



Northumberland National Park Authority

Local Plan 2017 – 2037

Issues Paper

Consultation Response Form/Questionnaire

February 2017

NNPA Local Plan Review – Issues Paper Public Consultation Questionnaire

Introduction

The Local Plan for Northumberland National Park currently comprises the Core Strategy and Development Policies document (2009), which is supported in its implementation by the Building Design Guide SPD (2011), Landscape Strategy SPD (2011) and Otterburn Camp SPD (2007). These documents set the spatial planning strategy, policies and guidance for Northumberland National Park for the plan period up to 2024. Government guidance stipulates that a Local Plan should be reviewed at least every five years (from adoption) which means that the current suite of development plan documents are out of date and need to be reviewed.

The Authority is currently undertaking a review of the existing statutory development plan (LDF Core Strategy and Development Policies plus associated Supplementary Planning Documents (SPDs)) with the aim of producing and adopting a new Local Plan by March 2019. **The new Local Plan will contain planning policies guiding future development and the determination of planning applications for a twenty year period from 2017-2037.**

Northumberland National Park is deeply rural in its nature. With a resident population of fewer than 2,000 spread over 1,094 square kilometres, its population density is the lowest in England at 2 persons per square kilometre (ONS). The largest single settlement is Elsdon, located in the east of the National Park, with a population of around 240 (2011 Census). Other key settlements include Alwinton, Falstone, Greenhaugh, Harbottle, Holystone, Lanehead and Stannersburn, referred to in the current Core Strategy as the 'Local Centres'. The larger 'gateway' settlements, including Bellingham, Haltwhistle, Rothbury and Wooler are more populous, however these towns are predominantly outside the National Park boundary and so only a fraction of their populations are resident within the Park.

The current Core Strategy has an overarching spatial approach based on a settlement hierarchy which seeks to ensure that new development will be located within the most sustainable locations. Policy 5 focuses new development, such as housing and new business premises, in the 8 largest local centres, then the smaller villages with Policy 6 advocating a sequential approach to site selection focusing development on previously developed land and sites located adjacent to existing built up settlements.

The approach places an expectation that the Local Centres within the Park be the focus for new local needs development. Clearly the National Park has a wide variety of different settlement types, so the spatial strategy requires that any development is of a scale that reflects the character and function of the settlement. It should also not impinge on the special qualities of the National Park.

Much of the National Park's population resides in the Local Centres, smaller villages and small nucleated hamlets, as well as isolated houses and farmsteads. Examples of these smaller settlements include Charlton, Ingram, Kirknewton, Rochester and Stonehaugh. The current Local Plan recognises that these areas' development needs cannot be ignored, but that there should be a particular justification for new development to happen there.

We have identified a number of key issues for the Local Plan such as the provision of community services, housing and employment. We would like to know what you think our future planning policies should be in order to address these issues. This is your chance to have your say at an early stage of the preparation of the new Local Plan. We want your views and would be grateful if you could answer as many of the questions set out below as you can. Thank you.

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Our Vision:

‘Northumberland National Park will be a truly welcoming and distinctive place, easily accessible to all. Its inspiring and changing landscapes, characterised by open spaces, tranquillity, diverse habitats, geology and rich cultural heritage, will be widely recognised and valued. The living, working landscape will contribute positively to the well-being of the thriving and vibrant communities in and around the Park.’

Question 1: Do you agree with using the same vision as the National Park Management Plan 2016-2021?

We would suggest that the vision includes a minor amendment in the final sentence “*The living, working landscape will contribute positively to the well-being of the thriving, ~~and~~ vibrant and sustainable communities in and around the Park.*”

We would also question if the vision properly reflects the Government’s 8-point plan. “*National parks: 8-point plan for England (2016 to 2020)*”.

Finally, it is not clear how the policies of the plan will comply with Section 108 of the Deregulation Act 2015, having regard to the “growth duty” now applicable to regulators.

Our Strategic Priorities:

Strategic Priority 1: To support sustainable development and land management that conserves and enhances the National Park’s distinctive natural and cultural qualities and protects its assets.

Strategic Priority 2: To support sustainable use of ecosystem products and services thereby enhancing natural capital across the landscape of the National Park, contributing positively to health and wellbeing.

Strategic Priority 3: To support and encourage sustainable economic growth to allow our local communities to thrive.

Strategic Priority 4: To support the provision of a range of housing that encourages more working age people and families to live in the National Park or one of its gateway settlements.

