

# **North Northumberland Coast 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 North Northumberland Coast Neighbourhood Plan.

Copies of the representations made on the Plan, and which were submitted to the independent examiner, can be made available on request from the County Council by contacting the Neighbourhood Planning and Infrastructure Team on 01670 623619 or by email at: [NeighbourhoodPlanning@northumberland.gov.uk](mailto:NeighbourhoodPlanning@northumberland.gov.uk)

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<b>Name</b>	<b>Organisation (if applicable)</b>	<b>Summary of representation</b>
Anthony McAdam	Beadnell Harbour Fisherman's Society	The Society expressed concern about the inclusion of land in their ownership being included in the Plan.
Melanie Lindsley	Coal Authority	The Coal Authority confirmed that the Plan 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 none of the Plan's designations promote new built development which could be detrimentally affected by mining legacy, they raise no objections to the Plan.
John Taylor	N/A	The representation expressed strong support for the Neighbourhood Plan, particularly the importance of retaining the area's appeal to visitors, while ensuring that development does not create a negative impact on the surrounding countryside and wildlife. Strong support was expressed in relation to the settlement boundary at Seahouses.
Denise Taylor	N/A	The representation expressed strong support for the Neighbourhood Plan generally, as well as expressing particular support in relation to the settlement boundary for Seahouses and North Sunderland. Support was expressed for the protection of the AONB from unnecessary development for the benefit of future generations.
Louise Tait	Environment Agency	The Environment Agency considered the Neighbourhood Plan to be legally and procedurally compliant and sound. The Agency particularly welcomed the inclusion of references to coastal change and the inclusion of the Shoreline Management Plan as part of the evidence base for the Plan.
Ellen Bekker	Natural England	Natural England confirmed that, further to revisions made to the Plan as a result of their representations at the Regulation 14 stage of the Plan's preparation, they only had minor comments to make at the Regulation 16 stage. The representation raised some minor issues relating to improving clarity in the text.  Natural England also provide comments relating to the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) reports and, overall, are supportive of both of these documents.
Zoe MacKay	Marine Management Organisation	The Marine Management Organisation commended the inclusion of reference to the Marine Policy Statement within the Neighbourhood Plan. In addition, the representation recommended some

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		additional text in a number of policies to strengthen references to the marine environment. These included references to sustainable marine development, further definition of seascape, reference to Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) which have marine components and reference to the Marine Policy Statement later in the Plan to support consideration of MPAs and biodiversity.
Graham Fairs	N/A	The representation expressed support for the Neighbourhood Plan in general, particularly the settlement boundary for Seahouses and North Sunderland. Further support was expressed for the Principal Residence Housing policy.
Stephen Copeland	N/A	<p>The representation expressed support for the Neighbourhood Plan in general, particularly the settlement boundary for Seahouses and North Sunderland. Further support was expressed in relation to protection of the AONB via the inclusion of the settlement boundary which was considered to recognise the traditional extent of North Sunderland.</p> <p>The representation also stated that development of greenfield sites should not be supported, but if it is essential then they would support building in the area identified as an extension to the industrial estate at North Sunderland.</p>
Guy Munden	Northumberland Estates	<p>Generally, Northumberland Estates expressed support for the preparation of the Neighbourhood Plan and supported its objectives of increasing the availability of housing in the area, including the provision of affordable housing. The representation recognised that new housing development should be located where it will enhance or maintain the vitality of rural communities and agreed that new housing in the villages of Bamburgh, Beadnell and North Sunderland/Seahouses would contribute substantially to the vitality of these areas.</p> <p>Northumberland Estates also welcomed that the Neighbourhood Plan had been positively prepared in the sense that it recognised that new development will and should come to the area in order to support the economy and create sustainable communities. Support was also expressed for the objective to provide sites for business and recognition of the importance of employment and business opportunities to support rural communities.</p>

