

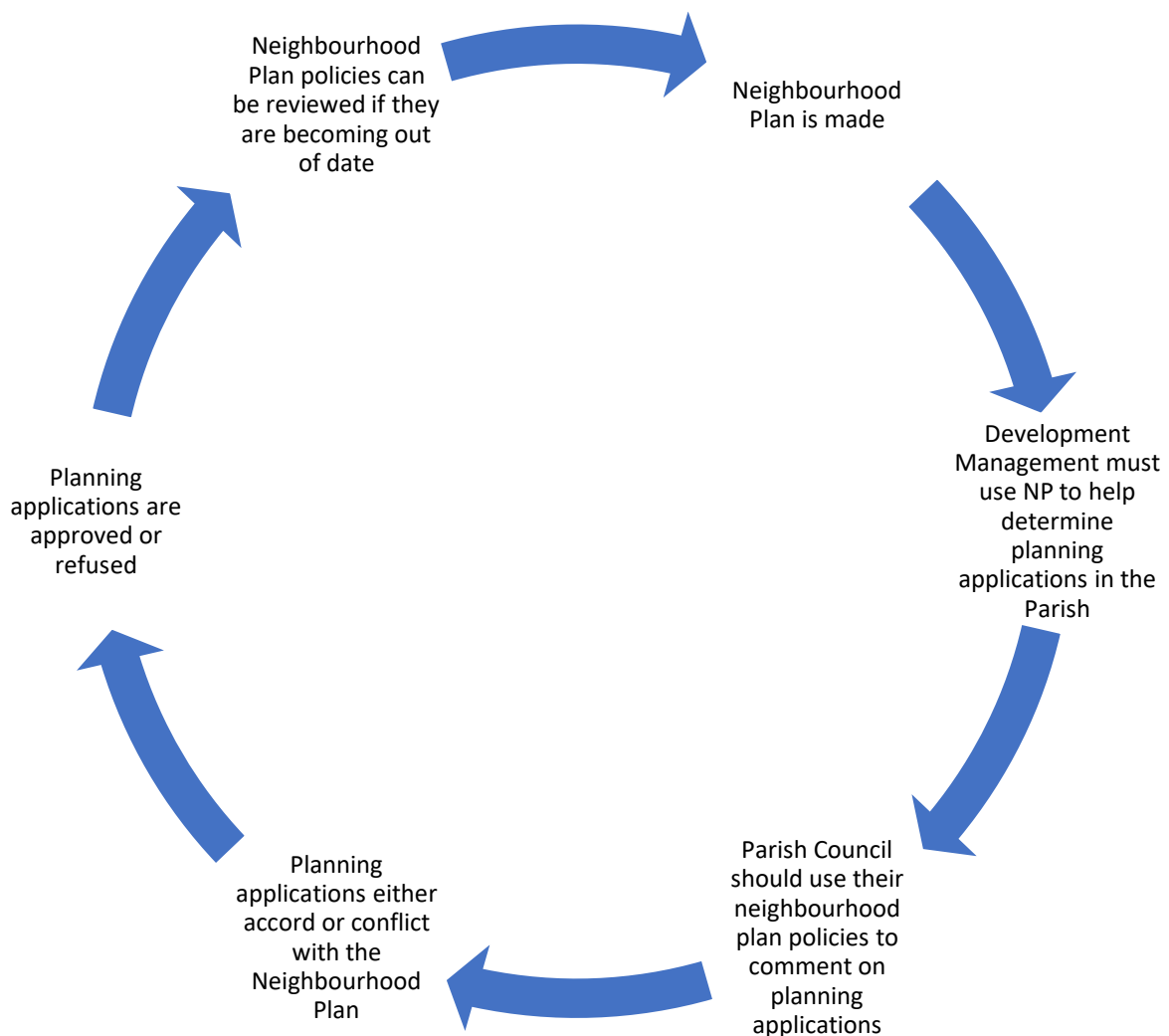
# Neighbourhood Planning Guides



Commenting on planning applications  
effectively using your neighbourhood plan

# 1. Introduction

- 1.1** This short guide has been developed for town and parish councils in Northumberland who have a made neighbourhood plan. The guide offers simple advice on how parish and town councils can be more effective in commenting on planning applications in their parish and offers practical examples of how to do so. The guide also provides tips on effectively monitoring your plan to ensure the policies are still achieving what they initially intended to do. The guide will be also useful to bodies currently preparing neighbourhood plans, in terms of thinking about later implementation and monitoring.
- 1.2** Your neighbourhood plan policies provide planning officers in the development management team with locally specific policies for your parish. Once made, the neighbourhood plan enters a simple cycle shown in the diagram below.



