

## **Longhorsley Neighbourhood Plan**

### **Summary of representations received and submitted to the Independent Examiner**

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

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

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Name	Organisation (if applicable)	Summary of representation
Hannah Lorna Bevins	Amec Foster Wheeler, on behalf of National Grid	National Grid confirmed the location of high voltage overhead powerlines and a high pressure gas pipeline within the neighbourhood area. However, they also confirmed that these do not interact with any of the proposed development sites.
Jules Brown	Historic England	<p>Historic England considered that the Longhorsley Neighbourhood Plan presented a positive vision for the historic environment and that there was a positive strategy for the conservation and enjoyment of the historic environment. The inclusion of heritage and landscape setting within the vision was considered to set a positive tone.</p> <p>Historic England noted the decision not to include a further policy (further to comments made at an earlier stage in the Plan's preparation) relating to heritage assets other than the conservation area. Historic England suggested the inclusion of a list of non-designated heritage assets identified locally, plus an associated policy, which would add local depth to the NPPF and development plan policy on locally-important heritage.</p>
Melanie Lindsley	Coal Authority	The Coal Authority confirmed that the Neighbourhood Area contains recorded risks from past coal mining activity; they confirmed that the Neighbourhood Area lies within the current defined coalfield and confirms the presence of mining legacy features. However, they also confirmed that as the Plan sought to allocate land for housing, both of which have already had planning permission, that they assume that ground conditions and mineral sterilisation were considered as part of the decision making process.
Ellen Bekker	Natural England	Natural England welcomed the revisions made to the neighbourhood plan, which they considered reflected their advice on the Pre-Submission Draft Plan. They confirmed that they had no further comments to make on either the Plan.
Laura Kennedy	Northumbrian Water	<p>Northumbrian Water welcomed the incorporation of Policy LNP16 on water management, and considered that the inclusion of the specific policy provided important guidance on flood risk and water management to ensure that new development in the neighbourhood plan area does not have an adverse impact. Particular support was also expressed in relation to references to flood risk from all sources, the restriction of surface water discharge rates to greenfield equivalent levels and the hierarchy of preference for the disposal of surface water.</p> <p>Northumbrian Water congratulated the Parish Council on the production of the Neighbourhood Plan.</p>

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Lucy Mo	Environment Agency	The Environment Agency confirmed that they consider the Neighbourhood Plan to be legally and procedurally compliant and sound. No further comments were made.
Robert Primrose	n/a	Support for the Plan was expressed. No detailed comments were made.
Lynn Bennett	n/a	Support for the Plan was expressed. No detailed comments were made.
Neil Bennett	n/a	Support for the Plan was expressed. No detailed comments were made.
Karen Horner	n/a	Support for the Plan was expressed. No detailed comments were made.
Denise Primrose	n/a	Support for the Plan was expressed. No detailed comments were made.
Diane Armstrong	n/a	Support for the Plan was expressed. No detailed comments were made.
Stuart Armstrong	n/a	Support for the Plan was expressed. No detailed comments were made.
Zoe Wilkinson	Pegasus Group, on behalf of Macdonald Hotels & Resorts Ltd	<p>Pegasus Group made a number of detailed comments on the policies contained within the Plan on behalf of their client. Macdonald Hotels stated that it was apparent that the draft policies appropriately considered the future vitality of the neighbourhood area and welcomed its production. They confirmed that, subject to some minor re-wording of policies, their concerns would be fully allayed.</p> <p>In particular, support was expressed for the following policies:</p> <ul style="list-style-type: none"> <li><b>Policy LNP1: Development within the settlement boundary</b></li> <li><b>Policy LNP2: Development in the open countryside</b></li> <li><b>Policy LNP3: Development in the Green Belt</b></li> <li><b>Policy LNP4: Design</b></li> <li><b>Policy LNP6: Sustainable dwellings in the countryside, outside the Green Belt</b></li> <li><b>Policy LNP7: Extensions</b></li> <li><b>Policy LNP11: Working from home</b></li> </ul> <p>Detailed comments were made on the following policies:</p> <ul style="list-style-type: none"> <li><b>Policy LN5: Housing within the settlement boundary</b></li> </ul>

