

Broomhaugh and Riding Parish Council Response to Comments on the Submission Draft Broomhaugh and Riding Neighbourhood Plan

Responses received from: NCC, Natural England, Martin and Kathy Marsh, Historic England, Mrs J Rowntree, Linden and Neville Furness, National Highways, Coal Authority, National Gas, National Grid, Environment Agency, Clare Irving, Osbit Limited, Carmen Pasco, Mr and Mrs Wallis and Mr and Mrs Dixon. Only those comments recommending changes to the plan are included in the table.

Consultee	Comment	Broomhaugh and Riding Parish Council Response
Policy BR2: Design		
Northumberland County Council	Bullet point n refers to 'retaining views'. We would suggest deleting this bullet point as the loss of a view is not a material consideration in planning decisions.	As explained within the consultation statement (page 73), the parish council accept that the right to a view may not be a material planning consideration but the impact of a development on a view which is important to landscape character is. If the examiner agrees with the comments of the LPA, it is requested that consideration should be given to the following amended wording for criterion 'n': <i>"Ensuring important elements of landscape character are conserved and where appropriate enhanced"</i>
Policy BR3: Natural environment		
Northumberland County Council	Regarding paragraph 1, it is not clear how a decision maker should interpret the list of birds (breeding waders, farmland birds and swifts) in paragraph 1. Are they associated with particular areas in the Parish? The natural environment background paper is not particularly helpful in this respect. In addition, the general reference to 'footpaths' does not give sufficient guidance to decision makers. This would tend to undermine any protective intentions that the policy might have	The features and species listed in section 1 of policy BR3 have been identified as being an important part of the natural environment of the parish. This is summarised in table 4 (see section 2.19). It may help with the application of the policy if section 1 and 2 are merged: <i>"1. Development should protect and enhance the rich natural environment of the parish by seeking to ensure no loss or significant harm to sites of biodiversity value, such as priority habitats protected and priority species and their habitats and corridors that connect sites and species. Support will be given to proposals which promote the conservation of priority habitats and species and the</i>

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		<p><i>protection and recovery of protected species. <u>The following areas, features and species, form an important part of the natural environment of the parish:</u></i></p> <p><i>a. <u>Tyne River, Corbridge – Stocksfield Local Wildlife Site;</u></i></p> <p><i>b. <u>...</u></i></p> <p>The policy included reference to important footpaths as these are regularly used and allow the local community to experience the rich natural environment. It may be more appropriate to refer to these footpaths, which are listed in table 4, in policy BR6. The first section of the policy could be amended as follows:</p> <p><i>“1. Support will be given to development that will improve and/ or extend the existing public rights of way network allowing greater access for all. <u>Several of the footpaths and rights of way within the parish allow the local community to experience the rich natural environment, including those identified in table 4. The network...</u>”</i></p>
Policy BR4: Local green space		
Martin and Kathy Marsh	Firstly, we propose that the open land in the Green Belt immediately to the east of Broomhaugh should be included in the list of protected local green space in Policy BR3. This land is of great ecological value and significant visual importance to the margin of the village, more so than other land proposed to be included in that Policy, such as the grazed land to the south.	As explained within the consultation statement (page 77) the site referred to was included within the housing site assessment process and considered suitable for housing. Following comments made to the pre-submission draft plan initial investigations were undertaken to consider the ecological value of the site, but this did not identify anything significant regarding its flora and fauna, it was therefore not proposed for allocation as local green space.
Clare Irving	One area I’ve drawn attention to in the past is the land from the cricket club east to the A695/A68 roundabout – it does not	Cricket ground is allocated as protected open space within the local plan. Land up to the A695/A68 roundabout lies

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	appear to be a Local Green Space past the Cricket field, and it isn't identified as a Protected Open Space. The opposite side of the A695 however is a Local Green Space and therefore has some degree of protection from future development. The Cricket field down to the roundabout provides a significant visual enhancement to this eastern margin of the village and I would hope is protected to retain this.	within the Green Belt and would be considered to be an extensive tract of land, which is why it was not proposed for allocation as LGS. Both sites will however be protected from in accordance with the requirements of the local plan and national planning policy. The land on the opposite side of the A695 is proposed as LGS (site LGS06) as it is well used by the local community, includes a flower rich strip of grassland and provides an attractive entrance to the village.
Paragraph 4.36 – land east of Broomhaugh cottage		
Linden and Neville Furness	If building was allowed on the green belt area to the east of Broomhaugh Cottage this would be a traffic hazard. There are already three roads accessing the A695 within a fifty yard stretch. The A695 becomes increasingly busier.	If a planning application is submitted on the land to the east of Broomhaugh Cottage there would be the opportunity to comment on this and highways issues would be considered as part of the assessment of the application.
Mr and Mrs Wallis and Mr and Mrs Dixon.	<p><u>Summary/ concluding paragraph</u></p> <p>Unfortunately, as things currently stand, the Landowners object to the Submission Draft version of the Neighbourhood Plan and wish for these representations to be registered formally on this basis. The basic conditions tests of a Neighbourhood Plan are not being satisfied and the essential need for the Plan to address identified local housing needs as evidenced in the HNA needs urgent attention. Failure to do so will result in this community being deprived of the range of housing types and tenures that it so desperately needs, especially when such housing can easily be delivered on a site that would have no adverse impact on the purposes of the Green Belt and which has already been accepted at earlier stages of the Neighbourhood Plan process as being entirely appropriate and preferable for future housing development by both the local community and the Parish Council. Consideration being to amending the Submission Draft Neighbourhood Plan to address these fundamental</p>	<p>As should be evident on reading the plan and housing background paper, the parish council considers that the site to the east of Broomhaugh Cottage should be allocated for housing development. Initial drafts of the neighbourhood plan proposed to allocate the site. The housing site assessment process (which included a Green Belt assessment) concluded that the overall contribution of the site to Green Belt purposes was low, particularly as a result of the site being well contained, as it is adjacent to development to the north and west and would not extend development to the east or south (see housing background paper page 31).</p> <p>However, the advice from NCC on 9 June 2022 was:</p> <p><i>“National Planning policy (NPPF, 2021) is explicit that only ‘Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed</i></p>

