p>My objections are as follows:-</p> <p>The land between the village and the coast is unspoilt prime farm land and provides a natural backdrop to the coastal path which is much used by tourists. It cannot be right that land of this type can be spoilt in this way when there must be other sites more suited to development if needed.</p> <p>The village has already seen a large development at Crichton Place which is about to be extended to an adjacent field. Does the village really need yet another development?</p> <p>I question whether any new development is warranted to satisfy local need as it seems that a relatively large number of the dwellings in Crichton Place are used as second homes. Surely more homes of this type will make Embleton a “ghost” village for much of the year.</p> <p>It is only fair to declare a personal interest in the Neighbourhood Plan; my family own a cottage on the “Highdales” site and have done so for over 30 years. Over this period we have spent a lot of time in Embleton and have enjoyed the village as it is as well as the beach and coastal walks. We really do not want it spoilt through over development. Naturally a development in front of Highdales would not be an attractive option.</p>	
	<p>Firstly, we would like to congratulate you on the excellent plan you have drawn up. There is a lot of detail in the plan as to residential development.</p> <p>Our comment/ suggestion would be that there should be some more detail in the plan with regard to commercial development, in particular that related to farming. We would like to suggest that you add something to indicate that intensive indoor farming would not be supported or encouraged, and the use of farmland for development as caravan parks or for the building of log cabins or similar multiple holiday cottages would likewise be rejected. Any such development would greatly</p>	<p>Support welcomed.</p> <p>Indoor farming cannot be controlled via planning policy. Additional Information about tourist development has been added.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	harm the visual amenity of the area.	
██████████	<p>Hi, firstly many thanks should go to the NP team and the Parish council for all their work on this plan to date.</p> <p>The Vision and Objectives are clear and well thought out, maximising the opportunities for the sustainability of Embleton village but taking into consideration all the various criteria for that sustainability eg, business, education, housing, habitat and historical significance.</p> <p>Given the over development of new property in the village in recent years, the plans already approved for the immediate future and the fact that Embleton has now far exceeded its building requirements, the proposed tight planning boundaries provide the best protection against the ongoing “creep” of the village.</p>	Support noted with thanks.
██████	<p>The original Boundary line to the East was sited in the natural place, I.e. the brow of the hill on Sea Lane. This line should be confirmed as the new Settlement Boundary since the green space and Sea view from there are very important features and are in an area designated AONB. Again Station Road seems a natural Boundary to the West and with the example of Beadnell, urban sprawl must not be allowed to happen.</p> <p>Embleton with a target of 65 new home approvals (2016-2032) has already exceeded the target by 15 and we feel that no further private or “affordable” housing should be allowed.</p> <p>The Settlement Boundary has been drawn on the line of the original S B and should be preserved</p>	Support noted.
██████████	<p>Firstly I would like to applaud your efforts in bringing the draft plan to fruition, it is a mammoth task to balance the opinions of the community, and the time which all members have given voluntarily in doing so, is much appreciated.</p> <p>I have some comments below with regards to the plan and process, which I hope will be taken in the constructive sense in which they are meant.</p> <p>I am a resident at Embleton Mill, and am part of the ██████████ family through my recent marriage. I have not grown up in an agricultural family and therefore my perspective on land ownership potentially differs in some respects to families who have owned, managed and protected land for generations. At a meeting I attended on the 20th June 2018, the steering group were subject to some intense</p>	Support noted with thanks.

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>questioning by local land owners. As an observer, there was a real sense that the people who own the land in the parish, had a deep rooted suspicion about the plan. Now, I appreciate that there was no requirement for any consultation at all during the process (until this current statutory period now) and so in many ways you had gone above what was required with the Whinstone Times questionnaire etc. However, the issue I felt was that the farmers and land owners, many of whom due to the location of their properties are not as engaged in village life as some members of the community, felt like they had not been consulted fully and they were not aware initially of impact the plan could potentially have on their land. Now, I am not a person who feels like landowners deserve special treatment, but when the discussion revolves around the future usage of their land and restrictions upon it, I feel like it was an error not to discuss these plans with the stakeholders, whose land was actually primarily impacted.</p> <p>In Policy 2, point B, reference is specifically made to farms in the parish, many of the owners of which were present at the aforementioned meeting. To my knowledge (I apologise if this is not the case), the naming of the farms in the draft plan has not been discussed with any of the farmers. Whilst I know in the case of Embleton Mill for example, that any plans to develop the buildings would of course be designed to specifically preserve the architecture of the buildings (which i am sure all farmers listed are very conscious of), I am concerned that the specific listing of these steadings, without discussion with the land owners, may perpetuate this sense of distrust in the plan. No other buildings or businesses noted in this way. I may of course be completely wrong as I am not speaking on anyone's behalf, it is simply an observation. I feel this is a real shame as many landowners have a deep sense of responsibility to the land and the community, and I think that this unease is something which could easily be avoided should the intentions of these listings be discussed directly with them.</p> <p>I am fully in agreement that second home ownership in Embleton, should be limited, and the stance the plan takes on this is applauded.</p> <p>I am also in full support of the plan's desire to support tourism infrastructure to benefit the local community and economy. I work in tourism myself, and</p>	<p>Noted. There have been various consultation events, and information has been published in the Whinstone Times and on the website. We are sorry that you feel that there has not been enough consultation.</p> <p>The names of farms have been removed.</p> <p>Noted.</p> <p>Noted.</p> <p>Additional information has been added about tourism development.</p>



## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>sustainability is key to ensuring that the tourism multiplier effect is felt throughout the parish.</p> <p>My comment is, that where boundaries and development types are discussed, there is no mention of expansion tourist accommodation provision. This could be formed of hotel accommodation, camping provision, specific holiday let accommodation etc. Within the boundaries there is no scope shown for growth in this area, and outside of them there is no comment made as to how any applications would be viewed with reference to the plan. I would welcome clarification of this as it seems somewhat contradictory. Such accommodation would provide employment and visitors to the parish and a diversification away from the week long holiday let and an increase in the limited number of hotel and bed and breakfast rooms i think would help attract a broader type of visitor the area.</p> <p>Another observation is that throughout the plan, huge merit is put on the requirement of affordable home provision in any development, which is admirable. The query I have is that the requirement of only 5 affordable homes which was assessed, makes this development preference a little at odds with demand. I appreciate fully the desire to have permanent residences over second homes, but I do feel like well designed, well built and fitting properties which attract a higher market value, should also be considered, as the occupiers are likely to contribute in a positive economic way to the local economy. Covenants regarding permanent residences could of course be applied.</p> <p>On the whole I really approve of the intentions contained within the draft plan, and the work it has taken to get to this stage, but I would welcome the comments above being discussed if at all possible.</p>	
[REDACTED]	<p>Many thanks for the hours of work that have been spent on the creation of the plan. I am in complete agreement with the Vision and Objectives and the boundaries provide best protection against the continued over development.</p>	Support welcomed with thanks.
[REDACTED]	<p>I would like to register my support for the current draft Neighbourhood Plan in place for Embleton and Christon Bank and would like it documented that I am opposed to the building of any additional housing being considered in the Village of Embleton.</p>	Support noted with thanks.

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>I would like to make a particular request to ensure preservation of the existing Settlement Boundaries to the east of Embleton Village. It would not be acceptable to consider housing land to the east of the current boundary as this is a conservation area that lies within an Area of Outstanding Natural Beauty and Heritage Coast</p>	
<div style="background-color: black; width: 100px; height: 40px;"></div>	<p>I fully endorse the objectives, the setting of clear settlement boundaries and the identification of local green spaces. My thanks go to all those whose hard work, persistence, patience and hours of labour have gone into the production of a valuable document.</p> <p>However, I feel careful thought should be given to the way in which two policies can be interpreted:</p> <p>In Policy 5, the six categories for consideration of development outside the village boundaries are clear. However, does this imply that tourism development and rural business/economic developments can take place in areas where permanent residences cannot be built? It would be a shame if wording can be construed in such a way that a tourism/business development such as holiday cottages would qualify to be built outside the settlement boundaries.</p> <p>This is also reflected in Policy 9:</p> <p>“In the open countryside, proposals for farm diversification schemes and other rural business enterprises which require a rural location will be supported.”</p> <p>What if such diversification and enterprises consist of the development of a holiday cottage complex in open countryside? The proposed Station Road development, for instance, showed that a large number of people were opposed to the building of permanent residences on that site. Can Policies 5 and 9 be interpreted as supporting rural business/tourism development in such a location? Some careful re-wording would avoid this.</p>	<p>Support noted with thanks.</p>
<div style="background-color: black; width: 100px; height: 20px;"></div>	<p>I read with dismay that a petition has been put forward to take this area of land out of the AONB and into the boundary of the draft neighbourhood plan giving it a better chance of gaining planning permission to enable the building of properties on this field. To us as a family who have stayed at Brackenrigg several times this would be TRUELY heartbreaking for Embleton. The whole point of staying here is the beauty tranquility and sheer loveliness of this particular place. It is timeless</p>	<p>Noted. There are no proposed changes to the settlement boundary.</p>


## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>beauty that once gone can never be replaced. We travel regularly the length and breadth of the country but nowhere quite matches that field. Often on a winters evening I think about the lovely view down to the sea the marvellous stroll past the field to the dunes. I have some stunning photographs of the field and further, in different seasons, the sun setting on the distant hay bales are magnificent. We have wonderful memories of the five young cows galloping into that field each morning actually jumping with joy. Until Embleton we had never seen such a magical scene. All this will be destroyed for profit for the supposed need for more houses. Anyone only has to go into any city or town to see vast swathes of brown belt land sitting untouched or empty houses left to rot. Seahouses and even Embleton have had housing put up on the edges of the village. Everytime this happens another little bit of magic is lost. If it meant there would be no housing on this field and I could never visit again I would agree because I would know those dozens of rabbits we often watched gambling around in the field would have been saved for future generations. Please please listen to the wildlife who have no voice, the visitors who have and the people of Embleton who adore their village just as it is and has been.</p>	
<div style="background-color: black; width: 100px; height: 20px;"></div>	<p>We have been made aware of a planning proposal for the village of Embleton. We have stayed at Brackenrigg cottage, next to where the proposed development would take place, on several occasions since 2014, but we also visited Embleton beach on a previous holiday in 2010. There is a proposal to build houses on the field next to the cottage, which beggars belief. Any development of a housing development would completely wreck the outlook and ambience of this cottage. This is an area of Outstanding Natural Beauty, supporting a wide variety of wildlife, which is why we keep returning to the cottage, along with many others. Testament to this is the fact that It is always difficult to find a free week in the year to make a booking. But, it's not just this cottage which would be blighted by the proposed housing development. People walking down to the beach at the moment enjoy an uninterrupted view over the fields on both sides. Plus any reduction in tourist numbers would mean lost revenue to all the local services. So, we would add our voices to those who I am sure have emailed you with similar dismay at this proposal. Please take note of</p>	<p>This planning application is outside the remit of the NP but the settlement boundary will remain as proposed.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>why people keep coming back to this beautiful part of Northumberland and reject the Pre-Planning application.</p>	
<p>██████</p>	<p>It is with concern that we understand there is a proposal to develop land adjacent to the cottage named Brackenrigg, in the village of Embleton. We have been coming to Northumbria for many years, and for the vast majority of our visits we have had the privilege of staying at Brackenrigg.</p> <p>We note that Brackenrigg and The Villas are designated on the map as being in an Area of Outstanding Natural Beauty and that perfectly describes the location. The open views from this green space to the dunes and beyond are beautiful as is the view of the village from the dunes. Wildlife is abundant in this field and obviously enjoys the protection that an Area of Outstanding Natural Beauty affords.</p> <p>We understand that there is a proposal that this piece of land be included within the boundary of the Draft Neighbourhood Plan thus taking it out of the AONB. I have attempted to read through the Plan and my understanding is that there is not a massive need for new housing within Embleton due to the two recent developments and feel that taking this space out of the AONB and allowing development would have a detrimental impact on the landscape. The DNP begins with the statement "Embleton is special". Yes it is, and most of its charm lies in the village "feel" and community. You do not have to go far up the road to encounter a village that has become overdeveloped.</p> <p>We realise that these comments are not from residents of Embleton but in a small way we make a contribution to the local area and we have become very fond of it over the years. Thank you for the opportunity to express our views</p>	<p>This planning application is outside the remit of the NP but the settlement boundary will remain as proposed.</p>
<p>██████</p>	<p>1. Protection of designated green spaces within the village - particularly in and around the conservation area - is very important:</p> <p>The character of the Embleton has been eroded by recent developments that haven't been sensitive or proportionate.</p> <p>The remaining green spaces with the settlement boundary are one of the few features that help maintain the historical and natural character of the village.</p>	<p>Noted.</p>

