

**CONSULTATION STATEMENT
LESBURY NEIGHBOURHOOD PLAN - SUBMISSION
VERSION 2019 – 2036**

November 2019

Lesbury Parish Council

CONSULTATION STATEMENT: LESBURY NEIGHBOURHOOD PLAN (Nov 2019)

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1.0 Introduction

1.1 This Consultation Statement has been prepared to fulfill legal obligations set out in the Neighbourhood Planning (General) Regulations 2012 and subsequent amendments. These Regulations require that when a qualifying body (in this case, Lesbury 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 therefore sets out:

- a brief background to preparation of a neighbourhood development plan for Lesbury;
- 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;
- 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 D;
- Details of who was consulted, how, and when (Appendix A contains a list of consultees, Appendix B and C contain copies of letters used for Regulation 14 consultation including the article sent for publication in the local newspaper).

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

2.0 Lesbury Neighbourhood Plan – Background

2.1 The application by Lesbury Council to designate the civil parish of Lesbury as a 'neighbourhood area' was approved by Northumberland County Council on 24th July 2017.

2.2 Following the approval of the designated area, there followed over two years of progressive consultation with the local community. This consultation built on

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information and evidence that the Parish Council had already gathered and used to write the Lesbury Parish Plan (2009) available at <http://www.lesbury-pc.org.uk/parishplan.php>

2.3 In order to keep an accurate and comprehensive record of the whole consultation process, the Parish Council website has publicly accessible records of all the following documents which are summarised here, but also available online at: <http://www.lesbury-pc.org.uk/neighbourhood-development-plan.php>

2.4 These consist of records of:

- All minutes from meetings since the Steering Group inception;
- Copies of all the Newsletters and information contained within them in relation to the Neighbourhood Plan;
- Information and results of all the consultation events held;
- All documents used in the Plan preparation (evidence base documents and 'working documents');
- Contact details for Steering Group members to enable feedback at any time throughout the process;
- All the latest versions of the Lesbury Neighbourhood Plan.

3.0 Consultation and Engagement Timeline

3.1 In general terms, local residents and businesses were kept informed about progress through the Neighbourhood Plan website. The Parish Newsletter publication distributed to all households in the Parish was the main vehicle for canvassing feedback.

3.2 In addition to the Steering Group, a group of 12 volunteers ('champions'), drawn from different locations within Lesbury, Hipsburn and Bilton helped to keep residents informed on the progress of the Plan. The idea behind this was that the 'champions' would know some/most of their neighbours personally and, for example, when distributing the questionnaires for the Housing Needs Survey, would be able to engage with the residents individually to elicit more comprehensive feedback.

2017

3.3 Following the Neighbourhood Area Designation, the Lesbury Neighbourhood Plan Steering Group was formed. Six volunteers from the community and four parish councillors as well as representatives from the school, church and village hall were included in the group. A Terms of Reference for the Steering Group were agreed (as set out in the minutes of that meeting).

3.4 The Steering Group began to work closely with the Council's Neighbourhood Planning Link Officer, Chris Anderson, who attended meetings with the group, and advised them on planning matters, and the wider strategic context in relation to the Council's own strategic planning documents.

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- 3.5 Meetings were held throughout 2017 with officers from Northumberland County Council, Community Action Northumberland (CAN) and with Northumberland Estates, to discuss options for the neighbourhood plan. As 'housing' had been a key area of concern, a Housing Needs Survey was commissioned (and produced by CAN), and the group started to gather their own evidence about community housing.
- 3.6 A 'vision' and a set of 'objectives' was drawn up by the Steering Group, with the assistance of County Council Officers to provide guidance on what were and were not material planning matters. This 'vision' and 'objectives' were the focus for the first major consultation event in November.
- 3.7 The Parish Newsletter (August 2017 Issue 54) contained a progress report for residents and an invitation to become involved. Following this, the Parish Newsletter (November 2017 Issue 55) explained the role of 'champions' (local people involved in the Lesbury Neighbourhood Plan, willing to discuss and share information with others in the community) and advertised the open community meeting on 7th November to talk about aims and objectives and the housing needs assessment.
- 3.8 A Community event was held in Lesbury Village Hall on 7th November 2017 presenting and seeking views on the draft Visions and Objectives for the NDP. Over 70 people attended the meeting and the Visions and Objectives were unanimously endorsed. Residents were invited to send in further comments at any time. An article reporting on the meeting was published in the Northumberland Gazette.



Figure 1: Community consultation event on 'vision' and 'objectives' on 7th November 2017

- 3.9 A questionnaire on leisure activities for young people was designed by young people and circulated to pupils (age range 8 – 16 years) attending Hipsburn Primary School or the

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Duchess High School in Alnwick. In total, 13 of the 60 questionnaires were completed from the primary school and 33 of the 40 questionnaires were completed from the High School. The results were analysed, presented as a report to the Steering group, discussed at the focus meeting in June 2018 (leisure and education) and included in the policy making for the Plan.

2018

- 3.10 Feedback from the open meeting held in November was given in the next Parish Newsletter (January/February 2018, Issue 56). There was clearly broad support for the identified 'vision' and 'objectives' in the emerging Plan. However, a number of key issues emerged from the consultation which resulted in a series of 'focus' meetings on those key areas: Housing, Transport and Parking (particularly in relation to the Railway Station) and Leisure, Education and Environment'.
- 3.11 The first focus meeting on 'car parking' was held in Lesbury Village Hall on 21st March 2018. The focus of this meeting was on parking issues and the railway station. Local residents were invited to give five-minute presentations on their ideas and views. Over 70 people attended the meeting with lively discussion and some clear ideas emerging.



Figure 2: Extract from Northumberland Gazette reporting on Focus Meeting

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- 3.12 The next Parish Newsletter (March/April 2018 Issue 57) reported on the ‘headlines’ from the Housing Needs Assessment, and in particular on the exceptionally high return of questionnaires (over 58%).
- 3.13 The second set of focus meetings on ‘**housing and development sites**’ were held in the cricket pavilion, the school and the village hall on the 15th, 17th and 19th May 2018. These meetings focussed on potential development sites and on issues related to housing. The meetings were held in different locations, at different times, during the week and at the weekend, so that as many sectors of the community as possible had the opportunity to attend. People left a note of their views and set out where they felt development should or should not occur. The Steering group collated the views of those who attended the meetings or submitted views subsequently and the outcomes were reported in the Parish Newsletter (May/ June Issue 58).
- 3.14 The key issues raised were in relation to affordable housing; housing for local people; the desire to see development come forward within settlement boundaries and a desire that development should be small-scale rather than larger ‘estate’ style development.
- 3.15 The housing requirement identified in the emerging Local Plan for 45 dwellings over the Plan period (39 of which had already been delivered) was considered to be a reasonable amount of housing to meet needs in the area.
- 3.16 In order to meet strategic objectives, and those of people in the Parish, the Parish Council decided to focus housing delivery in the Neighbourhood Plan within the settlement boundaries, but to support ‘exception’ sites for affordable and local needs housing on the edges of the settlements to address concerns about the need for housing for local people.
- 3.17 The final focus meeting on the subject of ‘**leisure, education and the environment**’ was held in Lesbury Village Hall on 23rd June 2018. The outcome of this is reported on the website. In summary, there was strong support for improved sports and recreational facilities, with specific examples cited, including improvements to specific footpaths, encouraging the provision of community facilities and improving access. Many of the proposals were not spatial planning matters and were related to activities and community events.
- 3.18 On 24th October 2018 members of the NDP Steering group met with representatives of the cricket club to discuss the development of sports facilities in Lesbury and a community meeting was held on the 25th October at Hipsburn Primary School which was attended by County Council Officers.
- 3.19 A chartered planning consultant was employed to assist the group in drafting a detailed set of policies to reflect the vision and objectives in the Plan. The policies were designed to be locally specific and relevant to the outcomes of the consultation events held over the year. Northumberland County Council Officers assisted the Parish Council by

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providing advice on policy context and by providing a set of policies maps for inclusion in the Neighbourhood Plan.

- 3.20 Towards the end of the year, the November/December Parish Newsletter (Issue 62) included another progress report and set out next steps, including consultation arrangements for the Regulation 14 consultation in 2019. An independent email address was set up by the Steering Group to receive comments on the emerging Plan.

4.0 Pre-Submission (Regulation 14) Neighbourhood Plan consultation (December 2018/January - February 2019) Responses to Pre-Submission Draft Plan

- 4.1 The Pre-Submission Draft Neighbourhood Plan was agreed by the Steering Group and ratified by the full Parish Council. The consultation took place for a period of 8 weeks from 18th December 2018 until 11th February 2019.
- 4.2 A list of consultees (who were consulted on both Reg. 14 and Reg. 13 consultations) is contained in Appendix A.
- 4.3 Notices were delivered with the Newsletter and placed around the village 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.
- 4.4 Hard copies of the Plan were placed in the Village Hall and Post Office. A post box was set up for comments to be received in the Post Office.
- 4.5 An article was sent to the local newspaper (Northumberland Gazette) to publicise the open events further (see below).
- 4.6 Finally, a series of drop-in events were organised and held in January. By offering morning, evening and weekend dates and times, the events were organised so that all sectors of the community would have a chance to attend. Over 150 responses were received by the Parish Council from attendees and other people writing/e-mailing with comments.

www.northumberlandgazette.co.uk Thursday, January 10, 2019

Village at final stage in vision of its future

BY BEN O'CONNELL
Local Democracy Reporter
ben.oconnell@pimedia.co.uk

Another neighbourhood plan in north Northumberland is reaching its final stages and residents are being encouraged to have their say.

The final draft of the Lesbury Parish Neighbourhood Development Plan has now been published, with consultation running until 4pm on Monday, February 11.

The plan's steering group, set up by Lesbury Parish Council, is urging everyone in the parish to submit their views on what they describe as a document which 'includes modest, straightforward and direct ideas drawn from wide consultation with the community over the last 18 months'.

A spokeswoman said: "The plan captures what really matters to the community, what local people say they love about this parish and where improvements over time could be made.

"It shows the strength of feeling in the community for preserving what is good and making sure developments do not damage the landscape, history and beauty of this much-praised tourist attraction."

The plan has five goals, with the first being to ensure that any houses that are built are of the highest quality and that buildings in the parish blend in with the distinct and unique features of Bilton, Hipsburn and Lesbury.

The second is around homes that are needed in the parish – small-scale developments at a cost and design that meet the needs of young families as well as the elderly who may want smaller houses.

It is pointed out that the Government's definition of affordable in relation to properties for sale – 80 per cent of market value – would mean 'affordable homes' in the Lesbury parish of almost £250,000.

Goal three is to support the provision of new community and business facilities, with Alnmouth Station as a hub and focus for this; to support Hipsburn Primary School; to protect existing community facilities; and to allocate land which is highly valued by the community as local green spaces.

The fourth goal is to provide better signage and greater prominence to some of the parish's heritage assets, such as the church and the Reading Room.

The fifth and final goal is to support projects that will improve the area – new facilities at the station, an accessible bridge from Steppey Lane to the village a focus this year, attracting volunteers willing to work with young people, and backing local businesses such as the pub and Post Office.

The final draft plan and supporting documents are available online – <http://www.lesbury-pc.org.uk> – while printed copies are also available in the Post Office and Village Hall.

Three consultation events are also taking place where residents can find out more and share their views: Saturday, January 12, 10.30am-1pm, Lesbury Village Hall; Wednesday, January 16, 7pm-9pm, Hipsburn Primary School; Tuesday, January 29, 7pm-9pm, Lesbury Village Hall.



The village of Lesbury.

Statutory Consultees' Responses to Reg.14 consultation:

- 4.7 There were a number of responses from Statutory Consultees (identified in Appendix A). Many of them related to minor changes or additions to policy wording and criteria. These responses are listed fully in Appendix D.
- 4.8 Responses were received from the Historic England, the Coal Authority, Natural England, Highways England, the Environment Agency, National Grid, Northumberland County Council, Alnwick Town Council and Longhoughton Parish Council. Most of these

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responses were in relation to minor changes to policy wording, most of which were incorporated.

- 4.9 Northumberland County Council suggested a significant number of modifications, the majority of which have been incorporated into the submission draft. All modifications made as a response to statutory consultees are shown in full in Appendix D.

Landowner responses to Reg.14 consultation

- 4.10 Northumberland Estates own considerable areas of land in the Neighbourhood Area with development potential. They submitted a comprehensive response, which is included in Appendix D. Some minor changes were made to the Plan as a result of this response, but the response related mainly to aspirations to deliver large scale housing development in the Parish and concerns that the correct procedures had not been followed in relation to SEA (the SEA consultation had not, at that point, taken place).

Residents responses to Reg.14 consultation

- 4.11 Over 150 responses were received from members of the community. Almost all of these responses were supportive of the vision and objectives and policies in the Plan.
- 4.12 Three residents objected to the settlement boundaries because they did not include parts of their garden land/curtilage area. Each of these residents was responded to individually, and their comments are summarised in Appendix D. Each case was considered carefully by the Parish Council, but it was decided that settlement boundaries should remain as they are for landscape reasons. Each respondent was informed that they could submit further representations at the Regulation 16 stage.
- 4.13 A summary of responses from residents is contained in Appendix D. Individual names have not been used for data protection purposes, and comments have been summarised, but the Parish Council have retained the full responses which can be made available for inspection if needed by the Examiner.

5.0 Habitats Regulations Assessment

- 5.1 A Screening Opinion was sought as to whether Habitats Regulations Assessment would be required. The Plan was screened '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 Northumberland County Council produced a Habitats Regulations Assessment Report in October 2019 (included in the Submission documents).
- 5.3 The result of the Habitats Regulations Assessment report was the recommendation to include mitigation in some of the policies in the Neighbourhood Plan. Initially, this mitigation was proposed for inclusion in a number of different policies in the Plan.

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However, it was decided (and advised by NCC) that it would be more practical to include a stand-alone policy covering mitigation. A new policy (Policy 2 in the Submission Plan) was incorporated as a result of this. Policy 2 requires developers to contribute to the Northumberland Coastal Mitigation Service (or provide alternative mitigation of demonstrable effectiveness) where a net increase of residential (or holiday) units are proposed.

6.0 Strategic Environmental Assessment

- 6.1 As a Habitats Regulations Assessment was required, a Strategic Environmental Assessment was also required. The Environmental Report was produced by Northumberland County Council on behalf of the Steering Group in October 2019.
- 6.2 The conclusion of the report was that overall, 'the Lesbury Neighbourhood Plan is likely to lead to positive or neutral environmental effects. No modification is required to the Plan to meet the SEA Objectives.'¹
- 6.3 Some minor modifications were made to the Plan to address concerns raised by the Environment Agency in relation to Local Green Space policy and flooding concerns at the scoping stage.² The wording suggested by the Environment Agency to ameliorate these concerns was incorporated into that policy.
- 6.4 In accordance with Part 3, Section 13 of the Environmental Assessment of Plans and Programmes Regulations 2004, Lesbury Parish Council conducted a consultation on the Environmental Report with the statutory consultation bodies and other interested parties set out in Appendix A for a period of 4 weeks, ending on 21st November 2019.
- 6.5 Responses were received from a number of consultees. These are set out in Appendix E. There were no concerns raised by statutory consultees. There was one objection raised by Northumberland Estates. Their full response is set out in Appendix E, along with the responses to those comments by Lesbury Parish Council.
- 6.6 The response from Northumberland Estates highlighted concerns that the consultation had not been carried out to meet the Regulations, and that 'reasonable alternatives' had not been fully considered as part of the Plan preparation process. Most of the concerns raised appear to be related to the Plan preparation process, and the decision not to allocate their proposed housing sites, rather than whether the Strategic Environmental Assessment had been carried out effectively. Responses to their comments have been included in Appendix E.

¹ Paragraph 6.93 (p.68) Lesbury Neighbourhood Plan Environmental Report (NCC) October 2019

² Set out on p.113 of the Environmental Report (NCC) October 2019

7.0 Conclusions

- 7.1 The Submission Plan is the outcome of nearly three 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 Lesbury Neighbourhood Plan (Submission version) is a fair reflection of the views expressed by the local community throughout the various stages of plan preparation.
- 7.3 All legal obligations regarding the preparation of neighbourhood plans have been adhered to by the Parish Council. The Submission Plan is supported by a Basic Conditions Statement and by this Consultation Statement, both of which adequately cover the requirements set out in the Neighbourhood Planning Regulations 2012 [as amended]. The Parish Council has no hesitation in presenting the Plan as a policy document that has the support of the majority of the local community who have been engaged in its preparation.
- 7.4 This Consultation Statement 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.

APPENDICES:

- APPENDIX A: LIST OF BODIES CONSULTED
- APPENDIX B: LETTER SENT OUT TO STATUTORY CONSULTEES AT PRE-SUBMISSION CONSULTATION STAGE
- APPENDIX C: LETTER SET OUT TO RESIDENTS AT PRE-SUBMISSION CONSULTATION STAGE and COPY OF ARTICLE SENT TO LOCAL NEWSPAPER
- APPENDIX D: RESPONSES TO PRE-SUBMISSION CONSULTATION
- D1: STATUTORY BODIES
- D2: RESIDENTS
- D3: LANDOWNERS (Northumberland Estates)
- APPENDIX E: RESPONSES TO STRATEGIC ENVIRONMENTAL ASSESSMENT CONSULTATION

Please note: Due to a change in policy numbers following the incorporation of an additional policy to reflect the outcome of the Habitats Regulations Assessment Report, responses in Appendix D refer to old policy numbers. All policies (except for Policy 1) are now one number higher than that listed in the responses.

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APPENDIX A: LIST OF STATUTORY BODIES CONSULTED AT REGULATION 14 AND/OR REGULATION 13 STAGES

CONSULTEE GROUP	CONSULTEE	EMAIL ADDRESS
Local Planning Authority	Northumberland County Council	rob.murfin@northumberland.gov.uk david.english@northumberland.gov.uk
Neighbouring Town Council	Alnwick TC	alnwicktownclerk@btconnect.com
Neighbouring Parish Councils	Alnmouth PC Denwick PC Longhoughton PC Shilbottle PC Warkworth PC	alnmouthclerk@aol.com Andrew.Robson@northumberlandstates.co.uk parishclerk@hotmail.com Daniel.metcalfe1@hotmail.co.uk warkworthparish@gmail.com
The Coal Authority		planningconsultation@coal.gov.uk
Natural England		consultations@naturalengland.org.uk
The Environment Agency		planning.nane@environment-agency.gov.uk
Historic England		e-neast@historicengland.org.uk
Network Rail Infrastructure		townplanning.LNE@networkrail.co.uk
Highways England	Kate Read	planningYNE@highwaysengland.co.uk info@highwaysengland.co.uk
Marine Management Organisation		consultations.mmo@marinemanagement.org.uk
Electronic Communications		jane.evans@three.co.uk newsitereceptionedinburgh@openreach.co.uk info@wildcard.net.uk public.affairs@ee.co.uk enquiries@briskona.com info@avonline.co.uk

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List of Statutory Consultees (cont.)