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	<p>shortcomings is therefore respectfully urged in the interests of ensuring national policy compliance and soundness.</p>	<p><i>amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans’ (paragraph 140). NPPF demands that ‘exceptional circumstances’ should be demonstrated before Green Belt boundaries can be changed.</i></p> <p><i>In Northumberland the newly adopted Local Plan (March 2022) identifies the full extent of the Green Belt in the County. Policy STP7 (a strategic policy) sets out the strategic approach to the Green Belt in Northumberland. It states clearly that the Green Belt within Northumberland, as defined on the Policies map, will be protected. Green Belt boundaries are defined on the Northumberland Local Plan policies map available here.</i></p> <p><i>National planning policy makes no provision for a Green Belt review to be instigated through the neighbourhood planning process. Neighbourhood plans may modify Green Belt boundaries, but only where the need for changes to the Green Belt boundary have been established through strategic policies. That is not currently the case in Northumberland. Therefore, in our opinion, the neighbourhood plan would fail to meet the basic conditions because it would not have regard to national planning policies, and it would not be in general conformity with Policy STP7 of the Northumberland Local Plan.”</i></p> <p>The representation requests that if the plan did not release land from the Green Belt policy BR6, which was included in the pre-submission draft plan should be reinstated (with revisions). Following the consideration of comments on the pre-submission draft plan it was agreed that a rural exception site policy would be more appropriate than policy</p>

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		BR6 (included in the pre-submission draft plan) given that any development adjacent to the settlement would be in the Green Belt.
Policy BR5: Rural exception sites		
Martin and Kathy Marsh	Secondly, the Draft Plan correctly states that “the management of development in the Green Belt is clearly set out within the local plan and national policy, it is therefore not necessary to repeat this within the neighbourhood plan” [para.4.9]. However, it then goes on to include at paragraphs 4.33 to 4.38 a polemic regarding the need for sites to be made available in the Green Belt around the parish, apparently in pursuit of achieving (para 2.21) a “diverse and balanced” [age, sex ,ethnicity?] population, on the grounds that the existing composition is atypical in a national and regional context. Perhaps it is typical of a Tyne Valley village. The provisions of the Draft Plan as proposed can be seen as encouraging housing development in the Green Belt around the village envelope, thereby fettering the discretion of future parish councils to respond to development proposals on their merits. Policy BR5 is incompatible with Paragraph 4.9, and should be deleted. Unless the above modifications are made, we will object to the adoption of the Plan.	The draft plan clearly explains the reasons why it is considered that there is a need for further housing within the parish and also the constraints of the Green Belt. Policy BR5 accords with the strategic policies of the Northumberland Local Plan and the National Planning Policy Framework (see Basic Conditions Statement pages 5 and 11). Should the current or future B&R Parish Council wish to revise any elements of the neighbourhood plan it can do so.
Clare Irving	The main concern is the protection of green belt and retaining the village as a unique environment separated from other settlements. There are numerous comments in the various documents made available by the Parish Council which raise my concerns over how protected our green belt will be in the future (during the timespan of this new Neighbourhood Plan) – paraphrased comments such as ‘much of the green belt is safeguarded’ and ‘desire to provide affordable housing...minimal impact on the green belt’. In planning and development	The draft plan clearly explains the reasons why it is considered that there is a need for further housing within the parish and also the constraints of the Green Belt. The neighbourhood plan does not however propose any amendments to the Green Belt within the parish. Whilst the local plan does not identify a housing requirement figure for the parish, this does not mean that there is no need for affordable housing. The local plan