Strategic Priority 5: To support the retention and enhancement of community facilities, infrastructure and rural services in order to sustain our thriving communities.

Question 2: Do you agree with our five Strategic Priorities for the Local Plan?

Yes, but would suggest that the definition of local communities is clarified and be inclusive of the business community.

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Your local area:

Question 3: Do you think that there is pressure for a particular type of development in your local area?

No comment

Question 4: Do you think that this issue has been adequately addressed by our existing planning policies?

No comment

Question 5: Are there specific planning issues affecting your locality that you think need to be addressed? (e.g. community facilities, infrastructure, housing, employment, renewable energy)

No comment

Question 6: Are there any sites in your locality that you would consider suitable for use as housing or employment land?

Whilst we have no particular site for housing or employment, it is important that due consideration is given to mineral safeguarding and where appropriate, the safeguarding of minerals infrastructure to accord with paragraph 143 of the NPPF.

Question 7: Do you think that any of the issues you have identified for your local area would apply to the wider National Park area?

No comment

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Key issues identified:

Spatial Strategy

Issue 1: Settlements

Question 8: Do we continue to focus new development in the local centres and villages as set out by a settlement hierarchy? Or do you think that this approach is too restrictive?

No comment

Question 9: Do you think that a farm-steading should be defined as a settlement?

No comment

Question 10: Should it be easier to convert existing buildings to houses outside of existing settlements?

No comment

Issue 2: Major development

Question 11: Do you agree with our existing definition of major development? Are the criteria too restrictive? Or do you think that they are appropriate?

No comment

Issue 3: Ageing Population

Question 12: Should we plan for more family housing within the National Park? If so, where do you think this should go?

No comment

Community Facilities and Infrastructure

Issue 4: Lack of adequate mobile phone coverage and broadband provision within the National Park.

Question 13: How could future planning policies support broadband and mobile telecommunications service providers to achieve high quality broadband and mobile phone coverage to adequately serve all businesses and citizens in the National Park?

No comment

Issue 5: Renewable energy provision

Question 14: What sort of renewable energy solutions and energy conservation measures would be appropriate in the National Park?

There is a case for considering former and existing quarries as potential sites for renewable energy facilities.

Question 15: What should the policy on large scale Renewable energy be?

No comment

Question 16: Should planning policies support micro-renewable energy generation in suitable locations to connect off-grid properties?

No comment

Issue 6: The maintenance of existing and the provision of new infrastructure and community facilities

Question 17: Who do you think should pay to support existing and new services and infrastructure needed in the National Park, and how?

No comment

Question 18: What services and infrastructure do you believe need improving in your community?

No comment

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Question 19: Where development outside the National Park, such as housing, has an impact within the National Park, should the developer be expected to pay for projects or works which would reduce that impact?

Any major developments which require mitigation as determined by an appropriate impact assessment would normally be required to include the mitigation as part of the overall development package. Mitigation could be delivered through the conditions attached to the planning consent or through an appropriate legal agreement.

Housing and Employment

Issue 7: Meeting our future housing needs.

Question 20: How might the local plan be more flexible to meet the housing needs of younger people, gypsies and travellers, older people, farm and rural workers, other employees, or self-builders?

No comment

Question 21: Should we review the current local housing need criteria? Should these remain broadly the same? Or should they be more restrictive? or less restrictive?

No comment

Question 22: The current plan restricts the use of holiday homes, to ensure that they do not become open market housing. Should the new local plan be more flexible around other short term use of holiday homes?

No comment

Issue 8: Meeting our future employment needs

Question 23: How could we more effectively plan for a range of businesses to meet the needs of local communities? Do we need a more flexible employment policy?

Under Section 108 of the Deregulation Act, it is believed there is a duty on the authority to better understand the needs of the business community and the business environment. This is not to say that businesses should be given carte blanche over the principles behind the status of the National Park. However, overly restrictive planning policies can stifle employment opportunities in the National Park and development creating jobs should be given the appropriate weighting, when considered against environmental effects of the development. Mineral working and minerals related activity are an important source of employment in National Parks, providing direct employment in rural areas and providing the raw materials to deliver downstream employment. It is not clear if there is a definition of “sustainable rural businesses” as reflected in the current policy. These considerations and a more flexible employment policy may help deliver Strategic Priority 3.

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Question 24: An increasing number people who live within the National Park work from home. How could the local plan help to meet the needs of these home workers?