CONSULTEE GROUP	CONSULTEE	EMAIL ADDRESS
Water Authority	Northumbria Water	katherine.dobson@nwl.co.uk
Gas and Electricity Provider		n.grid@amecfw.com box.landandacquisitions@nationalgrid.com
Police		Stuart.Bruce.893@northumbria.pnn.police.uk
Northern Rail	Station Manager, Alnmouth Railway Station, letter delivered by hand	
NHS		norccg.enquiries@nhs.net
NFU		andrew.stephenson@nfu.org.uk
Homes England		enquiries@homesengland.gov.uk
RAF Boulmer	Gleisinger, Steve Sqn Ldr Lewis, Ayshea Flt Lt	Gleisinger, Steve Sqn Ldr (BOU-SptWg-PMS OC) Lewis, Ayshea Flt Lt (BOU-SptWg-SCSO)
Sustrans		reception@sustrans.org.uk
Theatres Trust	Mark Price	mark.price@theatretrust.org.uk
All Things Neighbourhood Planning	Ed Dade	info@neighbourhood-planning.co.uk
SSA Planning	Steve Simms Mark McGovern	steve.simms@ssaplanning.co.uk mark.mcgovern@ssaplanning.co.uk

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List of Major Landowners, Local Businesses and Clubs

CONSULTEE GROUP	CONSULTEE	EMAIL ADDRESS
Major Landowners	Northumberland Estates – Rory Wilson Andrew Robson Chris Whitfield	rory.wilson@northumberlandestates.co.uk andrew.Robson@northumberlandestates.co.uk chris@uklandestates.co.uk
Local Businesses	Shilbottle Coal Company Stuart Brown Keith Hopper, letter delivered by hand Hawkhill Business Park, letter delivered by hand to Unit 1 for onward distribution to all other businesses George F. White, Hannah Wafer Knight's Taxis	shilbottlecoalcompany@gmail.com hannahwafer@georgefwhite.co.uk info@knightstaxi.com
St. Mary's Church	Rev. Ian MacKarill	info@alnardcoastal.org
Post Office	Jill le Marquand	jill.lemarquand@gmail.com
Hipsburn Primary School	Amanda Solomon	admin@hipsburn.northumberland.sch.uk
The Coach Inn	Joe Robson	lesbury.coach.inn@gmail.com
Village Hall Committee	Nigel Towers Murray Davies	nigel.towers@outlook.com murray_davies@btinternet.com
Northumberland in Bloom	John Malloy	johnmalloy77@btinternet.com
Alnmouth Golf Club	Peter Simpson, Club Manager	secretary@alnmouthgolfclub.com
Alnmouth and Lesbury Cricket Club	Andrew Hodgson Mark Brunton	jah@sportsworldrugby.co.uk mark.brunton@taitwalker.co.uk

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List of Major Landowners, Local Businesses and Clubs (cont.)

CONSULTEE GROUP	CONSULTEE	EMAIL ADDRESS
Alnmouth Football Club	Neil Robson	neil.p.robson@voa.gsi.gov.uk
Lesbury Bowling Club	Colin Platt	colin.platt2@btinternet.com
Lesbury Archery Club	Adrian Osler	ago@osler.demon.co.uk
Alnmouth Croquet Club	John Howie	greensfield@btinternet.com
Lesbury WI	Eleanor Morgan	el@btinternet.com
Lesbury Bridge Club	Ann Malloy	annmalloy@btinternet.com
Lesbury Dementia Friendly Community	Carol Southam Ann Malloy	carol.southam@yahoo.co.uk annmalloy@btinternet.com
ARUG	Jean Barr	jeanwbarr@btinternet.com
Aln Valley Railway	Tom Spence, Chairman AVR Trustees	tom.spence@alnvalleyrailway.co.uk trustees@alnvalleyrailway.co.uk

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APPENDIX B: COPY OF CONSULTATION LETTER SENT TO STATUTORY CONSULTEES

17 December 2018

Lesbury Parish Neighbourhood Plan

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

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

You have been 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 at **9.00am on Tuesday 18th December 2018** and ending at **4.00pm on Monday 11th February 2019**.

The Plan and supporting documents can be viewed on the Lesbury Parish Neighbourhood Plan website at <http://www.lesbury-pc.org.uk>.

Representations may be made by email to: lesburyndp@gmail.com.

Drop-in events will be held on the following dates and you would be most welcome to attend:

- **Saturday 12th January from 10.30-13.00 at Lesbury Village Hall**
- **Wednesday 16th January at 19.00-21.00 at Hipsburn Primary School**
- **Tuesday 29th January 19.00-21.00 at Lesbury Village Hall**

We would be pleased to receive any written representations you may wish to make on the Plan and supporting documents **before 4.00pm on Monday 11th February 2019**.

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

Yours sincerely

David Knowles
Chair
Lesbury Parish Council

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APPENDIX C: COPY OF CONSULTATION LETTER SENT TO RESIDENTS IN THE NEIGHBOURHOOD AREA. IN ADDITION, DROP-IN EVENTS WERE ADVERTISED IN THE NEWSLETTER AND ON POSTERS

To the Residents of Lesbury Parish

December 2018

Dear All,

The pre-submission NDP on the website brings together the views of the residents of Lesbury Parish on future development in the Parish. For the last 18 months, we have been consulting with residents through surveys, meetings and individual discussions and have now reached the pre-submission consultation stage, which is a formal stage before the Plan is submitted to NCC. The consultation period should last for a minimum of 6 weeks so, as it is close to the Christmas/New Year holiday period, we have set 4.00 pm on Monday, 11th February 2019 as the end of the consultation period. Approximately 45 Statutory Consultees, major landowners, and local businesses and clubs have been informed and have the opportunity to comment on the Plan. We also need to know from residents that we have reflected your views accurately and that our Aims and Objectives are fully supported by you.

Please let us know what you think. We want to ensure that, as with all other aspects of our consultation, we have been rigorous in our approach to gathering and reporting your views.

You can comment by:

Printing off and returning the attached form (please use the returns box in the Post Office or the Village Hall).

Joining us at one of the consultation meetings and completing a form at that time

Emailing your views to lesburyndp@gmail.com

To ensure that we are only counting your views once, we will ask you to give your name and address on the form you return.

The future development of Lesbury Parish is in your hands.

Best wishes,

Pamela Allen
NDP Chair

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APPENDIX C (cont...): COPY OF NEWSPAPER ARTICLE PUBLISHED IN NORTHUMBERLAND GAZETTE

LESBURY PARISH NEIGHBOURHOOD DEVELOPMENT PLAN

We are pleased to announce that the final draft of the Neighbourhood Development Plan for Lesbury Parish is now available.

Consultation closes at 4 pm on Monday 11 February. The Steering Group set up by Lesbury Parish Council would like to urge everyone in the Parish to submit their views.

Lesbury Neighbourhood Development Plan (NDP) includes modest, straightforward and direct ideas drawn from wide consultation with the Lesbury Parish Community over the last 18 months.

The final draft plan and supporting documents are on the website <http://www.lesbury-pc.org.uk>. Printed copies are also available in the Post Office and Village Hall.

The Plan captures what really matters to the community, what local people say they love about this Parish and where improvements over time could be made. It shows the strength of feeling in the community for preserving what is good and making sure developments do not damage the landscape, history and beauty of this much praised tourist attraction.

Our five goals:

The first two goals cover housing development, the next two relate to the areas we want to support, protect and improve within the Parish. The final goal links to projects we want to support to bring about improvements. These are outlines of our goals:

Goal one:

To ensure that any **houses that are built are of the highest quality** and that buildings in the Parish blend in with the distinct and unique features of Bilton, Hipsburn and Lesbury.

Goal two:

That any additional **new housing should reflect the views given in the Housing Needs Survey** carried out at the start of the NDP consultation, which is for small-scale housing development, defined by the government as between 5 and 10 houses in rural settings. The housing should be at a cost and design that meet the needs of young families as well as the elderly who may want smaller homes. There is some confusion over the term 'affordable homes'. This is a term used by Government and it means houses that are made available at 80% of the average cost of a new home in the locality. If we applied this to Lesbury Parish an affordable home would cost in the region of £246,320, which is beyond the reach of many young families. That is why we are proposing more affordable alternatives to this in the NDP.

Goal three is in four parts:

- to **support the provision of new community and business facilities** and, in particular, identify Alnmouth Railway Station as a hub and focus for new community and visitor facilities. This is not something the NDP can plan for directly because, as can be seen in the recently introduced measures, control over parking at the station is in the hands of NCC.
- to **support Hipsburn Primary School**. Over recent years, the reputation of the school as an outstanding school has made it attractive to families in other parishes and this has had a significant impact on the number of children attending Hipsburn. Currently, the school is able to use the facilities in the nearby cricket and football fields. It would

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welcome closer involvement of people from the local community to help out during the year.

- to **protect existing community facilities** such as the Village Hall, bowls club, cricket club, football club, croquet club, and golf club, all of which are thriving. There are small-scale improvements that can be made to ensure these facilities continue to meet the needs of the community. Young people, when asked through a survey, say they want to take part in more of the wide range of activities that are already available to adults.
- to **allocate land which is highly valued by the community for its heritage, recreation, and/or biodiversity value as Local Green Spaces.**

Goal four:

We have some **exceptional heritage sites in Lesbury Parish**, which are attractive to tourists. These include listed buildings such as St Mary's Church, the School (now the Village Hall), The Reading Room, as well as the old bridge, The Square, The Pant and the remains of the Mill. We want to provide better signage to give them greater prominence in the village.

Goal five:

We want to support projects that will improve the area:

- The **railway station is a Gateway to North Northumberland** and we think it would be good for tourism to have a vibrant business site with good public facilities at the station, especially since the Aln Valley Railway is so well-advanced. However, this is a large project with the potential to provide a resource for the whole of Northumberland, so whilst we are supportive, the future of this project will be in the hands of NCC and not Lesbury Parish NDP.
- Our **highest priority is to make the bridge from Steppey Lane to Lesbury Village accessible** for people with pushchairs and for users of cycles and wheelchairs. It will be an expensive project, but we plan to start a campaign for this in 2019.
- We want to **attract volunteers who are willing to work with young people** so that they have more opportunities to use more of the sports facilities and activities available in Lesbury Parish.
- We want to **support local businesses like The Coach Inn and The Post Office** so that old and young, locals and tourists, have access to essential services and are able to enjoy good places to meet for coffee, lunch and refreshments throughout the day.

Please join us at our consultation events to give us your views:

Saturday 12th January 2019, 10.30-13.00 hours, Lesbury Village Hall

Wednesday 16th January 2019, 19.00-21.00 hours, Hipsburn Primary School

Tuesday 29th January 2019, 19.00- 21.00 hours, Lesbury Village Hall

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APPENDIX D: CONSULTATION RESPONSES – STATUTORY CONSULTEES, RESIDENTS and LANDOWNERS (NORTHUMBERLAND ESTATES)

APPENDIX D1: STATUTORY CONSULTEES

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Respondent	Response made by respondent		Comments from Lesbury PC and changes proposed to Neighbourhood Plan
NCC	Page 5	"More detail on the consultation undertaken is provided in the Community Consultation Statement which will be submitted with the Plan for examination." It would be better to refer to the Consultation Statement.	Sentence changed
	Page 7 Paragraph 1.11	This section will need to be updated once the Screening Opinion from NCC has reached a conclusion. The screening opinion will be needed along with any Scoping report and Environmental report if the LNP is screened IN to the SEA process, or where an appropriate assessment is required under the Habitats Screening process. These documents will form part of the submission Plan package.	Para 1.11 has been altered to reflect the Screening Opinion which requires a Habs Regs Assessment and SEA for the NP.
	Page 9 Paragraph 2.17	It would be correct to say that Heritage Coasts are 'defined' not designated. The definition is not limited to heritage features but includes natural beauty of the coastline, and terrestrial, coastal and marine flora and fauna, amongst other aims.	Paragraph changed to refer to 'definition' rather than 'designation'
	Page 9 Paragraph 2.19 and 2.20	These sections of the LNP will need to be updated in line with the requirements set out by the SEA and HRA screening process.	Paragraph amended to reflect the positive screening opinion received.
	Page 13 Paragraph 3.2	Just for clarity, the titles of policy 1, 2 and 3 should be the same as the title of the Policies themselves.	Para. 3.2 changed
	Page 13 OBJECTIVE 2: HOUSING	The reference to "...any new housing meets the Objectively Assessed Housing need identified for the Parish should be re-worded to "...any new housing meets the Parishes housing requirement defined in the emerging Local Plan for Northumberland.	OBJECTIVE changed
	Page 14 OBJECTIVE 4	Conservation suggest revised wording to include "Our Objective is to ensure that all new development preserves	OBJECTIVE changed

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NCC	HISTORIC ENVIRONMENT	or enhances the special character or appearance of the Lesbury Conservation Area ..." in line with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.	
	Page 14 OBJECTIVE 5 WELL CONNECTED, HEALTHY AND SAFE PLACES	The authority supports the inclusion of sustainable transport themes within the plan, this includes objective 5: To ensure the neighbourhood area remains a well-connected, healthy and safe place to live, visit and work.	Noted
	Page 15 READING THE PLAN	It would be worth providing a paragraph to say how the Neighbourhood Plan fits in with other Development Plan policies. i.e. they will not supersede Development Plan policy.	New paragraph inserted (4.2)
	Page 16 POLICY 1 SUSTAINABLE DEVELOPMENT	<p>Would it be reasonable to quantify "small-scale" in the policy itself? Paragraph 5.4 in the supporting text refers to small-scale housing of between 1 and 9 houses.</p> <p>It may make the policy more clear if the types of development to be supported inside the settlement boundary formed criteria a) and the types of development that would be supported outside the settlement boundary in criteria b) rather than using the term and/or.</p>	Policy amended to include definition of 'small-scale' within the policy. Part 2 is amended to ensure that there is not inadvertent support for small-scale development which actually comprises 'major' development due to its impact on the AONB.
	Page 16 Paragraphs 5.6, 5.7 and 5.8	The reference to the Neighbourhoods Objectively Assessed Need is not the correct term to refer to. Lesbury has been given a housing requirement figure from the Northumberland OAN figure but it is not the Neighbourhoods Objectively Assessed Need.	Text altered to reflect comments

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NCC		Paragraph 5.8 would be better if it referred to Lesbury's housing requirement being largely met by existing planning approvals. The LNP still has an outstanding housing requirement of 6 dwellings that has not been met by current planning approvals.	
	Page 16 POLICY 2 SETTLEMENT BOUNDARIES	<p>Is it possible to fit the policy onto one page?</p> <p>We would suggest deleting the first sentence of the Policy 2</p> <p>Policy 2 may need to be re-drafted to say settlement boundaries are defined on the policies map and the structure looked at – we would be happy to try and help re-write this with the group at a future session or offer further advice alongside the Parish Council.</p> <p>Would it be better to refer to the types of development that will be supported outside the settlement boundaries rather than development that will be restricted?</p>	<p>Formatting changed so that Policy 2 is on one page.</p> <p>First sentence deleted, and reference made to Policies Map. The rest of the policy is considered to be appropriately worded, reflecting the aims of the Parish Council for development outside settlement boundaries.</p>
	Page 17 and 18 POLICY 3 DESIGN IN NEW DEVELOPMENT	The policy states that “permission will be refused for development of poor design that fails to take opportunities for improving the character and quality of the area.” The policy doesn't clarify what poor design is and assumes an automatic refusal for proposals that fail to take the opportunities for improving the character and quality of the area. This part of the policy makes it difficult for a decision maker to use the policy in a clear and concise nature.	Disagree – design is highly subjective, and it would be impossible to define in a policy what constitutes poor design. The criteria in the policy are intended to guide the decision maker on the elements that are considered important to secure a well-designed scheme.

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NCC	<p>Page 19 POLICY 4 RURAL EXCEPTION SITES AND COMMUNITY LED HOUSING</p>	<p>The second paragraph in the policy mentions development not being supported on the sensitive settlement edge. It would strengthen the policy if there was a paragraph in the supporting text explaining how the sensitive settlement edge was defined, using the AONB Landscape and Development Capacity study. This would reinforce the status of the edge that the NP is trying to create.</p> <p>As far as we are aware there has been no further work undertaken to establish the important views into and out of the settlements and are not identified on the Pre-submission Policies Map.</p> <p>Would it be sensible to define small-scale (between 1 and 9), for example?</p>	<p>Noted. Additional information is included.</p> <p>The sensitive edges are defined on the Policies Map. The key views will be added (these are fully assessed in the Landscape Character Assessment produced for the Northumberland Coast AONB). Further information about these 'key views' is included in the supporting text.</p> <p>It may be appropriate to include the extract from the Landscape Capacity Study in an Annexe to the Plan, where all the site-specific information is contained (but too much for inclusion in the body of the Plan).</p> <p>Small-scale is defined again in the policy as suggested.</p>

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NCC	Page 21 POLICY 6 LOCAL GREEN SPACES	<p>There seems to be an old reference to the sites designated for Local Green Space in the policy. The policy lists all 13 designations as LGS where the policies map was updated to reflect LGS 1-8, Recreational Space 1-3 and 2 allotments.</p> <p>The policy in the Plan either needs updating in accordance with the map (Dec 2018 version used for pre-submission) or the map updated to reflect the draft Policy.</p> <p>If the sites remained as all Local Green Spaces the Strategic Estates department would raise an objection against the school playing fields being designated for LGS as it hinders its potential future use as part of the strategic estates network of land belonging to NCC.</p> <p>Does the last paragraph in the policy add any extra protection? The first paragraph defines the level of protection given to LGS in accordance with Green Belt policy.</p> <p>There are no criteria or supporting text to explain what the status of the 3 areas of Recreational Space is in the Plan. The policies map designates 3 areas and classes them as RS 1, 2 and 3 – it would be helpful to the decision maker to understand what level of protection is being given to these spaces and what evidence is being used to support these designations.</p>	<p>Map to be updated to list all LGS as the principles to be applied to all those LGS s identified is to protect them from development. Policy amended to identify 13 LGS designations, and the Policies Map to be amended accordingly.</p> <p>In submission Plan, LGS 1-8, Recreational Space 1-2 and 2 allotments.</p>

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NCC		<p>Similarly, there is no supporting text or criteria in a policy to give any protection or indication of the status of the 2 allotment sites identified in the plan.</p> <p>It may be worth separating the 3 types of designation into specific policies with supporting text and not include them all in the Local Green Space policy.</p>	
	Page 22 POLICY 7 THE HISTORIC ENVIRONMENT IN THE NEIGHBOURHOOD AREA	<p>Conservation suggest revised wording to include "Our Objective is to ensure that all new development preserves or enhances the special character or appearance of the Lesbury Conservation Area ..." in line with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>Conservation has suggested the following re-wording to the last sentence in the policy. They suggest revised wording to include "Development of poor design that fails to preserve or enhance the character or appearance and quality of the Conservation Area will be refused."</p> <p>It would be better to refer to development of poor design AND development that fails to enhance the character or character or appearance rather than all one statement.</p>	<p>OBJECTIVE changed</p> <p>POLICY changed</p> <p>Policy amended to be more compatible with legislation</p>
	Page 23 POLICY 9	It would be helpful to add cycle access to this policy.	Cycle access added
	Page 24 POLICY 10 IMPROVEMENTS TO WALKING AND CYCLING ROUTES	The policy makes 2 references to proposals to improve Steppey Lane footbridge to allow disabled access and to provide a cycle and pedestrian route alongside the Aln Valley railway.	