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		<p>Northumberland Estates provide detailed comments on a number of policies within the Plan:</p> <p><b>Policy 1: Sustainable Development</b>                      Northumberland Estates considered that the inclusion of references to “small-scale” development within the policy was inappropriate and that the Plan should be more flexible to permit major development of more than 9 dwellings. Northumberland Estates recommended that the Plan should support development of more than 10 units and recognise that this scale of development is the only way to achieve the sustainable and viable communities that the policy is designed to create.</p> <p><b>Policy 8: Development within the settlements</b>                      Northumberland Estates provided comments on this policy in the context of a planning application which was approved in March 2017 and considered that the settlement boundary for Beadnell should be amended to reflect the details of this, as well as to include the wider area of Beadnell Green.</p> <p>Policy 9: Sustainable Development outside the Settlement Boundaries                      Northumberland Estates considered that, simply by virtue of being outside of a settlement boundary, a site is not automatically open countryside. They also considered that development is appropriate in areas outside of a settlement boundary with no facilities or services because it will add to the vitality of the existing social community.</p> <p><b>Policy 14: Principal Residence Housing</b>                      Northumberland Estates considered that the wording of Policy 14 was too restrictive in that it only allowed for new residential development if it provides principal occupancy housing; concerns over the viability of all housing development being solely for permanent occupancy were raised.</p> <p>Northumberland Estates considered that there would be a benefit to Beadnell in allowing additional housing development for second-home owners (holiday homes) in order to meet demand for this type of accommodation, which they believe would mean that existing housing stock would not be sold at</p>

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		<p>inflated prices to second-home owners. Northumberland Estates considered that this would increase the vibrancy and vitality of the community living in the existing housing stock and create a hub of permanent residents in the village core.</p> <p><b>Policy 15: Principal Residence Housing in the Hamlets</b> Northumberland Estates considered that the restriction for new dwellings and self-build plots in the hamlet areas should be removed from the policy as it is unrealistic and may affect the viability of development.</p> <p><b>Policy 16: Change of use from residential (C3) to holiday let (sui generis) and provision of new holiday accommodation; and</b> <b>Policy 18: Extensions to holiday lets</b> Northumberland Estates considered that Policies 16 and 18 were excessive in their car parking requirement for holiday accommodation and considered that this should be reduced in accordance with car parking requirements for C3 residential dwellings.</p> <p><b>Policy 21: New Tourist and Community Facilities; and</b> <b>Policy 23: Business and Employment</b> Northumberland Estates considered that the settlement boundary plans should include allocations for these facilities. It was suggested that the area of Beadnell Green should be included within the settlement boundary for Beadnell. This representation was made in regard to a proposed Masterplan for the area which was submitted as part of Northumberland Estates' representation on the Plan.</p>
Simon Herriot	Savills, acting on behalf of The Trustees of Lord Armstrong (Deceased)	<p>The representation expresses The Trustees' support for the overall aims, aspirations, objectives and most of the policies contained within the Plan. It also confirms The Trustees' active engagement in the Plan preparation process in recent years.</p> <p>The representation states that The Trustees consider that the settlement boundary for Bamburgh strikes an appropriate balance between recognising the need for new development, including some</p>

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		<p>limited settlement expansion over the Plan period, while providing a framework within which the special qualities of Bamburgh and its environs can be protected.</p> <p>The representation highlighted one area of concern, namely the detailed wording of policies 1 and 8. It considered that, while Policy 1 specifically limits support to defined ‘small scale’ proposals, Policy 8 which is likely to apply to the vast majority of development proposals, does not limit its support to ‘small scale’ proposals and simply states that proposals which are located within defined settlement boundaries and satisfy the design principles of Policy 5 will be supported. The Trustees considered that this issue could lead to difficulties in policy interpretation when considering individual planning applications.</p> <p>However, the representation also states that, subject to consideration of this point, the representation should be taken as supportive of the Plan.</p>
	Savills, acting on behalf of Lord Crewe’s Charity	<p>The representation states that the Charity has submitted representations to previous rounds of consultation on the Plan and is generally very supportive of the overall aims, aspirations, objectives and most of the policies contained in the Plan.</p> <p>The Charity considered that the proposed settlement boundary for Seahouses was appropriate. The representation refers to the inclusion of reference to the potential to accommodate some new housing on land to the east of Broad Road; Policy 8(i) elaborated on this by noting that improvements to Broad Road may be required. However, land in this area is designated as Local Green Space under designations S1 and S8. An amendment to Policy 19 (Local Green Spaces) was suggested in order to remove conflict.</p> <p>The representation highlighted concern regarding the detailed wording of policies 1 and 8. It considered that, while Policy 1 specifically limits support to defined ‘small scale’ proposals, Policy 8 which is likely to apply to the vast majority of development proposals, does not limit its support to ‘small scale’ proposals and simply states that proposals which are located within defined settlement</p>