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	<p>terminology, this leaves a lot of wriggle room for future developments, and it gives the impression there are developments in their infancy which we are not yet aware of. Hence my concerns as to what this Neighbourhood Plan could be leaving the village and surroundings open to.</p> <p>I was under the impression that Northumberland County Council had met the targets for affordable housing and our green belt boundary was secure. The Neighbourhood Plan does not appear to support this, and the green belt boundary is at risk.</p> <p>The plan requires the levelling up the demographics of the village to be 'diverse and balanced' as the village does not align with the rest of the UK and Northumberland in its entirety. How does the village's current demographics compare with other Tyne Valley settlements? My impression of this is that it's a tick box exercise which would result in housing developments being permitted, and the green belt being put at risk again. The plan is wanting affordable housing to be built at the expense of the green belt. Affordable housing seems to mean small housing estates at best – the risk is the start of urban sprawl and diminishing the unique and rare character of this village.</p>	<p>includes several policies which support the delivery of affordable housing, including policy HOU7 which would allow the delivery of affordable housing within the Green Belt where specific criteria are met – this reflects national planning policy.</p> <p>The purpose of neighbourhood plan policy BR5 is to provide support for the delivery of affordable housing on exception sites, where criteria are met and highlight that there is a need for smaller homes.</p> <p>With regard demographics, it is clear from the information presented in section 2 that the parish has an ageing population, with notably more households aged all over 65 and fewer families with dependent children. The parish council considers there is a need for this to be addressed and the provision of additional appropriate housing, has an important role.</p>
Green Belt - general		
Mrs J Rowntree	<p>I object to the draft plans for the following reasons:</p> <p>A) The Northumberland Local Plan defines the Green Belt inset boundary for Riding Mill and Broomhaugh. Outside this boundary is Green Belt. The plan also attached great importance to the Green Belt whose fundamental aim is to prevent urban sprawl and keep land open.</p> <p>B) The Northumberland Local Plan does not identify a requirement for the Green Belt boundary to be amended</p>	<p>The neighbourhood plan does not propose any amendments to the Green Belt within the parish.</p>

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	<p>or provide provision for a strategic review of the Green Belt. Therefore I feel moving it would be wrong in principle and dangerous in practice.</p>	
Linden and Neville Furness	<p>We feel that the designated Green Belt around Broomhaugh and Riding Mill is very important and should be kept as it is.</p>	<p>The neighbourhood plan does not propose any amendments to the Green Belt within the parish.</p>
Osbit Limited	<p>Summary and conclusions These representations to the Submission Draft of the Broomhaugh and Riding Neighbourhood Plan have been prepared on behalf of Osbit Limited. Osbit Limited specialise in subsea engineering and off-shore technology and are the only significant employer in the Broomhaugh and Riding Parish. Whilst the BRNP recognises the role of Osbit, and their plans for growth, the inclusion of Broomhaugh House within the Green Belt acts as a policy hurdle to future expansion. The Site has been assessed against the Green Belt policy found in the NPPF and NLP and it is concluded that the land makes a minimal contribution to the purposes of the Green Belt and so can be removed from it, without compromising the 'Basic Conditions' that the BRNP must meet in order for it to come into force. The removal of the Site from the Green Belt would assist in the expansion of Osbit as it would negate the policy requirements to demonstrate 'Very Special Circumstances' as part of any planning application.</p> <p>We trust that you have all of the information required to enable you to take our comments into consideration and make modifications to the Neighbourhood Plan to enable the growth of the only significant employer within the parish.</p>	<p>The parish council fully acknowledge Osbit as the only significant employer within the parish and its expansion plans. As explained with regard to potential housing development, it is not possible for the neighbourhood plan to revise Green Belt boundaries where no requirement to do so has been identified in the local plan. If the neighbourhood plan sought to do this, it would not, as required by regulations, be in general conformity with the strategic policies of the development plan.</p>
Carmen Pasco	<p>I want to lodge a concern about the draft neighbourhood plan for Broomhaugh and Riding Mill.</p>	<p>The neighbourhood plan does not propose any amendments to the Green Belt within the parish.</p>

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	<p>The concern is that the green belt boundary no longer seems secure. Particularly the fields to the east of the cricket field to the roundabout.</p> <p>I'm keeping this brief at this time. I can give more details but I really want this concern lodged.</p>	
Policy BR7: Sustainable transport and new development		
Northumberland County Council	<p>Bullet point e. seeks to ensure that the cumulative impact on traffic flows on the highway network will not be 'severe'. It is suggested that 'significant' could be a more effective term to use as it may be easier to demonstrate. It is noted that bullet point g is a differently worded repeat of bullet point k in policy BR2. We would question if this bullet point is needed</p>	<p>As explained within the consultation statement (page 96) the reference to impacts being 'severe' reflects the NPPF.</p> <p>Criterion 'g' of policy BR7 relates to the provision of EV charging points in new residential, employment, leisure and retail developments. Criterion 'k' of policy BR2 provides more general support for EV charging points in safe, accessible and convenient locations – so this could relate to standalone charging points.</p>
Policies Map		
Northumberland County Council	All maps should have the O.S. disclaimer	Agree – amend.