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Name	Response	Comment
	<p>Views across these green spaces, particularly around the conservation area, are especially important and these green spaces should be protected against development.</p> <p>The Glebe Land is the last remaining ancient green space which gives historical context to important heritage assets and listed buildings within the conservation area, namely Holy Trinity Church, the Old Manse and Moot Hall.</p> <p>The Glebe Land also contains WW2 pillbox, which is a valuable example of 20th C history within our community and should be protected as such.</p> <p>Community volunteers have said that they would like the Glebe Land to be a community orchard - I strongly believe that this green space should be used for an outdoor community project and not sacrificed for building development to fulfil a non-existent housing need.</p> <p>2. Settlement Boundary</p> <p>The settlement boundary is sensible, proportionate &amp; in line with the draft Local Plan - it should remain as drawn in the consultation doc.</p> <p>3 Building on the AONB</p> <p>I strongly believe that there should be no new development within the AONB. Our heritage landscapes and natural are hugely valuable resources that drive the local economy &amp; enrich the lives of local residents.</p> <p>4. Housing Quotas &amp; Housing Need: Embleton &amp; Christon Bank have already fulfilled their new housing quota for the period until 2036.</p> <p>There is little demonstrated housing need for more new housing developments in Embleton</p> <p>The only new developments that should be considered, should be 100% social rental housing, like traditional council housing, but with very specific clauses to suspend the Right to Buy, so that supply is maintained for the long term.</p> <p>Par 4.4 could change “affordable” to “social rental housing”, to highlight the plan’s preference for social housing schemes that do not involve owner occupiers, rather than private discount value sales.</p>	<p>Noted, the Glebe Land is protected as LGS. Additional information is to be added to the detail.</p> <p>Noted, although the NP cannot allocate land for a community orchard.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
	<p>I very much support the work done on the neighbourhood plan. In my opinion the consultation has been thorough and fair and the plan is a very clear summary of the desires of residents for the future of the village. It is my sincere hope that the</p>	<p>Noted with thanks.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>settlement boundary laid out in the plan is adhered to. The village needs to be protected from the avaricious desires of land agents and local landowners. No settlement must be allowed beyond the boundaries laid out. I am of the opinion that the village has accommodated enough new housing, more in fact than we are statutorily obliged to do. No more housing development should be permitted as there is not the demand for permanent dwellings. Any new development would serve only to provide more damage to the outlook and character of the village and result in more second homes standing empty for much of the year as demonstrated in Creighton Place. The existing social housing in the village is useful in sustaining the school and other services. It will remain useful is the houses are preserved for rent only. The housing should be kept for rental in order to provide benefit to the village in perpetuity. As highlighted in the plan I value the green spaces in the village, the green, the glebe land and the surrounding aspect of the AONB. All these features contribute greatly to the popularity of the village as a tourist destination and a place to live. At the moment there is a happy balance between tourism and residents. This balance must be maintained. I support the parish plan as I believe that it will allow the village to continue to flourish as a working community with a sustainable tourism base. The plan places a sensible restriction on development which will preserve the community, its economy and its unique aspect. I believe full adherence to this plan will sustain the village as a vibrant working community and protect it in future from the forces of greed which have already wrecked many small coastal communities along the Northumberland coast and beyond.</p>	
<div style="background-color: black; width: 100px; height: 20px;"></div>	<p>I have read with interest the Pre-submission Draft Plan and would like to make the following observations, on 4 areas in particular.</p> <p><b><u>Forward</u></b></p> <p>In the Forward it has been stated that the parish of Embleton and its surrounding area is special. This is undoubtedly correct. The Embleton Parish Neighbourhood Plan is not “adjacent” as is stated in the forward, but it appears to be partly located within an Area of Outstanding Natural Beauty (AONB). There are only 34 such areas in England and more attention should be given to the fact that eastern third of the Embleton Parish Boundary is within the AONB. The</p>	<p>Changed.</p>

# EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

[illegible]



## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>remain hamlets and villages remain villages. In other parts of the country much of the rural values and characteristics have been lost due to urban spread, that have swallowed up the original identity of the village. This is not progress. As custodians of the parish, this plan offers us an opportunity to maintain the abundant bio-diversity, wildlife and a heritage coastline. Currently we also benefit from dark skies which can be enjoyed, due to the absence of light pollution. This is something to be celebrated and maintained, as the current buildings and homes are sensitive, to the landscape leaving opportunities for most residents to easily enjoy the beauty of dark night skies, in close proximity to their homes. Embleton in particular is a very special and unique place, in the country that deserves and must be protected for future generations. After all not many communities have the privilege of being in AONB.</p> <p>The Northumberland Landscape Character Assessment correctly highlights some of the significant features that should be protected by the Neighbourhood Plan. The scenic beauty and striking wide views of the windswept coastal land stretching out to sea, and along the coast, both to the north and south are to preserved for generations yet to come. This is such a significant asset recognised by the designation of an AONB, which stretches right up the hill at the top east end of Embleton. The charm and character of this area is frequently described and appreciated by many who read and contribute to the quarterly Whinstone Times. People who live here are clearly inspired by their local environment and its people. The boundary of the AONB has to be respected and protected from future developments.</p> <p><b><u>Objectives 2- Sense of Place</u></b></p> <p>Policy 5 Settlement Boundaries for Christon Bank and Embleton</p> <p>The objective here is “To protect heritage assets and enhance local green spaces, landscapes and views, that contribute to the distinct look and feel of the village.”</p> <p>I think the current Embleton Parish Neighbourhood Plan has stayed from this objective when discussing the settlement boundaries. The purpose of this objective is to protect the heritage assets and enhance green spaces, therefore one of the key objectives of the whole Embleton Parish Neighbourhood Plan</p>	<p>Noted.</p>