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NCC		<p>There is no reference to these sites on the Policies Map, although the policy states there is. Need to update policy or map.</p> <p>From a Highways Development Management perspective, the main observation is that in terms of Policies 9 and 10, improvements to highways and infrastructure, whilst the Neighbourhood Plan is supportive of proposals to provide improvements to, inter alia, car parking at the station, walking and cycling facilities and the Steppey Lane footbridge, the mechanisms for facilitation or achieving the improvements are unclear.</p> <p>It is also noted that these elements of infrastructure are included within Section 7.0 of the Neighbourhood Plan as active Community Projects or on a "Wish List". It is therefore questioned whether these issues are appropriately controlled through Policies.</p>	<p>Policies map to be updated</p> <p>A planning policy merely sets out that development proposals that achieve these improvements will be supported. It does not need to say how it will be achieved.</p> <p>There is no conflict here. Although the Parish and other bodies are working to improve these aspects of infrastructure, planning permission would be required to achieve them, and this policy supports such development if/when it is applied for.</p>
	Page 27	Conservation suggest a revised wording to include "APPENDIX A: Non-designated heritage assets suitable for Local Listing in the Neighbourhood Plan area"	Separate Background Paper prepared following comments from Historic England, now included in new Appendix A Evidence Documents. Original Appendix A deleted.
	GENERAL COMMENTS	Is it possible to fit the policies onto one page that currently cover 2 pages?	Formatting changed so that Policies fit on one page
Historic England	Historic England is keen to ensure protection of the historic environment is appropriately taken into account in neighbourhood plans. Having reviewed the draft plan, I do not consider there is a need for us to be involved in its development		

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Historic England	<p>at this stage. Nonetheless, as you are aware, the plan area does contain a number of designated heritage assets (including listed buildings, a conservation area and a scheduled monument) as well as the potential for many more non-designated heritage assets. I therefore set out below comments on the draft plan together with some general advice on neighbourhood planning and the historic environment to help you as you progress.</p> <p>Detailed comments</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 that a large amount of work by the community has gone in to preparing the plan, and I would like to congratulate you on its content so far. I have the following comments to make. My biggest concern is in relation to Policy 8 and Appendix A.</p> <p>I welcome inclusion of protecting the historic environment in the Vision and Objective 4. Using the term ‘historic environment’ recognises you want to address a complex, inter-related, layered network of heritage assets and not just a collection of discrete buildings and spaces. I recommend using “conserve” instead of “preserve” as it signifies a more positive approach to managing change in the historic environment (by balancing significance and harm) rather than suggesting change should be prevented. In Objective 4 you could use “preserve” in relation to the conservation area (as that word appears in the relevant legislation), but it would be preferable to use “conserve” throughout the plan for all aspects of the historic environment because it is defined in the NPPF, thus bringing certainty to your plan.</p>	<p>Noted with thanks.</p> <p>Noted. Changes made where necessary.</p>
	<p>In Policy 2(c), including wording to allow potential heritage at risk to be tackled is welcome.</p> <p>In Policy 3, reference to the AONB Design Guide is welcome.</p>	Noted with thanks.

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Historic England	The significant views mentioned in Policy 4 are not shown on the draft Policies Map. When defining significant views, I recommend taking the setting of heritage assets, including landscapes, into consideration. More advice on this can be found in <i>HE Good Practice Advice in Planning 3 - The Setting of Heritage Assets</i> : https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/ .	Noted. These significant views will be incorporated, as they are identified in the AONB Landscape and Sensitivity Capacity Study.
	I am pleased in Policy 6 that you have taken advantage of the opportunity to recognise historically significant land in Local Green Space designations.	Noted with thanks.
	As the draft of Policy 7 only relates to the conservation area, I recommend changing the policy's name or, instead, widening it out to address other aspects of the historic environment if your evidence suggests this would be appropriate. Linking the policy back to evidence in the adopted conservation area character appraisal is welcome. The opening clause is unlikely to be in accordance with the legislation as it only requires a "positive contribution" rather than allowing development to leave character unharmed; the policy's closing clause is better worded in this respect. In clause (e), I recommend changing "buff stone" to "natural, local sandstone" to provide more certainty.	Reference to leaving character unharmed has been added to opening paragraph of Policy 7. Part (e) changed as recommended.
	In the Glossary , I recommend copying from the NPPF the definitions for "historic environment", "conservation", "significance", and "setting", and in the process familiarising yourself with them. These terms are crucial to applying your policies to protect and enhance the historic environment.	Noted and references are now included in the glossary. 'Setting' was already included, but 'significance' (as defined in the NPPF) has been added.
	I am concerned that the evidence for Policy 8 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,	Comments noted. The Appendix defining the non-designated heritage

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Historic England	<p>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. Firstly, the assets in Appendix A include several designated heritage assets (eg. St Mary's church, which is listed at Grade II*), to which this policy would not apply. I am also concerned that the appendix does not set out how the evidence on these assets was gathered other than linking it to a 2009 parish plan; in doing so, other assets which could be locally significant, eg. landscapes, 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. This will all weaken the evidence and, therefore, the policy. 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>: https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7 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: https://historicengland.org.uk/advice/planning/improve-your-neighbourhood/neighbourhood-plan-case-studies/. 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 "listed" to "identified" or "set out", and "list" to "set" or "assets" as appropriate.</p>	<p>assets has been altered to reflect advice given.</p> <p>Policy 8 has been amended to 'identify' rather than 'list' in reference to Appendix B</p>
	General advice on neighbourhood planning and the historic environment	Noted with thanks.

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Historic England	<p>We publish a full advice note on <i>Neighbourhood Planning & the Historic Environment (HE Advice Note 11)</i> which can be downloaded here: https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/. It should be the first port of call for advice on heritage in neighbourhood plans. Written specifically for those preparing plans, it explains why you should consider the historic environment, and sets out how to gather and use evidence on heritage to help prepare your plan. It also signposts a number of other resources, including how to explore what the community values in your area's heritage. We also have a wealth of neighbourhood planning advice and case studies on our website, here: http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/.</p> <p>The National Planning Policy Framework (NPPF) says neighbourhood plans have the power to develop a shared vision for their area, to shape, direct and help to deliver sustainable development (NPPF para 29). Specifically, this can include detailed policies on conserving and enhancing the historic environment and on design (NPPF para 28). The national Planning Practice Guidance (PPG) is clear that, where relevant, neighbourhood plans should include enough information about heritage to guide planning decisions and to put strategic heritage policies into action at a neighbourhood scale.</p> <p>As well as identifying the heritage assets in your plan area, it should include a positive strategy to safeguard those elements that contribute to their significance, including that generated by their setting. This will ensure they can be appropriately conserved and enjoyed now and in the future. For example, policies might address the following:</p> <ul style="list-style-type: none"> • Considering how the plan's objectives can be achieved by maximising the wider social, cultural, economic and environmental benefits flowing from heritage, eg. 	

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Historic England	<p>regeneration, tourism, learning, leisure, wellbeing and enjoyment.</p> <ul style="list-style-type: none"> • Locating new development to protect heritage assets and their settings. • Giving detail on the expected scale, density, massing, height, landscape, layout, materials and access of new development. • Offering solutions to heritage assets that are at risk from their condition or vacancy, or are vulnerable to becoming so during the life of the plan. • Considering how heritage assets can be enhanced. <p>The strategy and policies in your plan should be based on proportionate, robust evidence. For heritage, this might include a characterisation study, historic area assessment or archaeological appraisal, a summary historical narrative, or identifying locally significant buildings, areas and other assets. Rather than just the presence or absence of heritage assets, evidence should focus on what makes them significant and, where relevant, vulnerable. This helps you to identify the issues and options for your policies to address. More information is given in our advice note.</p> <p>To help in preparing the plan, your local authority should be able to offer you support, including providing evidence on heritage assets and in suitable mapping. The local Historic Environment Record will contain information on designated and non-designated heritage assets, whilst the conservation officer and/or archaeology adviser might be able to assist in using this information. You could involve civic and amenity societies or local history groups with an interest in your area's heritage. Locality provides funds to enable you to hire suitable historic environment expertise, for example to help prepare evidence, develop policy and produce the plan. More information is given in our advice note.</p> <p>Neighbourhood plans also give you the opportunity to tackle other issues important to the heritage, more on which can be found in our advice note. You</p>	

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Historic England	<p>have already taken advantage of many of these opportunities. One to consider is that communities with a neighbourhood plan in force can claim 25% of funds raised through the Community Infrastructure Levy (CIL) in their area. You plan can set out how CIL can be used to fund conservation of relevant heritage assets (eg. transport infrastructure such as historic bridges, or green and social infrastructure such as historic parks and gardens).</p> <p>The draft plan suggests you are currently considering whether or not it would be likely to have significant environmental effects and thus require Strategic Environmental Assessment (SEA) to comply with EU obligations. This is established by following the Environmental Assessment of Plans & Programmes Regulations 2004, which require you to consult us on the matter. We have not yet been consulted on the Screening Opinion you have sought from Northumberland County Council. We publish <i>HE Advice Note 8, Sustainability Appraisal and Strategic Environmental Assessment</i> to support the SEA process (https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/).</p> <p>Our comments are based on the information supplied to date; I hope they are useful. Our opinion may change should the plan change materially in content and direction. We should be consulted again under regulation 16 of the above regulations (publication stage) if our interests are affected, when we may provide further comments.</p>	<p>Noted. The Neighbourhood Plan has now been screened 'in', and thus requires SEA. HE will be consulted as the legislation requires.</p>

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<p>Natural England</p>	<p>In our review of the pre-submission draft of the Lesbury Neighbourhood Plan we have a few comments to make, which we have outlined below.</p> <p>Vision and Objectives Natural England welcomes the strategic aims of this document in promoting the provision of sustainable development as a bench-mark for all new proposals. We specifically note the importance placed within the document of the special qualities and features of designated sites within the parish and support the protection of important local landscapes.</p> <p>Natural England concur with the over-arching emphasis and the commitment to the protection of the natural environment shown as a common policy ‘thread’ throughout the neighbourhood plan.</p> <p>Environment- protection of designated sites. Natural England note the identification of Natura2000 sites within the plan, including the following:</p> <ul style="list-style-type: none"> • The Northumberland Coast Special protection Area (SPA) • The Northumberland Coast Ramsar. <p>And national sites:</p> <ul style="list-style-type: none"> • Northumberland Shore Site of Special Scientific Interest (SSSI) • The Alnmouth Saltmarsh and Dunes (SSSI) <p>One of the greatest challenges in protecting the interest features of the above-named sites, is the instance of increased recreational disturbance created by certain types of new development.</p>	<p>Noted with thanks.</p> <p>Noted.</p> <p>Noted.</p>
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Natural England	<p>Survey data of recreational visitors to the Northumbria Coast SPA and Ramsar highlight that a high percentage of visitors to the coast (and therefore the above-named sites) reside within a 10km buffer zone of the coast., with this part of the coastline offering significant opportunity for access to the aforementioned designated sites. In order to counter disturbance created to bird and marine life mitigation should be included within developments seeking to protect the special interest features mentioned. Appropriate mitigation may take the form of various schemes and provisions. Northumberland County Council has created a strategic scheme which seems to provide dog warden services which are financed through contributions provided by new residential and tourism schemes within the 10km buffer zone. We would suggest that the Coastal Mitigation Strategy (CMS) is outlined within the neighbourhood plan to ensure that developers are aware of this initiative.</p>	<p>The Coastal Mitigation requirement is identified in the Plan in paragraph 5.4 (preceding Policy 1).</p>
Natural England	<p>Environmental enhancement</p> <p>Development provides opportunities to secure a net gain for nature and local communities, as outlined in paragraphs 102d, 118a, 170d, 174b and 175d of the NPPF. We note that a high degree of integration of development within the natural landscape is outlined in the neighbourhood plan but wish to re-iterate the importance of the following that could be included within the environment policy to reinforce the importance of environmental enhancement. These can include:</p> <ul style="list-style-type: none"> • Providing a new footpath through the new developments to link into existing rights of way. • Restoring neglected hedgerows. • Creating a new pond as an attractive feature on the site. • Planting trees characteristic to the local area to make a positive contribution to the local landscape. • Using native plants in landscaping schemes for better nectar and seed sources for bees and birds. • Incorporating swift boxes or bat boxes into the design of new buildings. • Designing lighting to encourage wildlife. 	<p>These points have now been included in the policy explanation section preceding the policy, and some elements into the policy itself.</p>

CONSULTATION STATEMENT: LESBURY NEIGHBOURHOOD PLAN (Nov 2019)

Natural England	<ul style="list-style-type: none"> • Adding a green roof to new buildings. <p>You could also consider how the proposed developments can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:</p> <ul style="list-style-type: none"> • Links to existing greenspace and/or opportunities to enhance and improve access. • Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips) • Planting additional street trees. • Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links. • Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore). 	Noted. Our list of LGS includes areas that are important locally, some for biodiversity. Other recreational links are identified in Policy 10. Some of the suggestions are perhaps best delivered as 'projects' rather than as planning policies.
	<p>Access and Recreation</p> <p>Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate. Natural England welcome the neighbourhood plans wording on this issue.</p>	Noted.
	<p>Rights of Way, Access land, Coastal access and National Trails</p> <p>Paragraph 98 of the NPPF highlights the importance of public rights of way and access. It is advised that the neighbourhood plan includes wording which outlines that development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of developments.</p>	Noted, although this has not been raised as a specific issue and is already recognised in NPPF. It is not considered necessary to repeat this in the Neighbourhood Plan.

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	Consideration should also be given to the potential impacts on any nearby National Trails.	
Highways England	<p>Highways England welcomes the opportunity to provide comments on the Submission Version of the Lesbury Parish Neighbourhood Plan (the Plan) and we have undertaken a review of the Plan in accordance with our responsibilities and aims. This letter provides an overview of the Strategic Road Network (SRN) in Northumberland, the background to Highways England's engagement on the emerging Local Plan and our formal response to this Neighbourhood Plan consultation.</p> <p>Strategic Road Network Context Considering the location of Lesbury Parish, the A1 trunk road is the only part of the SRN which could be impacted by the development proposals within the proposed neighbourhood plan. Access to the A1 from Lesbury Parish is gained primarily via the Willowburn Roundabout or Shilbottle Road junction, to the south east of Alnwick. This junction connects into Lesbury via the A1068, approximately six kilometres in distance. Other SRN connections in Northumberland, including the A19 and A69, whilst important to the movement of traffic in Northumberland, would not be impacted upon by the proposals presented in the neighbourhood plan.</p> <p>Background The strategic road network - Planning for the future: A guide to working with Highways England on planning matters, details the approach we take to engaging in the planning system. It identifies that as a statutory consultee in the planning system, we are under a regulatory duty to co-operate and aim to give consideration to all proposals received and to provide appropriate, timely, substantive responses when consulted. We seek to be a proactive planning partner supporting local and national economic growth and regeneration and aim to actively engage at an early stage of thinking on all planning matters that could impact on the SRN. It builds on</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

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Highways England	<p>DfT Circular 02/2013 The Strategic Road Network and the delivery of sustainable development, which sets out the way in which Highways England will engage with communities and the development industry to deliver sustainable development and economic growth, whilst maintaining the safe and efficient operation of the SRN.</p> <p>We have been actively involved throughout the preparation and development of Northumberland County Council's local plan, which is currently at the publication stage. Highways England is currently reviewing the draft plan as part of the consultation period. Highways England review the local plan within the context of the county's future planning proposals and the potential impact this has on the operation and safety of the SRN. In particular, development aspirations in Northumberland, and indeed the wider Tyne and Wear region, will place additional demands on the SRN that will likely exacerbate existing network issues. We therefore consider that it is critical to ensure that the implications of development on infrastructure, and in particular, the SRN is fully understood at the earliest opportunity to enable any supporting measures to be appropriately planned for, as part of the plan making process.</p>	Noted.
	<p>Lesbury Parish Neighbourhood Plan</p> <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. We are generally supportive of the proposed vision and objectives for Lesbury Parish and in particular Objective 5: Well-Connected, Healthy and Safe Places, which seeks to, 'To ensure the Neighbourhood Area remains a well-connected, healthy and safe place to live, visit and work'.</p>	Noted with thanks.
	<p>To support the delivery of Objective 5, it is noted that policy 10 is proposed, which seek to support measures to improve walking and cycling. Whilst none of the policies have any direct implications for the A1, we are generally supportive of the intentions and the support given for such measures and improvements in that they can contribute to travel by sustainable means.</p>	Noted.

CONSULTATION STATEMENT: LESBURY NEIGHBOURHOOD PLAN (Nov 2019)

Highways England	Objective 2: Housing, presents policy associated with future housing provision within the parish. It is stated that the Northumberland Local Plan identified the parish of Lesbury requires an additional 45 houses to meet with the counties supply needs. It is identified that this housing provision shall be provided as 'infill' housing within the boundary of Lesbury and building on the rural boundary shall be avoided, with the exception of certain rural exception sites. In review of the supplementary documents, potential housing sites were investigated in the preparation of the draft neighbourhood plan (Focus Meeting 2 - Housing & Development), however it is stated in the plan that no specific housing sites have been brought forward.	
	The potential impact of 45 additional houses is unlikely to have a major impact on the SRN, given the scale of development and the distance from the A1, however it is worthy of note that to date Highways England has been consulted upon two housing sites (planning application references: 18/04527/OUT & 18/04528/OUT) in two locations within Lesbury. These sites total approximately 100 dwellings, which is already over double of that identified in the plan. Highways England is concerned about the level of development coming forward in the Lesbury area together with that coming forward in Alnwick and the potential for cumulative impact at the SRN junctions in Alnwick. Consideration should be given to how this potential cumulative impact shall be addressed either within the plan or by the Local Planning Authority.	Noted. The Neighbourhood Plan does not propose to allocate either of these sites. The impact will therefore need to be addressed by the LPA.
The Coal Authority	<p>The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield areas and also protect coal resources from unnecessary sterilisation by encouraging their extraction, where practical, prior to the permanent surface development commencing.</p> <p>As you will be aware the Neighbourhood Plan area lies within the current defined coalfield.</p>	Noted with thanks.

