

Humshaugh Neighbourhood Plan – responses to comments on Submission Plan

Consultee	Comment	HPC Response
General		
Northumberland National Park Authority	<p>The Humshaugh Parish Neighbourhood Plan covers an area which spans two separate local planning authorities. The response below relates to comments from the Northumberland National Park as a separate local planning authority, who will use the Neighbourhood Plan to determine planning applications in the part of the National Park within this parish.</p> <p>Northumberland National Park</p> <p>It should be noted that Northumberland National Park was designated in 1956 to benefit the whole nation. Its particular purposes are set out in Section 61 of the Environment Act 1995:</p> <ul style="list-style-type: none"> • to conserve and enhance the natural beauty, wildlife, and cultural heritage of the national parks; • to promote opportunities for the understanding and enjoyment of the special qualities [of the national parks] by the public. <p>In delivering these two statutory National Park purposes the Authority also has a duty to <i>‘seek to foster the socio-economic wellbeing of local communities within the National Park’</i>.</p> <p>As well as delivering sustainable development, the Northumberland National Park Local Plan aims to avoid outcomes that would prejudice the purposes for which the National Park was designated.</p> <p>National policy (NPPF para 182) gives great weight to the protection of the Special Qualities of the National Park, such as its landscape, wildlife and cultural heritage. The Special Qualities of Northumberland National Park are set out in the Management Plan (2022) and are identified as:</p> <ul style="list-style-type: none"> • A Distinctive Landscape Character • A Rich Cultural Heritage • A Place Rich in Biodiversity and Geology • A Sense of Tranquillity. 	Noted. No amendments required in response to this representation.

Consultee	Comment	HPC Response
Historic England	<p>Thank you for consulting Historic England on the publication draft of the above neighbourhood plan. As the public body that advises on England's historic environment, we are pleased to offer our comment.</p> <p>Historic England made a number of comments in relation to the pre-submission draft plan, on 22 January 2024. We are pleased that these have been taken into account and we have no further comments to make.</p>	Noted. No amendments required in response to this representation.
Natural England	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on this draft neighbourhood plan.</p>	Noted. No amendments required in response to this representation.
Defence Infrastructure Organisation	<p>It is understood that Northumberland Unitary County Council is seeking views on a proposed submission draft neighbourhood plan for Humshaugh Parish.</p> <p>The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.</p>	Noted. Northumberland Local Plan policy TRA7 relates to aerodrome safeguarding areas and allocations are included on the policies map. As a result of this and the requirements of the NPPF, it is not considered necessary to repeat this within the neighbourhood plan.

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	<p>Paragraph 101 of the National Planning Policy Framework (December 2023) requires that planning policies and decisions take into account defence requirements by ‘ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.’ Statutory consultation of the MOD occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued to Local Planning Authorities by the Department for Levelling Up.</p> <p>The area covered by any Humshaugh Neighbourhood Plan will both contain and be washed over by a safeguarding zone that is designated to preserve the operation and capability of RAF Spadeadam.</p> <p>The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans, and the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected.</p> <p>To provide an illustration of the various issues that might be fundamental to MOD assessment carried out in response to statutory consultation, a brief summary of the main safeguarding areas of concern is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.</p> <ul style="list-style-type: none"> • Birdstrike safeguarding zones with a radius of 12.87km are designated around certain military aerodromes. Aircraft within these zones are most likely to be approaching or departing aerodromes and therefore being at critical stages of flight. Within the statutory consultation areas associated with aerodromes are 	

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	<p>zones that are designed to allow birdstrike risk to be identified and mitigated. The creation of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. This can include landscaping schemes associated with large developments, as well as the creation of new waterbodies such as ponds, wetlands and/or attenuation basins. This would also include both on and off-site provision of Biodiversity Net Gain (BNG). Sustainable Drainage Systems (SUDS) additionally provide an opportunity for habitats within and around a development. The incorporation of open water, both permanent and temporary, provide a range of habitats for wildlife, including potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation and therefore may be subject to design requirements or for management plans to be applied.</p>	
Coal Authority	<p>The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>Our records indicate that within the identified Neighbourhood Plan area there are recorded coal mining features present at surface and shallow depth including: a single mine entry and coal workings. These features may pose a potential risk to surface stability and public safety.</p> <p>It is noted however that the Neighbourhood Plan does not propose to allocate any new sites for development and on this basis the Planning team at the Coal Authority have no specific comments to make on the document.</p>	Noted. No amendments required in response to this representation.
Humshaugh Net Zero CIC	On behalf of Humshaugh Net Zero CIC we would like to commend the content of the draft submission Humshaugh Neighbourhood Plan.	Noted. No amendments required in response to this representation.

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Paragraph 3.1		
JC Davison, M Grundseth and PJ McKee	Query whether achieving net zero greenhouse gas emissions by 2036 is achievable? The national commitment to reaching net zero is by 2050.	<p>No amendments required in response to this representation. It is appropriate for the vision of the neighbourhood plan to have a more ambitious target than that set nationally.</p> <p>The Northumberland County Council Climate Change Action Plan 2024-26 states: "Northumberland County Council pledges to work with the Government to make Northumberland carbon neutral (in relation to carbon dioxide emissions) by 2030 and to achieve net zero for all greenhouse gases for the county of Northumberland by 2040, whilst appreciating that this will require a concerted national shift in behaviours and significant technological advancements."</p> <p>Climate-Change-Action-Plan-2024-26.pdf (northumberland.gov.uk)</p> <p>Paragraph 3.1 is not inconsistent with this NCC policy.</p>
Paragraph 4.3		
JC Davison, M Grundseth and PJ McKee	Support the paragraph as drafted. In this respect the respondents agree that Humshaugh is appropriately classified as a service village. They also agree that it should provide a proportionate level of housing and be a focus for investment in the wider area to support the provision and retention of local retail, services and facilities.	Noted. No amendments required in response to this representation.
Paragraph 4.4		
JC Davison, M Grundseth and PJ McKee	Support the decision not to amend the settlement boundary. In relation to the second sentence which states, " <i>A main driver for reviewing settlement boundaries would be the need to provide sufficient land for new housing development</i> ", the respondents would record there is suitable and available land within the settlement boundary. Humshaugh	Noted. No amendments required in response to this representation. It is not necessary for the neighbourhood plan to repeat policies contained within the local plan.

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	Neighbourhood Plan, 'HNP' paragraph 4.3 states the Northumberland Local Plan, 'NLP' supports sustainable development within the settlement boundary. It is a requirement that the HNP accord with the NLP and therefore should expressly do the same.	
Policy 1: Community energy initiatives		
Northumberland County Council	<p>The Northumberland Local Plan (NLP) sets out through Policy REN 2 and the Policies Map '<i>Areas Potentially Suitable for Wind Energy Development Involving Turbines</i>'.</p> <p>In Humshaugh, the majority of the parish (excluding the National Park) is deemed potentially suitable for turbines up to 25m in Height to the Tip of the Blade.</p> <p>The purpose of the Humshaugh LP policy as explained in the supporting text is that wind turbines of 25m '<i>would not be economically viable</i>' and larger turbines should be supported.</p> <p>It would have been prudent, to assess and identify at a local level, sites that would be suitable within planning constraints for turbines above 25m and to what height would be appropriate:</p> <ul style="list-style-type: none"> • Under 25 metres; • 26 to 40 metres; • 41 to 65 metres; • 66 to 100 metres; • 101 to 135 metres. <p><i>(From para 13.101 of the Northumberland Local Plan).</i></p> <p>Without evidence that turbines under 25m are not viable and no new assessments for larger turbines made, there is insufficient evidence to alter the strategy of NLP Policy REN2 and therefore supporting Paras 4.11 and 4.13 should be deleted. They should also be deleted because the points made are not then actually reflected in Policy 1.</p>	<p>Comments from NCC on the pre-submission draft plan did not question draft policy 1, it stated that it did not add to NLP policy REN1. As a result, the parish council considers it is important to have the opportunity to explain in more detail the reasons why turbines under 25m are not economically viable.</p> <p>Note: The information below is provided by a member of the NP Steering Group, David Still CBE, who has worked in the renewable energy sector since 1984, including spending time at the Department of Trade and Industry as its Renewables Advisor to Ministers. David has worked as a developer, for manufacturers, as a government advisor and consultant.</p> <p>Humshaugh Net Zero commissioned a report in 2020 to identify the potential for wind energy within Humshaugh parish (Humshaugh) for wind energy. https://humshaughnetzero.org/reports This was in the context of reaching Net Zero by 2030 which was calculated as over 5300 tonnes of CO2 each year for just domestic emissions. A single 1 MW of wind energy generates savings of over 2000 tonnes of CO2 . This is almost 38% of domestic carbon emissions in Humshaugh.</p> <p>Maximum turbine generation size for a 25m tip height wind turbine is 11 kW. These turbines are typically used</p>

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	<p>Furthermore, Policy 1 as worded may be deemed superfluous to Local Plan Policy REN 1.</p>	<p>in remote locations for self-use, not for commercial generation of scale. To achieve an output of 1 MW using wind turbines with a tip height of 25m would require 90 x 11kW wind turbines.</p> <p>Each of these wind turbines would cost £80,000 (budget price according to market leader manufacturer Ryse https://www.ryse.energy/) or £7,200,000 for all 90 wind turbines plus grid cost of £200,000. To achieve a suitable Internal Rate of Return (IRR) of 10 % would require a selling price of 38p/kWh – or nearly 5 times the current achievable sales rate. This assumes no array losses.</p> <p>The 90 x 11kW wind turbines would require a significant area as each wind turbine needs to be at least 130 m apart. A 10 x 9 matrix for these WTs would therefore cover an area of approximately 900 m x 800 m instead of a single tower for a larger wind turbine.</p> <p>A single 1 MW wind turbine would cost £1,200,000, and using same size grid connection, would generate electricity at a cost of 8p/kWh, and would be a commercial project.</p> <p>Commercially, for grid connected wind projects, the smallest wind turbines currently installed are sized at 1 MW. The nominal tip height for these wind turbines is a minimum of 67 m.</p> <p>The economics are as follows to achieve an Internal Rate of Return of 10% for a 11kW wind turbine: 11kW WT requires selling price for power generated of £0.38/kWh; 1 MW requires selling price for power generated of</p>

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		<p>£0.08/kWh; The current market price for selling electricity is £0.08/kWh</p> <p>Market price update:</p> <p>https://www.newstreamrenewables.com/news/ppa-and-gpa-pricing-update-july-1st-2024/</p> <p>Detailed IRR calculation is attached for a single 11kW wind turbine, with a tip height of 25m:</p> <table><tr><td>No of WTs</td><td>1</td><td></td></tr><tr><td>WT size</td><td>11</td><td>kW</td></tr><tr><td>Blade tip</td><td>25</td><td>m</td></tr><tr><td>WT output (annual)</td><td>38000</td><td>kWh</td></tr><tr><td>PPA price</td><td>£ 0.38</td><td>/kWh</td></tr><tr><td></td><td></td><td></td></tr><tr><td>WT price installed</td><td>(80,000)</td><td>£</td></tr><tr><td>Grid connection cost</td><td>(20,000)</td><td>£</td></tr><tr><td>Annual operation costs</td><td>(3,000)</td><td>£</td></tr><tr><td></td><td></td><td></td></tr><tr><td>IRR</td><td>10%</td><td></td></tr></table> <p>Target IRR for investment is 10%</p> <p>Current export power price is £0.08/kWh</p> <p>To achieve target IRR, PPA price is £ 0.38 /kWh</p> <table><tr><th colspan="2">IRR CALCULATION</th></tr><tr><th>Year</th><th>£</th></tr><tr><td>0</td><td>(100,000)</td></tr><tr><td>1</td><td>11,440</td></tr><tr><td>2</td><td>11,440</td></tr><tr><td>3</td><td>11,440</td></tr><tr><td>4</td><td>11,440</td></tr><tr><td>5</td><td>11,440</td></tr><tr><td>6</td><td>11,440</td></tr><tr><td>7</td><td>11,440</td></tr><tr><td>8</td><td>11,440</td></tr><tr><td>9</td><td>11,440</td></tr><tr><td>10</td><td>11,440</td></tr><tr><td>11</td><td>11,440</td></tr><tr><td>12</td><td>11,440</td></tr><tr><td>13</td><td>11,440</td></tr><tr><td>14</td><td>11,440</td></tr><tr><td>15</td><td>11,440</td></tr><tr><td>16</td><td>11,440</td></tr><tr><td>17</td><td>11,440</td></tr><tr><td>18</td><td>11,440</td></tr><tr><td>19</td><td>11,440</td></tr><tr><td>20</td><td>11,440</td></tr><tr><td>21</td><td>11,440</td></tr><tr><td>22</td><td>11,440</td></tr><tr><td>23</td><td>11,440</td></tr><tr><td>24</td><td>11,440</td></tr><tr><td>25</td><td>11,440</td></tr></table>	No of WTs	1		WT size	11	kW	Blade tip	25	m	WT output (annual)	38000	kWh	PPA price	£ 0.38	/kWh				WT price installed	(80,000)	£	Grid connection cost	(20,000)	£	Annual operation costs	(3,000)	£				IRR	10%		IRR CALCULATION		Year	£	0	(100,000)	1	11,440	2	11,440	3	11,440	4	11,440	5	11,440	6	11,440	7	11,440	8	11,440	9	11,440	10	11,440	11	11,440	12	11,440	13	11,440	14	11,440	15	11,440	16	11,440	17	11,440	18	11,440	19	11,440	20	11,440	21	11,440	22	11,440	23	11,440	24	11,440	25	11,440
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Northumberland National Park Authority	NNPA raise no issues with this policy, which allows for the consideration of the impact of such proposals with consideration of criteria relating to landscape, cultural heritage and ecology - which are all special qualities of the national park that require specific consideration.	Noted. No amendments required in response to this representation.
Defence Infrastructure Organisation	<p>The MOD has, in principle, no objection to any renewable energy development, though some infrastructure enabling renewable energy production, for example wind turbine generators or solar photo voltaic panels can, by virtue of their physical dimensions and properties, impact upon military aviation activities, cause obstruction to protected critical airspace surrounding military aerodromes, or impede the operation of safeguarded defence technical installations. In addition, where turbines are erected in line of sight to defence radars and other types of defence technical installations, the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations potentially resulting in detriment to aviation safety and operational capability.</p> <p>This potential is recognised in the Government's online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of, or exceeding 2m.</p> <p>In order to provide a broader representation of MOD interests, and to ensure prospective developers are aware of the potential implications of these forms of development, it is requested that provision is made in Policy 1: Community energy initiatives to communicate that applications for renewable energy development which would not compromise, restrict or otherwise degrade the operational capability of safeguarded MOD sites and assets will be supported.</p>	Noted. No amendments required in response to this representation. Northumberland Local Plan policies REN1(3k) and REN2(2b) are considered to appropriately address this issue, there is no need to repeat this requirement within the neighbourhood plan.

