

# **Whittington Neighbourhood Plan**

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

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

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

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

## Whittington Neighbourhood Plan: Summary of representations received and submitted to the Independent Examiner

Name	Organisation (if applicable)	Summary of representation
Paul Dixon, Asset Manager	<b>Highways England</b>	<p>Highways England’s representation provided some general information about the role of the agency and its responsibilities relating to the strategic road network.</p> <p>With specific reference to the Whittington Neighbourhood Plan, Highways England confirmed that, despite the absence of an up-to-date adopted Local Plan, they had no particular concerns with the policies and provisions within the Neighbourhood Plan.</p> <p>General support was given to the vision and objectives. Support was also expressed for policies which seek to support measures to improve safety for vehicles, pedestrians and cyclists, as well as ensuring that impacts on the highway network are mitigated. Highways England were supportive of the Plan’s intention to direct sustainable development within existing settlements, with the majority of new housing development within Great Whittington. Highways England considered that the allocation of land for approximately 19 dwellings over the plan period is of a scale and in a location that is unlikely to detrimentally impact on the strategic road network. Support was also expressed for policies relating to community facilities and tourism, both of which include provisions to ensure that proposals will not have adverse impacts on highway safety.</p>
Hannah Lorna Bevins, Consultant Town Planner	<b>Amec Foster Wheeler E&amp;I UK, on behalf of National Grid</b>	The representation identified high voltage overhead power lines within the Neighbourhood Area but confirmed that these do not interact with any of the Neighbourhood Plan proposals. The representation also confirmed that there are no implications for National Grid Gas Distribution’s intermediate/high pressure apparatus but that there may be Low/Medium Pressure gas distribution pipes present within development sites.
Jules Brown, Historic Places Adviser	<b>Historic England</b>	Historic England welcomed the content of the Plan and did not have any detailed comments to make.
L Conway	n/a	The representation recognised that the content of the Plan reflected the results of consultation and expressed full support for the Plan.
M Conway	n/a	The representation recognised that the content of the Plan reflected the results of consultation and expressed full support for the Plan.

**Whittington Neighbourhood Plan: Summary of representations received and submitted to the Independent Examiner**

Name	Organisation (if applicable)	Summary of representation
G Harper	n/a	The representation expressed full support for the Plan and expressed that it should be implemented as soon as possible.
S Wheaton	n/a	The representation recognised that the content of the Plan reflected the results of consultation and expressed support for the Plan.
L Dawson	n/a	The representation recognised that the content of the Plan reflected the results of consultation and expressed full support for the Plan.
Caitlin Newby, Planner	<b>Hedley Planning Services Ltd</b>	<p>The representation stated that they considered that the Plan did not meet all of the basic conditions. Specific reference was made to the proposed settlement boundary and its conflict with the settlement boundary set out in the existing development plan, as well as the way in which the policies in the Plan seek to deliver housing over the plan period.</p> <p>It was considered that the settlement boundary should revert back to the scale in the existing development plan and that the settlement boundary should be removed from the Neighbourhood Plan altogether with preference expressed for a windfall type criteria based policy instead. Additionally, it was considered that there should be greater flexibility towards market housing, having regard to national guidance on sustainable development.</p>
Lucy Mo, Planning Technical Specialist – Sustainable Places	<b>Environment Agency</b>	<p>The Environment Agency expressed support for the inclusion of an objective relating to the conservation and enhancement of the natural environment. In addition, support was expressed for policies relating to biodiversity and design.</p> <p>The Environment Agency also expressed the view that the Plan should ensure that new development, including housing, is located outside flood zones 2 and 3 and that references to this should be included within the Plan. In addition, it was also considered that consideration should be given to the provision of green infrastructure and that the Plan should seek to achieve the objectives of the Northumbria River Basin Management Plan.</p>
Ellen Bekker, Lead Adviser – Sustainable Development	<b>Natural England</b>	Natural England did not have any specific comments to make on the Plan; however, they welcomed the policies relating to landscape character, tranquillity and biodiversity.