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The Coal Authority	<p>According to the Coal Authority Development High Risk Area Plans, there are recorded risks from past coal mining activity in the area including; 23 mine entries, reported surface hazards and likely historic unrecorded coal mine workings at shallow depth.</p> <p>However, it is noted that the Neighbourhood Plan does not allocate any sites for future development. On this basis the Coal Authority has no specific comments to make in respect of the Lesbury Neighbourhood Plan.</p> <p>In accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended) please continue to consult The Coal Authority on planning matters using the email address of planningconsultation@coal.gov.uk.</p> <p>The Coal Authority wishes the Neighbourhood Plan team every success with the preparation of the Neighbourhood Plan.</p>	
National Grid	<p>National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.</p> <p>About National Grid</p> <p>National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.</p>	Noted. No changes required.

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National Grid	<p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.</p> <p>Specific Comments</p> <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.</p> <p>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p> <p>Key resources / contacts</p> <p>National Grid has provided information in relation to electricity and transmission assets via the following internet link: http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</p> <p>Electricity distribution</p> <p>The electricity distribution operator in Northumberland Council is Northern Powergrid. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk</p> <p>Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:</p> <p>Hannah Lorna Bevins Consultant Town Planner n.grid@woodplc.com</p>	
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National Grid	<p>Wood E&I Solutions UK Ltd Gables House Kenilworth Road Leamington Spa Warwickshire CV32 6JX</p> <p>Spencer Jefferies Development Liaison Officer, National Grid box.landandacquisitions@nationalgrid.com</p> <p>National Grid House Warwick Technology Park Gallows Hill Warwick CV34 6DA</p>	
Environment Agency	<p>Environment Agency Position Thank you for giving us the opportunity to comment on the above consultation document. Having reviewed the documents submitted, we have the following comments and advice to offer.</p> <p>Flood Risk We suggest adding that new development should avoid Flood Zones as defined by the Environment Agency's Flood Map https://flood-map-forplanning.service.gov.uk/</p> <p>We encourage sustainable flood prevention measures within any new development such as SuDs and we recommend that these are designed in a way that provides additional habitat.</p>	<p>Policy 3 has been amended (part d) to include reference to providing habitats in SUDS designed schemes. Additional information has also been included in the supporting text (paragraph 5.15)</p> <p>No additional wording has been incorporated with regard to flooding, as there are no sites allocated, or indeed likely to come forward in any areas at risk of flooding.</p>

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<p>Environment Agency</p>	<p>Biodiversity</p> <p>We consider that there is an opportunity not only to preserve existing conditions, but to also enhance environment assets such as river corridors and natural habitats and to reduce pollution.</p> <p>We support policy 6: Local Green Spaces which recognises the need to safeguard and enhance such areas.</p>	<p>Support noted with thanks.</p>
	<p>Water Quality</p> <p>The consultation document does not make reference to issues such as flooding, green corridors, biodiversity and water quality. We would also welcome references to blue infrastructure and the importance of water for people and the environment. Blue infrastructure is a subset of green infrastructure and includes rivers, ponds, streams, wetlands and their riparian margins. Rivers, lakes, coastal and ground waters are an important resource for people, the environment and supporting industry, wildlife, tourism and recreation.</p> <p>We would welcome the inclusion of objectives in relation to The Water Framework Directive (WFD). The WFD is a European Directive that requires all water bodies to achieve good status by 2021. It also aims to prevent deterioration in waterbody status; reduce water pollution; conserve aquatic ecosystems and habitats; reduce the effects of floods and droughts on waterbodies and promote sustainable use of water as a natural resource. We suggest that further detail could be included in the plan regarding the protection of waterbodies from pollution and management of waterbodies so that they reach and maintain a good and sustainable waterbody status. The Northumbria River Basin Management Plan sets out which actions and measures are needed to achieve the objectives of the WFD.</p> <p>https://www.gov.uk/government/publications/northumbria-river-basin-district-riverbasin-management-plan</p>	<p>Noted; however there are no specific policies related to water courses, and the NP is not required to cover all topic areas.</p> <p>T</p> <p>There are no proposals in the Plan which are likely to impact on the WFD. Many of these matters are outside the scope of planning policies in the LNP.</p>

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<p>Alnwick Town Council</p>	<p>For Alnwick Town Council, the key parts of the draft Lesbury Neighbourhood Plan centre on Alnmouth Railway Station and in particular to:</p> <ol style="list-style-type: none"> 1. Railway parking 2. The development of a community/business/tourist hub at the station 3. Aln Valley Railway link to Alnwick <p><u>1. Railway parking (Neighbourhood Plan Objective 5, Policy 9):</u></p> <p>Relevance to ATC: Many Alnwick residents commute to work or for leisure and to Edinburgh and Newcastle airports from Alnmouth station and depend on there being sufficient car parking space every day to catch trains so the ambition to provide additional car parking is of interest to ATC. The need for more parking may become more acute following reopening of Aln Valley Railway.</p> <p>The Draft Lesbury NP policy supports a new car park, or extension of the existing car parks to alleviate the on-street parking problems that are suffered by residents in the area surrounding the station.</p> <p>Alnwick Town Council supports these proposals as they will potentially increase the use of the rail network as a sustainable (low carbon) alternative to private car use: Increasing car parking space would be supported in the context that it reduces road traffic on longer journeys. Any new car parks should have adequate electric car charging points installed to further help reduce the environmental impact of the car use.</p> <p>Alnwick Town Council would also like to see encouragement and enabling of a regular bus service to connect with all local communities as many people do not have access to a car and cannot afford regular taxi fares to and from the station: This of course also negates the requirement for increasing car park space which will be a continuing issue as the plan period moves forward based on recent levels of growth and the need for low carbon solutions to transportation in the very</p>	<p>Support noted with thanks.</p> <p>Support noted with thanks.</p> <p>Noted. An additional criterion has been added to require electric charging points to be installed as part of any scheme.</p> <p>Noted, this is not a planning policy matter, but could be added to the list</p>
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<p>Alnwick Town Council</p>	<p>near future. This is now an Alnwick Town Council priority as we try to lead decarbonisation initiatives in our local community.</p> <p>Not strictly a Neighbourhood Plan matter but Lesbury Parish Council needs to be aware (it probably already is) of the potential effects on Alnmouth station of the suggestion that fewer or no Cross-Country Franchise trains call there under the new franchise.</p>	<p>of 'community projects' proposed alongside the LNP.</p> <p>Noted.</p>
	<p><u>2. Alnmouth Railway Station Hub: community hub; business opportunity within a station building for café, car and cycle hire, tourist information. (Neighbourhood Plan Objective 3, Policy 5)</u></p> <p>Alnmouth Railway Station itself (or an adjacent site) has been identified in the draft Neighbourhood Plan as the location of the hub and focus for significant new community, retail, business and visitor opportunities and facilities.</p> <p>Relevance to ATC: The provision of a Tourist Information Centre, café and cycle hire at the station will generate a need for ATC and Alnwick-based partners (CoT, Castle, Garden, Tourism Association, tourist attractions, Alnwick TIC, etc) to ensure that these carry full information on Alnwick's offer and attractions and ensure full and convenient access to Alnwick town and to maximise transport links to and from Alnwick.</p> <p>The extra facilities at the station would be supported in context with all of the above comments. The station is a sustainable transport hub/interchange and its importance will only increase in the future. It needs to be able to accommodate more travellers and provide them with good quality facilities as expected at any modern transport hub. This would include but is not limited to provision of good quality food and drink, toilet facilities, adequate warm waiting rooms on both platforms, ticket and service information for busses and trains, tourist information, cycle / car hire and secure cycle / luggage storage etc.</p>	<p>Noted. These detailed matters are perhaps not appropriate for a planning policy, but a TIC has been added into part a) of Policy 5.</p> <p>Support noted with thanks.</p>

CONSULTATION STATEMENT: LESBURY NEIGHBOURHOOD PLAN (Nov 2019)

<p>Alnwick Town Council</p>	<p><u>3. Aln Valley Railway to Alnwick; cycle route; footpaths (Objective 5, Policy 10);</u> Relevance to ATC: The restored rail line should bring more tourists and visitors to Alnwick's Lionheart Business Park and into the town centre.</p> <p>Of major importance to ATC is the walking / cycling / accessible route (Alnwick Greenway) which will lie alongside the AVR route. This needs proper connectivity (both safe and convenient) at both the Alnwick and Hipsburn ends of the route. It will provide a safe, sustainable commuter, tourist, cycle tourism and, importantly, a route for local people to access Alnwick and the coast (the route is, of course, two way) with their children, in safety from the road. This can be cycling, walking, or disabled access and also facilitates connection with nature. The Hipsburn / Lesbury / Alnmouth / NCN 1 (Warkworth and south, and Boulmer / Longhoughton and north) connections need to be made safe and convenient for all users and this needs to have much greater emphasis within the Neighbourhood Plan. The improvement of the Steppy Lane footbridge is important in this regard, but so too would be safe routes between the station and Steppy Lane / the NCN 1 route. An alternative safe route from the station directly to Lesbury may also be appropriate.</p> <p>The draft Neighbourhood Plan also suggests that the AVR could become a commuter route from Alnwick to Alnmouth for connections north and south on the ECML. The provision of a proper platform for the AVR services at Alnmouth Station in close proximity to the existing Network Rail platforms must be a priority.</p> <p>The connection to Alnwick via the AVR is to be encouraged, but the usefulness of this will be heavily dependent on the level of service provision on that line and its use, as is suggested in the draft Neighbourhood Plan, as a commuter line is questionable given the likely seasonal nature of services and likely high fares which tend to be a feature of heritage railways.</p>	<p>Noted. Additional routes have been added into Policy 10 to reflect these comments (Provision of safe route between the station and Steppy Lane, and Lesbury)</p> <p>An additional criterion has been added to Policy 5 to support infrastructure required for the Aln Valley Railway.</p>
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Longhoughton Parish Council	<p>The Lesbury Neighbourhood Plan (pre-submission draft) was forwarded to Longhoughton Parish Council on 18.12.18 for comment as a neighbouring Council. This was discussed at the meeting of Longhoughton Parish Council on 18.02.19. The Council would like to submit the following comments.</p> <p>Comments from Longhoughton Parish Council.</p> <p>Longhoughton Parish Council has considered the Pre-submission draft. It is clear that the draft reflects considerable efforts that have gone in to consulting and engaging with the population of the Parish. The plan appears to be very sound and well supported by those who have been consulted. As a neighbouring Parish we do not have any further comments to make on the Plan.</p> <p>We wish you success in the final stages of getting the Plan approved and operational.</p>	Noted with thanks.
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CONSULTATION STATEMENT: LESBURY NEIGHBOURHOOD PLAN (Nov 2019)

APPENDIX D2: RESPONSES FROM RESIDENTS

REPONSES TO RESIDENTS OF LESBURY PARISH

The summary below shows the response to the written comments received from residents of Lesbury Parish. They are difficult to categorise and some responses reflect residents' views of the two preliminary planning applications that were submitted to build a total of 101 houses in the parish at the point at which the draft predetermination document was made available for consultation. The table below shows the number of responses and comments received. Some comments related solely to the housing applications and have not been included in our responses.

75 responses without any comment; 51 responses with one or more comment

count of 'Agree' with no comments	118	114	102	122	127	122	99
count of 'Agree with comments'	11	13	30	10	5	7	34
count of 'Disagree'	3	4	0	0	1	1	0
count of 'no response'	1	2	1	1	0	3	
TOTAL COUNTS OF RESPONDERS	133	133	133	133	133	133	133

Respondent	Response made by respondent	Comments from Lesbury PC and changes proposed to Neighbourhood Plan
Two Steppey Lane residents	1.Housing	Agreed.
One Curly Lane Resident	Some of the comments made by residents refer to proposals for building 101 houses in the parish.	Reflected in The Housing Needs Survey which formed the basis of the housing policy in the NDP
Two Riverside residents	Indicated that, if housing development is permitted, 'there must be an acceptable balance' of new houses 'contained to a minimum requirement' to avoid 'excessive development'	Agreed; NDP must be consistent with Northumberland Plan and supports fully affordable

CONSULTATION STATEMENT: LESBURY NEIGHBOURHOOD PLAN (Nov 2019)

Respondent	Response made by respondent	Comments from Lesbury PC and changes proposed to Neighbourhood Plan
Two residents from Townfoot	Must be within numbers set by Northumberland Local Plan; housing target almost met	homes where needed. However, number is not a target.
Two residents	Provision of more affordable homes	Noted
Lesbury Village	Suggestion that new houses should have two car parking spaces	Noted.
	Would like, sheltered accommodation/ single dwellings with warden	Noted
	Include provision for self-build plots	Noted
	Link car parking spaces to new houses	
Two residents from Croftlands	Queried the ability of the NDP to resist the pressure from landowners	Once the NDP is made it will have legal standing and must be considered when planning applications are received.
Thirty two residents from Croftlands	Against more houses being built and would wish to keep the building of new homes to a minimum based on established need. The respondents sited a range of different reasons for this:	More houses will be needed, but Agreed that this should be based on need.
Riverside, Lealands	The wish to limit/ prevent the sale of houses for second homes	Less than 20% of properties are used as holiday homes which means we have no legal grounds for limiting the use of new homes.
Town foot	To prevent an increase in the volume of traffic and exacerbate problems that currently exist e.g. at Church Corner	Traffic problems noted; no large scale housing proposed.
Meadowlands	Preserve the Village envelope	Agree with these statements; they reflect the proposals set out in the NDP; no amendments
	Preserve the character of the place	

CONSULTATION STATEMENT: LESBURY NEIGHBOURHOOD PLAN (Nov 2019)

Respondent	Response made by respondent	Comments from Lesbury PC and changes proposed to Neighbourhood Plan
Lesbury Village	Resist urbanisation	needed. However, some small-scale development will take place to meet local needs.
Hipsburn	Too much development; leave it as it is	Noted
South View	Loss of historic environment to houses would be permanent	Noted
Curly Lane	No new houses to be built in conservation area	Noted
	The NDP proposals are exactly what we need, 'to maintain, enhance and secure the future of our neighbourhood'	Agreed
	'Local people getting their chance to express their opinions'	Agreed. No changes required.
One resident Curly Lane	'Need 21 century housing/ facilities not listed buildings	Noted.
	're-develop and build for the FUTURE'	Not in line with any other responses and would not support the Parish as a Tourist Attraction. No change made to the NDP.
	2. Parking at the station	
Two Bilton residents	If a business hub is created at the station it must not be at the expense of parking facilities.	The station is the responsibility of Northumberland County Council and not within the remit of the NDP.
Two Riverside residents	Proposals for improving parking at the station	NCC is consulting on the efficacy of the measures taken and these comments will be forwarded to the relevant person.
	Questions the need for additional car parking as there are several spaces available on a daily basis as a result of NCC trial measures, which were put in place last year.	

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Respondent	Response made by respondent	Comments from Lesbury PC and changes proposed to Neighbourhood Plan
	3. Settlement boundaries and character of the Parish	
Two residents in Longhoughton Road	Queried the accuracy of the settlement boundary in that it did not include all land in the curtilage of the residents. Similar comments from resident in Lealands	Took planning advice from consultant and NCC and advised that in this case the settlement boundaries followed the Alnwick Plan and that hedgerows and natural landscape boundaries were preferred therefore no changes were recommended.
One Riverside Resident	Disagreed with 'distinct and separate' settlements for Bilton, Lesbury, Hipsburn; two residents queried the need for the distinction, and two reinforced the need for cohesion across The Parish.	Noted, no change made as NDP relates to development , for example to ensure that materials used in building are in keeping with the locality, and not the cohesiveness of groups of people living within the Parish. Agree that community cohesion is important and has been a significant part of the NDP development process.
Two Steppey Lane residents		
Two residents from Meadowlands		
	4. Environment and green spaces	
One resident on South View	Ecology survey should be conducted by the PC over 365 days; not by developer	Agreed, this is included in Policy 2
Two Bilton residents	Add protection of night skies from unnecessary light pollution to Policy 2 Concerns about flooding of the River Aln	Noted. Planning policy does not allow this; outside remit of NDP
Two Riverside residents	Question about any plans for the wooded area at the end of Lesbury Road/ Curly Lane and a wish for woods to the West of Steppey Lane	Comments noted; dark skies included in Policy 3 Noted

CONSULTATION STATEMENT: LESBURY NEIGHBOURHOOD PLAN (Nov 2019)

Respondent	Response made by respondent	Comments from Lesbury PC and changes proposed to Neighbourhood Plan
<p>One Hispburn Steadings Resident</p> <p>One South View resident</p> <p>One School Lane resident</p> <p>One Steppey Lane Resident</p> <p>Two residents</p>	<p>Emphasised the need to protect wildlife, 'preserve the special landscape', which 'includes rolling hills free of houses'</p> <p>Add woodland, consider tree planning and 'nature reserve' areas, foot and cycle paths</p> <p>Include foot/cycle paths to neighbouring villages such as Shilbottle, Alnmouth and Longhoughton</p> <p>Include an orchard if possible</p> <p>Include war memorial for VE garden</p>	<p>Policy 5 covers green spaces</p> <p>The wooded area is listed as a green space we would want to protect and there is a private enterprise underway to plant trees to the West of Steppey Lane</p> <p>Comments welcomed noted; the NDP emphasises green spaces</p> <p>Comments welcomed; policy on green spaces amended to incorporate and to show clearly where we want to protect cherished green spaces</p> <p>Greenways to other villages specifically mentioned in NDP, Policy 5 (5.51)</p> <p>Included in 3.4. bullet point 4 and in the 'wish list' of projects we want to develop should land and funding become available</p> <p>The Garden is a war memorial; there are also memorials to war in the Church yard, Church and Village Hall.</p>
Two residents from Lesbury Village	Include track and disabled parking near to the cricket club	Now listed in section 7 Community Projects (CP5)
	5. Services and infrastructure	

CONSULTATION STATEMENT: LESBURY NEIGHBOURHOOD PLAN (Nov 2019)

Respondent	Response made by respondent	Comments from Lesbury PC and changes proposed to Neighbourhood Plan
Two residents from Meadowlands	Need to upgrade infrastructure (sewage/electricity/gas/ water if there is more development	Noted
Two Residents from Lealands	Query about impact on medical services if too many houses	NDP proposes small scale development only
Two residents from Curly Lane	Query about capacity of school if too many houses	NDP proposed small scale development only
Two residents on Lesbury Road	Better bus service required	Information forwarded to NCC to discuss with service providers

CONSULTATION STATEMENT: LESBURY NEIGHBOURHOOD PLAN (Nov 2019)

APPENDIX D3: RESPONSE FROM LANDOWNERS (NORTHUMBERLAND ESTATES)