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Humshaugh Net Zero CIC	<p>We recognise the importance of proposed Policy 1 which will allow our community to support, amongst other technologies, community wind projects without the severe height restrictions imposed by the Local Plan.</p> <p>The current Local Plan restrictions have the effect of banning wind turbines as the height restrictions limit the use of largely untested small wind turbines which are not economic.</p> <p>Planning policy set in the Local Plan restricting the development of wind energy to uneconomical technical solutions is disingenuous. We would suggest that, with the need to reach Net Zero by 2035, that policies to make this happen should be in place. For Humshaugh this means allowing the community to be able to make decisions.</p> <p>Communities need to encourage actions that will both reduce the amount of energy lost by poor insulation, and CO2 emissions from use of oil & gas heating appliances. There will be an increased need to use electricity for both heating using heat pump technology and EV charging. This then requires houses to be both energy efficient and to be able to generate electricity from, for example, solar panels. Home batteries can store the power to reduce overall energy exports. This will, in the future, be expanded by new technology enhancements to allow EVs to be used to power homes.</p> <p>Finally, the community needs to be able to generate and store renewable energy locally from both solar projects and wind projects. Humshaugh has such a project under development, a 1MW solar farm that will generate 50% of the electricity used within Humshaugh.</p>	Noted. No amendments required in response to this representation.

Consultee	Comment	HPC Response
Paragraph 5.6		
JC Davison, M Grundseth and PJ McKee	It is acknowledged that NPPF paragraph 105 allows communities to designate land as Local Green Space. NPPF paragraph 105 goes on additionally to state, <i>"Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period"</i> . In the interests of balance, the respondents consider these further words should be included within paragraph 5.6.	It is considered that it would be appropriate to make this amendment.
Policy 2: Local Green Space		
Northumberland County Council	<p>Local Green Space will resist in the strongest planning policy terms any development until at least 2036 on the sites identified. Question whether the selection of two sites (LGS03 and LGS04) prevents the achievement of sustainable development.</p> <p>Whilst protection of LGS is commensurate with Green Belt, their purposes are different. Although acknowledging that Chollerford and Humshaugh have now effectively coalesced, the Green Belt purpose (b; NPPF para 143) to prevent towns merging into one another should not be a factor in the identification and designation of LGS.</p> <p>We continue to question whether LGS03 Bog Field and LGS04 Leggit Field each meet the threshold for Local Green Space criteria.</p>	<p>Comments noted. No response required to this element of the representation.</p> <p>There is no suggestion that the justification of either site LGS03 or LGS04 is to prevent coalescence – as that is not the purpose of LGS designation. However, it is important to highlight that in the committee report on planning application 19/00861/FUL for 20 dwellings on LGS03 (which was refused), the case officer referred to the importance of retaining the rural countryside setting (see 7.31-7.35): <i>"As it stands the application site offers significant visual relief to existing development, providing for open aspect as one goes through Chollerford and Humshaugh. It very much compliments the open space to the west of the site, the agricultural land to the east and open land to the south, thereby maintaining the rural character in this location."</i></p>

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	<p>LGS03 – Bog Field</p> <p>As per the point above, the LGS and POS Background Paper, under LGS03 and Comments, the first paragraph mentions an important gap between Humshaugh and Chollerford.</p> <p>In terms of beauty, it refers to fields and hills beyond rather than the site itself. For tranquillity, it refers to a lane to the south and Chesters Meadow as much as the site.</p> <p>This agricultural field does not appear to meet the high threshold for special qualities associated with a Local Green Space.</p> <p>LGS04 – Leggit Field</p> <p>In the LGS and POS Background Paper, under LGS04 and Comments, a typical agricultural field is described.</p> <p>Contrary to the comments, this site is <u>not</u> directly adjacent to the Conservation Area. It describes the site as contributing to the setting of the conservation area and listed buildings but does not explain how. Proximity alone does not enshrine a site to being a significant part of a setting.</p>	<p><i>It is therefore understandable that the settlement boundary is proposed in this way at present to protect the character of the area. It is officer opinion that the introduction of new housing in this more rural countryside setting would have a detrimental impact upon the character and appearance of the site and the village and the surrounding open countryside. When viewed from the open countryside beyond the site the visual effects would be significant, leading to a significantly increased perception of urbanisation."</i></p> <p>The background paper explains that the site is important to the character of this part of the village. This reflects the character analysis contained within the design code document which highlights the importance of the sense of connection of sites with the surrounding countryside. It is considered that that background paper clearly details the reasons the proposed site meets the requirements for LGS designation.</p> <p>As above, the design code highlights the importance of the site as part of the character of the village.</p> <p>Whilst the site does not directly <u>adjoin</u> the conservation area, it is considered to be very close to it (the northern side is 40m from the conservation area boundary and the southern side 120m) and therefore part of its setting. Sections 4.2 and 6.3 of the conservation area heritage paper explains that green spaces provide an</p>

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	<p>Ridge and Furrow can be important as part of a wider field system or remains of a settlement, which is not the case here. Ridge and Furrow is relatively common and would question whether there is sufficient historic significance to warrant LGS designation.</p> <p>Whilst there are aspects like mature trees, greenery and the proximity to two listed buildings that are planning considerations, these do not alone or in combination appear to meet the threshold for Local Green Space.</p> <p>LGS08 – Haughton Square Following comments at Reg. 14 stage, we are satisfied that sufficient evidence has now been provided to support LGS07 Haughton Square, particularly around recreation.</p>	<p>important rural setting to the conservation area. With regard to the role of the site as part of the setting of listed buildings, page 29 of the background paper includes two photographs taken from Hopewell House (top and bottom left). Hopewell House is 15m from the site and has the school on one side, houses on two sides and only one remaining open side overlooking LGS04 – it is therefore considered that the site clearly contributes to its setting, as evidenced by the photos.</p> <p>Humshaugh CofE Primary School - the first floor classroom in the two storey part of Humshaugh First School at the north end of the building has direct line-of-sight down into and across the Leggitt Field, and this contributes significantly to maintaining the rural character of the School which has been significantly eroded by the extensive adjacent Chesters Meadow development. The setting is evidenced in the The LGS and POS Background Paper, page 29, the picture bottom right hand side showing the school in the background and also on page 30 of the submission draft neighbourhood plan.</p> <p>In response to the comments regarding Ridge and Furrow, NCC Conservation Manager (Sara Rushton) highlighted in email correspondence that the Ridge and Furrow could be considered a non-designated Heritage Asset.</p> <p>Comments noted. No response required to this element of the representation.</p>

Consultee	Comment	HPC Response
	<p>LGS01 – Playing field and play area</p> <p>We query whether this playing field would be better identified as Protected Open Space, which would allow the criteria a-c in Policy 3 to be applied in circumstances like (for example) construction of a new school building or a new sports/ recreation field being provided elsewhere. Designation as LGS could be very restrictive for this site until 2036.</p>	<p>LGS01 is already allocated as open space within the NLP. Given its importance to the local community, particularly as a recreational resource, it is considered that the designation as LGS is appropriate. Should a proposal come forward for a new school or other community facility, it is considered that given the importance of the site, it would be appropriate to assess this against the provisions of policy 2 and national planning policy for Green Belt.</p> <p>In considering all comments made by NCC to the proposed LGS sites it is important to highlight that the proposed LGS in Humshaugh are all very similar when the criteria are compared and benchmarked, in terms of their importance to the local community. LGS03 forms part of the wider network of green spaces which shape the character, the quality and distinctiveness of the environment of the village. These qualities are valued not only by residents but also the wider community and visitors to the area. The approach to the assessment of the sites have been consistent. It is submitted that the erosion or dilution of this will impact on the special character of the area. An example of the appropriateness of this approach is in the Caterham, Chaldon and Whyteleafe Neighbourhood Plan which includes a number of sites grouped into three areas. The CPRE referenced the neighbourhood plan in research published in 2022 which highlighted the importance of the cluster of open spaces.</p>

Consultee	Comment	HPC Response
Northumberland National Park Authority	These are all outside the National Park and therefore the NNPA makes no comment.	Noted. No amendments required in response to this representation.
Diocese of Newcastle	<p>A full review of the submission draft plan has been undertaken along with a review of the supporting evidence base for the plan. Having undertaken this review it is considered that the previous objections raised by the Diocese to the content of Policy 2: Local Green Space and specifically the proposed designation of the Glebe Field (LGS 09) as Local Green Space (LGS) are appropriate and justified. A review of the plan policy and the Local Green Space and Protected Open Space Background Paper – November 2023 (LGSBP) and the site specific assessment contained in this, shows that the proposed LGS designation of the Glebe Field is not supported by sufficient evidence and does not meet the prescribed tests for LGS designation set out in the NPPF. This letter sets out the basis for this conclusion.</p> <p>The starting point for assessment of the proposal is the NPPF and specifically paragraphs 105 to 107. Paragraph 105 makes provision for the designation of LGS as part of the plan process, through either Local Plans or Neighbourhood Plans. It confirms plans allows <i>communities to identify and protect green areas of particular importance to them</i>. NPPF paragraph 107 confirms that an LGS designation gives effect to protection consistent with those for Green Belts. Paragraph 105 advises that any LGS designation should be consistent with the parallel requirement to deliver sustainable development and the supply of sufficient homes.</p> <p>NPPF Paragraph 106 sets out the tests which must be met for LGS designation to be justified. It confirms LGS designation should only be used where 3 tests are met. All 3 of these tests must be met. These require that the green space is:</p> <p><i>a) in reasonably close proximity to the community it serves;</i> <i>b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance,</i></p>	Noted. No amendments required in response to this representation – it provides a summary of the planning policy position.

Consultee	Comment	HPC Response
	<p><i>recreational value (including as a playing field), tranquillity or richness of its wildlife; and</i></p> <p><i>c) local in character and is not an extensive tract of land.</i></p> <p>Of the three tests a) and c) are relatively easily considered. Test b) provides further details on the question of a site's particular importance to a local community. It requires any proposed LGS designations to show they are demonstrably special and hold particular local significance. (our emphasis) These are considered high thresholds which must be demonstrated to be met in order to allow LGS designation.</p> <p>In order to show that these high thresholds are met the NPPF provides five examples of considerations which if proven can justify LGS designation. These are in the areas of beauty, historic significance, recreational value and tranquillity or richness of wildlife. It is not a requirement that all of these examples must be demonstrated to be present in order to justify LGS designation.</p> <p>The National Planning Policy Guidance (NPPG) – <i>Open space, sports and recreation facilities, public rights of way and new Local Green Space Designation</i>, provides further detail and clarity on the NPPF and the Frameworks LGS content.</p> <p>Paragraph 11 is of particular relevance in this case. The paragraph considers whether the extra protection afforded by an LGS is needed in circumstances where it is already protected by a designation including inter alia a conservation area. The NPPG requires that if land is already protected by such a designation, <i>consideration should be given as to whether any additional local benefit would be gained by designations as Local Green Space</i>.</p>	<p>There are examples where examiners have concluded that whilst allocation as a LGS would not provide additional protection, it would recognise the importance of the site to the local community, e.g: Broomhaugh and Riding Neighbourhood Plan examiners report (paragraph 108) and Middleton St George examiners report¹ (paragraph 3.50)</p>


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	<p>On the question of public access paragraph 17 confirms that land need not have public access to be designated as LGS if the land is valued for example due the wildlife present, the sites historic significance and/or its beauty. It can be noted that tranquillity is omitted from this list, indicating that access to a site should be present if tranquillity is to be considered as justification. The paragraph also confirms that LGS designation does not confer any rights of access where they do not already exist.</p> <p>The NPPF and NPPG therefore provide the policy context and framework in which any proposal for LGS designations must be assessed. In this context the proposed LGS9 designation of the Glebe Field will be examined.</p> <p>The Glebe Field as proposed to be designated (LGS09) is shown on the Submission Draft Inset Policies Map. The land can be seen to be surrounded by other land parcels and is remote from the public highway with no boundaries directly abutting any public rights of way or vehicle routes. The land is bounded to the east by the 20th century graveyard extension to St Peters Church. To the south it is bounded by a residential development site, which has an extant planning permission in which development has commenced but has not been completed. To the west the site is bounded by small parcels of private land with land immediately to the west forming the orchard to the vicarage garden to the north. To the north the land abuts the southern garden boundary of the vicarage. To the northeast of the site is St Peters Church and the original churchyard, however this does not bound the site other than where the corner of the two land parcels touch. The site is defined by stone boundary walls to the east and west while the south boundary is defined by a line of mature trees. The north boundary is defined by the south extent of the vicarage garden and the plants and trees within that.</p> <p>The land parcel has no public access and at present the field is a parcel of semi managed rough grazing land.</p>	<p>Disagree with this statement. Paragraph 17 actually states: <i>However, other land could be considered for designation even if there is no public access (eg green areas which are valued because of their wildlife, historic significance and/or beauty).</i> It is clear that these areas are examples and does not specifically exclude tranquillity.</p>