No comment

Question 25: Do you think that there any key employers or employment sectors that deserve special recognition in our policies?

No comment

Question 26: How could we better transfer the historic, cultural and natural assets of the Park into jobs and business opportunities?

The maintenance of cultural heritage may necessitate the production of distinctive local building materials. These relatively small-scale mineral activities provide local employment, skills training and help retain the local character by providing the local materials which help maintain the fabric of the area.

Transport and Access

Issue 9: Transport

Question 27: How could future planning policies contribute to reducing the need to travel and encouraging alternative forms of transport? Is this realistic given the public transport service limitations and dependency on the private car?

Policies aimed at maintaining and enhancing local employment opportunities will themselves reduce the need to travel greater distances to work.

Issue 10: Access

Question 28: Should new or improved access tracks for forestry, farming and shooting be used to provide opportunities for public access so that they provide wider benefits? How could we accommodate the infrastructure (e.g. tracks) necessary to support the shooting economy without harming the landscape?

No comment

Farming and Estates

Issue 11: Sustainable land management

Question 29: Should our approach be more focused in supporting farms and land-based businesses to diversify? Is the current approach too vague?

No comment

Question 30: Could future planning policies encourage and support the uptake of better and more sustainable land management practices which conserve and enhance the National Park's special qualities? E.g. by contributing to ecosystem services using the natural capital provided by the National Park.

No comment

Issue 12: Sustainable rural economic growth

Question 31: How could future planning policies help to retain, attract and develop new and traditional skills to meet the demand of enterprises and business growth in key sectors?

Paragraph 144 of the NPPF recognises the need for relatively small-scale dimension stone/building stone operations to provide materials for the repair of heritage assets. Such materials also enable new build houses to be built in sympathetic styles and public open spaces to be created with appropriate paving and walling materials.

Question 32: Do you think that there are other types of land-based rural enterprises beyond traditional farming that our policies should be catering for?

See above

Question 33: How could future planning policies help to improve infrastructure serving remote holdings without harming the landscape?

No comment

Question 34: How could we best ensure that our farm buildings and farmsteads are protected from poor development, and find viable new uses for them if they are no longer in use?

No comment

Natural Environment

Issue 13: Protecting the Natural Environment

Question 35: How should the local plan strike the right balance between protecting habitats and wildlife, and allowing new development? How should we protect Northumberland National Park's landscape from inappropriate change?

Refer to Strategic Priorities 3 to 5. A healthy environment requires a healthy local economy.

Question 36: Should planning policy be stronger in protecting the quality of our night skies and our areas of tranquility?

No comment

Question 37: How could future planning policies encourage an ecosystems approach to development within the National Park?

No comment

Issue 14: Flood Risk

Question 38: Are there other ways in which local plan (as opposed to land management) could reduce or slow the rate of run off so as to reduce downstream flood risk? Are there areas of land that should be safeguarded especially to accommodate flood water?

Former and current mineral extraction sites can provide opportunities for flood attenuation by providing additional storage capacity. This depends upon their location within the landscape and proximity to water courses.

Historic Environment

Issue 15: Heritage Assets

Question 39: How should the local plan conserve and enhance the National Park's archaeology, conservation areas and historic buildings?

Locally quarried building stone contributes to the distinctive character of many of the areas settlements - a feature recognised as one of our 'special qualities'. Maintaining the availability of such materials allows new buildings to be created in a sympathetic style.

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Question 40: How could future planning policies best support landscape scale protection of heritage assets?

No Comment

Issue 16: Design

Question 41: How should we balance the need to complement existing vernacular architecture with the need to support innovative high-quality design? Should we try and replicate old building styles or try something completely different?

Locally quarried building stone contributes to the distinctive character of many of the areas settlements. The availability of local materials has been fundamental in creating the local vernacular and can complement both traditional and modern designs.

Issue 17: Listed buildings, conservation areas

Question 42: What criteria should we use to decide which areas are protected against development? Do you think that there any locations that you think should be designated as a conservation area? How should we protect our archaeological landscapes?

No comment

Question 43: Should we allow listed buildings to be converted in order to prevent their loss, or would this change their character too much?

No comment

Leisure and Tourism

Issue 18: Recreation and sport facilities

Question 44: Should there be a policy specifying the delivery of improved recreational and sporting facilities as a part of a large scale development proposals?