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Name	Response	Comment
	<p>2019-2036, must include a clear statement that the settlement boundaries that have currently not been “saved” are now saved as depicted on Christon Bank Map 2 on page 16 and the Embleton Map 2 on page 17 are saved to fulfil this objective. The purpose must be to ensure that the settlement boundaries are not extended and the green spaces are to be retained in order to protect the heritage aspects. Any other argument that does not protect the heritage aspects and green spaces is contrary to the Objective 2 of the whole plan and cannot be supported.</p>	
<p>██████████</p>	<p>Please find comments on the proposed development in Embleton.</p> <ol style="list-style-type: none"> <li>1. A development in the field behind and at the side of The Villas would affect the open vista and rural nature of the village which has such an appeal to visitors. The views to and from the coast are very special and would go against the statement that great weight is given to local landscapes.</li> <li>2. It would affect the habitat bordering the old quarry site where local people are working hard to improve and establish a further natural attraction for the village.</li> <li>3. Holiday letting properties that are so well booked for much of the year could be significantly affected by housing on this site. Many regular visitors contribute to the local community and economy.</li> </ol> <p>We hope that, whilst understanding the urgent need for local affordable housing (we are aware that there has already been new housing in the village) these and other comments will be taken into serious consideration.</p>	<p>Noted. The land cited is outside the settlement boundary.</p>
<p>██████████</p>	<p>We would like to register our support for the Embleton Parish Neighbourhood Plan. We have read the documents and think it has been very well researched and the document is clear and well written. As local residents living within the settlement boundary, we fully agree with the concerns raised and support the policies outlined to achieve the stated objectives.</p>	<p>Noted with thanks</p>
<p>██████████</p>	<p>Under no circumstances am I going to allow any public right of way on my land that is not already a public footpath. I am referring to my stretch of land that joins the lay by at the north end of the village however just presume this is the case for any land my family own at North Farm Embleton.</p> <p>Paragraph 5.3 of the Neighbourhood Plan says local affordable housing needs in the region of five households. This document has not been published for scrutiny</p>	<p>Noted.</p>



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	<p>by the parish council or as part of the consultation process. Whilst I acknowledge the need for affordable housing in the Plan area and supports its provision through the Neighbourhood Plan, without publishing the evidence, the delivery of only five affordable units within the Plan area over the next 17 years is a bit crazy as in my opinion we are trying to help young local families. This fails to meet the basic tests required by a Neighbourhood Plan as it is not clear whether the delivery of five affordable homes will contribute towards sustainable development by ensuring the right type of homes are available.</p> <p>In order to address this issue, the full report from the Housing Needs Survey should be published as part of a further period of public consultation, so that the method and the conclusions in respect of this key element of the Plan can be effectively take forward correctly.</p> <p>I also think tourist parking or lack of it should be reviewed if things carry on as we are with visitors we are going to have a massive lack of parking for walkers and tourists.</p>	
<p>██████ ██████</p>	<p>No new housing should be built in Embleton or the AONB, and the glebe land. If low cost housing is provided it should be proper social housing managed via a housing association or local council Any housing should be sustainable with non-oil, gas or coal heating systems.</p> <p>Development including of farming should be secondary to preservation and enhancing of the AONB</p>	<p>Noted, policies seek to achieve these objectives.</p>
<p>██████████ ██</p>	<p>Having read the consultation copy of the Neighbourhood Plan I wish to give my support. It is obvious that a huge amount of work has been put into this by the committee, thank you.</p>	<p>Noted with thanks.</p>
<p>██████ ██████</p>	<p>I would like to mention a few points that occurred to me while studying the latest Embleton Neighbourhood Plan. (My name is ██████████ and all my life since 1947 I have been deeply attached to Embleton Bay, Embleton, Low Newton and the dunes. Since retirement I live in Craster).</p> <p>I welcome your "tightly drawn" Settlement Boundary, and also Policy 2 on Landscapes and Seascapes. However I do feel much, much more should be made of the vital issue of the protection of these unique wonderful assets which are what make Embleton so very special. The beaches, dunelands and links ,</p>	<p>Noted with thanks.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>with the crowning glory of the magnificent Dunstanburgh Castle ruins, need to be protected against ever more hordes of visitors being enticed here by excessive advertising by the NT, AONB, holiday lets , etc. when duneland erosion, too many vehicles clogging up our narrow roads , dog fouling , disturbance of wildlife are just some of the negative consequences. A healthy balance is needed so that the local natural treasures are not spoiled for future generations. The fields between Embleton's skyline and the golfcourse must NOT be allowed to be "developed" so that the beautiful views towards Embleton from the dunes, golfcourse and beach as well as from the village towards the sea remain unscathed., our exquisitely beautiful heritage protected and preserved.</p> <p>It is worrying that Policy 5 , esp e) and f), seems to leave much room for potential abuse of the fundamental principles laid down to protect the heritage of landscape, seascape, village character , and designated Local Green Spaces ( though I suppose there must be some leeway for establishing desirable companies that provide employment opportunities and enhance the existing amenities).</p> <p>On Policy 15: what about footpath/cycle track between Dunstan Hill Campsite and Embleton village? The road on the Spitalford bends and bridge is extremely dangerous for pedestrians and cyclists.</p> <p>a) the path leading from North Farm fields and along the Lonnen is a problem as there is no way to cross the golfcourse safely between the Lonnen and the salthole. Not viable as Dangerous for walkers and disruptive for golfers</p> <p>b) is only viable /safe if the footpath does not lead walkers on to golf fairways. Vital to have good signage.</p> <p>On Policy 4: it is a great shame that this plan was not in place to prevent the Creighton Place development being built in a style totally out of keeping with the character of the main core of Embleton.</p> <p>Appendix A should surely include the James Young shop in Christon Bank?</p> <p>Well, good luck with your important work and thank you.</p>	<p>The plan seeks to support the improvement of existing rights of way and cycle ways.</p>
<div style="background-color: black; width: 100px; height: 1.2em;"></div>	<p>Thank you for providing such a thoughtful and detailed plan to endeavour to maintain the integrity of the Embleton village community. We are delighted to have recently had the opportunity to join the community in a village which we</p>	<p>Support noted with thanks.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>have known and loved for over thirty years. We are pleased to see the proposed settlement boundary, which we hope will support the Embleton village we all know and love. However, under objective 2 Sense of Place-Policy 5 seems to offer the opportunity to disregard the settlement boundary in the future. It is also with great sadness, I note that the Alnwick Local Plan Boundary was not saved, thus allowing the recent Planning acceptance for Creighton Place Phase 2. If this had not been passed, the parish would only be one home short of the number deemed necessary up to 2032. It has also been designed to potentially exceed the settlement boundary in the future. We sincerely hope that the settlement boundary now remains secure to maintain Embleton as a village, and not spread to become urban sprawl. We hope this thoughtful plan is passed in a secure manner.</p>	
	<p>I would like to register some comments on the Proposed Neighbourhood plan. Having reviewed the proposed plan, I support the proposed settlement boundaries and every effort should be made to retain these rather than extend them and put at risk further development in the village. There has already been significant development in Embleton over the last few years and further extension of the settlement boundaries would increase the risk of further development which will spoil the beautiful village environment for everyone.</p>	Noted.
	<p>We most strongly wish to register our comments with regard to the Embleton Parish Neighbourhood Plan and the future "development" of this wonderful village.</p> <p>On various websites and paper literature, Embleton is highlighted as a "special place" with its unique heritage, village atmosphere and stunning and spectacular views. One of the best is looking down from the top of Sea Lane and taking in all the open countryside, coastline and Dunstanburgh Castle on the headland. Being in an Area of Outstanding Natural Beauty (AONB) makes it vitally important that every effort should be made by the Parish Council to uphold the Parish boundary as it exists and has done for generations. It is particularly important that the boundary in front of High Dales is maintained, as any future development in the land down to The Villas, would totally destroy the open</p>	Noted.