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	<p>In relation to the appearance and visibility of the site, the local topography of the area means that there are no direct views into the site from the public realm in respect of local footpaths or the public highway. The public highway to west running through the village is over 4 metres lower than the land level of the site. No views into the site or views of the surface of the field are available and only the boundary wall is observable along with the boundary vegetation and trees. Views into the site are available from the top of 20th century graveyard extension immediately east of the site. Although this land has unrestricted public access, it is not a trafficked public area in the typical sense of the public realm, instead being consecrated ground accessed ostensibly by people visiting friends and families' graves in the graveyard extension or attending funeral burials. Pedestrian access into this area is via the original churchyard to the north although a vehicle field gate entrance used for maintenance and burial vehicles is present at the northeast corner of the field.</p> <p>Establishing this visual context for the site is important as it clearly demonstrates the site is not readily visible or appreciable from the public realm with any visual appreciation of the actual site only being afforded to users of the graveyard extension.</p> <p>Before considering whether any detailed site-specific justification is demonstrated in the NP to justify the proposed designation in accordance with NPPF para 106, it is relevant to first consider the question of whether any additional protection of the land is actually required. Paragraph 11 of the NPPG is clear in requiring that consideration should be given to this question. In this case it can be confirmed that the site is already located within the Humshaugh Conservations area. In this respect it is afforded protection as part of a designated heritage asset as defined in Annex2 of the NPPF and considered in section 16 of the framework. The land and the current contribution it makes to the Conservation area is therefore afforded significant protection and even development of less than</p>	<p>Direct views into the site from the public realm or highway are not considered relevant to the assessment of whether the site meets the LGS assessment criteria. As is detailed within the representation, there are views into the site from the graveyard and it is explained within the background paper that one of the reasons the site is valued, for its tranquillity, is by people who attend the churchyard to remember their loved ones. The newer part of the churchyard is the most used area for this as the graves are more recent. It is very regularly visited and actively tended by many families and friends, as anyone can observe or as evidenced by comments in the visitor book in church. By association the proximity of the Glebe Field to this actively used and special space for people seeking tranquillity and comfort.</p> <p>Paragraph 106 of the NPPF states: <i>The Local Green Space designation should only be used where the green space is:</i></p> <ul style="list-style-type: none"> <i>a) in reasonably close proximity to the community it serves;</i> <i>b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</i> <i>c) local in character and is not an extensive tract of land.</i>

Consultee	Comment	HPC Response
	<p>substantial harm would have to show public benefits sufficient to outweigh any harm, in order to be acceptable. (Para 208)</p> <p>In relation to any potential for harm this protection is significant. The location within the Conservation Area is however all the more significant as it provides full protection to the mature trees which are present on the boundaries of the land. These trees in visual terms are considered, due to the topography of the land, to be the only aspects of the site in visual terms which are readily observable. These are the one element of the site which does actually contribute over a wider area to the character of the village, by virtue of their visibility from the public realm and the contribution they make in conjunction with other trees to the character of the area. These trees, by virtue of their location in the conservation area, are afforded full protection under the Act, equivalent to that of a Tree Preservation Order (TPO). In this respect significant protection for the main positive visual contributors on the land already exists. Indeed it can be noted that an LGS designation which affords protection equivalent to green belt policy would in fact afford no greater protection to the trees.</p> <p>In the context of the site location in the conservation area it can therefore be seen that the site is already afforded significant protection. The one visual feature of the site which does have wider public benefit and importance to the community, its boundary trees, are already fully protected.</p> <p>A review of the NP and the LGSBP shows no evidence that consideration has been given to whether any additional local benefit would be gained by LGS designation. Public consultation to identify what residents feel is important, as described in para 5.7 of the NP, does not constitute consideration of whether additional protection is required. In the absence of evidence to demonstrate consideration of this, it is concluded that the plan has not been prepared in accordance with the requirements of the NPPG and NPPF.</p>	<p>It is therefore not relevant to <u>first</u> consider whether additional protection is required. NPPG does not state that just because a site has another designation it should not be identified as LGS, it states '<i>consideration should be given to whether any additional local benefit would be gained</i>' – a local benefit is that it highlights the importance of the site to the local community.</p>

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	<p>Turning to the NP assessment of the designation tests described in NPPF para 106) these are set out on pages 37 and 38 of the LGSBP. On the tests prescribed in Para 106 a) and c) it is accepted that the site meets the prescribed tests.</p> <p>In relation to the test and criteria set out in 106 b) it is not considered that the evidence presented in the LGSBP does demonstrate the site is worthy of designation. The assessments undertaken are not accurate, robust or evidentially based. Each of the assessments will now be examined under separate subheadings derived from the LGS BP.</p> <p><u>The proposed space is of particular local significance because of its beauty.</u> The comments section of the assessment cites a number of considerations which seek to justify the conclusion the site has natural beauty sufficient to be of local significance. The assessment however fails in any way to consider or demonstrate where the site is visually capable of being appreciated from. In order to be of local significance for its beauty, it must be expected that the site will be visible from the public realm. As described earlier in this letter, the site itself is not actually visible from the public realm in respect of any PROW or public highways. Only users of the top section of the graveyard extension can actually see into the site. It is only the boundary trees which can be seen from the wider area of the village. Coupled with this, when the site is viewed internally it is unremarkable and certainly not 'beautiful'. There is therefore no evidence presented to demonstrate how the site is actually visually appreciable by the local community.</p> <p>The individual comments in the LGSBP as written in italics below, used to justify the designation are also flawed as will be demonstrated.</p> <p><i>The Glebe Field of St Peters is well maintained with a range of mature trees.</i> The glebe field is not well maintained and is only lightly managed as a grazing paddock. The photograph in the assessment (left of the two) shows</p>	<p>As detailed above, and in the background paper, the site is particularly important to members of the community who visit the churchyard.</p> <p>It is acknowledged that the reference to the site being well maintained is inaccurate and it would be better to state that it is only lightly managed. Decisions on the</p>

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	<p>its unmanaged state. The mature trees referred to are located on the boundary of the site and as detailed are already protected due to the location in the conservation area. LGS designation affords them no extra protection and therefore any justification that their 'beauty' will be protected by LGS designation is incorrect.</p> <p><i>The site also includes a small orchard containing apple and pear trees.</i> This statement is factually incorrect. The fruit trees referred to and the mown orchard shown in the photograph in the assessment, are not even part of the site being considered in the NP and defined as LGS09. The orchard referred to sits beyond the west boundary of the field and is part of the private garden to the vicarage to the north. This is therefore a wholly inaccurate and spurious justification, which highlight the absence of detailed rigorous assessment and evidence.</p> <p><i>It is also one of the sites that form the network of green spaces which shape the character of the rural village community.</i> As demonstrated the only aspect of the site which contributes to the character of the village in visual terms are the boundary trees, a feature which would gain no further protection under an LGS designation. In the relation to the site as green space, it is notable that the Conservation Area Heritage Paper November 2023 (CAHP) forming part of the NP evidence base, at no point identifies this parcel of land as contributing to the character of the village. The green space that is the site is largely unobservable. It is considered that the contribution that the sites boundary trees make, is actually being conflated with the notion that the site itself has positive contribution.</p>	<p>management of the site are for the landowner. As explained previously, it is appropriate for a site to be allocated as LGS in recognition of its importance to the local community, even if no additional protection results from its allocation.</p> <p>It is unclear where this reference is taken as it is not included within the version of the background paper that accompanies the submission draft plan. As part of the consultation on the pre-submission draft plan a larger site boundary was proposed. The orchard, adjacent to the Glebe Field was subsequently assessed as a separate site (see page 20 of the background paper) and discounted as it forms part of the private garden for the vicarage. Perhaps the wrong document has been reviewed?</p> <p>It is accepted that the mature boundary trees are a very important visual feature. Visually they link the Glebe Field and the churchyard into one space. The older part of the churchyard is bounded on the north, east and west by mature trees, the newer part of the churchyard is bounded by mature trees to the south and by mature cherry trees next to the road on the east side. The only boundary to the west of the newer part of the churchyard is the roughly 2m stone boundary wall to the Glebe Field. Beyond this the mature trees around the Glebe Field carry on the same visual boundary line from the churchyard to both north and south, (with slightly less mature trees to the west of the Glebe Field). This makes the combination of the churchyard and Glebe Field in the network of green spaces appear as one (see</p>

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	<p>It is also not clear how a green space in which there no public access and little or no visibility form the public realm can contribute to the character of a village <u>community</u>. (our emphasis) The character of a village community relates to how its occupants interact and the commonality which exists. This could in part be shaped and influenced by a green space and a network of these, if the community had a physical interaction with it and used a parcel or interlinked parcels of land in a particular way. In this case no such community interaction exists, and it not therefore considered accurate or correct to argue that this land contributes to the character of the community. There is no evidence to substantiate this.</p>	<p>photograph below). The presence of the open space of the Glebe Field beyond the churchyard but seemingly part of it enhances the feeling of spaciousness and quiet tranquillity of the whole area.</p>  <p>As detailed above, there is no requirement for public access. The site is highly valued by the local community for the reasons detailed within the background paper.</p>

Consultee	Comment	HPC Response
	<p>On the basis of the assessment undertaken, is considered to be clearly the case that justification for an LGS on the basis of the site's local significance in terms of its beauty is not demonstrated. The designation cannot be justified on this basis.</p> <p><u>The proposed space is of particular local historic significance.</u></p> <p>The assessment undertaken and comments in the LGBP do not demonstrate the site is of particular local historic significance. It can be noted that the test requires any land to be shown to be of particular local significance. (our emphasis). It must therefore be demonstrated what the particular importance of the land itself is in historical terms in the local context.</p> <p>In relation to the assessment undertaken the comments are almost solely a description of the history of St Peters Church and a description of the historic significance of this. This does not however in any way confer any particular local historic significance on the land being considered. The land just abuts the church boundary, at its northeast corner, nothing more. In terms of the actual historical significance of the land, it has none. Reference to the HCAHP show this. The historic maps on page 14 and 15 of the documents clearly show the land was never part of the churchyard or the vicarage. They also do not show it as Glebe Land in relation to its historical meaning and function. The land can be seen in the historic maps of 1860, 1897 and 1920 as simply forming a field to the south of the church which extends west from the public highway, eastward up to the current west boundary seen today. The site does not appear as a separate parcel of land with its current defined eastern boundary until Ordnance Survey mapping of 1952. This corresponds with the change of the eastern section of the field to become the graveyard extension. It is quite clear therefore that the parcel of land as defined today, is not a historic enclosure and is fact a result of the post war extension of the graveyard. The site itself therefore has no particular historic significance.</p>	<p>The earliest grave in the 'new churchyard' is that of Rev J W Bottomley in 1932, who actually commissioned the churchyard extension, and not a 1952 post war extension as suggested in the representation.</p>

Consultee	Comment	HPC Response
	<p>The assessment also suggests that the site is part of the listed churches setting and lies within the conservation area. In relation to the setting of the listed church, this alone cannot justify an LGS designation as the site itself must be of particular significance. Further to this the significance of the church as a designated heritage asset is derived from many elements. The setting of any listed building and changes to this are a material consideration where any change to this setting will impact on the significance of the heritage asset. (NPPF para 206.) In this case the land is not part of the original church yard, is not a historic field enclosure and is not part of a planned view or setting for the church. The field does also not create or contribute to a particular localised view of the listed church as part of a valued viewpoint within the village. In addition to this the field is to all intent and purposes visually separate to the historic church yard and church, with no composite views of the field in the foreground to the church being visible due to the vegetation which exists. The mature vegetation and trees within the churchyard largely limit any opportunities for the field to be viewed as part of the setting of the church. The basis of the above the justification for LGS designation derived from the land providing a setting for the church is not valid.</p> <p>In relation to the field's location in the conservation area, this certainly does not constitute the field being deemed to be of particular local historic significance. The field is not referred to specifically in the HCACP and simply because the land is within the conservation area does not imbue it with individual significance. If this were the case every parcel of land in the conservation area could be viewed as needing to be designated. The conservation area as detailed already provides protection to the site and its boundary trees in a manner far more robust than an LGS designation. The location in the conservation area is not grounds for designating an LGS.</p> <p>On the basis of the above it considered that no case based on historic evidence has been presented to demonstrate the field is of particular local</p>	<p>As detailed above, the LGS allocation would recognise the importance of the site to the local community.</p>

Consultee	Comment	HPC Response
	<p>historic significance. Designation on this basis would not be valid.</p> <p><u>The proposed space is of particular local significance because of its tranquillity.</u></p> <p>The assessment undertaken and comments on this in the LGSBP, is considered demonstrate that a designation based on tranquillity is not valid. The assessment states it is <i>tranquil site which, alongside the adjacent churchyard, provides an area of tranquillity at the heart of the village.</i></p> <p>On the question of tranquillity, it is considered that for a parcel of land to deliver or contribute to tranquillity there must invariably be public access onto the land. The NPPG commentary and omission of tranquillity as a consideration, where no access exists, signifies this. As a further indicator of this The Open Space Society guidance on LGS advises that <i>some authorities have an existing tranquillity map showing areas that provide an oasis of calm and space for quiet reflection.</i> This description it is considered helps to demonstrate that for tranquillity to be present the site needs to be that oasis or space in which tranquillity can be experienced. In this case this is not the case and the only space in which tranquillity can be experienced is in the adjacent graveyard. It can also be noted this is not the Churchyard referred to in the assessment. This graveyard though is not the public realm in the normal sense, and whilst freely accessible, the 20th century graveyard extension is clearly not an obviously or commonly used public area. It cannot be viewed as a space of particular local significance for tranquillity other than by users of the graveyard. In this respect the tranquillity of the graveyard is already assured by the fact it is a consecrated graveyard. The designation of an adjacent field as an LGS would not enhance or further safeguard this, given the graveyard will continue to be bounded by the public highway to the east. It is the case therefore that field cannot actually be considered to provide a used space of tranquillity of particular local significance. No evidence is presented to demonstrate that this is the case or that any users rely on the field's</p>	<p>Tranquillity is a concept that is not easily defined. Significant work has been undertaken by the CPRE to map tranquillity. As part of this work there have been various studies, including those undertaken by the University of Newcastle and Northumbria University to seek to understand perceptions of tranquillity. It is not accepted that just because a site is not open for public access it cannot be considered to be tranquil or to contribute to the character of the wider area.</p>