Respondent	Response made by respondent	Comments from Lesbury PC and changes proposed to Neighbourhood Plan
North'land Estates	Northumberland Estates have demonstrated support for the production of Neighbourhood Plans in local communities across Northumberland, specifically recognising the objectives of enhancing and maintaining the vitality and sustainability of rural communities.	Support noted and welcomed
	As the principal landowner in Lesbury Parish, Northumberland Estates have sought to engage with the Neighbourhood Plan Steering Group throughout the production of the Lesbury Parish Neighbourhood Plan. However, whilst Northumberland Estates were initially supportive of a Neighbourhood Plan for Lesbury Parish, it has become clear that the aspiration and vision of the Steering Group is alarmingly limited, which is reflected in the Pre-Submission Draft of the Neighbourhood Plan ("the Neighbourhood Plan") and will threaten the sustainability of local services and facilities.	A point of fact: Northumberland Estates were invited to all the consultation events that have taken place throughout the production of the NP but chose not to get involved.
	Northumberland Estates have set out an ambitious vision for Lesbury Parish by sharing our development proposals, engaging with the Parish Council through formal pre-application discussions, and finally through the submission of two major planning applications in Lesbury and Hipsburn (ref. no. 18/04527/OUT and ref. no. 18/04528/OUT). It was hoped that the Neighbourhood Plan Steering Group would recognise the unique opportunities and benefits that these proposals would bring and that by working collaboratively through the Neighbourhood Plan these benefits could be secured for the Parish and wider area. However, it is apparent that the negative vision of the Pre-Submission Draft Neighbourhood Plan is directly opposed to the proposals of Northumberland Estates.	We are aware of the two development proposals being considered at the moment. Neither of these proposals are supported by the community. In addition, the proposals are at such a scale in terms of dwelling numbers, that it is highly likely the Neighbourhood Plan would fail the Basic Conditions test if it were to take them forward. This is a Neighbourhood Plan and we will respond to comments relevant to the

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Respondent	Response made by respondent	Comments from Lesbury PC and changes proposed to Neighbourhood Plan
N'd Estates (cont.)	In response to the Pre-Submission Draft Consultation, Northumberland Estates offers the following comments. It is hoped that the Steering Group carefully consider these comments and make positive amendments to the Neighbourhood Plan. Whilst it is hoped that positive amendments can be made to the specific policies of the Neighbourhood Plan, Northumberland Estates have concerns on a more fundamental level that the Neighbourhood Plan has not been prepared in a robust manner and is unsound. Before any positive amendments to the specific policies can be addressed, the Neighbourhood Plan needs to ensure that it meets the Basic Conditions Test, as it currently does not and would not be found sound at Examination.	Neighbourhood Plan. Comments in relation to planning applications are not to be considered here.
	<p>1. Basic Conditions Test</p> <p>Neighbourhood Plans must meet three Basic Conditions, identified in the Town and County Planning Act (1990). These Basic Conditions are:</p> <ul style="list-style-type: none"> • Must have regard to national planning policy and guidance; • Must be in general conformity with strategic policies in the development plan and contribute to sustainable development; and • Must be compatible with EU obligations and human rights requirements <p>The Neighbourhood Plan states in paragraph 1.2 that a Basic Conditions Statement will be submitted to Northumberland County Council. However, it is not clear why this Basic Conditions Statement has not been prepared and produced alongside the Pre-Submission Draft. This is a fundamental piece of documentation that goes to the heart of the Neighbourhood Plan process and soundness of the plan-making process. Without this being disclosed at this early stage in the process, it shows a distinct lack of transparency and clarity over how the Neighbourhood Plan has been prepared and whether it does indeed meet the required Basic Conditions Test. The Basic Conditions</p>	It is normal practice (and required in the Regulations) to submit a BCS at Regulation 15 (submission) stage, along with a Consultation Statement. There is no requirement to produce a BCS at Regulation 14 stage.

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N'd Estates (cont.)	<p>Statement should not form a separate document, as the Neighbourhood Plan should explicitly demonstrate how it meets the Basic Conditions throughout the entirety of the Neighbourhood Plan.</p> <p>Northumberland Estates consider that the Neighbourhood Plan does not meet the Basic Conditions Test in several ways, notably by not conforming to national planning policy or the local development plan, and the ways in which the Neighbourhood Plan fails to do so are set out in the following representations.</p>	
	<p>2. Sustainability Assessment</p> <p>The Basic Conditions Test requires Neighbourhood Plans to have regard to national policy and guidance, as well as being compatible with EU obligations. It is considered that the Neighbourhood Plan fails these tests in regard to adequate sustainability assessment. The NPPF (para.32) states that '<i>Neighbourhood Plans may require Strategic Environmental Assessment, but only where there are potentially significant environmental effects</i>'. EU Directive 2001/42/EC relates to the assessment of the effects of plans and programmes on the environment. This is enshrined in UK law through the Environmental Assessment of Plans and Programmes Regulations 2004. It is considered that the Neighbourhood Plan fails the Basic Conditions Tests by not complying with national policy, UK legislation, or the EU obligation in regard to its Strategic Environmental Assessment (SEA).</p> <p>The Neighbourhood Plan states at paragraph 1.10 and 1.11 that a request for a Strategic Environmental Assessment screening opinion has been submitted to Northumberland County Council. It is unclear what the result of this screening opinion is, and it is considered that Northumberland County Council's screening response should be made publicly available to avoid a lack of transparency over the plan-making</p>	<p>To provide clarity on this matter: Prior to the Regulation 14 consultation, Lesbury Parish Council requested a Screening Opinion from NCC on whether SEA/Habs Regs is required.</p> <p>This screening opinion will be made available when the Plan is submitted at Regulation 15 stage. If the LPNP is screened 'in', then the full Environmental Report and Habitats Regulations Assessment will be carried out, and consulted on, as per the Regulations, prior to the submission of the Plan.</p>

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N'd Estates (cont.)	<p>process. Indeed, Appendix B of the Neighbourhood Plan list a Strategic Environmental Assessment produced by AECOM as part of the Evidence Base for the Neighbourhood Plan, but this has not been published as part of the Regulation 14 Consultation process, yet presumably has been drafted in response to the County Council's screening opinion requiring it do be prepared. Similarly, a Habitats Regulation Assessment also produced by AECOM has been included in Appendix B, but without being made publicly available as part of the Regulation 14 Consultation process. The SEA and HRA are fundamental pieces of work that underpin the sustainability and environmental assessment, and therefore the soundness, of the Neighbourhood Plan.</p> <p>Strategic Environmental Assessment is required by national planning policy, UK legislation and by EU Directive, and without this fundamental assessment being published publicly the Neighbourhood Plan cannot be adequately assessed. It is considered that without the SEA being made available at this stage the Neighbourhood Plan should not and cannot progress to the next stage of consultation with Northumberland County Council and certainly not to Examination. Unless the SEA can at this stage in the plan-making process demonstrate that the Neighbourhood Plan has fully ensured that all environmental and other sustainability aspects are considered effectively in the proposed policies, it cannot be allowed to progress. This is a fundamental aspect of the plan-making process and without adequate SEA assessment at this stage, including a legitimate consultation period to allow proper scrutiny, it is considered that the Regulation 14 Consultation is unsound. The lack of transparency over adequate SEA will face the risk of legal challenge and judicial review, which would delay the Neighbourhood Plan process significantly.</p>	<p>It was made clear in Appendix B that these reports will be made available if required. If required, there will be another consultation on these reports, as required in legislation.</p> <p>We are aware of the legislation. In March 2019, we were informed that we would need an HRA and a SEA. The scoping report for the SEA should be available by 18th April 2019.</p>

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N'd Estates (cont.)	<p>3. Duty to Cooperate</p> <p>The Basic Conditions Test requires Neighbourhood Plans to be prepared in regard to national policy and guidance. The NPPF paragraph 24-27 describe how effective cooperation should be maintained on strategic matters that cross administrative boundaries. This element of the NPPF relates to the full duty to cooperate responsibility prescribed for Local Planning Authorities during plan-making, however the principles of the duty to cooperate are best practice for all groups that are preparing a spatial plan, including Neighbourhood Plan groups. It is considered that the Lesbury Parish Neighbourhood Plan has not been prepared according to this best practice guidance, has ignored the responsibility and duty to cooperate with other relevant bodies, and therefore has not been prepared in accordance with national planning policy and fails the Basic Conditions Test.</p> <p>It is considered that the Neighbourhood Plan has not been prepared with sufficient involvement or consultation with neighbouring Parish Authorities, specifically Alnmouth Parish Council. The Development Plan identifies Lesbury/Hipsburn/Bilton/Alnmouth (Policy S1) as together forming a Sustainable Village Centre. As per the Basic Conditions Test, the Neighbourhood Plan should conform to the strategic policies of the Development Plan, however the Neighbourhood Plan only has regard to Lesbury/Hipsburn/Bilton and does not include Alnmouth within its spatial area or policy considerations. Given the Development Plan's identification of this cluster of settlements functioning as a <i>single</i> Village Centre, it is incompatible that the Neighbourhood Plan seeks to plan for only three of these settlements and ignore Alnmouth.</p> <p>Besides the Development Plan's identification, there are clear strategic planning matters that relate to the conjunction of Lesbury/Hipsburn/Bilton/Alnmouth, which cannot be considered in isolation from each of the individual settlements forming part</p>	<p>There is no duty to co-operate for Neighbourhood Plans.</p> <p>Neighbourhood Plans are not intended to deal with strategic matters. These matters are to be dealt with through the emerging NLP.</p> <p>There was an early attempt to produce a joint Neighbourhood Plan with Alnmouth who did not at that time wish to produce a joint plan.</p> <p>There has been full consultation with all neighbouring parishes throughout the process.</p> <p>This is not relevant. The NP can only cover matters within the Neighbourhood Area; it cannot produce policies beyond the NP area.</p> <p>We do not agree with this statement.</p> <p>The Neighbourhood Plan is not a strategic planning document.</p>

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Respondent	Response made by respondent	Comments from Lesbury PC and changes proposed to Neighbourhood Plan
N'd Estates (cont.)	<p>of the overall Sustainable Village Centre. As NPPF paragraph 26 states, <i>'effective and on-going joint working between...relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.'</i></p> <p>For example, strategic planning matters that are relevant to each of the settlements of Lesbury/Hipsburn/Bilton/Alnmouth include Alnmouth Station (a mainline Station connecting Edinburgh to Newcastle to London), with all of these settlements having a strategic interest in the sustainability and future of this infrastructure asset. Not only is Alnmouth Station of importance to Lesbury/Hipsburn/Bilton/Alnmouth, it is a strategic infrastructure asset in Northumberland, and its future should not be left to the plan-making of a Neighbourhood Plan that has a very localised and specific spatial interest. Alnmouth Station is one of the few Mainline Railway Stations in Northumberland, and its user catchment area is vast with people commuting and travelling to and from Alnmouth Station from a very wide geographical area, making Lesbury/Hipsburn/Bilton/Alnmouth one of the most sustainable locations in North Northumberland, if not the entire County. To secure the future of Alnmouth Station its facilities are required to be expanded and improved, along with new housing development in the vicinity to support and maintain the level of regular train services. This has been identified as a key priority of Northumberland County Council, with specific attention being given to address the Station's car parking problems. It is considered that the Neighbourhood Plan has not consulted with wider strategic bodies and authorities in regard to Alnmouth Station, such as Network Rail or Northumberland County Council, and has therefore failed to recognise a strategic infrastructure asset and failed to plan positively for the wider area of North Northumberland beyond Lesbury Parish.</p>	<p>This advice is for strategic plan-making bodies. These strategic matters will be dealt with through the NLP. As a piece of 'strategic infrastructure', the train station is outside the remit of the LPNP.</p> <p>The Neighbourhood Plan seeks to support development of parking at the railway station in Policy 9.</p> <p>There is no evidence to demonstrate that more housing is required to maintain the train station, which is currently very well used (which contributes to some of the parking issues identified by the local community)</p> <p>Network Rail and NCC have been consulted alongside other statutory consultees. Network Rail have not replied, and NCC have no objections to Policy 9.</p> <p>Strategic matters are not for Neighbourhood Plans. A focus</p>

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		<p>meeting was held with the local community with regard to the railway station. Details of this consultation event are contained in the Consultation Statement. Northumberland Estates were invited to this meeting but did not attend.</p> <p>Following this meeting NCC confirmed that the large-scale development of the train station is a strategic matter.</p>
N'd Estates (cont.)	<p>Other assets that are cross-boundary matters across Lesbury Parish and Alnmouth Parish include Hipsburn Primary School and adequate sports facilities. This school is located in Hipsburn, but attracts pupils from Lesbury, Alnmouth and the wider Parish. Without meaningful consultation with Alnmouth Parish and the wider school catchment area, the Neighbourhood Plan has planned for the future of Hipsburn Primary School with no regard to the actual catchment area of the school, which falls across Parish boundaries and outside of the Neighbourhood Plan area. It is considered that the Neighbourhood Plan has not positively prepared a strategy for the sustainable future of Alnmouth Station or Hipsburn Primary School as the Neighbourhood Plan demonstrates no identification of these assets as cross- boundary matters or matters that require strategic and wider consideration beyond the boundary of Lesbury Parish.</p> <p>Further cross-boundary issues that have been ignored by the Neighbourhood Plan relate to the consideration of housing. As NPPF paragraph 26 states, <i>'joint working should help to determine where additional infrastructure is necessary and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.'</i> The Neighbourhood Plan includes a Housing Needs Survey that was carried out throughout Lesbury Parish, which has formed the evidence base for the</p>	<p>See previous comments with regard to cross-boundary/strategic matters.</p> <p>Consultation has taken place with Alnmouth Parish Council and with the school (the Chair of Governors is on the Steering Group). Other adjoining Parishes were consulted in the Regulation 14 consultation.</p> <p>Again, the Neighbourhood Plan is not a strategic document.</p>

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Respondent	Response made by respondent	Comments from Lesbury PC and changes proposed to Neighbourhood Plan
N'd Estates (cont.)	conclusion that only 45no. additional dwellings are required during the plan period 2016-2036. Given that Lesbury/Hipsburn/Bilton/Alnmouth function as a single Sustainable Village Centre as defined in the Development Plan, it is certainly not a ' <i>positively prepared and justified strategy</i> ' (NPPF, para.26) to base an objectively assessed housing need on a Housing Needs Survey that does not truly represent the cross-boundary nature of the Sustainable Village Centre.	<p>Infrastructure provision at a strategic scale is not a Neighbourhood Planning matter.</p> <p>The figure of 45 additional dwellings was provided by Northumberland County Council and is contained within emerging policy HOU4. This figure was not obtained from the Housing Needs Survey, which was based on affordable housing needs.</p>
	The Housing Needs Survey is therefore fundamentally flawed in the sense that it has disregarded Alnmouth Parish, which is part of the same Sustainable Village Centre, and has its own distinct housing needs, including housing to support local services, affordable housing, and homes for permanent occupancy. As NPPF paragraph 26 advises, joint-working across parishes should determine whether development needs that cannot be met within a particular area could be met elsewhere. This is case in point for Alnmouth, which is spatially very constrained by the River Aln and the Coast and has limited opportunity for additional housing development, whilst facing the very real pressure of increasing second-home ownership eroding the community. It is considered that the Neighbourhood Plan should have thoroughly included Alnmouth Parish within its Housing Needs Survey and as part of its responsibility to cooperate with neighbouring authorities it should also have the vision to plan for the sustainability of the wider area by supporting development within Lesbury Parish to support Alnmouth Parish, especially given its joint-nature as a Sustainable Village Centre in the Development Plan.	<p>The Housing Needs Survey was conducted by Community Action Northumberland to assess housing needs in Lesbury Parish.</p> <p>It is not within the remit of a NP to plan for areas beyond the Neighbourhood Area.</p> <p>Should Alnmouth Parish decide to produce a Neighbourhood Plan, these matters could be addressed through their Plan.</p>

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Respondent	Response made by respondent	Comments from Lesbury PC and changes proposed to Neighbourhood Plan
N'd Estates (cont.)	<p>As it stands the Neighbourhood Plan will impact negatively upon Alnmouth village. During the next plan period the continuing trend for housing within the village being purchased for second and holiday homes will continue, with levels of second- home ownership in Alnmouth now at around 50%. This is wholly unrestricted and open to the market because existing housing stock cannot be restricted for purchase and use as primary residences. However, new housing can be restricted for permanent occupancy through a S106 agreement. By providing no new housing development within the Parish of Lesbury (to serve the Parish of Alnmouth), the existing housing stock will continue to be bought as second-homes and there will be less opportunity for families and young people to live in this area. Without intervention, the future of Alnmouth will be like Beadnell where 90% of the houses are in use as second and holiday homes and the social fabric of the community is undermined. The Neighbourhood Plan should make provision to address the continuing trend of second home ownership by identifying housing sites that can be developed as a mix of private and affordable housing that are restricted to permanent occupants only, in order to secure future residents to preserve the community and social sustainability of the area.</p>	<p>Alnmouth is not within the Lesbury Neighbourhood Area.</p> <p>Issues with regard to second homes are noted, but the Neighbourhood Plan could not require principal occupancy, as the figures for second homes for Lesbury are below 20% at the present time.</p> <p>The Neighbourhood Plan covers Lesbury Parish, not Alnmouth. These issues relate to a place which is outside the Neighbourhood Area.</p>
N'd Estates (cont.)	<p>NPPF paragraph 27 states that to demonstrate effective and on-going joint working, plan-making authorities should prepare and maintain one or more statements of common ground, identifying the cross-boundary matters being addressed (for example the cross-boundary matters suggested above). Crucially, which the Neighbourhood Plan does not do, NPPF paragraph 27 states that joint-working on cross-boundary matters should <i>'be made publicly available throughout the plan-making process to provide transparency.'</i> There has been no attempt to work with neighbouring Parish Authorities or with wider strategic bodies throughout the preparation of the Neighbourhood Plan, and it is considered that this lack of soundness in the plan-making process fails the Basic Conditions Test.</p>	<p>This is not required for Neighbourhood Plans. Statements of common ground are for Local Plans.</p>

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N'd Estates (cont.)	<p>4. Settlement Boundaries</p> <p>The Basic Conditions Test requires conformity with the strategic policies in the development plan. The relevant Development Plan is the Alnwick Core Strategy (2007), alongside the limited saved policies of the Alnwick District Local Plan (1997). The Neighbourhood Plan states in paragraph 1.4 that the Basic Conditions Statement provides an assessment of the extent to which the Neighbourhood Plan conforms to the policies of the Development Plan. However, notwithstanding that the Basic Conditions Statement is seemingly non-existent, the Neighbourhood Plan certainly is not in conformity with the policies of the Development Plan, and therefore fails the Basic Conditions Test.</p> <p>Specifically, the Neighbourhood Plan's identification of settlement boundaries is not in conformity with the Development Plan. Paragraph 5.8 identifies the basis of the proposed settlement boundaries as the Alnwick Local Plan (1997). It is seriously questionable whether the settlement boundaries of a Local Plan that is over 20 years old can be considered a justifiable and robust position. Furthermore, Policy H2 of the Alnwick Local Plan which specifies that planning permission will be granted within the settlement boundaries was not listed as a 'saved policy' in the Secretary of States Direction and therefore expired in September 2007. Therefore, Policy H2 and the previously identified settlement boundaries of the Alnwick Local Plan are no longer relevant and not part of the Development Plan, as the Alnwick Core Strategy (2007) replaced the Alnwick Local Plan and did not identify any settlement boundaries. The Neighbourhood Plan's reliance on the policy of settlement boundaries from the Alnwick Local Plan is extremely out-dated and is not in accordance with the Development Plan.</p> <p>Policy 2 of the Neighbourhood Plan identifies settlement boundaries around Lesbury, Hipsburn and Bilton. Paragraph 5.6 states that these boundaries accommodate enough land to meet the housing requirement for the area as set out in Northumberland</p>	<p>The pre-submission consultation has involved consultation with all statutory consultees set out in Schedule 1 of the Neighbourhood Planning Regulations.</p> <p>Noted.</p> <p>The Basic Conditions Statement will be submitted at Regulation 15 stage, as required in the Neighbourhood Planning Regulations.</p>

