

Humshaugh Neighbourhood Plan

Summary of representations received and submitted to the Independent Examiner

Northumberland County Council is required, under Regulation 4(3)(b) of The Neighbourhood Planning (Referendums) Regulations 2012, to provide a summary of any representations submitted to the independent examiner pursuant to paragraph 9 of Schedule 4B to the 1990 Act.

This document provides a summary of those representations which were made in relation to the Submission Draft Humshaugh Neighbourhood Plan.

Electronic copies of the representations made on the Plan, and which were submitted to the independent examiner, are available under the Humshaugh tab on our Neighbourhood Planning web page:

<https://www.northumberland.gov.uk/Planning/Planning-policy/Neighbourhood.aspx>

List of Representations

1. Historic England
2. Ward Hadaway on behalf of J C Davidson, M Grundseth and P J McKee
3. Northumberland National Park Authority
4. Humshaugh Net Zero CIC
5. R&K Wood Planning LLP on behalf of the Diocese of Newcastle
6. Natural England
7. Savills, on behalf of Cussins North East
8. Coal Authority
9. Defence Infrastructure Organisation
10. Northumberland County Council

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| Jules Brown Historic Places Adviser | Historic England | Historic England made a number of comments in relation to the pre-submission draft plan. They are pleased that these have been taken into account and have no further comments to make. |
| | Ward Hadaway on behalf of J C Davidson, M Grundseth and P J McKee | <p>Vision – paragraph 3.1 The Plan fails to meet the basic conditions because its target of achieving net zero by 2036 does not accord with national policies and advice issued by the SoS and is not in general conformity with strategic policies in the Northumberland Local Plan.</p> <p>Policy 2 – General Comments</p> <p>It fails to meet the basic conditions because:</p> <ul style="list-style-type: none"> • It has not been demonstrated that there is sufficient suitable and available land in the Neighbourhood Area for sustainable development to be delivered to meet identified needs in this and the next Plan periods commensurate with Chollerford / Humshaugh's classification in the Northumberland Local Plan as a Service Village. It is therefore contrary to strategic policy STP1 of the Local Plan. • It has not been demonstrated that the proposed LGS is capable of enduring beyond the end of the plan period. • It undermines the achievement of sustainable development which includes supporting strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations. <p>The respondents consider that any new guidance / change issued by a new government must be taken into account by the examiner.</p> <p>Policy 2 – Site Specific Comments in relation to LGS04, The Legitt Field</p> |

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| | | <p>The proposed designation of LGS04 (Legitt Field) is not justified and should be deleted. It does not meet the LGS designation requirements. There is no public access and the site is not of particular local significance by reason of beauty, historic significance, tranquillity, or richness of wildlife.</p> <p>The proposed LGS fails to meet the basic conditions, because:</p> <ul style="list-style-type: none"> It undermines the achievement of sustainable development which includes supporting strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations. The site is within the settlement and is suitable and available and could contribute towards development needs in a sustainable location. It follows that the HNP is also not in general conformity with the strategic policies contained in the development plan for the area of the authority. <p>Policy 5 Reasoned Justification paragraph 6.4</p> <p>The Plan fails to meet the basic conditions because:</p> <ul style="list-style-type: none"> The Plan does not set out the approach to proposed housing developments within the settlement boundary. In the absence of a policy approach allowing in principle for such sites to come forward, the HNP does not contribute to the achievement of sustainable development and is inconsistent with the Northumberland Local Plan. |
| Susannah Buylla, Head of Planning & Policy | Northumberland National Park Authority | <p>Policy 1 Community energy initiatives - No issues with this policy.</p> <p>Heritage Assets - Agree that existing adopted local plan policies for designated assets are sufficient and the Historic Environment Record is sufficient for non-designated heritage assets.</p> <p>Policy 5 Humshaugh Design Code – Agree the importance of high quality design, which is also required by NNPLP policies but feel it is written specifically for new housing rather than all development. There is also duplication in parts 1, 3 and 4 especially with reference to set backs. Part 1 is considered appropriate and is generally supported. Part 1 c. relates more to Part 3 on landscape, and query the retention of “existing views” which is not necessarily a material planning consideration. Key views are referred to in Part 3 e. as well. This duplication of slightly different intentions may cause problem for the LPA officers in using this policy. Part 2 requires high quality</p> |