Consultee	Comment	HPC Response
	<p>presence for this purpose. The test of demonstrating particular local significance for tranquillity is clearly not met.</p> <p><u>The proposed space is of particular local significance because of its richness of wildlife.</u></p> <p>On designation of an LGS based on its wildlife value, it must be demonstrated what wildlife is present on the actual site. In this respect it would be expected that a designation sought to be promoted on this basis would be accompanied as a minimum by some form of walk over survey, ecological assessment or site-specific records. In this case no evidence of this type at all has been provided.</p> <p>Instead, the assessment relies on reference to the DEFRA Magic Map 1 and the designations that over wash the site from Arable Assemblage Farmland Birds, Grey Partridge and Lapwing. The notion that these broad designations indicate the presence of these species on site is not credible. The DEFRA Magic designations are broad categorisations which cover entire groups of farms and land holdings where the habitat is suitable and supports particular species. The areas in question are plotted as overlapping circles based on the survey location in question where species or suitable habitats have been observed and have a fixed radius irrespective of whether they take in built habitats which are clearly not suitable for the species in question. This is the case here and it is clear that this field is not for example part of an arable assemblage. To illustrate the issue further appended to this letter are extracts of the relevant Magic Maps. The Lapwing map as seen covers an area of some 65km by 50km while the Farm Bird and Grey Partridge maps cover an area of some 30km by 18km. Humshaugh is located centrally in all three maps.</p> <p>It is impossible to argue that the field is of particular local significance because of its rich wildlife, based on the evidence cited in the LGSBP. The presentation of such evidence as justification, highlights the question of how credible the proposed LGS designation is, given that its designation is</p>	<p>The DEFRA Magic Map is considered an appropriate source of information to inform the assessment/ understanding of wildlife value of a site.</p>

Consultee	Comment	HPC Response
	<p>sought to be justified amongst other things on this basis. The LGS cannot be justified on wildlife grounds.</p> <p>From the assessment undertaken it is considered that it has been clearly demonstrated that the proposed LGS is not justified. No accurate, or site-specific evidence has been presented in the LGSBP or NP that actually demonstrates to the required level that the site is of particular local significance in any of the relevant areas. We would question entirely the basis for seeking LGS designation on this land and other parcels of proposed designation. As an illustration of this it is patently unnecessary and ill conceived to seek to designate as LGS the adjacent St Peters Churchyard and graveyard extension. (LGS08). The entire site is consecrated ground, in which graves are present through the land parcel outside the footprint of the Church. An LGS as confirmed in NPPG paragraph 5 is a way to provide special protection against development for green areas or particular importance to local communities. It is abundantly clear that St Peters Churchyard is not capable of development and yet an LGS is sought to be designated in the NP. This is considered to be a clear indicator that LDS designation has not been approached in a rigorous manner with sufficient regard to the purpose of designation and the tests required to be undertaken.</p> <p>We do not consider in relation to proposed designation LGS 09 – The Glebe Field, that the need for an LGS designation has been demonstrated. No evidence has been presented to show why the existing protection afforded by the conservation area is not sufficient. In relation to the criteria for demonstrating the particular local significance of the site against NPPF criteria, it considered that evidence to support proposed NP Policy 2 falls significantly short of the standards required. The site has not been shown to be demonstrably special to the local community in line with the requirement of NPPF Paragraph 106b) and we therefore request that The Glebe Field be removed from Policy 2 and the list of proposed Local Green Space.</p>	

Consultee	Comment	HPC Response
<p>JC Davison, M Grundseth and PJ McKee</p>	<p>Object to the proposed designation of The Legitt Field (note correct spelling) as Local Green Space. NPPF paragraph 105 states that designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. NPPF paragraph 105 continues that Local Green Spaces should only be designated when a plan is prepared or updated and be capable of enduring beyond the end of the plan period. The Planning Practice Guidance states that designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making, para 007 Ref ID: 37-007-2014-306.</p> <p>Acknowledging the above it is necessary to consider the housing and other development needs in Humshaugh in this and future plan periods commensurate with its status as a Service Village as designated in the Northumberland Local Plan. This is to ensure that sufficient developable space remains available to meet Humshaugh's needs. Failure to provide this would not be sustainable and mean for example that the extent of the land designated as LGS may not be able to endure beyond the end of the plan period. An assessment of suitable and available land within the settlement boundary therefore needs to be undertaken.</p> <p>The HNP proposes the designation of twelve areas of Local Green Space, 'LGS'. An assessment has been undertaken as to whether each of these areas is developable having regard to proposed designations in the HNP and to other relevant considerations including the SHLAA and existing designations. This assessment is set out below.</p> <p>LGS01 School Playing Field and Play Area, this site is not assessed in the Northumberland SHLAA 2022, the 'SHLAA'. Additionally as a playing field</p>	<p>The HNP plan period aligns with the Northumberland Local Plan. As explained within sections 6.3 and 6.4 there has been significant housing growth in the parish since 2011. There are no allocations for housing development within the Northumberland Local Plan. The indicative number of dwellings to plan for over the plan period has been significantly exceeded, there are also extant permissions for additional dwellings. It is therefore considered that the LGS designations will be consistent with sustainable development.</p> <p>There is no requirement in national planning policy or guidance to undertake an assessment as to whether a proposed LGS is suitable, available or developable. The suggestion that because the Leggit Field is included within the Northumberland SHLAA as suitable, available and achievable, within the settlement boundary and bounded by development, it is not appropriate for LGS designation is fundamentally flawed. The 'positive' assessment of a site within the SHLAA does not prevent allocation as LGS. If the site were allocated for development within the Northumberland Local Plan or had planning permission, then it would not meet the requirements of national planning policy or guidance (as explained within the background paper). There are many examples of LGS sites across Northumberland that lie within settlement boundaries and are bounded by development.</p>

Consultee	Comment	HPC Response
	<p>the site benefits from protection including under NPPF paragraphs 102 – 103. For these reasons amongst others this site is not developable.</p> <p>LGS02 The Orchard, this site is not assessed in the SHLAA. Additionally the site is in the Conservation Area and benefits from the protections afforded by the designation. Policy 4 of the HNP refers to significant views including across The Orchard. For these reasons amongst others this site is not developable.</p> <p>LGS03 Bog Field is assessed in the SHLAA as not suitable, site reference 9563. A planning application on the site, 19/00861/FUL, was refused by the LPA on 15 August 2019 for reasons including (1) principle of development, and (2) that the proposed development would result in encroachment into the open countryside and have a harmful impact upon the character and appearance of the site and the surrounding area including the setting of Humshaugh Conservation Area. That the site is open countryside is reflected in the site being shown as being outside Humshaugh Settlement Boundary in Figure 4 of the Plan. For these reasons amongst others this site is not developable.</p> <p>LGS04 The Legitt Field, this is assessed in the SHLAA as suitable, available and achievable, site reference 9184. The total yield is assessed as 19 dwellings and the time line for delivery is projected as 6 – 10 years. The site is developable in this and in future plan periods and this is confirmed by the respondents who own the site. It is also material that the site is not open countryside it being bounded on all sides by existing development, roads and houses for example. This is reflected in the site being included within the Humshaugh Settlement Boundary as shown in Figure 4 of the Plan and as such development is acceptable in principle under policies in the NLP.</p> <p>LGS05 Humshaugh Burn Wood, this is not assessed in the SHLAA, is outside the settlement, there is extensive tree cover upon it and is likely not</p>	

Consultee	Comment	HPC Response
	<p>accessible for a residential development. For these reasons amongst others, this site is not developable.</p> <p>LGS06 Humshaugh War Memorial. This site is small scale, Grade II Listed, outside Humshaugh Settlement Boundary and clearly is not developable acknowledging it is a War Memorial.</p> <p>LGS07 Haughton Square, this is within SHLAA site 2377 which is recorded as having been completed with a development of 21 dwellings. The site is open space within the development and it makes a positive contribution to its character and appearance. For these reasons amongst others this site is not developable.</p> <p>LGS08 St Peter's Churchyard, this is not assessed in the SHLAA. There are graves within the site which benefit from legislative protection. Additionally the site is in the Conservation Area and benefits from the protection afforded by the designation. For these reasons amongst others this site is not developable.</p> <p>LGS09 The Glebe Field, this is not assessed in the SHLAA. Additionally the site is in the Conservation Area and benefits from the protection given by the designation. Access is likely also a constraint. For these reasons amongst others this site is not developable.</p> <p>LGS10 Entrance to Doctor's Lane, this is not assessed in the SHLAA. There are trees on the site, it is small, irregularly shaped and it adjoins the Conservation Area. For these reasons amongst others the site is not developable.</p> <p>LGS11 Chester Meadow Amenity Area, this is within SHLAA site 9038 which is recorded as having been completed with a development of 21 dwellings. The site is open space within the development and is outside the settlement boundary. For these reasons amongst others this site is not developable.</p>	

Consultee	Comment	HPC Response
	<p>LGS12 Field opposite Douglas Terrace, this site is outside the settlement boundary and is assessed in the SHLAA as not suitable, site reference 2632b. The site is not developable.</p> <p>Acknowledging the above the respondents support the designation of sites LGS01, LGS02, LGS03, LGS05, LGS06, LGS07, LGS08, LGS09, LGS10, LGS11 and LGS12 as Local Green Space, consider the designation can endure on these sites and not impact on sustainable development within Humshaugh. The respondents, the landowners, however object to the proposed designation of LGS04 The Legitt Field as Local Green Space, it being a site within the settlement boundary which is suitable and available and which could contribute towards Humshaugh's development needs in this and future Plan periods in a sustainable location close to various services and facilities including the school. Acknowledging these factors amongst others, the site should not be designated as Local Green Space.</p> <p>An assessment has additionally been undertaken whether other land not proposed to be designated as LGS in and around Humshaugh is developable. Other sites assessed in the SHLAA assessed as being suitable for development include;</p> <ul style="list-style-type: none"> - site 2632a, Evans Charity Humshaugh (north). This site is proposed in Policy 3 of the HNP to be Protected Open Space, site POS01 and as such will benefit from policy protection. The site is also shown in Figure 4 as being outside Humshaugh Settlement Boundary. Access is also likely to be a constraint. For these reasons amongst others this site is not developable; - site 6746, Land to the East of Humshaugh. This site is proposed in Policy 3 of the HNP to be designated as Protected Open Space, site POS02 and as such will benefit from policy protection. The site is also shown in Figure 4 as being outside Humshaugh Settlement Boundary. For these reasons amongst others this site is not developable; 	

Consultee	Comment	HPC Response
	<p>- site 2543, Land at Chollerford, this site is outside and detached from the settlement and separated from services and facilities, the school for example, by busy roads including the B6318 and the B6320. Additionally the site is shown in Figure 4 as being outside Humshaugh Settlement Boundary. For these reasons amongst others the site is not a sustainable location for future development.</p> <p>Following on from the above, Evans Trust Field, is not assessed in the SHLAA, is outside Humshaugh Settlement Boundary and is proposed in Policy 3 of the HNP to be Protected Open Space, site POS03 and as such will benefit from policy protection. The site is also shown in Figure 4 as being outside Humshaugh Settlement Boundary. For these reasons amongst others this site is not developable.</p> <p>Acknowledging this assessment it is apparent that suitable and available land in and around Humshaugh is limited and other sites such as SHLAA site 2543 (Land at Chollerford) are unlikely to be preferred locations for new development for reasons including it being separated from services and facilities by busy roads. The NPPG states that the LGS designation should not be used in a way that undermines the aim of plan making of identifying sufficient land. This is an ongoing requirement which extends to future plan periods.</p> <p>A copy of the Submission Draft Inset Policies Map is attached marked to show the site assessment detailed above. The lack of options for future sustainable development in Humshaugh is clear.</p> <p>The respondents do not consider the requirements set out in NPPF para 105 when designating land as LGS have been met, it not being clear that the proposed LGS designations can endure beyond the end of the plan period acknowledging the need for sustainable planning, that Humshaugh is a Service Village and that there will be an ongoing requirement for development in this and future plan periods amongst other things.</p>	

Consultee	Comment	HPC Response
	<p>The Legitt Field has been assessed as being suitable, available and achievable in the SHLAA, site reference 9184. It is within the Humshaugh Settlement Boundary, is in a sustainable location in close proximity to the School and is bounded on all sides by existing development. Acknowledging these considerations and having regard to NPPF paragraph 105, The Legitt Field should not be designated as Local Green Space such that it can contribute to Humshaugh's development needs in this and future Plan periods. For these reasons amongst others the proposed designation of LGS04 The Legitt Field does not meet the basic conditions, the site should be kept available for development in the interests of the sustainable development of the settlement. The respondents have further comments on the Basic Conditions Statement March 2024 which are set out in their response to Humshaugh Neighbourhood Plan : Basic Conditions Statement March 2024 which is submitted in parallel.</p> <p>Following on from the above, NPPF paragraph 106 sets out further guidance. It states that the LGS designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land.</p> <p>As set out in the response submitted in parallel to the Humshaugh Neighbourhood Plan Local Green Space and Protected Open Space Background Paper, the 'LGS Background Paper', the respondents consider The Legitt Field should not be designated as Local Green Space designation.</p> <p>Responding to the assessments in Appendices 1 and 2 of the LGS Background Paper, in relation to LGS04 The Legitt Field, the respondents do not agree that The Legitt Field is of particular local significance because of its beauty. In this respect the site is in the centre of the village and is bounded amongst other things by existing development including (1) the</p>	<p>Whilst it is accepted that the consideration of whether a site is 'beautiful' is subjective, the Design Code highlights the importance of the site as one of the network of green spaces. It explains that the patch work of built form and</p>