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Respondent	Response made by respondent	Comments from Lesbury PC and changes proposed to Neighbourhood Plan
N'd Estates (cont.)	County Council's OAN of 45no. units. This is questionable and it is unclear where these infill sites within the settlement boundaries are located. 45no. units is the minimum number required and identifying such restrictive settlement boundaries will result in only a very limited number of houses being delivered over the plan period to 2036. It is considered that the proposed settlement boundaries are extremely negative to housing delivery and will greatly restrict the sustainability of the Parish over the plan period. Again, as principal landowner, Northumberland Estates queries where the supposed infill sites are located within the settlement boundaries and would suggest that the Neighbourhood Plan allocates these sites on the Policies Map to ensure deliverability.	<p>The settlement boundaries have been changed to allow for the amount of development identified by Northumberland County Council.</p> <p>A clear methodology was used for settlement boundaries.</p> <p>The Neighbourhood Plan does not identify specific infill sites. These sites are likely to come forward through windfall developments. The Plan also promotes the delivery of rural exception sites, which are supported on appropriate locations on the edges of settlements.</p>
	Policy 2 is highly restrictive to all development (not just housing) outside the settlement boundaries. This is in opposition to the Neighbourhood Plan's aspiration for <i>'further development at the railway station, which could be a hub for community and visitor facilities, as well as a business hub'</i> (Paragraph 2.34 and Policy 5). There is an inconsistency within the Neighbourhood Plan in that Policy 2 restricts development at	<p>The Plan is to be read as a whole. There is clear policy to support the development of the railway station, and part a) and part f) of Policy 2 support the development of rural and</p>

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N'd Estates (cont.)	Alnmouth Station given that it is outside of the identified settlement boundary, yet also claims an aspiration for the development of community and visitor facilities and a business hub. How can these items be delivered under the restrictions of Policy 2?	<p>economic development proposals and tourism development. It is considered that these exceptions, alongside Policy 5, do allow for a hub.</p> <p>It is accepted that this could be clarified, and an additional criterion will be added to Policy 2 to ensure that those developments identified in Policy 5 can be brought forward despite being outside the settlement boundary.</p> <p>In addition, other elements have been added to the supporting text to Policy 5 to ensure it is deliverable. Policy 5 will also include reference to Aln Valley Railway and associated buildings and infrastructure. This could include small-scale holiday accommodation, a micro-pub and café.</p>
	Furthermore, Policy 9 states that extensions to existing car parking facilities at Alnmouth Station will be supported, including pedestrian accessibility, landscaping and improved highway safety. This is welcomed and supported by Northumberland Estates, but would caution that Policy 9 is incompatible with the remainder of the Neighbourhood Plan including the settlement boundaries of Policy 2, and as it stands Policy 9 is simply undeliverable. If the Neighbourhood Plan is sincere in its desire to improve car parking at Alnmouth Station, this should be reflected and designated on	<p>Support noted.</p> <p>Policy 2 will be amended to include improvements to Alnmouth Station including car parking, as an additional criterion.</p>

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Respondent	Response made by respondent	Comments from Lesbury PC and changes proposed to Neighbourhood Plan
N'd Estates (cont.)	the Policies Map with an area for development identified within the settlement boundary. Northumberland Estates have submitted a planning application (ref. no. 18/04528/OUT) that delivers everything specified in Policy 9. The proposed development includes 80no. new car parking spaces adjacent to Alnmouth Station including pedestrian access, landscaping and an improved highway junction on Curly Lane. This proposal demonstrates how Policy 9 can be delivered in full and meet the desire of 96% of local residents for additional car parking at Alnmouth Station (paragraph 5.38).	<p>Policy 9 does not seek to provide housing. It is unclear how the planning application referenced will deliver Policy 9. 18/04528/OUT is an application for housing development, with an incidental provision of parking places. It is not relevant to this Neighbourhood Plan.</p> <p>Although there is support for additional car parking in the local community, this question was not asked in the context of providing 60 additional houses to provide them.</p>
	<p>5. Housing Needs Survey</p> <p>As referenced above, Northumberland Estates consider the methodology (and therefore the conclusions) of the Housing Needs Survey that is supporting Neighbourhood Plan Policies 1, 2, 3, 4 to be flawed. This is on the basis that it has not included for the housing needs of the surrounding areas, particularly Alnmouth Parish, which under NPPF paragraph 26 '<i>development needs that cannot be met wholly within a particular plan area could be met elsewhere</i>'. Given that Lesbury/Hipsburn/Bilton/Alnmouth function as a single Sustainable Village Centre (as defined in the Development Plan), it is not positively prepared or justified to base a Housing Needs Survey on only part of this designation, i.e. the Housing Needs Survey ignored the housing needs of Alnmouth Parish that could legitimately be provided for within the settlements of Lesbury/Hipsburn/Bilton.</p>	<p>See comments made previously. This is a Neighbourhood Plan, not a Strategic Plan.</p> <p>The Housing Needs Survey was to assess housing needs in the Neighbourhood Area.</p> <p>The housing requirement was provided by NCC.</p>

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N'd Estates (cont.)	By basing a Housing Needs Survey exclusively on Lesbury Parish, the survey has only taken into account existing residents who already live and have houses there, which masks the wider issue of people who have already been driven out of the area by lack of suitable housing availability. Local Housing Needs Surveys are notoriously narrow for providing a realistic picture of the true housing need in an area, as a robust survey needs to have a much wider catchment area than just the settlement or Parish in question. Not only should the Housing Needs Survey certainly have included Alnmouth given that Alnmouth is part of the designated Sustainable Village Centre, but the Housing Needs Survey should have included the wider area including places such as Longhoughton, Boulmer, Shilbottle and Warkworth, as well as the smaller settlements around these areas.	<p>See previous comments.</p> <p>The market housing requirement was provided by NCC.</p> <p>It is suggested that these comments are addressed to NCC as the strategic planning body.</p>
	Furthermore, the Housing Needs Survey shows no sign of consulting with Registered Providers active in the area or with Affordable Housing Officers at Northumberland County Council. Registered Providers would have been able to offer a much wider strategic picture of the true local housing need of the area, having knowledge of the delivery of affordable housing and where there is highest demand. There may be high levels of housing need and demand for affordable housing outside the Lesbury Parish area, but this does not mean that Lesbury Parish has an exemption from making provision for a wider area, particularly as it has all the services and facilities to make it a sustainable location for new housing development. As NPPF paragraph 60 states ' <i>any local housing needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.</i> ' The Neighbourhood Plan has not been prepared in accordance with the NPPF by only taking into account Lesbury Parish and not considering the neighbouring areas, the Housing Needs Survey is therefore flawed and should be disregarded as an evidence base and any proposed policies that rely on it should also be disregarded until a robust housing needs survey has been carried out.	<p>Local Estate Agents were consulted, as were NCC as the main housing provider. The report was conducted by CAN who have carried out similar surveys elsewhere.</p> <p>Strategic housing needs are identified in the Northumberland County Council Strategic Housing Needs Assessment and is available on the NCC website and was updated in preparation for the development of</p>

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N'd Estates (cont.)	<p>This point has been tested and demonstrated at Neighbourhood Plan Examination. In June 2012 the Dawlish Parish Neighbourhood Plan was rejected at Examination, which sets a precedent for the development of all Neighbourhood Plans subsequently. The Examiner rejected the plan on the basis that there was a lack of clarity around how decisions had been made given the lack of a robust evidence base, specifically the housing needs survey. The Examiner said <i>'It is extremely difficult for an objective assessment of development needs for housing and employment land to be undertaken at a neighbourhood level...it cannot be demonstrated that the level of housing growth provided for in the Neighbourhood Plan is based on firm evidence. This is because the approach by the Steering Group has sought to assess the level of housing which would be 'acceptable' to the local community rather than that which is needed.'</i> The precedent set by this Examination demonstrates the lack of weight a local housing needs survey carries and the difficulties in drawing conclusions of an objective assessment of housing need upon an extremely localised evidence base, which does not capture the true picture of housing need as mentioned above. The Lesbury Parish Neighbourhood Plan will face the same scrutiny at Examination and it is considered that the Housing Needs Survey which has been used as a key evidence base for the Plan (and Policies 1, 2, 3, 4) is flawed given the lack of wider engagement and consultation. Northumberland Estates agree with the conclusion of the Examiner above, that the Lesbury Parish Neighbourhood Plan has sought to assess the level of housing which is <i>acceptable</i> to the local community rather than taking a wider view and trying to make provision for what is actually <i>needed</i>, both in Lesbury Parish and beyond for the entirety of the plan period.</p>	<p>the emerging Northumberland Local Plan.</p> <p>We are not aware of anything in the NPPF requiring Parish Councils to undertake housing needs surveys for neighbouring areas.</p> <p>This example is not relevant to the Lesbury NP.</p> <p>The Lesbury Housing Needs Survey has not been used to determine the housing requirement of the Neighbourhood Area. As stated previously, this figure was provided by NCC, based on their Strategic Housing Studies.</p>

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Respondent	Response made by respondent	Comments from Lesbury PC and changes proposed to Neighbourhood Plan
N'd Estates (cont.)	<p>The Neighbourhood Plan did not consult Northumberland Estates as part of the Housing Needs Survey. This is considered to be a significant information gap in the results of the survey. Over recent years Northumberland Estates have completed several residential developments in Lesbury and the surrounding area, including acting as Registered Provider to enable delivery of affordable housing. Northumberland Estates are in the unique position as having direct and relevant evidence of market signals and the demand for affordable housing in the local area. For example, in a current development in Lesbury of 10no. affordable houses available for rent, despite the first phase of houses not being completed until April 2019 Northumberland Estates have already received 10 enquiries. In Longhoughton, which is just 2 miles away, Northumberland Estates acted as Registered Provider for 5no. affordable houses available for rent, and received over 30 applications. Clearly, this demonstrates an overwhelming local housing need in Lesbury and the surrounding area which has not been recognised or recorded in the limited Housing Needs Survey being used as evidence for the Neighbourhood Plan. As the NPPF paragraph 31 states <i>'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.'</i> It is considered that the Housing Needs Survey supporting Policies 1, 2, 3, 4 of the Neighbourhood Plan is not robust and has failed to take into account relevant market signals, of which Northumberland Estates has extensive knowledge. The Housing Needs Survey and relevant policies of the Neighbourhood Plan therefore do not meet the Basic Conditions Test to comply with national planning policy and guidance.</p> <p>The Neighbourhood Plan concludes that the Housing Needs Survey shows there to be a small amount of need for new affordable and social housing (paragraph 5.17 of the Neighbourhood Plan). Northumberland Estates questions this interpretation of the Housing Needs Survey, given that 33 households recorded some sort of housing need including no housing for young people, no larger accommodation for growing families,</p>	<p>Northumberland Estates was invited to get involved with the NP at an early stage. This invitation was declined.</p> <p>As stated previously, the Housing Needs Survey was carried out by Community Action Northumberland (an organisation of which the Duke of Northumberland was Patron at the time) and the survey was distributed to local residents and was used to determine housing needs for the Neighbourhood Area. A number of agencies were approached.</p> <p>It is not clear how this evidence is relevant to the Neighbourhood Plan, which meets the identified housing requirement and supports the provision of additional affordable housing.</p> <p>Noted, but as stated previously, the data with regard to the housing requirement has been provided by the Strategic Planning Authority.</p>

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N'd Estates (cont.)	and elderly people wishing to downsize. 33 households expressing housing need does not constitute a 'small amount of need'. In fact, out of the 450 households of Lesbury Parish this constitutes 7% of all households being in current housing need. This picture of housing need will only increase as time goes by, with there being less housing suitable for younger and elderly people, increased house prices for larger family homes, and an increasing amount of second-home ownership pricing local people out of the market and decreasing the housing stock available. If 7% of all households are currently in housing need, what percentage will this be by 2036?	<p>The Neighbourhood Plan supports the provision of affordable housing through rural exception sites.</p> <p>In the Housing Needs Survey, affordable rented housing need was identified for 13 households.</p>
	<p>Northumberland Estates consider that it is extremely short-sighted of the Neighbourhood Plan to interpret this need as minor and not worthy of allocating and identifying housing sites suitable to meet these needs over the plan period. It is considered that if 33 households are in housing need currently, this will only increase hugely over the lifetime of the plan period, by which time it will be too late to re-balance, given that existing housing stock will increase in price whilst choice and availability decrease, fewer people living and working in Lesbury Parish, more people owning second-homes, inevitably resulting in local services and facilities closing. Elsewhere across Northumberland it has been seen that when local shops, services and schools close, it is almost impossible to redress this balance and bring these facilities back. Northumberland Estates would urge the Neighbourhood Plan to identify, allocate and plan positively for the current and growing housing need and to take a longer-term vision (which a Neighbourhood Plan should be doing) for the area. Northumberland Estates have submitted two planning applications (ref. no. 18/04527/OUT and ref. no. 18/04528/OUT) to pre-empt these demographic changes and to ensure that Lesbury Parish and the surrounding area have sufficient homes to meet the local housing need for the foreseeable future, including 2 and 3-bed homes suitable for younger people, 4 and 5-bed family homes, and 1 and 2-bed bungalows suitable for elderly people, along with affordable housing and housing secured for permanent occupancy. These two developments would ensure that Lesbury Parish and the surrounding area have the</p>	<p>This rather dire prediction is based on assumption rather than fact.</p> <p>To identify land for housing that exceeds the housing requirement to such a significant degree, would result in a Neighbourhood Plan which does not comply with the strategic plan, or with the results of the community consultation. This means that the Neighbourhood Plan would fail to meet the Basic Conditions Test.</p> <p>The scale of housing proposed by Northumberland Estates is at a strategic level, which is not supported by the Neighbourhood Plan, and does not comply with the current strategic plan, or the emerging Local Plan.</p>

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	housing that it needs to thrive and sustain the existing community and local facilities throughout the life of the next plan period.	
N'd Estates (cont.)	<p>6. Housing</p> <p>Paragraph 3.3 of the Neighbourhood Plan states that Lesbury Parish has already met its Objectively Assessed Need (OAN) for housing. This conclusion was based on Policy HOU3 of the emerging Northumberland Local Plan (which is not part of the Development Plan), which identifies the housing requirement for Lesbury Parish as 45no. units from 2016-2036. The emerging Northumberland Local Plan is at an early stage of preparation and can only be afforded very limited weight. This is particularly the case in respect of Lesbury where there are unresolved objections to the Local Plan which have not been subject to Examination. It is therefore wrong to rely upon the emerging Local Plan as fixing the housing requirement for Lesbury.</p> <p>Nonetheless, it should be noted that Policy HOU3 specifies 45no. units as the <i>minimum</i> housing requirement over the period 2016-2036. 45no. units is not a maximum, and in planning terms should be interpreted as the absolute minimum number of houses required. Unfortunately, the Neighbourhood Plan has interpreted this number as a maximum, which is evident through the lack of housing allocations or basic acknowledgement that this is a minimum number anywhere in the text of the Neighbourhood Plan. Indeed, paragraph 3.3 of the Neighbourhood Plan states that Lesbury Parish has already met the OAN of 45no. units, however offers no evidence of where this requirement has been met. In paragraph 5.14 the Neighbourhood Plan states that since April 2016 planning permission has been granted for 39no. units. In what sense does a shortfall of 6no. units constitute already meeting the 45no. units required? The Neighbourhood Plan should identify this shortfall and therefore allocate site(s) for housing development to meet the required minimum number. The Neighbourhood Plan's claim that the OAN of 45no. units has already been met is both incorrect (only 39no. units have been granted planning permission) and even if 45no.</p>	<p>Although the NP is not required to comply with the emerging NLP, it is good practice to work in alignment with this emerging document, which is now at Regulation 19 stage.</p> <p>The Neighbourhood Plan does not specify 45 units as a maximum. Indeed, infill development is supported within the settlement boundaries, as is the provision of affordable housing through rural exception sites.</p> <p>The Plan period is up to 2036, during which time it is likely that applications in excess of 6 units are likely to come forward.</p>

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	units had been delivered this would only constitute delivery of the <i>minimum</i> number of new houses required. It is therefore not correct to draw the conclusion that no new housing development will be supported in the Parish, as the Neighbourhood Plan cannot stagnate on this minimum number until the year 2036.	Noted. See previous comments.
N'd Estates (cont.)	Besides the required minimum 45no. units the Neighbourhood Plan does state that it will provide affordable and social housing to meet local needs, but only through the development of infill sites and rural exception sites. As principal landowner in the area, Northumberland Estates questions where these 'infill' sites are located and suggests that the Neighbourhood Plan identifies them on the Policies Map to ensure deliverability. Furthermore, to only allocate new affordable housing through infill sites or rural exception sites is a very negative approach to planning. Rural exception sites by definition are beyond the built-up settlement and as exception sites will be determined against different planning policies to assess their merits, which are supported by national planning policy. It is considered that the Neighbourhood Plan's reliance on rural exception sites to deliver affordable housing is a very negative approach, and instead should seek to allocate new housing sites to provide a mix of private and affordable housing in a well-planned and co-ordinated manner, including the opportunity to secure planning obligations for the local community. Reliance on rural exception sites for purely affordable housing will inevitably face viability issues and ultimately lack of delivery. To plan for a meaningful number of affordable housing this should be planned for alongside private market housing to ensure deliverability. This approach is supported in the NPPF where it specifies that a proportion of market homes are allowed on rural exception sites to enable the delivery of affordable units.	<p>There is no requirement to identify land for housing in the Neighbourhood Plan.</p> <p>Noted. It is not considered negative. This approach is supported by National Planning Policy.</p> <p>The sensitive nature of the settlements, including their proximity to European sites, means that development of this scale allocated in a NP would in all likelihood fail to meet the Basic Conditions Test.</p>
	Northumberland Estates objects to Policy 1 of the Neighbourhood Plan in light of the above comments. As principal landowner, there are not considered to be any available or suitable small-scale infill sites within the identified settlement boundaries, rural exception sites are a negative approach to affordable housing delivery, and the development of social, community, leisure, recreational and educational facilities are	Noted. The Parish Council do not agree with these conclusions.