**Whittington Neighbourhood Plan: Summary of representations received and submitted to the Independent Examiner**

Name	Organisation (if applicable)	Summary of representation
Melanie Lindsley, Team Leader – Planning Liaison	<b>The Coal Authority</b>	The Coal Authority confirmed that had no specific comments to make on the Neighbourhood Plan. However, they did identify the Neighbourhood Area as lying within the current defined coalfield. In addition, there are recorded risks from past coal mining activity in the form of 53 mine entries. The Coal Authority noted that the Neighbourhood Plan allocates sites for future housing development but confirmed that these allocations fall outside of the defined Development High Risk Area where coal mining legacy is present. Instead, these allocations lie within the Development Low Risk Area.
David English, Planning Manager – Communities and Infrastructure	<b>Northumberland County Council</b>	<p>The County Council responded with comments to the following parts of the Plan.</p> <ul style="list-style-type: none"> <li>• <b>Policy WNP2: Tranquillity</b> The County Council had previously made representations on this policy but concerns remained regarding the relevance and necessity of the policy and how it could be applied in practice. The County Council considered that the policy failed to meet the ‘basic conditions’ due to the difficulty in applying the policy with any certainty or consistency.</li> <li>• <b>Policy WNP5: Heritage Assets</b> The County Council considered that the Policy failed to reflect NPPF guidance with regard to mitigation to offset damage caused to the significance of a heritage asset if permission is granted and suggested the inclusion of a clause to ensure that, where development will lead to the loss of significance of a heritage asset, the developer should be required to record that loss, advance understanding of that significance and make the results publicly accessible.</li> <li>• <b>Policy WNP6: General location of new development</b> The County Council had previously made representations on this policy but concerns remained regarding the way that the policy was drafted. The County Council was supportive of the approach to direct the majority of development in the Parish to within the settlement of Great Whittington. However, the approach taken to development in other smaller settlements within the Parish was less clear when considered in the context of national policy and guidance. The County Council considered that the policy failed to meet the basic conditions because it did not have proper regard to paragraph 55 of the NPPF and failed to have regard to the principles described at paragraph 17 of the NPPF. The County Council considered that it would be more appropriate to treat development outside the Great</li> </ul>

**Whittington Neighbourhood Plan: Summary of representations received and submitted to the Independent Examiner**

Name	Organisation (if applicable)	Summary of representation
		<p>Whittington settlement boundary as open countryside, but with exceptions set out whereby some development may be appropriate.</p> <ul style="list-style-type: none"> <li>• <b>Policy WNP7: Housing</b> The County Council considered that references to housing need and tenures should be removed from this policy as the policy relates to open market housing (without restriction), not affordable housing.</li> <li>• <b>Policy WNP8: Rural exceptions sites</b> The County Council expressed concern regarding the inclusion of reference to “the needs of the local community” as this conflicted with the Council’s Common Allocations Policy with regard to the allocation of affordable housing.</li> <li>• <b>Policy WNP12: Tourism and leisure</b> The County Council had previously made representations on this policy but concerns remained that the policy could give rise to opportunities for development such as chalets or newly-built cottages in the countryside, where permission could later be sought to remove conditions preventing permanent occupancy. It was therefore suggested that consideration should be given to the inclusion of additional criteria.</li> </ul> <p>In addition to the above, the County Council also suggested general amendments to the Plan in order to correct grammatical and/or typographical errors.</p>
C Lawson	n/a	The representation stated that the policies within the Plan have arisen from extensive consultation. Support for the plan was expressed.
Carrie Taylor, New Development Planning Assistant	<b>Northumbrian Water</b>	<p>Northumbrian Water expressed support for the Plan’s Vision, particularly the inclusion of references to sustainability and the conservation and enhancement of environmental heritage for the benefit of current and future residents. Further support was expressed for the objectives, particularly Objective 1 which focuses on the natural environment.</p> <p>Particular support was expressed for Policy WNP4 which promotes the adoption of sustainable drainage principles within development proposals, as well as referring to impacts on water quality in</p>