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| | | <p>materials, which may not be appropriate for all development. Part 3 is supported, including the reference to the World Heritage Site. Part 3 duplicates parts of part 1.</p> <p>Policy 6 Small Scale rural exceptions sites – Given the boundary of the settlement and the distance from the NNP boundary, NNPA has no comments to make on the detailed criteria.</p> <p>Policy 7 Community facilities – NNPA fully support highlighting the importance of community facilities.</p> <p>Policy 8 Tourism - Part 1 is logical as tourism facilities should ideally be located in more accessible areas. Part 2 is relevant to the area within the national park and is consistent with NNPLP Policy 7. Part 3 raises concern by including the term “inaccessible locations” in this Tourism policy. NNPA would like to see the term “inaccessible location” removed from Policy 3.</p> <p>The first sentence to part 3 should clearly set out that this relates to small scale tourism development only to make it consistent with NNPLP Policy DM7. As there is an “and” after 3 part e) it is assumed a proposal would need to meet all 5 parts of part 3 to be supported.</p> <p>Policy 9 Sustainable Transport – Agree with all parts of this policy, however it is noted that reference to the protection of public rights of way have been removed between this version and the pre-submission draft. This is disappointing; however it is acknowledged that the NNPLP policies allow for the protection of public rights of way.</p> <p>Annex 1 Community Actions</p> <p>It is noted that many of the community actions reflect the aims and objectives in the NNP adopted Management Plan, notably Actions 3, 5 and 6 relating to the Biodiversity and natural environment and tree planting and river water quality; and the Transport and Accessibility actions 9, 10, 11 and 12.</p> <p>Comments on other submitted documents</p> <p>Policies Map Overview: This clearly shows Northumberland National Park area within the Parish.</p> |

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| | | <p>Basic Conditions Statement</p> <p>NNPA is satisfied with the general content of the Basic Conditions Statement. It is considered that the Plan has appropriate regard to national policy and guidance, and this is referenced throughout the plan. In addition, it is considered that the plan contributes to the achievement of sustainable development.</p> <p>Consultation statement: NNPA are satisfied with the level of consultation carried out.</p> <p>Humshaugh SEA Screening: NNPA agrees Humshaugh Neighbourhood Plan is unlikely to have any significant positive or negative effects on the environment and a Strategic Environmental Assessment is NOT required for the Plan.</p> <p>Humshaugh HRA Screening: Some of the European sites referred to fall within the NNP boundary. NNPA agree there is no requirement for Strategic Environmental Assessment (SEA) because of ecological concerns.</p> <p>Humshaugh Design Guidance and Codes</p> <p>This is a comprehensive and helpful document and is supported.</p> |
| David Still | Humshaugh Net Zero CIC | They would like to commend the content of the draft submission Plan. They recognise the importance of proposed Policy 1 which will allow their community to support, amongst other technologies, community wind projects without the severe height restrictions imposed by the Local Plan. |
| | R&K Wood Planning LLP Wood Planning LLP on behalf of the Diocese of Newcastle | The Diocese object to the proposed designation of the Glebe Field as Local Green Space (LGS09) saying it does not meet the tests set out in the NPPF, specifically that it is not backed by evidence to show that the site is of particular local significance because of its beauty, its historic significance, its tranquillity or its richness of wildlife. In addition, it states that the site is already afforded significant protection and said the evidence does not show whether any additional local benefit would be gained by LGS designation. |

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| Sally Wintle, Consultations Team | Natural England | Natural England do not have any specific comments on this publication draft neighbourhood plan. |
| | Savills, on behalf of Cussins North East | <p>Policy 3 Protected Open Space</p> <p>Cussins object to the proposed designation of Doctor's Lane Field as a Protected Open Space (POS02) saying the evidence is not robust and therefore the site is not justified on the following grounds: biodiversity or amenity and recreation.</p> <p>The proposed POS and Local Green Space sites prevent realistic opportunities to meet the identified local housing needs for the Plan period.</p> <p>Local Housing Needs and Policy 6 Small scale rural exception sites</p> <p>No sites have been allocated in the draft Plan (either market or affordable) yet there is an unmet need for affordable housing in Humshaugh of approximately 60 dwellings during the Plan period. This is not consistent with the principles of sustainable development. Where there is a clear identified local housing need, the Plan should be positively planned to meet it. The Plan fails to meet the basic conditions in this regard.</p> <p>Policy 6 restricts the scale of rural exception sites to 0.49 hectares or 9 dwellings or less. This is more restrictive than Policy HOU7 of the Local Plan therefore the neighbourhood plan is not in conformity with strategic policy.</p> <p>An element of market housing may be required order to support the delivery of affordable homes to meet local needs on exception sites. As currently restrictively drafted, the Plan places those in local housing need at significant and unacceptable risk of [not] having their need for a home met.</p> |