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>landscape both looking east down to the coast and also west when walking up Sea Lane from the beach.</p> <p>Any such development here of modern, state of the art properties, would completely spoil the character and environmental impact. If any future planning application was approved here, then where would it end? The dreadful sprawl of Beadnell comes to mind. It is also vitally important that consideration must be given to the abundant wildlife here as it neighbours the quarry, a safe haven for many species.</p> <p>It must be apparent that any development between High Dales and The Villas will command the highest property prices as per the location, and ultimately could never be offered as affordable housing no matter any assurances given. This then begs the question, who will benefit if planning approval was given by virtue of the boundary being changed, as is being pursued by the landowner? It would only be him and the developer, but the catastrophic impact would be inflicted not only on all the immediate adjoining residents, but the thousands of locals and visitors who travel up and down Sea Lane year on year and marvel at the fantastic views.</p> <p>If affordable homes are required to be built in Embleton and Christon Bank, then economically they need to be in an appropriate location. Affordable housing is a misnomer, given that already a recently built property sold under those terms, has been used as a holiday let.</p> <p>It is hoped that any future development and housing requirements will be provided bearing in mind the environmentally sensitive nature of Embleton and Christon Bank. However, upon reading through much of the documentation in this exercise, it appears that the requirement for housing has already been met. Northumberland County Council has assessed the need for 65 houses in the Embleton Neighbourhood Area between 2016 and 2032. There has already been approval for 80 dwellings since 2016 thereby exceeding the target by 15 of the total required by 2032.</p> <p>There have been occasions in the past when a man has been in the field between High Dales and The Villas, and when asked what he was doing, he said</p>	

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>that he was testing for "methane gas". At this point we are bound to ask if the risk of methane gas here has been eliminated?</p> <p>Embleton is indeed a special and unique place enhanced in particular by its heritage, the abundant wildlife, being in an AONB and its dark night skies. Truly magical.</p> <p>This being so, it is incumbent upon the powers that be to ensure that the settlement boundaries are not extended so as to protect the heritage and characters of Embleton and Christon Bank. Anything less will be an error of constitutional duty and inconceivable misjudgement which will inflict a devastating legacy for residents and visitors alike.</p>	
[REDACTED]	<p>It has been brought to our attention of proposed plans for building in the field next to Brackenrigg, High Dales and The Villas in Embleton.</p> <p>This area is in the conservation area/area of national beauty and if successful would mean building in the field next to these properties which is currently used as agricultural land.</p> <p>We come on holiday frequently and have been doing so for a few years, therefore we strongly object as this would spoil the view across the field to the golf club and sea.</p> <p>Please do not let Embleton end up as an urban sprawl like Beadnell.</p>	Noted.
[REDACTED]	<p>I would like to commend all those involved in the preparation of the Neighbourhood Plan, I have been especially impressed with the level and quality of the Consultation.</p> <p>The Area Covered by the Neighbourhood Plan Am I right that this is a Parish Plan? The reason I say this is because a large proportion of the discussion has related to the Settlement areas as a result of present planning applications. However, applications could presumably be made to build in other areas, say to extend a farmstead or build a small rural craft centre?</p> <p>Housing: I support the plan in its approach to controlling second home ownership and supporting affordable housing. I see a conflict where holiday rentals are concerned, as they are a vital business asset but the level has to be controlled, can it be?</p>	Support noted.



## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	<p>Local Business I welcome the strong support you would give to future businesses. We cannot foresee whether someone will arrive with an innovative business idea that is in keeping with this area.</p> <p>The role of the EU? It is not easy for you to prepare this in a time of change Transport. 5.57 Since this is a Parish Plan not just a Settlements Plan. I welcome your proposals regarding footpaths bridleways and cycleways, I would have hoped it could go further where the Parish remit allows to try to link footpaths and add footpaths to roads whenever roadwork is being done and money available from Christon Bank to Newton Crossroads and along to Embleton is used by pedestrians and very dangerous.</p>	
<p>██████████</p>	<p>I support the current draft Neighbourhood Plan, in particular the preservation of the existing Settlement Boundaries to the east of Embleton Village.</p> <p>The land to the east of the village is an open area and is what makes Embleton such an attractive place to visit and spend time in.</p> <p>I have been going to Embleton for over 23 years and there has never been a need for extra housing or high rise buildings to destroy the beautiful coastline, there is plenty of local hotels and cottages that keep that part of the village covered.</p>	<p>Support noted.</p>
<p>██████████</p>	<p>I am writing in support of the opposition towards further developments in Embleton on the field towards the golf course on Sea Lane.</p> <p>I own a bungalow on Embleton links and I am concerned about any further development in this area. There already has been significant development so far. It is a real area of natural beauty that has wonderful views, English heritage landscapes; is becoming increasingly popular for tourism and hosts numerous different wildlife species and flowers (many native to this area). This is an area we should be protecting and should concentrate on developing elsewhere. I understand the need for further affordable housing but surely it makes sense to build in areas away from such landscapes.</p> <p>We should aim to keep the boundaries where they are and resist the temptation to develop further in such areas.</p> <p>I hope you are able to take some of these points in to consideration.</p>	<p>Support noted.</p>

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	The long-term health of the village depends on a mix of people of all ages. We need housing that will attract and keep young families. This will ensure the future of the school. We cannot fossilise the village by rejecting new housing.	Noted. New housing is supported in appropriate locations.
	Can the people from Embleton and Christon Bank have a vote to stop anymore 2 <sup>nd</sup> homes or holiday lets? Seahouses and Beadnell have done this, we need to.	The planning policy will ensure that new houses are for permanent occupation.
	I'm more than happy for more properties being built in the village as long as they are for permanent residents only and not for holiday lets. Also more rented properties would benefit the villages a lot, as not many families can afford the high priced properties which draws them out the village.	Noted. This is what the plan is seeking to achieve.
	Garden of Eastfeld adjacent to B1340 omitted. Christon Bank green space in middle of road. ACV10 doesn't include all of Blink Bonny.	Errors in maps have been rectified.
	Whilst it may seem petty ACV10 & ACV12 are inaccurately drawn or located, similarly LGS6.	Errors in maps have been rectified.
	Please note the school is a primary school.	Noted.
	We appreciate the efforts and amount of work done by those who have worked on the Neighbourhood Plan, and support much of the summary. We are concerned that there seems to be no mention of the infrastructure services of Embleton and Christon Bank, eg water, sewage, electricity and communication links eg broadband. Sewage/water pipes still have some old layouts which have caused problems with existing and new developments in the past few years. Some improvements have occurred but some commitment to encourage modernisation of such utilities should be in the plan, to support any new development causing extra pressure on the Embleton Parish area.	Noted.
	Page 44 – please amend Head Master to Head Teacher	Noted.
	South Parish boundary should be Embleton Mill and Embleton Burn. Factually incorrect?	The Parish boundary is correct.
	Land behind Chapel View needs to be included which has caravans sited on it. Land behind chapel for rental houses is not shown on the plan, this is essential for rentable homes.	The caravan site is not included. The land behind the church is outside the settlement boundary
	The Christon Bank plan is a shambles, if this is the PC knowledge of Christon Bank they don't know anything about the village. Where is the proposed	The egg farm was considered too large an area to include in the settlement boundary

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

Name	Response	Comment
	development behind the church? The well is not where you say it is. Why isn't the egg farm land included?	and would have been contrary to the principles of sustainable development.
	Policy 7: LGS is a road junction B6347/B1340 not a green space. Policy 14: Half ACV10 is a private garden not a community facility. A much older well is at Redstead Cottages(rear) may have been covered over in garden of bungalow behind. Station building should be of historic value.	Error in map corrected.  Station buildings are listed.
	A well thought through plan which captures the issues facing our villages. Tourism is a key driver in the local economy and we must protect the factors that attract tourists. Primary residence is an excellent idea, it build community cohesion and prevent local buyers being continually outbid by second home or holiday let buyers. An excellent effort from the team of volunteers.	Support noted.
	Approve of the proposals. To have a viable village we need affordable homes for local families. Tourism is important to the local economy. The natural beauty of the area must not be compromised.	Noted.
	Page 19, Is poor design subjective? Anything better?	No response.
	Policy 2, Point B. Naming farms in person/in particular. Is it necessary to name them? Perhaps too restrictive.	Names removed.
	Settlement boundary seems OK. It is important to keep the green spaces.	Noted.
	I am happy for the existing village neighbourhood plan as per current plan. It would be a real shame if any further developments were permitted between the existing village and the coastline.	Noted.

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

### APPENDIX C4 – FURTHER RESPONSES TO ADDITIONAL REG.14 CONSULTATION

Name	Response	Comment
Low Newton by the Sea Parish Council	The Draft Embleton Neighbourhood Plan was discussed at the Newton by the Sea PC meeting on 17th July 2019. The response of the PC was as follows: 'The PC has no comments and wishes Embleton PC success with their application'	Noted with thanks.
Historic England	Thank you for contacting Historic England regarding the re-consultation exercise for Embleton Neighbourhood Plan. I can confirm that the error noted below did not impact on Historic England's response to the pre-submission draft, and the representations made by Jules Brown in our letter of 20 <sup>th</sup> February 2019 still stand.	Noted.
Natural England	Natural England does not have any specific comments on this amendment to the neighbourhood plan.	
Northumberland County Council	We support the Parish in recognising and rectifying this administrative error, which resulted in the incorrect versions of the Policies Maps being published on the Embleton Parish Council website. We have no further comments to make on the Policies Maps.	Noted.
Diocese of Newcastle	Thank you for the update.	