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	not deliverable or realistic outside of the planning and development process (i.e. these items are delivered as part of new development, not in isolation). To enable a meaningful number of affordable houses to be delivered, and a meaningful contribution towards community facilities to be secured, the Neighbourhood Plan should allocate housing sites in a well-planned and co-ordinated manner.	
N'd Estates (cont.)	<p>7. Community Facilities</p> <p>The Neighbourhood Plan identifies several community facilities that should be supported, for example there is a desire for Hipsburn Primary School to grow and provide more recreational facilities (paragraph 2.29), a desire for a community orchard (paragraph 2.30), additional car parking facilities and development at Alnmouth Station (paragraph 2.33-2.34), improvements to public rights of way and Steppey Lane bridge (paragraph 2.35). These are identified in Policy 5 and Policy 9 (Alnmouth Station).</p> <p>These are admirable sentiments from the Neighbourhood Plan, but the Plan has absolutely no control of delivering any of the above items. As the principal landowner in Lesbury Parish, Northumberland Estates have a track record of preserving and enhancing the built and natural landscape of the local area, including many of the above items. However, during preparation of the Neighbourhood Plan Northumberland Estates were not consulted upon these specific proposals or asked about the feasibility or viability of any of these suggestions. Without robust consultation with the relevant landowner, it is considered that the Neighbourhood Plan cannot make these claims, and offers no understanding of the planning process whereby these community benefits can actually be delivered as part of planning obligations from new development. Furthermore, how does the Neighbourhood Plan expect Hipsburn Primary School to grow and provide more recreational facilities with an aging population, an increasing number of second and holiday homes and no new housing suitable for families and young people?</p>	<p>Noted.</p> <p>The Neighbourhood Plan is not a delivery document. It is a planning policy document and will be used to determine planning applications.</p> <p>Noted. No claims are being made. The Plan merely seeks to support certain type of development. It is conceded that the provision of a community orchard would not require planning permission, and this has been removed from the policy.</p>

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N'd Estates (cont.)	<p>Indeed, two recent planning applications from Northumberland Estates (ref. no. 18/04527/OUT and ref. no. 18/04528/OUT) include many of these aspirational facilities specified in the Neighbourhood Plan. For example, application 18/04527/OUT includes an open area identified for community use in Lesbury, which could include a community orchard, whilst application 18/04528/OUT includes an area of additional car parking facilities at Alnmouth Station. Despite the Neighbourhood Plan identifying these elements as desirable and required facilities for the local community, the two proposed developments were resisted through the plan-making process and current determination process. It is unrealistic for the Neighbourhood Plan to aspire for these sorts of community facilities without the acknowledgement and realism that the only means of delivery is through development. Without acknowledging this, the Neighbourhood Plan is undeliverable and can only be said to make aspirational claims for the provision of community facilities with no realistic prospect of these coming forward outside of the planning and development process.</p> <p>Somewhat ironically, the Neighbourhood Plan states in paragraph 5.25 that <i>'where a proposal would lead to the loss of any of these facilities, it is considered that this would not be sustainable development, as it would result in the further erosion of sustainable communities.'</i> It is considered that it is not any future development proposal that would threaten the loss of any of these facilities, but the Neighbourhood Plan itself. The Neighbourhood Plan makes no effort to preserve or enhance local services and facilities, instead hoping that by offering no new housing or opportunities for young families that the existing shops, services and school will somehow sustain themselves. The reality is that without provision of new housing opportunities and the benefits that development would bring, the community assets listed in paragraph 5.26 and 5.27 and Policy 5 will inevitably be unsustainable in the medium to long-term. It is the Neighbourhood Plan, not any future development proposals, that will erode the existing community and contribute to the lack of sustainability of local services and facilities. Without accepting that new development will bring opportunities and</p>	<p>These issues are similar to those that affect many rural areas. The Neighbourhood Plan does not, nor can it, solve the problems that affect North Northumberland.</p> <p>Neither will either of these applications, which are not relevant to the Neighbourhood Plan.</p> <p>Significant community consultation has demonstrated that the community do not support such a significant level of housing provision, even if the community facilities were offered as part of the development.</p> <p>Noted. As stated previously, the NP is not a delivery document. However, it is worth noting that grant applications are underway for improvements to Steppey Lane Bridge, and some other community projects, including the Aln Valley Railway development which is strongly supported by the Duke of Northumberland, as we understand.</p>

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	benefits, including enhanced facilities at Hipsburn Primary School, a new multi-use games area, a community orchard and enhanced facilities at Alnmouth Station, these items (and therefore Policy 5) are undeliverable.	<p>There has been significant residential development in the Neighbourhood Area in recent years and the Neighbourhood Plan seeks to support housing to at least meet the identified requirement.</p> <p>Tourism is in fact the main driver for many local services and facilities.</p> <p>See comments made previously. This is not a delivery document.</p>
N'd Estates (cont.)	<p>8. Local Green Spaces</p> <p>Policy 6 and the Policies Map of the Neighbourhood Plan identifies various Local Green Spaces that are considered to be important and of particular quality. Northumberland Estates consider that LGS6 'Hipsburn, at the corner of Lesbury Road and Curly Lane' is not of a particularly high quality and is in need of enhancement, particularly from the northern approach from Lesbury. The stone boundary wall in a poor condition, and the footpath around this area is of low quality. It is considered that these elements could be improved and enhanced, and without these improvements should not be considered of particular quality. It is considered that the northern edge (grass verge) should not be included within the LGS6 designation, as this is outside of the clearly defined wooded area and is simply a highways verge. Northumberland Estates would challenge the robustness of the evidence base that has formed the designation of the Local Green Spaces, and query whether any robust survey work has informed these designations, such as tree surveys, ecology surveys or landscape and visual assessment? As the NPPF paragraph 31 states <i>'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be</i></p>	<p>The test for Local Green Spaces is not a qualitative test. The test is whether the space is valued by the community, with specific tests associated with judging value, set out in paragraph 100 of the NPPF.</p> <p>We welcome the suggestion that these areas could be improved and, as landowner, would very much welcome you taking this forward.</p> <p>The tests for a local green space are the value of a space to a local community. This space is valued, for</p>

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	<i>adequate and proportionate, focused tightly on supporting and justifying the policies concerned.</i> It is not clear that Policy 6 has been positively prepared in accordance with the NPPF.	its landscape value, and its biodiversity value. Noted, but do not agree. A background report has been prepared which explains the reason for the designation for all local green spaces.
N'd Estates (cont.)	<p>9. Settlement Edges</p> <p>Policy 4 and the Policies Map of the Neighbourhood Plan identifies a 'settlement edge sensitive to new housing development'. In relation to new development, including rural exception sites to deliver affordable housing, the Neighbourhood Plan does not allow new development along these 'sensitive edges'. It is considered that this designation is hugely restrictive to the delivery of new housing, including affordable housing via rural exception sites. The Neighbourhood Plan is very restrictive to new housing except through rural exception sites, yet adds another layer of restriction by not allowing new development along the 'sensitive edges', despite identifying the entirety of Lesbury and Hipsburn's east-facing boundary as 'sensitive'. This effectively removes an entire boundary from consideration for development, further restricting the possibilities for the delivery of housing. Northumberland Estates consider that this 'sensitive edge' should be revised and more evidence required to determine whether the full east-facing boundary is appropriate and whether it really is a 'sensitive edge' as the Neighbourhood Plan concludes. Have the Steering Group carried out any robust assessment of this designation, such as a Landscape and Visual Appraisal? As the NPPF paragraph 31 states <i>'The preparation and review of all policies should be underpinned by relevant and up- to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned.'</i> It is not clear that the 'sensitive edges' designation on the Policies Map and referred to in Policy 4 has been positively prepared in accordance with the NPPF.</p>	The Northumberland Landscape and Sensitivity Capacity Study identifies 'sensitive settlement edges', and this report is provided within the evidence base documents.

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	<p>Of particular concern is the area included within the 'sensitive edge' at the north of Lesbury village facing north towards Longhoughton along the B1339. It is not considered that this view north (west of the B1339) should be regarded as a 'sensitive edge' to be protected. This area is not within the AONB designation unlike the eastern-facing 'sensitive edge', and furthermore the topography of the land to the north rises sharply to Longhoughton which precludes any key views of or from the perceived 'sensitive edge'. It is considered that including this north-facing edge within the 'sensitive edge' designation further precludes new development from coming forward, as this location would be where a new access from the B1339 would be taken to access the land to the north of Lesbury (west of the B1339). Again, this further erodes the opportunities for new housing development in this area, particularly as this location is suitable and available for new housing as it is connected spatially to Lesbury and is outside of the AONB boundary and so can deliver a meaningful number of houses and affordable housing, since Policy 1 of the Neighbourhood Plan precludes major housing development within the AONB boundary. Including this north-facing boundary as a 'sensitive edge' is highly restrictive to delivering new housing (including rural exception sites) in Lesbury, given that this location would be deemed a sensitive edge despite being outside the AONB boundary and having no significant key views. Northumberland Estates suggest the Neighbourhood Plan amends the 'settlement edges sensitive to new housing development' to exclude this north-facing view on the west of the B1339. Without making this amendment, Policy 1 and 4 of the Neighbourhood Plan have little prospect of being delivered.</p> <p>In conclusion, Northumberland Estates repeats its offer to work with the Neighbourhood Plan Steering Group in a positive way to meet the challenges that face many rural communities. However, as matters stand the Neighbourhood Plan is both unsound and open to legal challenge.</p>	<p>The Northumberland Landscape and Sensitivity Capacity Study identifies 'sensitive settlement edges', and this report is provided within the evidence base documents.</p> <p>Thank you for your comments. You were specifically invited to a number of consultation events but chose not to attend. You were also invited to be more involved in the NP right at the beginning of the process.</p>

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APPENDIX E: RESPONSES TO STRATEGIC ENVIRONMENTAL ASSESSMENT CONSULTATION

Respondent	Comments	Response
Highways England	<p>I provide here Highways England's response to your consultation of 21 October 2019 regarding the Lesbury Parish Neighbourhood Plan, Strategic Environmental Assessment (SEA) report, October 2019.</p> <p>Within February 2019 Highways England provided comments responding to the Lesbury Parish Neighbourhood Plan, Submission Version, December 2018, providing an overview of the Strategic Road Network (SRN) and our formal response to the Neighbourhood Plan consultation.</p> <p>Having reviewed the Lesbury SEA there are no matters identified which impact upon the SRN. Therefore, we offer no further comment to those made in February, in response to your consultation.</p>	Noted
Historic England	<p>Thank you for consulting Historic England on the above Strategic Environment Assessment (SEA) environmental report. We are the public body that advises on England's historic environment.</p> <p>We have no comment to make on the report.</p> <p>We reserve the right to review our opinion should the plan change materially in its content and direction. Please do not hesitate to contact us if you have any queries.</p>	Noted
Natural England	<p>Natural England have assessed the submitted Strategic Environmental Assessment (SEA) report and I can advise that we concur with the findings of the report. We note that significant</p>	Noted

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	work has been carried out in identifying the appropriate issues and have no further comment to make.	
Marine Management Organisation (no comments – just information about the MMO and its functions)	Thank you for including the MMO in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.	No further submissions were made.
Coach Inn, Lesbury (no comments to make)	I have no comments to add as we are in the latter stages of a sale and hope to complete in early January, so will not be a concern going forward	Noted.
Lesbury Archers (no comments to make)	I have spoken to my fellow archers this week and we have no comments on the document/s pertaining to the plan.	Noted.
Alnmouth Croquet Club	The committee of Alnmouth Croquet Club very much appreciates being consulted on the Lesbury Parish Neighbourhood Plan. We have no comments to make on the this. We wish you every success in the development of your Plan.	Support noted with thanks

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<p>The Coal Authority</p>	<p>Thank you for the notification of the 21 October 2019 consulting The Coal Authority on the above NDP.</p> <p>The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas.</p> <p>I can confirm that we have no comments to make on the Environmental Report.</p>	<p>Noted.</p>
<p>Longhoughton Parish Council (no comments to make)</p>	<p>I am sending this to you as Clerk of Lesbury Parish Council. Please advise your Council that Longhoughton Parish Council were very pleased to be invited to comment on this important document.</p> <p>We have no comments to offer on what appears to be a very thorough assessment.</p> <p>We would like to wish your Council well in the remaining stages of obtaining approval for your Neighbourhood Plan.</p>	<p>Support noted with thanks</p>
<p>Northumberland Estates</p>	<p>Northumberland Estates have previously submitted representations in relation to the Regulation 14 Pre-Submission Draft (December 2018) of the Lesbury Parish Neighbourhood Plan. In our representations we noted that the Neighbourhood Plan lacked Strategic Environmental Assessment, and that this should be carried out to ensure that the Neighbourhood Plan has fully considered all environmental aspects of the proposed policies. It is welcomed that a Strategic Environmental Assessment has now been prepared, however we have a number of substantial concerns that are set out in the enclosed representations.</p> <p>1. Environmental Assessment of Plans and Programmes Regulations 2004</p>	<p>Noted.</p>