Consultee	Comment	HPC Response
	<p>main road through Humshaugh to the west, (2) another road, Doctors Lane, to the north (3) a house to the north west (The Legitt), (4) housing to the east and (5) a recently completed housing estate to the south. These factors impact on the character and appearance of the site and mean it is not 'beautiful'.</p> <p>The respondents do not agree that The Legitt Field is of particular local historic significance. It is outside the Conservation Area and does not adjoin it. An application by a third party to add the site to the Schedule of Monuments was refused by Historic England (HE ref 1459660). The following principal reasons were listed by Historic England for their decision;</p> <ul style="list-style-type: none"> • <i>"Rarity: medieval open field systems are widely distributed across England and areas of ridge and furrow are a common occurrence;</i> • <i>Survival: it is a fragment of a formerly more extensive field system, which is therefore poorly preserved overall;</i> • <i>Potential: insufficient of the field system survives to demonstrate its exact nature and any regional variations in the form of its fields and furlongs;</i> • <i>Group value: it does not retain a clear, physical association with the scheduled remains of a contemporary settlement".</i> <p>A copy of Historic England's letter dated 15 October 2018 and their associated report is attached to the respondents' Local Green Space Background Paper response. The principal reasons for not adding the site to the Schedule of Monuments remain applicable. The respondents would add that since Historic England's decision on 15 October 2018, the housing estate to the south has been developed and impacted on the character and appearance of the site.</p> <p>It is also not agreed that the site makes a particular contribution to the setting of Hopewell House or Humshaugh CoFE Primary School. The List Descriptions for Hopewell House and Humshaugh CoFE Primary School</p>	<p>open space is a part of the character of the village and the local green spaces should be protected.</p> <p>Section 4.2 of the Conservation Area Heritage Paper details its special significance, this includes <i>'Gardens and green spaces providing an important rural setting'</i>. Section 6.3 explains: <i>'The wider setting of the Conservation Area is dominated by the hugely attractive rural landscapes of the North Tyne valley, which are expansive. They come to the edge of most of the Conservation Area other than along the southern approach road where the built-up area is extended by C20th residential developments between the historic village and Chollerford'</i>.</p> <p>The purpose of the list description is not to describe its significance it is to provide a brief summary of the age, architectural details and occasionally some historic</p>

Consultee	Comment	HPC Response
	<p>record the buildings were Listed for their Group Value reflecting amongst other things the historic association between the two buildings, Hopewell House formerly being the headmaster's house. These buildings are situated on the opposite side of the main road from The Legitt Field. To the south of The Legitt Field is a recent housing development. This is a similar distance from Humshaugh CofE Primary School to The Legitt Field and demonstrates that housing development can integrate acceptably on the opposite site of the road subject to appropriate design, landscaping and materials amongst other things.</p> <p>The respondents agree with the assessment that The Legitt Field is <u>not</u> of particular local significance because of its recreational value. As stated in the Appendix 2 assessment in the LGS Background Paper, there is no public access.</p> <p>The respondents do not agree that The Legitt Field is of particular local significance because of its tranquillity. As stated in both Appendices 1 and 2 of the LGS Background Paper, the site is in the centre of the village. It adjoins the main road and is close to the school which generates comings and goings, noise and activity. Doctors Lane is to the north and there is existing housing both adjoining the site and in close proximity, factors, which combined with the size of the site mean that it is not tranquil. It is additionally material that it is not publicly accessible.</p> <p>The respondents do not agree that The Legitt Field is of particular local significance because of its richness of wildlife. In this respect similar wildlife is found on other sites proposed in the HNP to be designated as Local Green Space. Additionally it is material that the site has been grazed.</p>	<p>information. No list description is all-inclusive, nor is it a comprehensive statement of the building's significance. The fact that something is not mentioned in the list description does not mean that it is not important. The first floor classroom in the two storey part of Humshaugh First School at the north end of the building has direct line-of-sight down into and across the Legitt Field, and this contributes significantly to maintaining the rural character of the School which has been significantly eroded by the extensive adjacent Chesters Meadow development</p> <p>Tranquillity is a concept that is not easily defined. Significant work has been undertaken by the CPRE to map tranquillity. As part of this work there have been various studies, including those undertaken by the University of Newcastle and Northumbria University to seek to understand perceptions of tranquillity. It is not accepted that just because the site is close to existing housing, the road and school that it cannot be considered to be tranquil or to contribute to the character of the wider area.</p> <p>The DEFRA Magic Map is considered an appropriate source of information to inform the assessment/ understanding of wildlife value of a site.</p>

Consultee	Comment	HPC Response
	Acknowledging the above assessment, the tests in NPPF paragraph 106 criterion b) are not met. It follows that The Legitt Field should not be designated as Local Green Space.	It is noted that the respondents specifically state their support all the other proposed LGS designations. It is submitted that this results in support for the way in which the assessments have been undertaken. It is unclear how the respondents can conclude that with regard to beauty and tranquillity that LGS04 could be considered less beautiful or tranquil than LGS03, LGS07, LGS10, LGS11 and LGS12. Similarly with regard to the assessment of wildlife value – it is unclear how it could be concluded that LGS04 is different to LGS03, LGS08, LGS09 and LGS12. When considering historic significance of LGS04 and the approach taken to the assessment of other sites (supported by the respondents) LGS02 The Orchard is over the road from a Grade II listed building the same as LGS04. LGS08 is slightly further away from the same building. Similarly, LGS12 is further from the War Memorial than LGS04 is from the two grade II listed buildings and LGS10's historic significance is solely its relationship with the conservation area.
Policy 3: Protected Open Space		
Northumberland County Council	See LGS01 above.	See previous response – the parish council consider that the site should be allocated as LGS.
Northumberland National Park Authority	These are all outside the National Park and therefore the NNPA makes no comment.	Noted. No amendments required in response to this representation.
JC Davison, M Grundseth and PJ McKee	The respondents support the designation of each of POS01, POS02 and POS03 as Protected Open Space.	Noted. No amendments required in response to this representation.
Cussins North East	These representations are made in connection with site POS02 Doctor's Lane Field ('the Site') which is identified in Policy 3 of the SDHNP as	Noted. No amendments required in response to this element of the representation.

Consultee	Comment	HPC Response
	<p>Protected Open Space ('POS'). Our client previously made representations in January 2024 to the Pre-submission HNP objecting to the draft POS designation of the Site. We are disappointed that no modifications have been made to the SDHNP to address our concerns. We must therefore object again to the SDHNP. For the reasons set out in this letter, we do not consider that the draft POS designation of the Site at Policy 3 accords with the basic conditions for neighbourhood planning as set out in the Town and Country Planning Act (1990) (as amended) and summarised in National Planning Practice Guidance (NPPG). The reasons for this are set out in this letter. In order to address this, the SDHNP should be modified to remove site POS02 from Policy 3 with corresponding amendments to the Policies Map.</p> <p>We also consider that in failing to identify any specific housing sites against an identified unmet local need, compounded by and overly-restrictive Draft Policy 6 which is not in conformity with strategic policy, the SDNP further fails to meet basic conditions.</p> <p>We request the Independent Examiner to consider the matters raised in this letter as part of the examination of the SDNP. We are happy to assist that process further if required.</p> <p>The Site</p> <p>The Site is located on the eastern edge of the built form of Humshaugh. The Site is in private ownership and comprises of agricultural fields used for livestock grazing. There is no public access of the Site with no rights of way. The landowner was approach by the Neighbourhood Plan Group as part of the SDHNP preparation concerning the draft POS designation of his land to which both the landowner and Cussins strongly objected. Cussins have a longstanding interest in the Site and hold an Option agreement with the landowner to develop the Site for new homes. Indeed Cussins have recently constructed 21 new homes known as Haughton Square at the northern boundary of the Site. Existing residential properties are</p>	<p>Private ownership (or longstanding legal agreements), the use of land, lack of public rights of way or relationships with existing development does not prevent a site being identified as protected open space.</p>

Consultee	Comment	HPC Response
	<p>located adjacent to the eastern and southern boundary of the Site. Doctors Lane forms the southern boundary of the Site. The Site is therefore contained and influenced by urban development on three of its four boundaries.</p> <p>The Site is comprised by two large agricultural fields, the boundaries of which are marked by hedgerow and tree planting.</p> <p>Policy Position</p> <p>The Independent Examiner will be familiar with relevant planning policy and regulatory requirements pertaining to the SDHNP, however for the purpose of these representations it is submitted that the draft POS designation of the Site (POS02 at Policy 3) fails the following basic condition:</p> <p><i>“Having regard to national policies and advice contained in guidance issued by the Secretary of State.”</i></p> <p>In this regard the HNP must have regard to national policy contained within the NPPF and NPPG. Of relevance to these representations, the NPPG makes clear that:</p> <p><i>“Proportionate, robust evidence should support the choices made and the approach taken [in the draft neighbourhood plan]. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan”²</i></p> <p>We consider this matter below.</p> <p>Assessment by the Evidence Base</p> <p>The Site has been assessed by the submitted evidence base which informs the choices made in the SDHNP.</p>	<p>Noted. No amendments required in response to this element of the representation.</p>

² NPPG 040 Reference ID: 41-040-20160211

Consultee	Comment	HPC Response
	<p>f) Overall the biodiversity of the Site is being vastly overplayed. There is concern that it appears that attempts are being made to ‘fit’ evidence to support a POS designation of the Site in the local knowledge that our client holds an Option agreement for housing development. [extracts from Defra Magic Map included]</p> <p><u>Amenity and Recreation</u></p> <p>a) Given that the Site is private ownership as an operational agricultural field with no public access, it provides no recreational use or value.</p> <p>b) The Site is not a natural or semi-natural greenspace and there is nothing in the planning system to stop the land owner undertaking intensively managed agricultural activities on the Site at any time. Natural and semi natural green spaces have been defined as “land, water and geological features which have been naturally colonised by plants and animals and which are accessible on foot to large numbers of residents³.” Clearly such a definition is not appropriate to the Site (see site photographs below taken in 2024).</p> <p>c) The Basic Conditions Statement (March 2024) states (page 9) that <i>“Policy 3 identifies three areas of open space which are valued for the local amenity value <u>and</u> for informal/formal recreational purposes. Access to high quality open spaces and opportunities for health and recreation are important to the health and well-being of local communities, as well as the environment of the area, therefore supporting the delivery of both the social and environmental objectives”</i> (our emphasis). Again, given the Site is in private ownership with no public access, it cannot meet this definition. It does not provide any opportunities for informal/formal recreation. This is unlike the other two draft POS sites in Policy 3 – site POS03 has a permissive path which the evidence states the community “make extensive use of”⁴ and</p>	<p>There is no suggestion within the background paper that the site is used for recreation. It is however important to the character of this part of the parish. Policy 3 states that the POS have been identified as contributing to local amenity and character.</p>

³ Harrison, C, Burgess, J, Millward, A, and Dawe, G (1995) Accessible Natural Greenspace in Towns and Cities English Nature Research Report 153, English Nature

⁴ Background Paper pages 19 and 52

Consultee	Comment	HPC Response
	<p>site POS01 where the evidence states that there is a “public right of way on its eastern boundary”⁵.</p> <p>d) The Site is influenced by urban features including a new-build housing estate to the north, existing residential properties to the west and south and Doctors Lane to the south.</p> <p>e) Chollerton Road is an elevated section of road rising up from Humshaugh to Chollerton and therefore views are prominent of Humshaugh as a settlement and not the Site specifically.</p> <p>Furthermore, with reference to Appendix 4 of the Background Paper, it is noted that other sites which have been assessed and scored the same as the Doctors Lane Field site have <u>not</u> been selected for POS designation see extracts at Figure 6 below). For example, Sites 17, 21 and 22 all score the same/very similarly but have all been discounted for POS designation. The reasons given for discounting are the same for each site – namely that they are “<u>farmland</u>” (as is the subject Site) and it:</p> <p><i>“would not be appropriate [to include as POS] as it is not a natural/semi natural green space, nor does it have a recreational value. The site would be protected from development by as an agricultural field within the open countryside.”</i> (our emphasis)</p> <p>The same conclusion must also be made of the Doctors Lane Field site given it is private farmland with no public access or recreational value. This is a clear and prejudicial inconsistency in the methodology and site selection process which means that the POS designation of the Site fails the basic condition of compliance with the NPPG for neighbourhood plans to be based upon proportionate and robust evidence. This inconsistency should be rectified by removing the draft POS designation of the Site so that it is treated the same was as other comparable sites 17, 21 and 22.</p>	

⁵ Background Paper page 15

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	<p><u>Conclusion</u></p> <p>In conclusion, there are no reasonable biodiversity or amenity justifications for the designation of a private agricultural field actively used for livestock grazing as POS. The evidence simply does not support that conclusion. To do so would also raise conflict with other sites assessed in the submitted Background Paper. The Site would be ‘protected’ by the strategic policies of the Northumberland Local Plan in the same way as other farmland sites by virtue of being located in open countryside. The SDHNP requires modification to remove the draft POS designation at Policy 3 and the draft Policies Map in order that it can meet the basic conditions.</p>	
Paragraph 5.13		
Northumberland National Park Authority	The NNPA agrees that existing adopted local plan policies for designated assets are sufficient and the Historic Environment Record is sufficient for non-designated heritage assets.	Noted. No amendments required in response to this representation.
Policy 4: Humshaugh Conservation Area		
Northumberland County Council	<p>Part 1, <i>‘including special interest generated by the relationship it has with its setting’</i> can be removed as setting is mentioned in the first part of the sentence.</p> <p>Part 2 is not very clearly worded and the sub-bullet points do not read logically on from each other.</p> <p>In Part 2a iii: <i>‘where planning permission is required for maintenance and repairs, these should be sympathetic to the positive characteristics of the area’</i>. Planning permission is not usually required for this kind of work (for an unlisted building in a Conservation Area). If it relates to a listed building, repairs may need LBC, and this distinction should be made or the criterion removed from the policy.</p> <p><i>‘Past gardens and walls along the main street’</i> is not sufficiently clear about what these views are of and how they can be protected.</p>	<p>Agree with proposed amendment.</p> <p>Section 2 could be reworded as follows: The following are key considerations when paying special attention to the impact of development on the character or appearance of the Conservation Area and its setting, development should, where relevant:</p> <ul style="list-style-type: none"> a. Reflecting the positive architectural characteristics, vernacular building forms, materials, density and form of the historic core. In particular through: <ul style="list-style-type: none"> i. the use of modern, artificial materials which are designed to mimic the appearance of natural materials should be resisted;