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| Melanie Lindsley | Coal Authority | Their records indicate that within the identified Neighbourhood Plan area there are recorded coal mining features present at surface and shallow depth including a single mine entry and coal workings. These features may pose a potential risk to surface stability and public safety. It was noted however that the Neighbourhood Plan does not propose to allocate any new sites for development and on this basis the Planning team at the Coal Authority have no specific comments to make on the document. |
| Chris Waldron, DIO Assistant Safeguarding Manager | Defence Infrastructure Organisation (MOD) | The area covered by any Humshaugh Neighbourhood Plan will both contain and be washed over by a safeguarding zone that is designated to preserve the operation and capability of RAF Spadeadam. Policy 1: Community energy initiatives The MOD has, in principle, no objection to any renewable energy development. In order to provide a broader representation of MOD interests, and to ensure prospective developers are aware of the potential implications of these forms of development, it is requested that provision is made in Policy 1 to communicate that applications for renewable energy development which would not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites and assets will be supported. |
| Sarah Brannigan, Neighbourhood Planning Team | Northumberland County Council | Policy 1: Community Energy Initiatives and supporting text Without evidence that turbines under 25m are not viable and no new assessments for larger turbines made, there is insufficient evidence to alter the strategy of Northumberland Local Plan Policy REN2 and therefore supporting Paras 4.11 and 4.13 should be deleted. N.B. These points are not reflected in the Policy. Policy 1 as worded is superfluous to Local Plan Policy REN 1. Policy 2: Local Green Space Question whether the selection of two sites (LGS03 and LGS04) prevents the achievement of sustainable development. Question whether LGS03 Bog Field and LGS04 Leggit Field each meet the threshold for Local Green Space designation. |

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| | | <p>LGS08 – Haughton Square – The County Council is satisfied that sufficient evidence has been provided to support this designation.</p> <p>LGSO1 – Playing field and play area – Suggest this could be designated as Protected Open Space to allow criteria a-c in Policy 3 to be applied in circumstances such as the construction of a new school building or a new sports/ recreation field being provided elsewhere.</p> <p>Policy 4: Humshaugh Conservation Area</p> <p>Part 1 – duplication of point about ‘setting’.</p> <p>Part 2 is not clearly worded and the sub-bullet points do not read logically on from each other. In Part 2a iii, planning permission is not usually required for maintenance and repairs (for an unlisted building in a Conservation Area). If it relates to a listed building, repairs may need LBC, and this distinction should be made or the criterion removed from the policy.</p> <p>‘Past gardens and walls along the main street’ is not sufficiently clear about what these views are of and how they can be protected.</p> <p>Policy 5: Design Code</p> <p>General comments</p> <p>Without referring to the separate Design Code document, only the elements copied to this policy will apply to development proposals. Suggest that the policy is renamed ‘Design Guidance’ as it does not fit the definition of a code set out in The National Model Design Code (MHCLG, 2021).</p> <p>Comments on clarity</p> |

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| | | <p>1c. Make clear this is about views for the community as a whole to avoid any impression that individuals' views would always be preserved. Much the same point is repeated in 3e, but there is no list or assessment of key views.</p> <p>1f. This opens the danger that developers would simply leave leftover green spaces that were unusable and not overlooked. Suggest rewording.</p> <p>3a. This is already mentioned in 1d.</p> <p>Policy 6: Small scale rural exception sites</p> <p>This policy is supported as it accords with NLP Policy HOU7. However, the County Council question the inclusion of criterion (a) that 'it should be demonstrated, through the submission of a detailed site options appraisal, that..... no other suitable and available sites exist within the Humshaugh settlement boundary'. By definition, rural exception sites are sites that would not normally be used for housing. Therefore, there is no need for this requirement in policy 6.</p> <p>Policy 8: Tourism</p> <p>We County Councils supports the intention of this policy but question the wording, which appears to be more restrictive than in Local Plan Policy ECN 15.</p> <p>Paragraph 2 is almost identical to paragraph 2d of Local Plan Policy ECN 15; however, the latter only relates to permanent buildings for 'visitor accommodation'. Paragraph 2 of Policy 8 applies the same considerations to proposals for 'tourism facilities and visitor accommodation'. This requirement, therefore, would appear to go beyond what is set out in the Local Plan.</p> <p>In paragraph 3, support for proposals for temporary visitor accommodation in 'inaccessible locations' is impractical. If the intention is to support these proposals the County Council recommend re-wording the Policy. The criteria replicate or go beyond what is set out in NLP policies (ECN 14,</p> |

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| | | <p>ECN15), which would be a more restrictive approach. They question whether a proposal would be expected to meet all of the criteria a-e.</p> <p>Criterion a – Suggest this is expanded to ‘rural businesses’ not just ‘agricultural, horticultural or forestry business’.</p> <p>Criterion b - This is more restrictive than the NLP as ECN15(f) does not require camping (sites), caravans, and chalets to meet this criterion.</p> <p>Criterion c - The supporting text implies that this would be sought after, especially in less accessible locations but not necessarily required in all cases.</p> <p>Policy 9: Sustainable transport This policy is largely repetitive of NLP Policies TRA1, TRA2, TRA4 and STP4 (vehicle charging).</p> |