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		<p>boundaries and satisfy the design principles of Policy 5 will be supported. The Charity considered that this issue could lead to difficulties in policy interpretation when considering individual planning applications.</p> <p>However, the representation also states that, subject to consideration of these points, the representation should be taken as supportive of the Plan.</p>
Fiona Copeland	N/A	<p>The representation was supportive of the Plan, in particular the settlement boundary for North Sunderland / Seahouses. It was considered that the proposed boundary would protect the farmland and scenery as well as the view across to Bamburgh Castle. Full support was given to the area where the proposed settlement boundary adjoins existing properties in Cuthbert Close, Regal Close and Main Street, protecting the AONB from unnecessary housing development.</p>
Barbara Hooper	Historic England	<p>Historic England raised a number of concerns regarding the Plan, in particular the apparent oversight which meant that their representations at Regulation 14 stage had not been taken into account.</p> <p>Some detailed comments were provided specifically in relation to the Regulation 16 Submission Draft Plan, and Historic England submitted their Regulation 14 comments on the Plan in addition to this.</p> <p><b>Policy 2: Landscapes and Seascapes</b> Historic England considered that the landscape evidence base should also include National Character Areas and the Historic Landscape Characterisation in order to fully inform the consideration of how proposals might impact upon the historic landscape and how the landscape contributes to the understanding and enjoyment of heritage assets. Reference was also made to the Marine Policy Statement, in particular its definition of ‘seascape’. The representation raised concerns that the policy may not be adequately protecting the full suite of heritage assets.</p> <p><b>Policy 4: Coastal Management and the Coastal Strip</b> Historic England considered that the Plan should include links with the emerging North East Marine Plan.</p>

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		<p><b>Policy 5: Design in New Development</b>  Historic England raised concerns that the Plan includes no requirement to conserve and enhance the significance of heritage assets.</p> <p><b>Policy 6: Shop Front Design</b>  The representation welcomed the intention of Policy 6 and recommended minor wording changes in order to further strengthen the policy.</p> <p><b>Policy 8: Sustainable Development within the Settlements</b>  While this policy contains caveats to protect and enhance important wildlife sites, Historic England considered that there was nothing to ensure that the significance of any heritage asset affected is sustained and enhanced.</p> <p><b>Policy 9: Sustainable Development outside the Settlement Boundaries</b>  Historic England considered that there is potential for inclusion of a reference that sensitively designed developments to protect and enhance the significance and setting of historic buildings, particularly where they have fallen into disrepair or disuse.</p> <p><b>Policy 10: Seahouses and North Sunderland Conservation areas; and</b>  <b>Policy 11: Bamburgh Conservation Area</b>  Historic England suggested some additional wording to recognise that a conservation area’s significance can derive from its setting as well as its contents. With specific reference to the Bamburgh Conservation Area, which does not have an adopted character appraisal, it was suggested that consideration be given to adding the requirement for applicants to set out their understanding of the conservation area’s character and appearance as relevant to their proposals and to explain how their proposals preserve or enhance it.</p> <p><b>Policy 12: Historic Core of Beadnell</b></p>

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		<p>Historic England expressed support for this policy but considered that it would be strengthened by referring to the significance and setting of heritage assets.</p> <p><b>Policy 13: Non-Designated Heritage Assets</b> Historic England expressed support for this policy but were concerned that there was no additional reference to designated heritage assets.</p> <p><b>Policy 21: New Tourist and Community Facilities;</b> <b>Policy 22: Footpaths and Cycle Ways; and</b> <b>Policy 25: Caravans, Camping, Bunkhouses and Chalets</b> Historic England suggested inclusion of a caveat in these three policies to ensure that there will be no negative impact upon heritage assets. An alternative approach was also suggested, with inclusion of a proviso that proposals should be considered against all policies in the plan and be in accordance with them, on the assumption that a more 'generic' heritage asset policy is included within the Plan.</p> <p><b>Policy 23: Business and Employment</b> Historic England welcomed the inclusion in Policy 23 of a possible heritage hub at Bamburgh to take advantage of the tourist potential of the historic environment there. It was considered that this would provide a positive strategy for the historic environment in the plan, not one merely reactive to development proposals.</p>
Val Fairs	N/A	The representation supports the adoption of the Neighbourhood Plan and specifically welcomed the proposed Seahouses / North Sunderland settlement boundary and proposed Principal Residence policy.
Mark Ketley	Northumberland County Council	<p>Northumberland County Council were generally supportive of the content of the Neighbourhood Plan and provided detailed comments on a number of the Plan's policies:</p> <p><b>Policy 5: Design in New Development</b> The various criteria set out in this policy are largely supported by the County Council. However, there</p>