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	<p><i>1.1 Environmental Assessment Procedure</i></p> <p>This consultation is on the Environmental Report (Regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004). However, the Strategic Environmental Assessment has been undertaken on a revised version of the Neighbourhood Plan (the Submission Draft Plan, October 2019), which has been amended from the previous consultation version of the plan (the Pre-Submission Draft Plan December 2018), and has not itself been subject to public consultation. Whilst these representations relate to the Environmental Report, it is considered that one cannot make full representations without also scrutinising the amended Submission Draft Plan, which the Environmental Report relates to. However, this is not the purpose of this Regulation 13 consultation, and the timeframe of this consultation does not allow full and meaningful consideration of the Submission Draft Plan to be made.</p> <p>It is understood that the Submission Draft Plan will undergo further consultation (Regulation 16) when it is submitted to the Local Planning Authority, but it is procedurally difficult to make representations on an Environmental Report when the Environmental Report is assessing a version of the Neighbourhood Plan that has not been made publicly available through formal consultation. The Environmental Report should have been published alongside the Regulation 14 Pre-Submission consultation to allow full and transparent scrutiny and consultation. Failing that, the Environmental Report should have been published alongside another Regulation 14 consultation on an amended version of the Pre-Submission Draft, rather than being published without a simultaneous consultation on the latest version of the Neighbourhood Plan itself. The Environmental</p>	<p>Noted. The Submission Draft Plan differs from the Regulation 14 Plan, as it incorporated recommendations from the Appropriate Assessment. The only alteration of any substance was the addition of a single policy to ensure that the Coastal Mitigation requirements as set out in the Appropriate Assessment are met. The Plan is, therefore, substantially the same. There is no requirement to carry out the SEA on the Regulation 14 Draft Plan.</p> <p>The consultation is on the SEA Report, not on the Draft Plan. There will be another opportunity to respond to the Draft Plan at Regulation 16 stage.</p> <p>We are not aware of any requirement in law to do this. The SEA Report was consulted through the SEA Regulations.</p> <p>In any event, the Plan remains substantially the same as the Reg.14 consultation version. If it were substantially different, it would need to be consulted on again in any case.</p>
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	<p>Report has assessed a version of the Neighbourhood Plan that will not undergo further pre-submission consultation, and therefore will not have the opportunity for modification before submission to the Local Planning Authority.</p> <p>Planning Practice Guidance states that screening for Strategic Environmental Assessment should be carried out at an early stage of a Neighbourhood Plan's preparation (PPG para. 028 ref. ID 11-028-20150209). Planning Practice Guidance states that a plan-maker should start work on a Strategic Environmental Assessment at the earliest opportunity, so that the process for gathering evidence on the environmental report and for producing the draft neighbourhood plan can be an integrated process, and to allow the environmental assessment process to inform the choices being made in the plan (Planning Practice Guidance para. 029 ref. ID 11-029029150209). Planning Practice Guidance outlines the key stages of neighbourhood plan preparation alongside Strategic Environmental Assessment, stating that the preparation of the Environmental Report should be carried out alongside the evidence gathering early preparation stage of the Neighbourhood Plan process, with the Environmental Report consultation running simultaneously alongside the Pre- Submission consultation of the Neighbourhood Plan (PPG para. 033 ref. ID 11-033- 20150209).</p> <p>The above guidance (in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004) is to ensure that the Strategic Environmental Assessment and the preparation of the Neighbourhood Plan is an iterative process, with appropriate environmental assessment informing the decisions and direction of the Neighbourhood Plan. It is considered that this procedure has not been followed in the development of the Lesbury Parish Neighbourhood Plan. Evidence</p>	<p>Noted. However, this is not always easy to accomplish. Lesbury Parish Council were advised that we were unlikely to need SEA on our Plan during the early stages. The SEA was indeed only required because the Habitats Regulations Assessment concluded that that an Appropriate Assessment would be required; this triggered an automatic requirement to carry out SEA.</p> <p>We would agree that ideally, it should be an iterative process. However, this is not set out in legislation, and the reason for this is that in some circumstances (such as ours), the need for SEA to be carried out is not always recognised until later on in the process. Whilst the Plan was being written, the Parish Council were advised that SEA was unlikely to be required.</p>
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	<p>gathering for the Lesbury Parish Neighbourhood Plan began in September 2016, resulting in a Pre-Submission Draft consultation in December 2018. It was not until 2019 when a Strategic Environmental Assessment was prepared, with the assessment being undertaken on a modified version of the Pre-Submission Draft that has not been subject to public consultation. The current Regulation 13 consultation on the Environmental Report does not include consultation upon the modified Submission Draft of the Neighbourhood Plan. It is considered that the Neighbourhood Plan Steering Group are trying to retrofit appropriate environmental assessment in an attempt to meet the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, rather than engage in meaningful environmental assessment of the Neighbourhood Plan.</p> <p>Consulting upon an Environmental Report without also simultaneously consulting upon a Pre-Submission Draft of the Neighbourhood Plan goes against Planning Practice Guidance and does not demonstrate that the Environmental Assessment is informing the direction of the Neighbourhood Plan. Instead the Environmental Assessment has been carried out upon a Submission Draft of the Neighbourhood Plan that has not been subject to consultation and will not be subject to consultation before being submitted to the Local Planning Authority, and therefore has no possibility of informing the decisions and direction of the Plan. It is considered that this Strategic Environmental Assessment does not accord with the procedure set out in the Environmental Assessment of Plans and Programmes Regulations 2004 and has not been prepared with the meaningful intention of shaping the direction of the Neighbourhood Plan. It has instead assessed a Submission Draft of the Plan, which has no further opportunity for modification, whereas it should have</p>	<p>See comments above.</p> <p>We believe we have complied with all the relevant legislation on this matter.</p> <p>See comments made earlier.</p> <p>It is not clear which element of the procedure set out in the Environmental Assessment of Plans and Programmes Regulations 2004 has not been complied with.</p>
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	<p>assessed a Pre-Submission Draft with the opportunity to iteratively shape the choices and decisions of the Plan. This is not in accordance with Planning Practice Guidance which states that ‘the [environmental] appraisal of proposals in neighbourhood plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings’ (para. 038 ref. ID 11-038-20190722). Instead, the Environmental Report has assessed what the Neighbourhood Plan Steering Group are taking to be the final Submission Draft of the Neighbourhood Plan, with no intention to revise the Neighbourhood Plan as a result of meaningful environmental assessment.</p> <p><i>1.2 Environmental Assessment Consultation</i></p> <p>Regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004 states that the consultation period for the Environmental Report should be of such length as will ensure that the consultation bodies and public consultees are given an effective opportunity to express their opinion on the relevant documents. The Planning Practice Guidance (para. 40, ref. ID 11-040-20140306) states that this consultation can be incorporated into the pre-submission publicity and consultation process for the neighbourhood plan.</p> <p>It is not considered that these regulations have been followed. Firstly, the advice to incorporate the Environmental Report consultation into a consultation on a pre- submission draft of the Neighbourhood Plan has not been carried out. The Environmental Report has assessed the Submission Draft of the Neighbourhood Plan, and it has therefore assessed a version of the Plan that will not be subject to further Regulation 14 Pre-Submission Consultation. The consultation bodies and public consultees have</p>	<p>The consultation is on the Environmental Report, not on the Draft Plan.</p> <p>If the Environmental Report had found that further changes were needed to be made to the Plan, we would have made them. As it was, the Environmental Report concluded that the Plan would have positive and neutral effects, so no changes were required.</p> <p>Noted.</p> <p>This is advice; it is not a statutory requirement. We have explained why the SEA was consulted on after the Plan had finished the Regulation 14 consultation.</p> <p>The consultation bodies and public bodies have all responded positively to the Environmental Report.</p>
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	<p>no opportunity to comment on a Pre-Submission Draft of the Neighbourhood Plan, and therefore the Environmental Report is not able to be properly scrutinised and amended to reflect valid consultation responses.</p> <p>Secondly, it is not considered that an appropriate consultation period has been given for representations relating to the Environmental Report. Northumberland Estates were notified via email on 21 October 2019, with a closing date for the consultation period on 21 November 2019. This is a total consultation period of 31 days. This is not a sufficient length of time to ensure that all consultation bodies and public consultees have sufficient opportunity to respond, which is exacerbated by the fact that two of these weeks fall within school half-term holidays where many consultees are away and unable to respond. The minimum consultation period considered good practice is 6 weeks, as exemplified through the Regulation 14 and Regulation 16 consultation process for Neighbourhood Plans. 31 days to consider the Environmental Report and to digest a modified version of the Neighbourhood Plan that has not previously been publicly available is not sufficient time and calls into question the validity and legality of this Regulation 13 Consultation.</p> <p>2. Baseline Conditions</p> <p>Planning Practice Guidance states that environmental assessment should establish the baseline information which is the existing environmental characteristics of the area likely to be affected by the neighbourhood plan, and their likely evolution without implementation of the neighbourhood plan. Importantly, the area</p>	<p>The Regulations do not stipulate a specific consultation period. Regulation 13 sets out the consultation period: <i>"...must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents."</i></p> <p>The Parish Council took the decision to consult over a period of 4 weeks. We considered this to be a more than adequate amount of time to respond (given that planning applications require 21 days for responses from neighbours and statutory consultees). All statutory consultees were able to respond well within the deadline. Alnmouth Parish Council responded late, due to a computer error, but their response is still included.</p>
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	<p>likely to be affected may lie outside the designated neighbourhood area (para. 036 ref. ID 11- 036-20140306).</p> <p>The Environmental Report (para. 4.4) has selected the following baseline conditions to assess:</p> <ul style="list-style-type: none"> • Air Quality • Biodiversity and Geodiversity • Climate Change (including Flood Risk) • Landscape and Historic Environment • Land, Soil, Water Resources • Population and Community • Human Health • Transportation <p>It is considered that the Environmental Report has not adequately captured the extent of the baseline condition in terms of understanding that the area of the baseline condition is wider than the geographical extent of Lesbury Parish. In regard to each of the above conditions, the Environmental Report refers constantly to the 'Neighbourhood Area' and does not consider anything beyond the Parish Boundary which might be affected by the implementation of the Neighbourhood Plan.</p> <p>An important example is in consideration of the Transportation baseline condition, the Environmental Report states (para. 4.57) that the East Coast Mainline cuts through the Neighbourhood Area from north to south, with Alnmouth Railway Station being located within Lesbury. Alnmouth Station is a key piece of transport infrastructure, being one of the few East Coast Mainline Stations in Northumberland. Alnmouth Station functions as a strategic transport hub for a much wider area than Lesbury Parish,</p>	<p>Noted. However, the Environmental Report is in relation to the Lesbury Neighbourhood Plan, which has policies which only cover the Neighbourhood Area.</p>
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	<p>serving the catchment of North Northumberland. It is considered that the Environmental Report has not adequately captured the significance and importance of Alnmouth Station as part of the baseline conditions, and not appropriately recognised that the catchment of Alnmouth Station (far beyond the limit of Lesbury Parish) will be affected by the Neighbourhood Plan. For example, should the Neighbourhood Plan restrict development around Alnmouth Station leading to conditions which prejudice its future operational requirements and the ability of the station to fulfil its strategic function, that clearly has a wide-ranging impact on the entirety of North Northumberland.</p> <p>3. Reasonable Alternatives</p> <p>Planning Practice Guidance states that strategic environmental assessment needs to consider and compare the reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental characteristics of the area and the likely situation if the neighbourhood plan were not to be made (para. 038 ref. ID 11-038-20190722). PPG states that this assessment must include the following:</p> <p>Outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental facts using the evidence base (employing the same level of detail for each alternative option);</p> <p>Identify any likely significant adverse effects and measures envisaged to prevent, reduce, and, as fully as possible, offset them;</p>	<p>It is not clear why this matter is relevant. The Neighbourhood Plan does not consider strategic matters. It therefore follows that the SEA report, which is assessing the Neighbourhood Plan, does not consider strategic matters.</p> <p>Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 states: 'The report shall identify, describe and evaluate the likely significant effects on the environment of a) implementing the plan or programme; and b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.'</p> <p>The objectives identified in the Neighbourhood Plan, were not to take forward large sites for</p>
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	<p>Provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives.</p> <p>PPG defines reasonable alternatives as the different realistic options considered in developing the policies in the plan, acknowledging that there may be limited alternatives that can realistically be considered in the context of the strategic policies for the neighbourhood area (para. 038 ref. ID 11-038-20190722).</p> <p>In its assessment of reasonable alternatives, the Environmental Report states that the strategic policies in the statutory development plan limits the reasonable alternatives that can realistically be considered, and in some instances the only reasonable alternative would be a 'no policy' alternative (para. 6.6). This conclusion is based on the Northumberland Local Plan being the statutory development plan (para. 6.7). Northumberland Estates object to this on the basis that the Environmental Report has based its identification of any reasonable alternatives solely on the emerging Northumberland Local Plan, which is not the statutory development plan for the area, has not been examined or adopted, has outstanding unresolved objections, and carries limited material weight in the planning process.</p> <p>The Environmental Report states that settlement boundaries have been identified in the Neighbourhood Plan, despite settlement boundaries not being included within the statutory development plan, namely the Alnwick District Core Strategy (2007) which did not save the settlement boundaries of the former Alnwick District Local Plan (1997) (para. 6.9).</p>	<p>housing. It is unreasonable to consider this as a reasonable alternative when the objectives of the Plan do not cover this. The objectives were based on the outcome of detailed consultation with the community. That is the purpose of Neighbourhood Planning; to reflect the wishes of the community.</p> <p>The Environmental Report does assess the reasonable alternatives taking into account the objectives of the plan.</p> <p>The purpose of the Environmental Report is to assess the impact of the Neighbourhood Plan policies on the environment.</p>
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	<p>In its assessment of reasonable alternatives the Environmental Report states that the Neighbourhood Plan has considered larger settlement boundaries, including a residential development on land east of Alnmouth Railway Station (para. 6.11). It is unclear what these larger settlement boundaries extend to or are based on, besides a cursory consideration of several sites identified by the Northumberland County Council Strategic Housing Land Availability Assessment (SHLAA). Para. 6.12 of the Environmental Report states that the SHLAA sites were the basis for discussion but these discussions ‘did not progress to formal housing site assessments to determine suitability, deliverability, viability and availability’, and if these housing site allocations had been progressed it would have meant the expansion of the settlement boundaries to include one or more of the sites for housing, therefore ‘these alternative settlement boundaries were subsequently dismissed’. It is considered that these larger settlement boundaries were dismissed without any proper assessment of suitability, deliverability, viability or availability, instead being dismissed simply because inclusion of the sites would have been politically unacceptable to the motivations of the Neighbourhood Plan Steering Group. Para. 6.13 of the Environmental Report states that the alternative settlement boundaries were dismissed on the basis that:</p> <ul style="list-style-type: none">• The SHLAA sites were too large in relation to existing settlements;• The emerging Northumberland Local Plan has identified a limited housing requirement for the Parish;• The results of the local housing needs assessment;• Consultation comments from the local community	<p>The strategic environmental assessment should only focus on what is needed to assess the likely significant effects of the <u>neighbourhood plan</u>. It should focus on the environmental impacts which are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the neighbourhood plan.</p> <p>Paragraph: 030 Reference ID: 11-030-20150209</p>
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	<p>It is considered that these reasons do not constitute adequate justification to dismiss the larger settlement boundaries as reasonable alternatives to the proposals of the Neighbourhood Plan:</p> <ul style="list-style-type: none"> • The SHLAA sites are not too large in relation to the existing settlements, in fact the SHLAA identifies 3no. sites (0273, 0046, 0274) as suitable, available and achievable for development. These sites would not have been identified in this way if it were deemed by the Local Planning Authority that the sites were of an inappropriate size in relation to the existing settlements. • The housing numbers identified by the emerging Northumberland Local Plan are not definitive, as the Local Plan is subject to unresolved objections in relation to its assessment of housing need, has not been through Public Examination, has not been adopted, and cannot be relied upon at this stage in its preparation. Nonetheless, the Local Plan actually identifies a minimum housing requirement in neighbourhood areas, and therefore this cannot be used to justify dismissal of larger settlement boundaries on the basis that larger settlement boundaries would deliver more than an identified minimum housing number. • The housing needs assessment referred to in the formation of the Neighbourhood Plan has not been properly prepared and is fundamentally flawed, as outlined in Northumberland Estates previous representations to the Regulation 14 Pre-Submission Draft (December 2018) of the Lesbury Parish Neighbourhood Plan. These objections are unresolved and therefore the housing needs assessment cannot be used to justify dismissal of larger settlement boundaries. 	<p>The strategic environmental assessment should only focus on what is needed to assess the likely significant effects of the <u>neighbourhood plan</u>. It should focus on the environmental impacts which are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the neighbourhood plan. (Paragraph: 030 Reference ID: 11-030-20150209)</p> <p>It is not clear why this point is being made. The purpose of Neighbourhood Planning is to incorporate locally specific planning policies to an area (such as settlement boundaries)</p>
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	<p>It is considered that these alternative settlement boundaries were dismissed as reasonable alternatives largely on the basis that they would not align with the main motivation of the Neighbourhood Plan Steering Group to thwart and restrict development, rather than on any rational, evidence-based, planning-led justification.</p> <p>Furthermore, the Environmental Report states that SHLAA sites 0273 and 0274 were dismissed on the basis that 'there would be problems associated with the development of both of these sites in terms of access, sewerage disposal, drainage, landscaping and footpaths' (para. 6.20). This is fundamentally incorrect and is not based on any evidence whatsoever. These two SHLAA sites are identified by the Local Planning Authority as suitable, available and achievable for development. Furthermore, in relation to one of the sites (0273) there is a current planning application (ref. no. 18/04528/OUT) which has been valid since 8 January 2019 (the entirety of the Strategic Environmental Assessment process), which has been subject to full technical consultation and has no outstanding objections from the Local Planning Authority relating to access, drainage, landscaping or footpaths. At this stage all technical considerations have been addressed and resolved, and is awaiting a positive determination for approval. It is therefore unclear on what basis the Environmental Report has dismissed this site (and other sites) as being unsuitable for development as a reasonable alternative(s) to what is being proposed in the Neighbourhood Plan.</p> <p>The Environmental Report states that 'it was concluded through the SEA that no genuine reasonable alternative approaches exist in relation to the allocation of sites for housing' (para. 6.22). This is a fundamentally flawed conclusion to make. To conclude that there are no genuinely reasonable alternatives to what is being proposed</p>	<p>Noted. However, the Parish Council were writing a Plan that was based on public consultation and consensus, and in line with existing and emerging strategic policy. It is not clear why it is considered that the Parish Council should progress sites that were not likely to receive public support in a referendum.</p> <p>The strategic environmental assessment should only focus on what is needed to assess the likely significant effects of the <u>neighbourhood plan</u>. It should focus on the environmental impacts which are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the neighbourhood plan. (Paragraph: 030 Reference ID: 11-030-20150209)</p> <p>These points are in relation to the Neighbourhood Plan, not the SEA, and should perhaps be reserved for the Regulation 16 consultation.</p>
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	<p>in the Neighbourhood Plan is not positively prepared or justified.</p> <p>The Environmental Report's consideration of reasonable alternatives is extremely limited for the following reasons:</p> <ul style="list-style-type: none"> • It has only relied upon a handful of SHLAA sites to be reasonable alternatives, rather than any meaningful consideration of any other alternatives; • It has outrightly dismissed the SHLAA sites as reasonable alternatives without any justification, contrary to the assessment of the Local Planning Authority and through the consultation responses in relation to planning application 18/045/28/OUT; • It has dismissed any reasonable alternatives on the basis of the housing requirements identified in the Northumberland Local Plan, which is not the statutory development plan document and carries no planning weight; • It has not considered the statutory development plan (Alnwick Core Strategy) in any detail at all. The Alnwick Core Strategy does not identify settlement boundaries and therefore there are many possible reasonable alternatives for development which have been given no consideration at all. As the Planning Practice Guidance states, 'it may be that the strategic policies for the neighbourhood area limit the alternatives that can realistically be considered' (para. 038 ref. ID 11-038-20190722), however in this case the strategic policies of the statutory development plan do not limit the extent of reasonable alternatives at all. The limited extent of the Environmental Report's consideration of reasonable alternatives is therefore flawed. The Environmental Report admits in para. 2.11 that 'the extent to which genuine reasonable alternatives were available to assess...is a reflection 	<p>These points again are not considered relevant to the SEA.</p> <p>The strategic environmental assessment should only focus on what is needed to assess the likely significant effects of the <u>neighbourhood plan</u>. It should focus on the environmental impacts which are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the neighbourhood plan. (Paragraph: 030 Reference ID: 11-030-20150209)</p> <p>Paragraph 66 of the NPPF states: 'where it is not possible to provide a requirement figure for a neighbourhood area [in relation to housing because existing plans are out of date], the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.'</p>
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	<p>of progress at the strategic planning level...in the preparation of the Northumberland Local Plan.’ This is not the case and there are is no limitation to the genuine reasonable alternatives available by the statutory development plan (Alnwick Core Strategy). It is incorrect to dismiss the extent of genuine reasonable alternatives on the basis that the Local Planning Authority is currently preparing a new strategic plan and therefore ignore the adopted strategic plan and the reasonable alternatives it could promote. The emerging Northumberland Local Plan is not adopted, and is not the statutory development plan for the Environmental Report to be considering reasonable alternatives against;</p> <ul style="list-style-type: none"> • The assessment of the reasonable alternatives (the larger settlement boundaries, specifically the SHLAA sites) does not align with the procedure defined in the Planning Practice Guidance. The PPG states that the reasonable alternatives should be evaluated in terms of their likely significant effects on environmental factors using the evidence base (employing the same level of detail for each alternative option), providing conclusions on the reasons the rejected options are not being taken forward (PPG para. 038 ref. ID 11-038- 20190722). The Environmental Report does not do this. It does not evaluate the reasonable alternatives against the same criteria used in Section 4 (Air Quality, Biodiversity and Geodiversity, Climate Change, Landscape and Historic Environment, Land, Soil, Water Resources, Population and Community, Human Health, Transportation), and offers no conclusion as to why the reasonable alternatives are not being progressed in these terms. Rather, it rather simply dismisses the reasonable alternatives because there was a ‘dampened appetite for further alternative site discussions in the [Neighbourhood Plan] Steering Group’ (para. 6.21). A lack of desire for development 	<p>It is therefore not reasonable to suggest that the reasonable alternatives that should have been considered are open ended. The housing requirement figure was given by the strategic planning authority to the Parish Council. It is simply not reasonable to assess a much larger provision for housing when a) this is not what the community wanted, and b) this is not what the strategic policies have said is needed.</p> <p>The Environmental Report is not a report that considers the merits or otherwise of site allocations. That is the purpose of the Neighbourhood Plan. It is suggested that these comments are made at Regulation 16 stage.</p> <p>The SEA Report is to assess the impact of the Neighbourhood Plan on the environment and sustainable development.</p> <p>It should be noted that there is no requirement on Neighbourhood Plans to include policies on every matter. Indeed, there is no requirement for neighbourhood plans to have policies on housing, sites allocations, etc. It would therefore seem reasonable to identify a suitable alternative as a ‘no policy’ approach. This may not be realistic in a strategic plan, which is required to allocate land for housing.</p> <p>Again, see comments made above. There is no requirement for a neighbourhood plan to allocate land.</p>
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	<p>and a lack of will to appropriately consider reasonable alternatives to that being proposed in the Neighbourhood Plan is not an appropriate, sufficient or legal reason to fail to comply with the procedure of the Environmental Assessment of Plans and Programmes Regulations 2004.</p> <p>In conclusion, Northumberland Estates objects to the Environmental Report that is the subject of this consultation. The Environmental Report has not been appropriately prepared in relation to the Environmental Assessment of Plans and Programmes Regulations 2004 and is therefore open to legal challenge.</p>	<p>It is not made clear how the respondent considers that the Environmental Report fails to comply with procedure set out in the Environmental Assessment of Plans and Programmes Regulations 2004.</p> <p>It is not entirely clear what is being objected to. If the conclusions of the SEA report are considered to be incorrect, it has not been made clear how they are incorrect.</p>
<p>Alnmouth Parish Council (response submitted 23rd November because of</p>	<p>Thank you for consulting Alnmouth Parish Council on the SEA report for the Lesbury Neighbourhood Plan. I apologise for the late response which is a result of your request being 'lost' in a Spam folder. Having reviewed the document I can confirm that Alnmouth Parish Council agree with the statement on page 68 of the report that 'Overall, the Lesbury Neighbourhood Plan is likely to lead to positive or neutral environmental effects. No modification is required to the Plan to meet the SEA objectives.' And that.. 'the Neighbourhood Plan's vision, objectives and policies have avoided significant environmental impacts and the policies will serve to mitigate potential adverse effects'. Once again, I apologise for our tardy response. Alnmouth Parish Council recognises that an enormous amount of effort is required to develop a Neighbourhood Plan and wishes you well in this endeavour.</p>	<p>Support noted with thanks</p>