Consultee	Comment	HPC Response
		<p>ii. the reinstatement of missing architectural features and replacement of inappropriate materials and details will be supported; and</p> <p>iii. where planning permission is required for maintenance and repairs, these should be sympathetic to the positive characteristics of the area;</p> <p>b. Recognise the importance of the green spaces, grass verges and gardens to the character of the area;</p> <p>c. Consider the impact of significant views which are important to the character and appearance of the area, these include ing views across The Orchard, past gardens and views of walls along the main street, and along lanes and tracks to the rural hinterland;</p> <p>d. Ensure the retention of stone field and boundary walls;</p>
Northumberland National Park Authority	This area falls outside the National Park and therefore NNPA makes no comment.	Noted. No amendments required in response to this representation.
JC Davison, M Grundseth and PJ McKee	The respondents support the policy.	Noted. No amendments required in response to this representation.
Policy 5 Design Code		
Northumberland County Council	<p>General comment on Policy 5</p> <p>A separate Design Code document has been prepared for Humshaugh. To confirm, without reference to it in the policy only the elements copied over to this policy will apply to development.</p> <p>We would firstly suggest that this policy is renamed 'Design Guidance'. The National Model Design Code (MHCLG, 2021) describes design codes as '<i>a set of simple, concise, illustrated design requirements that are visual and numerical wherever possible to provide specific, detailed parameters for</i></p>	<p>Suggested amendments to reflect feedback from NCC and NNPA</p> <ol style="list-style-type: none"> 1. To protect and enhance the rural character of the Parish, new residential development should have regard to the requirements of the Humshaugh Design Guidance and Codes Document. The following are considered to be key design considerations which,

Consultee	Comment	HPC Response
	<p><i>the physical development of a site or area</i>'. We do not find that the policy would meet this definition of a Design Code and whilst agreeing to the use of terms '<i>should</i>' and 'where appropriate and relevant' these do contribute to the policy not being concise or specific.</p> <p>Comments on clarity</p> <p>1c. It needs to be made clear that this is about views for the community as a whole to avoid any impression that individuals' views would always be preserved.</p> <p>Suggest rewording: "Protect and enhance the rural setting, in form, character and location. Existing views to the rural landscape should be retained, <u>wherever possible, especially from public spaces in the village</u>".</p> <p>Much the same point is repeated in 3e, but there is no list or assessment of key views.</p> <p>1f. This opens the danger that developers would simply leave leftover green spaces that were unusable and not overlooked. Suggest rewording "Allow for <u>useable, overlooked amenity green space within new housing developments</u> to create a balance between open space (including gardens) and development, such that formal open spaces are fully integrated in the layout."</p> <p>3a. This is already mentioned in 1d.</p>	<p>where appropriate and relevant, should be reflected in new development accord with the following codes:</p> <ul style="list-style-type: none"> a. Development should include setbacks from the road to limit the visual impact on the rural setting and to make a positive contribution to the landscape character; b. Respect The historical character of the Parish should be respected in new development, particularly through the use of low stone boundary walls and natural screening such as hedgerows and trees. Existing mature hedgerows and trees must be retained where possible; c. Development should protect and enhance the rural setting, in form, character and location. Existing views to the rural landscape should be retained, wherever possible, especially from public spaces; d. Dwellings should be low density, low rise (not exceeding two storeys) and be modest in scale to prevent the urbanising of a rural environment Dwellings should be low rise, not exceeding two storeys. e. New build infill development shall respond to the immediate setting of the proposal and provide: <ul style="list-style-type: none"> i. A mixture of set backs; ii. Varied aspects, with some houses frontages towards the main street; iii. Generous front and rear gardens;

Consultee	Comment	HPC Response
		<p>iv. Prioritised pedestrian links to the existing community and connections to the wider landscape;</p> <p>e. Development should allow for useable, overlooked amenity pockets of green space within new housing developments in and amongst dwellings to create a balance between open space (including gardens) and development, such that formal open spaces are fully integrated in the layout; and</p> <p>f. Include provision for generous front and back gardens that respect existing local set backs. Open green space should be considered for public use.</p> <p>2. Materials used within new development should, where appropriate and relevant, reflect the requirements of the Humshaugh Design Guidance and Codes Document, in particular accord with the following codes:</p> <p>a. Façade materials should adopt a palette which reflects locally distinctive materials such as sandstone. Where manmade materials such as reconstituted stone, render and brick are selected, the colour, tone, quality and finish should be considered to make a positive contribution to the existing character;</p> <p>b. Roofing materials should consist of high quality Welsh slate where possible, or a sympathetic alternative which will match the tonality and texture of the local vernacular style. Solar panels should be incorporated</p>

Consultee	Comment	HPC Response
		<p>where possible, integrated sensitively into the roof pattern to minimise visual disruption. Heritage assets must sensitively balance energy performance whilst maintaining heritage value;</p> <p>c. Opportunities should be taken to reflect the local architectural vernacular (when appropriate) by incorporating features such as stone mullions, sash windows, rectangular windows and doorways, covered porches and pitched roofs.</p> <p>3. To protect and enhance the landscape character of the Parish, new development, where appropriate and relevant, should:</p> <p>a. Generally not be higher than two storeys;</p> <p>b. Retain mature trees and hedgerows wherever possible and provide new planting where appropriate;</p> <p>c. Integrate into its surrounding landscape through the use of planting and soft landscaping; Hedges and flower beds may be used at the property edge to mark the private domain;</p> <p>d. Include provision for front and back gardens that respect existing local set backs. Open green space should be considered for public use;</p> <p>d. Consider key views; both the unique, 'hidden' quality of many areas in the village, alongside outward views to the wider countryside; and</p>

Consultee	Comment	HPC Response
		<ul style="list-style-type: none"> e. Respect its relationship to the Hadrian's Wall UNESCO World Heritage Site, maintaining and enhancing an integrated range of appropriate and sustainable connections to this key site, prioritising ease of access for both the local community and wider special-interest groups. <p>4. Development which creates urban levels of dwellings development should be avoided. Infill development should:</p> <ul style="list-style-type: none"> a. Reflect the density of the adjacent development; b. Not result in large scale backland development behind existing dwellings which would disrupt the settlement pattern; c. Respect the existing setback if there is a standard street edge or variety of setbacks; and d. Be of a similar scale and height to adjoining properties and not overwhelm them. <p>5. Proposals for extensions or conversions of existing buildings should respond to and enhance the building by ensuring, where appropriate and relevant to the development, that:</p> <ul style="list-style-type: none"> a. External additions are subordinate in scale to the original or primary form of the building; b. Extensions are designed to match or complement the existing façade material of the structure; and c. Modifications retain evidence of a building or structure's previous use, where possible, and

Consultee	Comment	HPC Response
		<p>enhance the appearance of the original building and the wider setting;</p> <p>6. Where a Design and Access Statement is required as part of a planning application, this should demonstrate how the proposal has responded to the above as an integral part of the design process.</p>
Northumberland National Park Authority	<p>The NNPA agrees the importance of high quality design, which is also required by NNPLP policies. However, as a whole it feels like it is written specifically for new housing rather than all new development eg. reference to setbacks from the road (1a, 1e, 3d and 4c), front and rear gardens (1 e and 3 d), flowers beds at property edge (3 c). There is also duplication in parts 1, 3 and 4 especially with reference to set backs.</p> <p>Part 1 is considered appropriate and is generally supported. Part 1 c. relates more to Part 3 on landscape, and I would query the retention of “existing views” which is not necessarily a material planning consideration. Key views are referred to in Part 3 e. as well. This duplication of slightly different intentions may cause problem for the LPA officers in using this policy.</p> <p>Part 2 relates to materials within new development. This suggests that all new development, whatever it is for, should meet a very high standard of quality. Whilst these would be appropriate for a new build house or new build tourist accommodation etc, new agricultural sheds may be proposed within the Parish, and these would not need to be made of such high quality materials. It is suggested that the wording is altered to refer to residential and tourism development and not encompass all new development, as there will be new development being proposed where utilitarian development may be appropriate.</p> <p>Part 3 relates to protecting and enhancing the landscape character of the Parish. This is supported, including the reference to the World Heritage Site. Part 3 duplicates parts of part 1.</p>	See above.

Consultee	Comment	HPC Response
JC Davison, M Grundseth and PJ McKee	The respondents support the policy.	Noted. No amendments required in response to this representation.
Housing needs, paragraphs 6.2 to 6.11		
Cussins North East	<p>Local Housing Needs & Conflicts with Local Plan Strategic Policy</p> <p>In relation to housing need and delivery, the draft HNP references that Northumberland County Council has provided an indicative figure of 28 dwellings (to be clear this is indicative and not a ceiling) to be accommodated in the Parish between 2016 and 2036, and that the Parish consider that this figure has already been met by existing housing completions as of 2021. As a result, the SDHNP has been prepared on the basis that no sites should be allocated for housing (either market or affordable).</p> <p>However, the SDHNP (page 43 bullet point 7) also acknowledges that <i>“it is estimated that there is a need for 2.1 affordable rented homes per year in the Parish, equating to a total of 27.2 over the Plan period. Also that there is the potential demand for 2.6 affordable home ownership dwellings per year, or 33.3 over the Plan period.”</i></p> <p>This means there is a clear and total unmet need for affordable housing need in Humshaugh of approximately 60 dwellings during the Neighbourhood Plan period. The SDHNP states at footnote 26 that <i>“the figures of 27.2 and 33.3 are not suggesting that this level of affordable homes should be built. The figures highlight there is an unmet need for affordable homes.”</i> In our view this is not a sound approach which is consistent with the principles of sustainable development (NPPF paragraph 11(a)). Where there is a clear identified local housing need as is the case here, the HNP should be positively planning to meet it. The SDHNP fails the basic condition of having regard to national policy in this respect.</p> <p>Draft Policy 6 of the SDHNP sets out a policy for ‘small scale rural exception sites’, however there is no evidence that this will be anywhere near</p>	<p>It is for the neighbourhood planning body to decide on the scope of the neighbourhood plan. As explained, the parish council concluded the plan did not need to allocate land for housing within the parish.</p> <p>It is important to note that NCC has previously advised that it should be recognised that parish level HNA often over-estimate the local level of need. So if HNAs were prepared for all parishes, the cumulative affordable housing needs would exceed the overall countywide affordable housing need (as indicated by the Strategic Housing Market Assessment).</p> <p>The HNA does however provide information on the need for specific type/ mix of affordable housing within the parish which would help inform decisions on housing developments within the parish, including for <u>small scale</u> rural exception sites.</p>

Consultee	Comment	HPC Response
	<p>sufficient to meet the identified local housing need. Indeed, criteria c) restricts the scale of rural exception sites to 0.49 hectares or 9 dwellings or less (i.e. under the “less than” terms of the draft policy a site of 0.5 hectares or 10 dwellings would not comply). Furthermore, the corresponding strategic policy for exception sites in the NLP (Policy Hou 7) does not contain these restriction and so Draft Policy 6 fails the basic condition of conformity with strategic policy.</p> <p>Furthermore, by proposing to designate land such as our client’s Site and other sites as POS, along with the Local Green Space designations, this further prevents realistic opportunities for the identified local housing needs of Humshaugh to be delivered for the whole of the plan period noting limited opportunities on suitable sites which adjoin the settlement edge (Draft Policy 6 criteria b).</p> <p>Finally, the NPPF paragraph 82 specifically recognises that in rural areas, such as Humshaugh, that exception sites may require an element of market housing in order to support the delivery of affordable homes to meet local needs on exception sites. Given the clear local housing need of 60 affordable homes over the HNP period, it may very well be the case that an element of market housing is required to ensure needs are met. As currently restrictively drafted, the SDHNP places those in local hosing need at significant and unacceptable risk of having their need for a home met by the HNP. In our view this is not an acceptable outcome for the HNP and it fails the basic conditions as set out above.</p>	
Paragraph 6.4		
JC Davison, M Grundseth and PJ McKee	It is noted that the Plan does not propose to allocate sites for new market housing. The respondents consider there is a need for the reasoned justification and / or a policy in the Plan to set out the approach to proposed housing developments within settlement boundaries, as stated in reasoned justification paragraph 7.49, NLP policy STP1 allows for a level of development within and adjacent to existing settlements. It is material	It is for the neighbourhood planning body to decide on the scope of the neighbourhood plan. As explained, the parish council concluded the plan did not need to allocate land for housing within the parish.

Consultee	Comment	HPC Response
	<p>that such development can deliver benefits, affordable housing contributions for example, which should be afforded positive weight.</p> <p>Following on from the above, it is noted from paragraph 6.4 that NCC has provided an indicative figure of 28 dwellings to be accommodated in the Parish between 2016 and 2036. The respondents consider the word '<i>minimum</i>' should be inserted in the sentence such that it reads '<i>NCC has provided a minimum indicative figure</i>' to make it clear that the indicative figure is a minimum figure, not a maximum.</p> <p>In relation to the 28 dwelling indicative figure, having regard to the Planning Practice Guidance (para 009 ref ID:41-009-20190509), it will need to be tested at the neighbourhood plan examination. At this stage the respondents note that reasoned justification paragraph 6.4 states that between April 2016 and the end of March 2021, 53 dwellings were completed within the Parish. It continues that there are also extant permissions for additional dwellings – including 3 dwellings on The Paddock, which is adjacent to the Village Hall. Paragraph 6.4 concludes that the indicative figure has already been markedly exceeded and that as a result the Plan does not propose to allocate sites for new housing. The respondents would make number of points in relation to this including;</p> <p>1 The Northumberland Local Plan was adopted in March 2022. The respondents do not consider it sustainable that housing completions in the six year period April 2016 – March 2022 and extant planning permissions be set against the figure for delivery in the balance of the HNP period. Future supply should not be restricted because of planning permissions granted before the Adoption of the Plan. In this respect there is a need for continuity of supply this being an element of significantly boosting the supply of homes in accordance with NPPF para 60;</p> <p>2 the affordable housing need is stated in paragraph 6.6 of the HNP to be estimated at 27.2 affordable rented homes and 33.3 affordable homes ownership dwellings over the Plan period, therefore approximately 60 dwellings. The current performance against this target should be set out.</p>	<p>It is important to note that NCC has previously advised that it should be recognised that parish level HNA often over-estimate the local level of need. So if HNAs were prepared for all parishes, the cumulative affordable housing needs would exceed the overall countywide affordable housing need (as indicated by the Strategic Housing Market Assessment).</p> <p>The HNA does however provide information on the need for specific type/ mix of affordable housing within the parish which would help inform decisions on housing developments within the parish, including for small scale rural exception sites.</p> <p>With regard to the approach of the new government and reforms to the planning system, whilst there may be changes proposed, these have not yet been published or subject to consultation.</p>

Consultee	Comment	HPC Response
	<p>In turn the Plan should include positive measures towards meeting the outstanding need including through the allocation of land for housing;</p> <p>3 HNP reasoned justification paragraph 6.5 states that a material number of respondents said their current home was not suitable for their needs for the next 5 years. The main concern is stated to be homes being too large. It follows that there is a need for an increased mix of housing, including market housing, to respond.</p> <p>4 The Submission Draft HNP was issued before the date of the General Election was announced. In turn the deadline for responding to the consultation is before Election day. Whilst it is not known how the new Government will proceed, both planning reform and housing delivery feature prominently in the manifestos which have been issued thus far. Acknowledging that to be case it is possible that the new Government will introduce new guidance and change in the short term. The respondents consider if this happens it must be taken into account in the Examiner's consideration of the HNP it needing to be up-to-date and forward looking amongst other things. The Examiner will also need to consider whether there should be an opportunity for respondents to comment on any new guidance which comes forward in advance of their Examination of the Plan.</p>	
Paragraph 6.5		
JC Davison, M Grundseth and PJ McKee	The respondents agree with the key issues and note amongst other things the assessed need for 27.2 affordable rented homes and 33.3 affordable home ownership dwellings over the Plan period. The respondents consider the HNP should be proactively seeking to address this need.	Policy 6 supports the provision of small scale rural exception sites. This approach is considered appropriate and proportionate.
Policy 6: Small scale rural exception sties		
Northumberland County Council	<p>This policy is supported as it accords with NLP Policy HOU7.</p> <p>However, we question the inclusion of criterion (a) that <i>'it should be demonstrated, through the submission of a detailed site options appraisal, that..... no other suitable and available sites exist within the Humshaugh settlement boundary'</i></p>	It is considered appropriate for an applicant to demonstrate that there are no suitable, alternative sites available within the settlement boundary to ensure the countryside is protected from development.