## 2. Once your plan is made

- 2.1** Once made, your neighbourhood plan becomes part of the statutory development plan for the area. Planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. The local planning authority (LPA) has a key responsibility in implementing the neighbourhood plan, by applying the policies through the development management process.
- 2.2** Development management planning officers will normally have a caseload of planning applications to work through and where an application falls within a neighbourhood area, with a made plan, they must apply the policies of the neighbourhood plan, to help determine the application.
- 2.3** The LPA also has a duty set out in the Neighbourhood Planning Act 2017 to consult Parish Councils on all relevant planning applications where a made neighbourhood plan is in place. The LPA must take any representations received into account in making their decision, as far as they relate to material planning considerations. It is therefore important that your comments on relevant planning applications relate to the use and development of land and any associated social, economic, and environmental impacts of development and are structured in the most effective format by referencing how the neighbourhood plan policies relate to the planning application.

## 3. Commenting on Planning Applications

- 3.1** Set out below are several short tips and examples to help provide effective comments on planning applications in your neighbourhood area. Used together, these suggestions should help you develop a consistent and robust approach to making representations on planning applications and stay focused on how a proposal accords or conflicts with the policies in your neighbourhood plan. The aim is to keep your comments simple and clear.

### A. Focus on the development scheme

Planning decisions are based on the use and development of land. Effective representations that are clear, rational, balanced and relate to the actual proposed development will be more effective. Comments on the developer or its staff or consultants should be avoided. Over emotive or insulting language should also be avoided.

## B. Focus on your neighbourhood plan policies first

Your made neighbourhood plan is a legal planning document so using the contents and quoting direct from relevant policies will be considered more than emotive or laborious representations that skim over the neighbourhood plans policies and focus on the problems a proposed development may cause.

### Example of good planning comments

We object to the proposed development. The scale and massing of this scheme are out of character with the surrounding context. The conservation area character appraisal identifies the domestic scale of properties as a key part of the area's character. The scheme would harm the character and appearance of the conservation area and be contrary to policy CONS11 of the Village Neighbourhood Plan and policy DC5 of the Local Plan. We do recognise the need for smaller new housing and recognise the innovative 'green' aspects of the design. By breaking down the massing differently, the scheme could be made to fit in with the local context. We would be happy to work with the developer and local planning authority to achieve this.

### Example of poor planning comments

We object strongly to this planning application. We do not like the look of it either. It is modern and ugly. Our residents pay council tax and have made clear that they do not like change and do not want any new development. The developers are only proposing this housing to make a profit.

## C. Make sure any other comments you make are a material consideration

There are many helpful guides on what is and is not a material planning consideration. Having a guide or creating one to have alongside you as you prepare your comments helps you remain focused and provide effective comments.

Comments which relate to the use and development of land and any associated social, economic, and environmental impacts of development should be the priority for your representation. The table below gives a brief example of certain topics and what is and is not a material consideration.

A material planning consideration	Not a material planning consideration
Impact (positive or negative) on a town centre.	Competition with a specific shop or business
Impact on the character or appearance of a conservation area	Personal design tastes within the conservation area

The capacity of local transport infrastructure (public transport, cycle facilities, roads, and other infrastructure) to support development. Impact of development on traffic safety	Management of existing traffic systems and public parking charges
Impact on the amenity of residential properties for example through noise, dust, and vibration	Impact on the value of property
Impact on pedestrian convenience and safety including convenient routes in the layout of new housing, with good connections to surrounding paths and facilities	Regularity of local bin collections
Impacts on trees and protected landscapes	Loss of view from your property
The need for design to take account of flood risk is a material consideration	Adequacy of foundations and construction

**D. Remember, an objection can be followed by constructive suggestions**

Responses can highlight both how the scheme meets policy requirements and where it does not. When supporting a scheme, it is useful to set out the positive impacts of the scheme and the benefits that it would deliver. It is useful to balance criticism of parts of a scheme with recognition of positive aspects. When objecting to a scheme, make clear the specific reasons for underpinning the objection. It may be useful to use bullet-points. Where policy requirements are not being met, constructive suggestions for modifications and improvement of the scheme are helpful. Representations should be made as early as possible, to allow time for modification of a scheme, where necessary.

**E. Use the same format each time to prepare your comments**

Establishing a template in which to record your comments allows consistency and ensures the relevant considerations have been submitted to the planning officer each time you provide a representation on a planning application. A simple and straightforward way to highlight the relevant neighbourhood plan policies and other material considerations that accord or conflict with the planning application will provide a recognisable representation to the planning department and avoid important considerations being lost amongst lots of unnecessary text.

Planning App Reference	

**F. Remember, your neighbourhood plan becomes less effective over time**

If you are using a neighbourhood plan that is approaching 5 years old or more the policies in your plan might be out of date. Changes to the NPPF and changes to the planning system, like the use classes order and the general permitted development

order may mean that aspects of your neighbourhood plan, that initially required developers to do certain things, or policies that did not support certain changes, may be out of date. There is also a new Local Plan which was adopted in March 2022 in Northumberland. That may affect the weight attached to certain policies in your neighbourhood plan. Where non-strategic policies conflict, the plan that was made or adopted most recently will carry more weight. It may be worthwhile reviewing the policies in your plan to ensure they are still effective, up to date and being given sufficient weight in any representations.