# CONSULTATION STATEMENT: EMBLETON PARISH NEIGHBOURHOOD PLAN

## APPENDIX D: CONSULTATION STRATEGY FOR EMBLETON PARISH NEIGHBOURHOOD PLAN

### Embleton Neighbourhood Development Plan – Engagement Strategy

**WHAT is our process for engagement? HOW will we engage? WHEN will we engage? Engagement Strategy – Overarching Principles and Process of Engagement – WHAT is our process?**

This Strategy has been prepared to help guide the process of community and stakeholder engagement needed to produce an informed and relevant community-led Neighbourhood Plan for the Parish of Embleton. It sets out a range of activities and actions that can be taken to draw information from the community in and around Embleton. The process and methods described in the Strategy all seek to give a voice to the community and others who can influence the way new development is planned and delivered in Embleton. The process will result in the publication of a Neighbourhood Development Plan for the Parish. The way in which that plan is prepared and what it includes should reflect a considered understanding of issues people raise during its preparation. Effective engagement with local residents, community groups, businesses and landowners is a crucial aspect in creating a credible spatial plan.

Embleton Parish Council is the ‘qualifying body’ as defined in the Neighbourhood Planning Regulations. The Parish Council has appointed a Steering Group with delegated powers to oversee and lead the development of the Embleton Neighbourhood Plan.

The way in which the Steering Group progress the Plan will need to secure confidence from the community in the Parish. Confidence in the process and support for the outcomes will be more certain by starting this process in a demonstrably transparent way and continuing in that way through all stages of plan preparation. We will do this by:

- showing a willingness to openly encourage opinions and suggestions from all individuals and organisations within the community whether or not these present potentially conflicting, challenging or critical views of the Plan or the process;
- making every effort to understand all views expressed from all individuals and groups and respond clearly on all matters raised in a timely manner;
- demonstrating, in a form that is readily accessible and easily understood by the whole community, how the Plan reflects the views and opinions expressed during each stage of engagement and, where those views cannot legitimately be taken into account, explaining why that is the case; and
- presenting a reasonable, realistic, evidence based and cogently argued case to support the Plan at each stage of its preparation.

This Engagement Strategy is a way of explaining the steps we intend to take, from the start to the end of the process. We want to make sure that anyone who wishes to get involved through whatever mechanism is able to do so. The Strategy has been prepared to demonstrate from the start that this is a process that **needs community involvement** and that the community knows this.

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

A separate Project Plan has also been produced, which sets out in greater detail a proposed programme of community engagement activity and other evidence gathering work required at various stages throughout the production of the Plan. The Project Plan will inevitably evolve as the project develops over time.

### **The Embleton Neighbourhood Plan Consultation Statement**

Two main supporting statements must be submitted along with the Neighbourhood Plan before it can proceed to independent examination.

The first is a Consultation Statement, and the second is a Basic Conditions Statement.

The Neighbourhood Planning Regulations 2012 require that a Consultation Statement must cover the following:

- Details of who was consulted on the proposed NDP (including any statutory consultees)
- An explanation of how they were consulted
- A summary of the main issues and concerns raised through consultation
- A description of how these issues were considered and, where relevant, addressed in the proposed Neighbourhood Plan

A thorough Community Engagement Strategy which clearly explains the stages of Consultation proposed (and these are included in the Project Plan), and how each consultation stage will be carried out, with whom, and, where relevant, where (i.e. public consultation, on-line, meetings etc.) is essential to guide effective engagement throughout the process. This Engagement Strategy sets out how and when the Embleton Neighbourhood Plan Steering Group propose to consult with the local community and other stakeholders and what the aims are for local community engagement.

### **The aims of the Embleton Neighbourhood Plan consultation process are:**

- To involve as much of the community as possible throughout all consultation stages (see below) of the development of the Plan to ensure that it is genuinely informed by the views of local people and other stakeholders;
- To ensure that non-statutory consultation events take place at **critical points** in the process where decisions needed to be taken; these critical points may change depending on how the plan progresses;
- Use as a minimum, the staged consultation points referred to below (and in the Project Plan), via newsletters, drop-in sessions where appropriate and social media engagement;

## **EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT**

- To engage with as wide a range of people as possible, using a variety of approaches and communication and consultation techniques; and
- To ensure that results of consultation are fed back to local people and are available to read (via the Steering Group's website) as soon as possible after all consultation events.
- To ensure all minutes of Steering Group meetings are available on the website 2 weeks after meetings, and keep a record of all consultation events

### **Stages of Consultation – WHEN?**

Below is a list of consultation stages that are proposed in the development of the Embleton Neighbourhood Plan:

#### **Stage 1: Initial Consultation – Gathering the Issues (October 2017)**

Finding out what people like and dislike about the neighbourhood is normally the first stage of consultation. This stage will ask broad-ranging issues about what people like about living in the area, what people don't like, and what people would like to see change. This will take the form of a 'drop-in' session which will be advertised to every household and business in the Parish, by way of the community net service, and a flyer leaflet.

This engagement stage seeks to create the opportunity to bring together the broad views of the local community in how the area might be protected, change or grow over time. The intention ultimately would be to develop a shared view about the range of issues affecting the Embleton area. From this activity a plan can be developed that presents a comprehensive and co-ordinated approach showing how development required addressing these matters can be delivered.

The results of this Stage 1 consultation will be posted on the website.

#### **Stage 2: Vision, Objectives and Initial Policy Areas**

Using the initial Stage 1 consultation responses, and feedback from this event, a suggested Vision and Objectives for Embleton will be developed. From these, a suggestion of potential planning policy areas will be proposed.

These may be 'theme' based policy areas, and there may be opportunities to consider site specific proposals at this stage.