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		<p>was some concern that this could be overly prescriptive. The Council stated that it would be supportive of inclusion of references to supporting innovative design, provided that it does not conflict with other criteria within Policy 5 and accords with those Policies set out in the wider Plan.</p> <p><b>Policy 7: Outdoor Signage</b> The County Council raised concern regarding the reference to high quality design in the context of advertisement control. There was also concern regarding the reference to size in proportion to the building as this is unclear and open to interpretation and therefore difficult to apply consistently.</p> <p><b>Policy 8: Sustainable Development within the Settlements</b> The County Council suggested some minor amendments to this policy in order to seek to limit/reduce the impact of on-street parking. The County Council was supportive of the inclusion of SuDS in the policy. An amendment to the policy was suggested in relation to the loss of existing car parking spaces in order to provide further clarification of the scope of the policy.</p> <p><b>Policy 12: Historic Core of Beadnell</b> The County Council raised concerns regarding the justification for seeking to designate a historic core in Beadnell and that the policy as drafted does not provide a practical framework within which decisions on planning applications can be made.</p> <p><b>Policy 13: Non-Designated Heritage Assets</b> The County Council considered that, while the policy and associated Appendix A provide a list of non-designated heritage assets, no details were provided. The County Council suggested that, if further details could be included in Appendix A, this would aid in decision making where development proposals may result in adverse effects on these non-designated assets.</p> <p><b>Policy 14: Principal Residence Housing</b> The County Council expressed strong support for this policy and considered that the policy was</p>

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		<p>sufficiently robust both in its evidence and in its currently-drafted form.</p> <p><b>Policy 16: Change of use from residential (C3) to holiday let (sui generis) and provision of new holiday accommodation</b>                      A minor amendment to the policy was suggested as it was considered that, when read alone, criterion (a) did not consider the material impacts.</p> <p><b>Policy 18: Extensions to holiday lets</b>                      Concern was raised in regard to consideration of the level of parking provision when considering proposals for extensions.</p> <p><b>Policy 19: Local Green Spaces</b>                      The County Council objected to the inclusion of Seahouses First School Playing Fields as Local Green Space as the school is now closed and the site inaccessible. The future of the site has yet to be determined by the Authority.</p> <p><b>Policy 21: New Tourist and Community Facilities</b>                      The County Council raised concerns that the proposals in this policy were specific but now shown on the Policies Map. There was also concern regarding landscape and ecological issues with the site which have not been addressed in the Plan.</p> <p><b>Policy 22: Footpaths and Cycle Ways</b>                      The County Council welcomed the inclusion of this policy and supported its intentions. The County Council did, however, question whether such routes were included on the Policies Map.</p> <p><b>Policy 25: Caravans, Camping, Bunkhouses and Chalets</b>                      The County Council was satisfied that comments made at the Regulation 14 stage had been taken into account by the Parish Council. However, there was concern that the policy did not include</p>

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		consideration of the potential for adverse impacts of such development on the integrity of nationally or internationally important wildlife sites.
Stephanie Linnell	George F White, acting on behalf of Mrs S Carr, Mr G Carr and Mr Patterson-Dunn.	<p>This representation was made by the agent, on behalf of their client, in the context of their current planning application in the Neighbourhood Area.</p> <p>The representation considered that the proposed settlement boundary for Seahouses does not reflect the extent of existing development and that the settlement boundary should be amended to allow for incremental growth of the settlement of an appropriate scale, or deleted altogether, as this unnecessarily restricts sustainable development of the settlement.</p> <p><b>Policy 1: Sustainable Development</b> The representation considered that the plan is lacking as it does not include a policy for the consideration of 'large' scale development or the development of sites of more than 10 new homes. It also considered that the Plan's support for a level of development set out in the now withdrawn Northumberland Core Strategy is flawed.</p> <p><b>Policy 8: Sustainable Development within Settlement Boundaries</b> The representation noted that, while the Plan does not allocate land for residential development, it does suggest that residential development could take place in specific locations. The representation considered that insufficient detail had been provided to demonstrate: the proposed quantum of new housing; how the proposed minimum number of new homes will be delivered over the plan period and where; or an assessment of viability and deliverability of potential sites. It was considered that the settlement boundary may restrict the delivery of new homes in Seahouses to meet the future needs of the settlement.</p> <p><b>Policy 9: Sustainable Development outside the Settlement Boundaries</b> The representation considered that the policy should be sufficiently flexible to allow for the</p>

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		<p>consideration of development on land adjoining settlement boundaries, where it can be demonstrated that the proposed level of residential development is unlikely to be attained within the settlement boundary during the plan period.</p> <p><b>Policy 25: Caravans, Camping, Bunkhouse and Chalets</b> Support for this policy was expressed.</p>