No comment

Issue 19: Holiday accommodation, visitor facilities and sustainable tourism

Question 45: Should planning policy make it more difficult to permit the loss of visitor accommodation and visitor facilities, for example by requiring marketing evidence before making a decision that would lead to the permanent loss of facilities?

No comment

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Question 46: Should our policies allow the change of use of barns and other traditional buildings, in appropriate places, to additional self-contained holiday accommodation?

No comment

Question 47: Should we explore the opportunities to support the provision of Sill 'satellite' developments in suitable locations to further improve visitor facilities within the National Park?

No comment

Question 48: Is there a need to develop new tourism products that a) help spread the benefits of the visitor economy across the National Park and b) extend the holiday season to make the National Park an all-year-round destination?

No comment

Minerals and Waste

Issue 20: Ensuring a sustainable supply of minerals

Question 49: Is nature conversation the most appropriate after-use for restored quarries in the National Park? How should restored quarries be managed for the long-term benefit of residents and visitors?

It is unclear why Questions 49 and 50 do not fully represent the points raised in Issue 20 (page 45) of the consultation document. In the consultation document, further questions are posed which are worthy of consideration. These questions are:-

To what extent, if at all, should permission be granted for additional working from existing quarries?

Paragraph 144 of the NPPF is clear that when determining planning applications, local planning authorities should amongst other matters give great weight to the benefits of the mineral extraction, including to the economy, recognising that as far as is practical (our underlining), provision for the maintenance of landbanks of non-energy minerals from outside National Parks. It does not preclude mineral workings from National Parks.

Would further working within existing quarry footprints be acceptable and, if so, under what circumstances?

Paragraph 116 of the NPPF is clear that planning permission for a major development could be granted in National Parks "in exceptional circumstances", where it can be demonstrated they are in the public interest. Any development proposals should consider: - the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and, any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Should environmentally acceptable small-scale working of walling and roofing stone be encouraged?

Yes. Locally quarried building stone contributes to the distinctive character of many of the areas settlements. The availability of local materials has been fundamental in creating the local vernacular. Paragraph 144 of the NPPF recognises the need for small-scale dimension

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stone operations to provide materials for the repair of heritage assets. Such materials also enable new build houses to be built in sympathetic styles and public open spaces to be created with appropriate paving and walling materials.

Where mineral extraction operations do take place in the National Park, it is extremely important that overly restrictive conditions do not unnecessarily constrain the operations. These must be proportionate to the scale of the development. The small-scale nature of building stone operations, means that the return on investment is low and over a long period of time. Overly restrictive planning conditions can place a significant and disproportionate burden and cost on the operator, making the operations uneconomic and ultimately resulting in the closure of the operations with a consequential loss of employment and source of distinctive local building material.

In answer to Question 49 specifically, mineral operations offer significant opportunities for net gain in biodiversity and geodiversity and creating an environment to deliver green infrastructure on the landscape scale. The ability to deliver public access may be constrained by ownership, however, it is not uncommon, for such operations to provide public access post restoration.

Question 50: Should the Local Plan introduce a policy to safeguard future minerals supplies within the National Park?

Yes. The Planning Practice Guidance is clear that mineral resource safeguarding areas should be defined in designated areas. Mineral Safeguarding Areas enable the presence of the resource to be taken into account when determining planning applications with the aim of avoiding the sterilisation of resources. Minerals Safeguarding Areas do not add any weight in favour of minerals extraction in these areas.

Issue 21: Sustainable waste management

Question 51: What provision should be made for local recycling sites and how should re-use and recycling be encouraged?

Recycling facilities should be provided for where there is a demonstrable need.

Question 52: Do you think that provision should be required for the management of any other types of waste produced within the National Park e.g. energy from farm waste?

No comment

Do you have any other thoughts or comments?

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Your details:

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Thank you for your time in completing this questionnaire. Please note that any comments you make may be made publicly available. Please return it to a member of staff or post to the following address:

**Forward Planning,
Northumberland National Park Authority,
Eastburn, South Park,
Hexham,
Northumberland,
NE46 1BS.**

Alternatively you can email an electronic copy to localplan@nnpa.org.uk or complete an online survey version at: www.nnpa.org.uk/localplanconsultation.

Your questionnaire and any other comments should be received by the Authority by **4:30pm on Friday 28th April 2017**. It should be noted that any representations received cannot be treated as confidential and will be published by the Authority in accordance with the provisions of the Data Protection Act 1998.