The community will again be consulted on the Vision, Objectives, and potential planning policy areas for the ENP. Any site specific proposals will also be consulted on. This consultation will be another drop-in session, with feedback from the first session, and an indication of how responses are steering the proposed long term development for the Parish.

The results of these consultations will be posted on the website.



## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

### Stage 3: Pre-submission consultation on your draft Neighbourhood Plan (statutory stage)

If other consultation is required prior to this formal stage, then the Project Plan will be amended to reflect this. If no further community consultation is felt to be needed, then the next stage of consultation will be the formal pre-submission or Regulation 14 consultation. This is the first statutory stage of engagement with the community on the pre-submission draft neighbourhood plan. At this stage all relevant statutory consultees will be contacted as defined in the Regulations and the consultation will be conducted over a 6 week period. The results of this consultation, and how information about how the Plan has been amended will be contained in the Consultation Statement which will be submitted with the Plan to Northumberland County Council.

### Methods of Engagement – HOW?

Community engagement can take place in many different ways. The methods used should reflect the objectives of the exercise and can be as specific or as wide-ranging as is necessary. It can involve simply telling people that something is happening, or asking people what they think about a particular matter. It can also mean asking people what they think the issues are that need to be addressed. This normally takes place at the start of a process of responsive and inclusive spatial plan-making.

Techniques used will vary depending upon the stage of plan-making. The first stage of engagement must be to **inform** the community about planned activities. This should be the start of a continuous process of information sharing and relationship building and should allow appropriate messages to get to the right people at the right time. Techniques will include:

- **Social media:** Website, Facebook page and Twitter account for the Plan
- **written correspondence:** leaflets and input into the local newsletter giving information to individuals, groups and organizations;
- **media coverage:** drafting press releases, advertisements about events and maintaining dialogue as necessary to secure media coverage to maintain a public media profile throughout the life of the development of the Embleton Neighbourhood Plan.
- **public exhibitions:** mainly in the form of informal drop-in sessions where information can be provided and initial opinions gathered.
- **face-to-face meetings:** planned discussions with local groups and people in the community.

### Summary

The Parish Council, as lead organisation in the Embleton Neighbourhood Plan project, through the Steering Group has agreed to adopt a set of key commitments on community and stakeholder engagement. These are presented as an agreed set of actions and approaches to engagement that we will offer to the community as part of this project:

- Begin the process by collecting information from the community to prepare a comprehensive picture of life in Embleton before agreeing the full scope of the Plan

## EMBLETON PARISH NEIGHBOURHOOD PLAN – CONSULTATION STATEMENT

- All information collected to inform plan making will be openly available
- A website will be provided for information sharing as early as possible following the launch of the project
- Regular press releases will be provided giving activity updates
- Information will be provided through local newsletters
- An open agreement to meet with individuals and groups throughout the project whatever their views and opinions as resources reasonably allow
- Consider options for providing some form of community ‘listening post’ during consultation periods where face-to-face contact can be made, subject to initial consultation feedback and ongoing review
- Respond within a reasonable time to all written representations demonstrating how comments have been taken into account and how the plan has been informed by those comments

In return we will ask only that anyone seeking to participate by providing information, opinions or analysis of proposals at any stage of the project is prepared to do so in writing to ensure that all comments can be properly noted as a true record of their views. Once we reach the stages in the process where statutory guidance has to be followed we will be required to publish comments made about the Plan.

The following table sets out the anticipated stages of community consultation.

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### Community Engagement – Action Plan

EVENT	ACTIONS REQUIRED	DATE
<b>FIRST STAGE CONSULTATION</b>	CREATE DATABASE OF KEY CONSULTEES	AUG/SEPT 17
	WRITE AND CIRCULATE INITIAL PRESS RELEASE FOR FIRST CONSULTATION EVENT	SEPT 17
	NEIGHBOURHOOD PLAN LOGO COMPETITION – ENGAGEMENT WITH FIRST SCHOOL	SEPT/OCT 17
	CREATE DISPLAY BOARDS, PREPARE MAPS, FOR COMMUNITY EVENT	SEPT 17
	DROP-IN EVENT	9 <sup>th</sup> OCT 17
	ANALYSIS OF RESPONSES TO BE MADE AVAILABLE ON WEBSITE	NOV 17
<b>SECOND STAGE CONSULTATION (VISION AND OBJECTIVES, POLICY AREAS)</b>	CIRCULATE QUESTIONNAIRE ON KEY ISSUES IDENTIFIED FROM INITIAL CONSULTATION (VISION/OBJECTIVES/POLICY AREAS)	JAN/FEB 18
	CREATE DISPLAY BOARDS, PREPARE MAPS FOR COMMUNITY EVENT	FEB 18
	PRODUCE FINALISED VISION/OBJECTIVES/POLICY AREAS BASED ON RESULTS OF CONSULTATION – PUBLISH ON WEBSITE	APRIL/MAY 18
<b>PRE-SUBMISSION CONSULTATION (REGULATION 14) (6 weeks)</b>	CIRCULATE DETAILS OF WHERE TO VIEW THE NEIGHBOURHOOD PLAN (WEBSITE)	AUG/NOV '18 (Timings dependent on whether SEA required)
	ENSURE ALL INFORMATION, INCLUDING NEIGHBOURHOOD PLAN, MAPS AND BACKGROUND EVIDENCE REPORTS ARE AVAILABLE ON THE WEBSITE	AUG/NOV '18 (Timings dependent on whether SEA required)
<b>CONTINUOUS CONSULTATION</b>	ACCESS TO BACKGROUND PAPERS, CONSULTATION RESPONSE ANALYSIS AND OTHER RELEVANT INFORMATION TO BE MADE AVAILABLE ON THE WEBSITE. LINKS TO WEBSITE TO BE	Ongoing

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	REGULARLY POSTED ON FACEBOOK AND TWITTER	
<b>FEEDBACK</b>	INFORMATION ON 'NEXT STEPS' WILL BE AVAILABLE ON THE WEBSITE	Ongoing