**Whittington Neighbourhood Plan: Summary of representations received and submitted to the Independent Examiner**

Name	Organisation (if applicable)	Summary of representation
		relation to new development.
J Roberts	n/a	The representation stated that the policies within the Plan have arisen from extensive consultation. Support for the plan was expressed.
Fraser McKenna, Graduate Development Surveyor	<b>Strutt &amp; Parker, on behalf of Mr T Oliver</b>	<p>The representation included general comments on the Plan, as well as detailed comments on individual policies.</p> <p>General comments included concerns about the timing of the Neighbourhood Plan in relation to the adoption of the Northumberland Core Strategy, as well as consultation on the government’s Housing White Paper. It was considered that the Plan should wait until the outcome of these is known.</p> <p>Additionally, it was considered that the Plan did not specifically explain its role in meeting objectively assessed housing needs.</p> <ul style="list-style-type: none"> <li>• <b>Policy WNP1: Landscape</b> The representation considered that less weight should be given to the retention of all ridge and furrow fields as they are felt to provide only a modest contribution towards the overall value of the landscape.</li> <li>• <b>Policy WNP2: Tranquillity</b> Support was expressed for this policy. However, it was considered that the assessment of whether noise, traffic and light generation might be materially harmful should be taken on the merits of the scheme as a whole and there should be no inference within such a policy that any detriment to tranquillity should mean that a development scheme should not be supported.</li> <li>• <b>Policy WNP3: Biodiversity</b> Support was expressed for this policy. However, there was concern that the evidence to underpin the policy was inadequate and should be based on clear statistical and analytical evidence from a suitably well-regarded source.</li> <li>• <b>Policy WNP4: Design</b> Support was expressed for this policy. However, the representation stated that simply taking buildings of modern proportions and style and using traditional materials for construction</li> </ul>

**Whittington Neighbourhood Plan: Summary of representations received and submitted to the Independent Examiner**

Name	Organisation (if applicable)	Summary of representation
		<p>does not achieve the desired visual effect and the emphasis on design should drill down to all aspects of the buildings and the layout of a scheme, relating this back to the history and design of the surrounding parish.</p> <ul style="list-style-type: none"> <li>• <b>Policy WNP5: Heritage Assets</b> Support was expressed for this policy. It was considered that the Conservation Area Character Appraisal is a thorough and generally well prepared piece of work and is generally regarded as being a useful reference point for the assessment of applications.</li> <li>• <b>Policy WNP6: General location of new development</b> The representation objected to the settlement boundary set out in the neighbourhood plan, particularly in the context of a planning application which was pending consideration at the time of the Regulation 16 publicity period. The representation stated that it was believed that the Plan had no regard to the planning application, particularly in the process of seeking to establish a settlement boundary for Great Whittington.</li> <li>• <b>Policy WNP7: Housing</b> The representation considered that the Plan did not make provision for future development as it has allocated land which already has planning permission. This comment was made in the context of a site to the east of the settlement.</li> <li>• <b>Policy WNP8: Rural exceptions sites</b> It was considered that the Plan fails to identify evidence relating to housing need and that the emphasis should not be placed on a developer to demonstrate a need.</li> <li>• <b>Policy WNP9: Community services and facilities</b> It was considered that, if community service/buildings might require land outside the settlement boundary, the Neighbourhood Plan will have failed to provide for a Plan adaptable enough to meet the specified need.</li> <li>• <b>Policy WNP10: Infrastructure</b> Support was expressed for this policy. No detailed comments were provided.</li> <li>• <b>Policy WNP11: Agriculture</b> Support was expressed for this policy. It was considered, however, that the policy fails to</li> </ul>

## Whittington Neighbourhood Plan: Summary of representations received and submitted to the Independent Examiner

Name	Organisation (if applicable)	Summary of representation
		<p>adequately cover the dichotomy that modern agricultural buildings are often unappealing in appearance and often found to be incongruous within the natural landscape.</p> <ul style="list-style-type: none"> <li>• <b>Policy WNP12: Tourism and leisure</b> Support was expressed for this policy. However, it was considered, while a thriving tourism industry can also have all the same benefits as referred to in the economic development policy, strict adherence to a settlement boundary does not seem to be entirely commensurate with this.</li> <li>• <b>Policy WNP13: Transport and new developments</b> It was considered that the County Council, as highways authority, should be the clear hierarchical and overarching arbiter of traffic impact. It was also considered that local residents often feel that traffic impact is likely to be much greater from a given development than is often the case in reality and that it would be inappropriate for this perception to skew judgement on new schemes.</li> <li>• <b>Policy WNP14: Active travel routes</b> Support was expressed for this policy. No detailed comments were provided.</li> </ul>
E Treadway	n/a	The representation stated that the policies within the Plan have arisen from extensive consultation. Support for the plan was expressed.
M Brooker	n/a	The representation stated that the policies within the Plan have arisen from extensive consultation. Support for the plan was expressed.
B Elliott	<b>Elliott Architects Ltd</b>	The representation was made in the context of a housing scheme in the Neighbourhood Area. The representation expressed support for the Plan and also expressed gratitude at the approach to writing the Plan and the inclusive nature of the process and those involved in the Plan's preparation.