Consultee	Comment	HPC Response
	By definition, rural exception sites are sites that would not normally be used for housing. Therefore, is there a need for this requirement in policy 6? This is not a restriction made by either the NPPF (para 83) or NLP Policy HOU7. Is there justification for keeping criterion (a)?	
Northumberland National Park Authority	It is noted the pre-Submission draft required rural exception sites to adjoin the settlement boundary. This has now changed to adjacent or well - related to the Humshaugh Settlement boundary. Given the boundary of the settlement and the distance from the NNP boundary, NNPA has no comments to make on the detailed criteria.	Noted. No amendments required in response to this representation.
JC Davison, M Grundseth and PJ McKee	The respondents note that the development of affordable housing will be supported outside the settlement boundary as an exception to meet locally identified need, where all the criteria are met. Criterion a is that it should amongst other things be demonstrated that no other suitable and available sites exist within the settlement boundary. As set out in the comment on reasoned justification paragraph 6.4, the respondents consider there is a need for the reasoned justification and / or a policy in the Plan to set out the approach to proposed housing developments within settlement boundaries, NLP policy STP1 allowing for a level of development within and adjacent to existing settlements.	It is for the neighbourhood planning body to decide on the scope of the neighbourhood plan. As explained, the parish council concluded the plan did not need to allocate land for housing within the parish. It is considered that with regard to the assessment of the principle of housing development within the existing settlement boundary that the NLP provides the appropriate policy context and there is no need to repeat this within the neighbourhood plan.
Policy 7: Community facilities		
Northumberland County Council	No comments.	Noted. No amendments required in response to this representation.
Northumberland National Park Authority	NNPA fully support highlighting the importance of community facilities. These facilities do not just support those living in the village of Humshaugh but its wider community including those residents and visitors to the National Park.	Noted. No amendments required in response to this representation.
JC Davison, M Grundseth and PJ McKee	Support the policy. It is agreed that the facilities in CF1 – CF6 are of great importance to the local community. It is material, as set out in paragraph 2.24 of the Plan, that the community is benefitting greatly from a diverse	Noted. No amendments required in response to this representation.

Consultee	Comment	HPC Response
	set of new residents who are supporting the many activities that take place in Humshaugh, enabling community institutions to thrive, a benefit which has been delivered by recent housing development in Humshaugh.	
Policy 8: Tourism		
Northumberland County Council	<p>We support the intention of this policy but, as highlighted at Regulation 14, we question the wording, which appears to be more restrictive than in NLP ECN 15.</p> <p>Paragraph 2 is almost identical to paragraph 2d of NLP ECN 15; however, the latter only relates to permanent buildings for <i>'visitor accommodation'</i>. Paragraph 2 of Policy 8 applies the same considerations to proposals for <i>'tourism facilities and visitor accommodation'</i>. This requirement, therefore, would appear to go beyond what is set out in NLP ECN 15.</p> <p>N.B. It is worth noting that a recent application for visitor accommodation in the Parish (ref: 23/04596/FUL) was recommended for refusal because it was considered contrary to both NLP ECN 15(2d) and the tourism policy in the presubmission draft Humshaugh Neighbourhood Plan (Policy 9), which is largely the same as the version submitted to the local planning authority.⁶</p> <p>In paragraph 3, support for proposals for temporary visitor accommodation in <i>'inaccessible locations'</i> is impractical. If the intention is to support these proposals we recommend re-wording as: <i>Proposals for chalets, camping pods, caravans and camping sites will be supported where it can be demonstrated that they would:</i></p> <p>The criteria replicate or go beyond what is set out in NLP policies (ECN 14, ECN15), which, again, would suggest a more restrictive approach than that which is sought by the Parish Council. In addition, would a proposal be expected to meet <u>all</u> of the criteria a-e?</p>	<p>It is not considered that the policy is more restrictive than ECN15. As explained within the supporting text, the policy is looking to support proposals that may be considered to conflict with criterion 2f of policy ECN15 which requires the development to be located 'in accessible locations'. There could be opportunities for a sustainable tourism business to operate from what may appear to be an unsustainable location.</p> <p>Suggest the wording could be amended to 'in areas that may be considered not to be accessible'.</p> <p>It is considered that all requirements should be met.</p>

⁶ The Tynedale Local Area Council Planning Committee, 12 March 2024, granted planning permission against officer recommendation.

Consultee	Comment	HPC Response
	<p>Criterion a – Suggest this is expanded to ‘rural businesses’ not just ‘<i>agricultural, horticultural or forestry business</i>’.</p> <p>Criterion b - This is more restrictive than the NLP as ECN15(f) does not require camping (sites), caravans, and chalets to meet this criterion.</p> <p>Criterion c - The supporting text implies that this would be sought after, especially in less accessible locations but not necessarily required in all cases.</p>	<p>Agree, this amendment would be appropriate.</p> <p>Policy ECN15(f) only supports proposals in accessible locations – which is the key issue the policy is seeking to address.</p> <p>If the site was considered to be less accessible, so not meet the requirements of ECN15(f) then all criteria should be met.</p>
Northumberland National Park Authority	<p>This policy recognises the importance of tourism. Part 1 is logical as tourism facilities should ideally be located in the areas that are more accessible such as within the settlement of Humshaugh.</p> <p>Part 2 is relevant to the area within the national park. It is acknowledged that small scale tourism development can be accommodated to meet the tourism need in the area and that is consistent with NNPLP Policy 7.</p> <p>Part 3 raises concern by including the term “inaccessible locations” in this Tourism policy. This term is not one well known within planning legislation or law and is not included within the glossary. “Inaccessible” to NNPA could mean sites that are not accessed via private car but by foot only. However, how can caravans be brought safely to an inaccessible location and how are the chalets and camping pods to be constructed in such inaccessible locations? Reference to highway safety should also be included as this would be essential to this proposal where large vehicles such as caravans and campervans are being brought along narrow country roads and to “inaccessible locations”. NNPA would like to see the term “inaccessible location” removed from Policy 3.</p> <p>The first sentence to part 3 should clearly set out that this relates to small scale tourism development only to make it consistent with NNPLP Policy</p>	<p>Noted. No amendments required in response to this element of the representation.</p> <p>Noted. No amendments required in response to this element of the representation.</p> <p>Suggest the wording could be amended to ‘in areas that may be considered no to be accessible’.</p> <p>Agree with the suggestion.</p>

Consultee	Comment	HPC Response
	DM7. As there is an “and” after 3 part e) it is assumed a proposal would need to meet all 5 parts of part 3 to be supported.	
JC Davison, M Grundseth and PJ McKee	The respondents support the policy.	Noted. No amendments required in response to this representation.
Policy 9: Sustainable transport		
Northumberland County Council	This policy is largely repetitive of NLP Policies TRA1, TRA2, TRA4 and STP4 (vehicle charging).	Noted. No amendments required in response to this representation.
Northumberland National Park Authority	Agree with all parts of this policy, however it is noted that reference to the protection of public rights of way have been removed between this version and the pre-submission draft. This is disappointing; however it is acknowledged that the NNPLP policies allow for the protection of public rights of way.	Noted. No amendments required in response to this representation.
JC Davison, M Grundseth and PJ McKee	The respondents support the policy.	Noted. No amendments required in response to this representation.
Annex 1: Community Actions		
Northumberland National Park Authority	It is noted that many of the community actions reflect the aims and objectives in the NNP adopted Management Plan, notably Actions 3, 5 and 6 relating to the Biodiversity and natural environment and tree planting and river water quality; and the Transport and Accessibility actions 9, 10, 11 and 12. The Management Plan can be viewed online: https://northumberlandnationalpark.org.uk/wp-content/uploads/2023/07/Management-Plan2022.pdf	Noted. No amendments required in response to this representation.
JC Davison, M Grundseth and PJ McKee	<u>Community Action 8 : Community - Led Housing</u> The wording of the Action refers to 'a small scale site (fewer than 10 homes)'. The use of the word 'a' indicates a single site. This contrasts with HNP policy 6 which does not include a single site limitation.	Community actions are separate from planning policies and are not examined.

Consultee	Comment	HPC Response
	<p>Following on from the above a small scale site (fewer than 10 homes) would not meet the need stated in the last bullet under para 6.6 of the HNP of 27.2 affordable rented homes and 33.3 affordable home ownership dwellings required over the Plan period. The approach is not sound it not meeting the assessed need or even coming close to it.</p> <p>A further comment that the respondents would make is that HNP policy 6 criterion a) requires that it be demonstrated, through the submission of a detailed site options appraisal, that the site is the most suitable site and that no other suitable and available sites exist within the Humshaugh settlement boundary. Criterion b) requires that the site should be adjacent or well related to the Humshaugh settlement boundary. The lack of options for future sustainable development in Humshaugh is set out in the response to Policy 2 and illustrated in the attached plan.</p> <p>A further point that the respondents would make is that sites adjacent or wellrelated to the settlement boundary may well be further from community facilities in Humshaugh, the School for example, than sites within the settlement boundary and result in a less sustainable form of development.</p>	
Policies Map Overview		
Northumberland National Park Authority	This clearly shows Northumberland National Park area within the Parish.	Noted. No amendments required in response to this representation.
Policies Map Inset		
Northumberland National Park Authority	This is outside the National Park boundary and therefore NNPA has no comments to make.	Noted. No amendments required in response to this representation.

Consultee	Comment	HPC Response
Basic Conditions Statement		
Northumberland National Park Authority	NNPA is satisfied with the general content of the Basic Conditions Statement. It is considered that the Plan has appropriate regard to national policy and guidance, and this is referenced throughout the plan. In addition, it is considered that the plan contributes to the achievement of sustainable development.	Noted. No amendments required in response to this representation.
JC Davison, M Grundseth and PJ McKee	<p><u>Vision – paragraph 3.1</u></p> <p>Basic condition a. breached insofar as the Plan sets a target of achieving net zero by 2036. In this respect the Government's target is that all UK emissions are to reach net zero by 2050. The Humshaugh Neighbourhood Plan Submission Draft March 2024, the 'HNP', does not accord with national policies and advice contained in guidance issued by the Secretary of State. For this reason it is not appropriate to make the neighbourhood development plan.</p> <p>Basic condition c. breached insofar as the Plan sets a target of achieving net zero by 2036. In this respect the Northumberland Local Plan, the 'NLP', in reasoned justification paragraph 13.98, refers to the Government's target to cut its carbon emissions to 'net zero' by 2050. The HNP is therefore not in general conformity with the strategic policies contained in the development plan for the area of the authority.</p> <p><u>Policy 1</u></p> <p>The respondents note the commentary on Policy 1 within Table 1. No further comments to make.</p> <p><u>Policy 2 – General Comments</u></p> <p>Basic condition a. breached it not having been demonstrated that there is sufficient suitable and available land in the Neighbourhood Plan Area for sustainable development to be delivered in the Neighbourhood Plan Area to meet identified needs in this and the next Plan periods commensurate with Chollerford / Humshaugh's, 'Humshaugh's', classification in the NLP as a Service Village. This is a classification which will be maintained through</p>	Noted. No amendments required in response to this representation as it does not raise any additional issues to those already addressed above.