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		<p>The representation considered that it should be made clear in the policy that the delivery of 80 dwellings referred to within the policy is not a cap and that, if there is scope to sustainably and sensitively accommodate more homes within the settlement boundary, then this should be supported.</p> <p><b>Policy LNP8: Use of affordable housing for local needs</b> Support for the overall aspiration of the policy was expressed. The representation stated that affordable housing can also be secured via planning conditions requiring an ‘affordable housing scheme’ to be submitted in the future, which could be another form of legal obligation/agreement outside the s106 arrangements.</p> <p><b>Policy LNP9: Support for business in the open countryside, outside the Green Belt</b> Support was expressed for the first sentence of the policy. However, the second sentence was considered too restrictive and not consistent with national planning policy. There was concern that there could be implications for existing businesses by including specific reference to only allowing “small-scale” proposals. It was suggested that reference to “small-scale” should be removed and considered that the merits and suitability of any proposal would still be required to be assessed in accordance with the relevant national and local policies and any proposals would still need to respect the intrinsic character and beauty of the open countryside and be adequately and effectively screened by landscaping.</p> <p><b>Policy LNP10: Retaining local business services and community facilities</b> The representation recognised the intention and purpose of the policy and considered it to be reasonable. However, it also highlighted that there are examples where it is not possible to continue businesses in a viable manner and that facilities have had to close despite all best efforts.</p> <p><b>Policy LNP14: Support of community facilities</b> The representation requested that the precise wording of the policy be reconsidered. The supporting</p>

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		<p>text to the policy refers to a range of rural uses. It was considered that the inference of the policy, as currently worded, is that such uses and proposals relating to them are to be directed to locations within the settlement boundary. There is concern that the policy could restrict their client's interests as Linden Hall is located outside the settlement boundary. Suggested alternative policy text was provided, together with the suggestion that Linden Hall be specifically referenced within the policy.</p>
Richard Morgan	YoungsRPS, on behalf of Mr & Mrs Bell, East Wingates Farm	<p>The representation expressed support for the inclusion of land owned by their client to the east of Normandy Terrace (site LNP5(2)) in the Plan and fully supported its allocation for housing in the Plan.</p>
Mark Ketley	Northumberland County Council	<p>Northumberland County Council made detailed comments on the policies contained within the Plan:</p> <p><b>Policy LNP1: Development within the settlement boundary</b>  It was considered that, due to the way that the policy was worded, this could result in an expectation of the refusal of some schemes on previously developed land within the settlement boundary. This was considered overly-restrictive. In addition, it was considered that inclusion of reference to scale in the context of the Local Plan in the final paragraph of the policy was confusing and unclear. It was considered more appropriate for the policy to support development, including re-use and redevelopment, subject to the controls set out in the final paragraph of the policy.</p> <p><b>Policy LNP2: Development in the open countryside</b>  A minor revision to wording was suggested.</p> <p><b>Policy LNP5: Housing within the settlement boundary</b>  The County Council considered that the reference to "...a total of around 80 dwellings..." implies a ceiling. It was suggested that the policy should be revised to make clear that 80 dwellings is not a cap on development.</p>

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		<p><b>Policy LNP6: Sustainable dwellings in the countryside, outside the Green Belt</b> It was considered that, as drafted, it was not clear how a decision maker could assess whether a development would “materially change the impact of the dwelling on the countryside” and it would therefore be difficult to ensure consistency in application of the policy. In addition, it was considered that references to the effects of development on the character or setting of buildings should be reworded to provide greater clarity about how the policy could be applied.</p> <p><b>Policy LNP10: Retaining local business services and community facilities</b> The County Council considered that it wasn’t clear whether the first sentence was referring to the settlement of Longhorsley or the Neighbourhood Area. Further comments were made on the second section of the policy, in order to make it clear that applicants would be required to demonstrate that a current use is no longer economically viable and that the site has been marketed for its current use.</p> <p><b>Policy LNP12: Local Green Spaces</b> The County Council’s Strategic Estates team objected to the inclusion of the school playing field as Local Green Space as the field is only used occasionally for village events, but with the specific permission of the school. The County Council does not want to encourage further public access as the field is an operational part of the school and needs to be kept secure.</p> <p><b>Policy LNP16: Water management</b> The County Council expressed support for this policy and confirmed that all previous comments made by the authority relating to this policy in previous iterations of the plan have been taken into account.</p> <p><b>Policy LNP17: Rural features</b> The County Council considered that Policy LNP17 misunderstood the designations referred to in the supporting text to the policy and referenced within the policy itself. The policy was concerned with protecting views of environmentally designated sites, all of which (except one) were outside the neighbourhood area.</p>

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		<p><b>Policy LNP22: Walking safely</b> The County Council supported the policy but considered that the omission of a reference to cycleways in the policy was a missed opportunity.</p> <p><b>Annex A.1: Longhorsley PROW and Annex A.2: Longhorsley Neighbourhood Area</b> The County Council considered that the inclusion of higher-resolution maps would be appropriate.</p> <p><b>Annex B</b> It was considered that some minor rewording was required in relation to providing greater clarity in relation to eligibility and occupancy cascade arrangements for affordable housing.</p>
Ian Cameron	NHS Northumberland Clinical Commissioning Group	The NHS Northumberland CCG welcomed the intent to support a more active lifestyle through 'walking safely' policies and the desire to interconnect walking routes wherever feasible. The representation also stated that any significant housing development is likely to require S106/CIL contributions towards healthcare infrastructure.