Consultee	Comment	HPC Response
	<p>the current Northumberland Local Plan period. It is also a classification which likely will be maintained in the next Northumberland Local Plan period, the settlement hierarchy being based on robust evidence and an assessment of Humshaugh's sustainability relative to other settlements.</p> <p>NPPF para 105 requires amongst other things that designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. It continues that Local Green Spaces should only be designated when a plan is prepared or updated, <u>and be capable of enduring beyond the end of the plan period</u> (our emphasis). Acknowledging Humshaugh's classification in the settlement hierarchy it is likely, and indeed necessary, that Humshaugh accommodate some development in the current and the next plan periods. Basic condition a. breached as it has not been demonstrated that there is sufficient suitable and available land in the Neighbourhood Plan Area to allow this development to be delivered in a sustainable location which does not benefit from existing NLP and / or HNP policy protection. It has not therefore been demonstrated that the designation is capable of enduring beyond the end of the plan period.</p> <p>Following on from the above, NPPG para 007 Ref ID: 37-007-2014-0306 requires that designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. It continues that the Local Green Space designation should not be used in a way that undermines this aim of plan making. Without analysis of where development may go, it has not been demonstrated that the proposed Local Green Space designations are consistent with local planning for sustainable development in the area.</p> <p>For the reasons discussed above the HNP does not accord with national policies and advice contained in guidance issued by the Secretary of State and it is not appropriate to make the neighbourhood development plan.</p>	

Consultee	Comment	HPC Response
	<p>Following on but without prejudice to the above, the Submission Draft HNP was issued before the date of the General Election was announced. In turn the deadline for responding is before Election day. Whilst it is not known how the new Government will proceed, both planning reform and housing delivery feature prominently in the manifestos which have been issued thus far. Acknowledging that to be the case it is possible that the new Government will introduce new guidance and change in the short term. The respondents consider if this happens it must be taken into account in the Examiner's consideration of the HNP it needing to be up-to-date and forward looking amongst other things. The Examiner will also need to consider whether there should be an opportunity for respondents to comment on any new guidance which comes forward in advance of their Examination of the Plan.</p> <p>Basic condition b. breached, the HNP undermining the achievement of sustainable development which includes supporting strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations, NPPF para 8 b). In turn NPPG para 007 Ref ID: 37-007-2014-0306 states that designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. For equivalent reasons to those discussed above in relation to basic condition a, the HNP does not contribute to the achievement of sustainable development.</p> <p>Basic condition c. breached, NLP policy STP1 stating that the Service Villages, of which Humshaugh is an example, will provide for a proportionate level of housing and be the focus for investment in the rural areas, to support the provision and retention of local retail, services and facilities. That Humshaugh is a Service Village is a classification which will be maintained through the current Northumberland Local Plan period. It is also a classification which likely will be maintained in the next Northumberland Local Plan period, the settlement hierarchy being based</p>	

Consultee	Comment	HPC Response
	<p>on robust evidence and there being a range of services and facilities in Humshaugh. The HNP at paragraph 2.24 states that the village is benefiting greatly from a diverse set of new residents who are supporting the many activities that take place in Humshaugh, enabling the community institutions to thrive. The HNP is not in general conformity with the strategic policies contained in the development plan for the area of the authority, the NLP requiring a proportionate level of development in Humshaugh. It has not been demonstrated that there is sufficient suitable and available land in the Neighbourhood Plan Area for this development to be delivered in a sustainable manner later in the current plan period or in the next.</p> <p><u>Policy 2 – Site Specific Comments in relation to LGS04, The Legitt Field</u></p> <p>Basic condition a. breached insofar as policy 2 proposes LGS04, The Legitt Field, as Local Green Space. LGS04, The Legitt Field, does not meet the LGS designation requirements. As set out in the respondents' responses to (i) the Local Green Space and Protected Open Space Background Paper March 2024, and (ii) the Humshaugh Neighbourhood Plan Submission Draft March 2024, there is no public access and the site is not of particular local significance by reason of beauty, historic significance, tranquillity, or richness of wildlife. The proposed designation of LGS04 is not justified and should be deleted. The HNP does not accord with national policies and advice contained in guidance issued by the Secretary of State. For this reason it is not appropriate to make the neighbourhood development plan.</p> <p>Basic condition b. breached, the Plan undermining the achievement of sustainable development which includes supporting strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations, NPPF para 8 b). The Legitt Field is a site within the settlement which is suitable and available and which could contribute towards development needs in a sustainable location adjoining existing housing and close to local services including the school. Designating The Legitt Field as</p>	

Consultee	Comment	HPC Response
	<p>Local Green Space means the HNP does not contribute to the achievement of sustainable development, the designation if confirmed, will constrain development, NPPF para 107 requiring that policies for managing development with a Local Green Space, should be consistent with those for Green Belts.</p> <p>Basic condition c. breached, NLP reasoned justification paras 14.36 and 14.37 referring to the national policy in relation to the use of the LGS designation. For the reasons discussed above the HNP is in breach of basic condition a. It follows that the HNP is also not in general conformity with the strategic policies contained in the development plan for the area of the authority.</p> <p><u>Policy 3</u> The respondents note the commentary on Policy 3 within Table 1. No further comments to make.</p> <p><u>Policy 4</u> The respondents note the commentary on Policy 4 within Table 1. No further comments to make.</p> <p><u>Policy 5</u> The respondents note the commentary on Policy 5 within Table 1. No further comments to make</p> <p><u>Reasoned Justification paragraph 6.4</u> Basic condition b. breached insofar as the HNP does not set out the approach to proposed housing developments within the settlement boundary. In this respect, whilst it is noted that the Plan does not propose to allocate sites for new market housing, applications for residential development may be submitted on sites within the settlement boundary of Chollerford / Humshaugh. In the absence of a policy approach allowing in principle for such sites to come forward, the HNP does not contribute to the achievement of sustainable development.</p>	

Consultee	Comment	HPC Response
	<p>Basic condition c. breached. Following on from the above, the HNP does not set out the approach to proposed housing developments within the settlement boundary. This is inconsistent with the NLP. As stated in HNP reasoned justification paragraph 7.49, NLP policy STP1 allows for a level of development within and adjacent to existing settlements. NLP policy STP1 further states that the Service Villages, including Chollerford / Humshaugh, will provide for a proportionate level of housing and be the focus for investment in the rural areas, to support the provision and retention of local retail, services and facilities.</p> <p><u>Policy 6</u> The respondents note the commentary on Policy 6 within Table 1. No further comments to make.</p> <p><u>Policy 7</u> The respondents note the commentary on Policy 7 within Table 1. No further comments to make.</p> <p><u>Policy 8</u> The respondents note the commentary on Policy 8 within Table 1. No further comments to make.</p> <p><u>Policy 9</u> The respondents note the commentary on Policy 9 within Table 1. No further comments to make.</p>	
Consultation Statement		
Northumberland National Park Authority	NNPA are satisfied with the level of consultation carried out.	Noted. No amendments required in response to this representation.
SEA Screening		
Northumberland National Park Authority	NNPA agrees Humshaugh Neighbourhood Plan <i>is unlikely to have any significant positive or negative effects on the environment</i> and a Strategic Environmental Assessment is NOT required for the Plan.	Noted. No amendments required in response to this representation.

Consultee	Comment	HPC Response
HRA Screening		
Northumberland National Park Authority	Some of the European sites referred to fall within the NNP boundary. NNPA agree there is no requirement for Strategic Environmental Assessment (SEA) because of ecological concerns.	Noted. No amendments required in response to this representation.
Local Green Space and Protected Open Space Background Paper		
Northumberland National Park Authority	No comments to make.	Noted. No amendments required in response to this representation.
JC Davison, M Grundseth and PJ McKee	<p><u>Para 2.3</u> Support the inclusion of the whole of NPPF paragraph 105 within the Paper. As set out in the guidance, designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. As also set out in the guidance, Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.</p> <p><u>Para 2.6</u> Support the setting out of the Planning Practice Guidance. The respondents would specifically note the guidance in the first bullet point which states that plans must identify sufficient land in suitable locations to meet identified development needs and that the Local Green Space designation should not be used in a way that undermines this aim of plan making (Paragraph 007 Reference ID:37-007-2014036). Having regard to this guidance, the HNP should not use the Local Green Space designation in a manner which could prejudice sustainable development in this and subsequent Plan periods.</p> <p><u>Para 3.4 – Table 1 Row 2</u> Having regard to the guidance, the respondents consider it necessary for two additional questions to be asked following on from question, "Is the</p>	Noted. No amendments required in response to this representation as it does not raise any additional issues to those already addressed above.

Consultee	Comment	HPC Response
	<p><i>space allocated or proposed to be allocated in a Development Plan?". The additional questions that should be asked are;</i></p> <p>a) Is sufficient land identified in suitable locations in the Neighbourhood Plan Area for sustainable development to meet identified needs in this Plan period?</p> <p>b) Is sufficient land identified in suitable locations in the Neighbourhood Plan Area for sustainable development to meet identified needs in the next Plan period?</p> <p>The above questions are necessary conscious of the requirements that designating any LGS will need to be consistent with local planning for sustainable development in the area and that the Space should be capable of enduring beyond the Plan period. In this respect it is material that Humshaugh is a Service Village and that there is a need for continuity of housing supply in this and future Plan periods which will necessitate the development of land. There are also needs for a mix of housing and a significant affordable housing requirement which will not be met by a rural exception site.</p> <p><u>Appendices 1 & 2, LGS01 - LGS01 School playing field and play area</u> The respondents support the assessment and the proposed designation of LGS01 as LGS.</p> <p><u>Appendices 1 & 2, LGS02 - The Orchard</u> The respondents support the assessment and the proposed designation of LGS02 as LGS.</p> <p><u>Appendices 1 & 2, LGS03 Bog Field</u> The respondents support the assessment and the proposed designation of LGS03 as LGS.</p> <p><u>Appendices 1 & 2, LGS04 The Legitt Field</u> The respondents, the owners of the site, object to its proposed designation as LGS.</p>	

Consultee	Comment	HPC Response
	<p>The respondents do not consider the space is of particular local significance because of its beauty, table 2, row 1. In this respect the site is in the centre of the village and is bounded amongst other things by existing development including (1) the main road through Humshaugh to the west, (2) another road, Doctors Lane, to the north (3) a house to the north west (The Legitt), (4) housing to the east, and (5) a recently completed housing estate to the south. These factors impact on the character and appearance of the site. Whilst it is acknowledged it is currently not developed, it is not <i>'beautiful'</i> or of <i>'particular local significance'</i>.</p> <p>The respondents do not agree that The Legitt Field is of <i>'particular'</i> local historic significance, table 2, row 2. It is outside the Conservation Area and does not adjoin it. In turn an application by a third party to add the site to the Schedule of Monuments was refused by Historic England (HE ref 1459660). The following principal reasons were listed by Historic England for the decision;</p> <ul style="list-style-type: none"> • <i>"Rarity: medieval open field systems are widely distributed across England and areas of ridge and furrow are a common occurrence;</i> • <i>Survival: it is a fragment of a formerly more extensive field system, which is therefore poorly preserved overall;</i> • <i>Potential: insufficient of the field system survives to demonstrate its exact nature and any regional variations in the form of its fields and furlongs;</i> • <i>Group value: it does not retain a clear, physical association with the scheduled remains of a contemporary settlement".</i> <p>A copy of Historic England's letter dated 15 October 2018 and their associated report is attached. The principal reasons for not adding the site to the Schedule of Monuments remain applicable. The respondents would add that since Historic England's decision on 15 October 2018, the housing estate to the south has been developed and impacted on the character and appearance of the site.</p>	

Consultee	Comment	HPC Response
	<p>It is also not agreed that the site makes a particular contribution to the setting of Hopewell House or Humshaugh CoFE Primary School. The List Descriptions for Hopewell House and Humshaugh CoFE Primary School record the buildings were Listed for their Group Value reflecting amongst other things the historic association between the two buildings, Hopewell House formerly being the headmaster's house. These buildings are situated on the opposite side of the main road from The Legitt Field. To the south of The Legitt Field is a recent housing development which impacts on its character and appearance. It is also not agreed that the site makes a particular contribution to the rural and historic experience of visitors to Hadrian's Wall or to Humshaugh or to the services within it.</p> <p>The respondents agree with the assessment that The Legitt Field is not of particular local significance because of its recreational value, table 2, row 3. As stated in the Appendix 2 assessment, there is no public access.</p> <p>The respondents do not agree that The Legitt Field is of particular local significance because of its tranquillity, table 2, row 4. As stated in both Appendices 1 and 2 of the Background Paper, the site is in the centre of the village. It adjoins the main road and is close to the school which generates comings and goings, noise and activity. Doctors Lane is to the north and there is existing housing both adjoining the site and in close proximity. These factors, combined with the size of the site, mean that the site is not tranquil. It follows it is not of particular local significance because of its tranquillity. It is additionally material that The Legitt Field is not publicly accessible and therefore cannot be used for quiet reflection.</p> <p>The respondents do not agree that The Legitt Field is of particular local significance because of its richness of wildlife, table 2, row 5. In this respect similar wildlife is found on other sites proposed in the HNP to be designated as Local Green Space. Additionally it is material that the site has and continues to be grazed reducing its ecological value.</p>	

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	<p>In conclusion, The Legitt Field, LGS04, does <u>not</u> meet the LGS designation requirements. There is no public access and it is not of particular local significance by reason of beauty, historic significance, tranquillity, or richness of wildlife. The proposed designation of LGS04 is not therefore justified and should be deleted.</p> <p><u>Appendices 1 & 2, LGS05 Humshaugh Burn Wood</u> The respondents support the assessment and the proposed designation of LGS05 as LGS.</p> <p><u>Appendices 1 & 2, LGS06 Humshaugh War Memorial</u> The respondents support the assessment and the proposed designation of LGS06 as LGS.</p> <p><u>Appendices 1 & 2, LGS07 Haughton Square</u> The respondents support the assessment and the proposed designation of LGS07 as LGS.</p> <p><u>Appendices 1 & 2, LGS08 St Peter's Churchyard</u> The respondents support the assessment and the proposed designation of LGS08 as LGS.</p> <p><u>Appendices 1 & 2, LGS09 The Glebe Field</u> The respondents support the assessment and the proposed designation of LGS09 as LGS.</p> <p><u>Appendices 1 & 2, LGS10 Entrance to Doctor's Lane</u> The respondents support the assessment and the proposed designation of LGS10 as LGS.</p> <p><u>Appendices 1 & 2, LGS11 Chester Meadow Amenity Area</u> The respondents support the assessment and the proposed designation of LGS11 as LGS.</p>	

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	<p><u>Appendices 1 & 2, LGS12 Field opposite Douglas Terrace</u> The respondents support the assessment and the proposed designation of LGS12 as LGS.</p> <p><u>Appendix 4 – POS01, Field to the North of the Crown Inn</u> The respondents support the assessment and the proposed designation of POS01 as Protected Open Space.</p> <p><u>Appendix 4 – POS02, Doctors Lane Field</u> The respondents support the assessment and the proposed designation of POS02 as Protected Open Space.</p> <p><u>Appendix 4 – POS03, Evans Trust Field (north of war memorial)</u> The respondents support the assessment and the proposed designation of POS03 as Protected Open Space.</p>	
Conservation Area Heritage Paper		
Northumberland National Park Authority	No comments to make.	Noted. No amendments required in response to this representation.
Design Guidance and Codes		
Northumberland National Park Authority	This is a comprehensive and helpful document and is supported. As a local planning authority, officers will use the code as a reference point against which to assess planning applications in the Humshaugh area. The Design Code will also be used in discussions with applicants during application and pre-application discussions.	Noted. No amendments required in response to this representation.