

Statutory Consultee Responses from Pre-submission Consultation Draft March – May 2015

<u>No.</u>	<u>Consultee</u>	<u>Page or Policy</u>	<u>Comment</u>	<u>Response</u>	<u>Changes Proposed</u>
1	NNPA	Page 4	Do the community not feel that they have been able to comment on and influence the NPA'S LDF and Former Plans?	The Neighbourhood Planning Regulations were introduced in 2012 to give local communities the opportunity to Plan for their areas. Local elected representatives of the Parish Council wanted to take the opportunity to produce a neighbourhood plan with specific policies which better reflected the issues affecting the Parish of Tarset and Greystead.	None
2	NNPA	Page 8	This is National Cycle Network Route 10 – also known as The Reivers Route	Noted with thanks	Change proposed: the No.10 cycle way the National Cycle Network Route 10 – also known as The Reivers Route
3	NNPA	Page 9	Where the County Core Strategy is referred to, it should be noted that it excludes the area of the National Park which is a separate LPA	Noted. Although this is made clear elsewhere in the document, a further sentence could be added	Add sentence in page 9 to read: ..."the latter will be reviewing its Core Strategy and Development Policies Document. The National Park is the Planning Authority for those parts of the Plan area that are in the National Park.
4	NNPA	Part 3 pages 10 – 11	Any views on forestry given that over half of the Plan area lies within the Moorland Forestry Mosaic LCA. Is there scope or a desire to see forestry expand and create new jobs or is this seen as a threat to the local landscape and long distant views that the community treasure?	Forestry is not a planning matter, and was not raised as a particular issue during Community Consultation although it is included in Objective 4	No change
5	NNPA	Page 11	What about the use of forestry haulage vehicles using the narrow roads found throughout the parish? Is there a need for	This is not an issue the NP can address through planning policy. There is a Community Action on	No change

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			management or restrictions?	this matter at the end of the Plan in Appendix 2	
6	NNPA	Page 12	What is the community view of overhead electricity and telecoms lines in such an open landscape? Do they wish to see it underground where technically feasible or are they happy to have it run overhead?	The community did not raise a specific view on these matters. The wider landscape was considered to be important.	No change
7	NNPA	Page 13	Would the community be happy to see an increase in afforestation at the expense of upland hill farming in line with the regional agenda and network of forest roads that this would entail?	See response to 5 above. Also Landscape policies cover the importance of Rolling Uplands and Rolling Upland Valleys. Forestry is outside of planning control at present.	No change
8	NNPA	Page 13	Might be worth adding in the word 'sensitively' after accommodated	Agreed	Objective 6 to read: ..."in existing infrastructure where it can be sensitively accommodated"
9	NNPA	TG3 p.21	Criterion (g) – what about protection of existing notable trees or hedges. Should new development seek to retain existing trees of notable character for their biodiversity and landscape value?	Agreed	g) 'physical and natural' characteristics of the site. "without requiring landform re-profiling solutions or loss of established trees and hedgerows to accommodate the development
10	NNPA	p.25	Policy explanation – roofs – what about the colour of agricultural shed roofs and walls? Any preferred colour or stipulation	It is not considered necessary to be that specific. This was not raised as an issue through the consultation. Muted colours are specified throughout the plan.	No change
11	NNPA	p.26	Trees and Shrubs – add 'Goat Willow, Salix Caprea' to list of trees/shrubs. It is good for early pollinating species such as bees.	Agreed	Add ' Goat Willow, Salix Caprea ' to 'Trees and Shrubs – A Suggested Palette' on p.26

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12	NNPA	p.44	The landscape section deals with development in the parish but what about the impact of development outside the parish but that has an effect on the views to and from Tasset and Greystead parish, i.e. windfarms? The text may need to mention the need for close working arrangements with the respective planning authorities	Agreed – although the NP can only influence decisions in the Plan area. The importance of views beyond the Plan area is referred to at a number of points throughout the plan.	Insert in first paragraph in ‘Landscape’ section, after ‘Lake District’. It is important to recognise that development outside the Plan area can have a significant impact on these views and liaison between neighbouring planning authorities is considered vital in such circumstances.
13	NNPA	TG5, p.29	Is ‘Presumption against development’ too negative a phrase to use?	Agreed	TG5 to be re-worded to remove ‘presumption against’: Reads: Proposals for new development, conversion of redundant buildings or changes of use within the Lanehead clusters as shown on Map 3 will be supported except in the following locations: i), ii), iii), iv), v). In all other cases, development must a) be led by the site context... b) be adjacent to an existing road... etc.
14	NNPA	TG6 p.32	Policy explanation – incorrect to say that these two applications have been finalised. They have been to DM committee however the S106 agreements have not yet been signed	Noted	Paragraph removed commencing “There are two planning applications currently approved...”
15	NNPA	TG11 p.45	Criterion b): Does this include overhead electricity and telecoms service?	Policy TG11 is a criteria based policy with regard to all applications requiring planning permission. The overall impact of any development would be judged against this policy.	No change
16	NNPA	p.46	Trails and views: Is increased afforestation	See response to 6	No change

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			seen as a threat to open moorland views?		
17	NNPA	TG12 p.49	Where reference is made to unbroken skylines, it might be worth inserting text to encourage forest managers to avoid creating geometric shapes within the neighbouring landscape and unsightly straight lines either when planting new crops or when harvesting	See response to 6	No change
18	NNPA	TG13 p.50	What about possible impact of development on the distinct forest skyline? We have seen met masts recently erected in forested areas to the north of the parish but would this or the possibility of large scale wind turbines be supported elsewhere? TG17 suggests not. Do you need to refer to the potential impact of such development in this policy if it is not covered in TG17?	Large scale renewable projects are outside the scope of the NP, are covered by National Planning Policy are (over a certain scale) determined by DECC. Changes have been made in accordance with Comment No.12	No change (see changes to comment 12)
19	NNPA	p.52	Economy and Tourism – 1st paragraph: Does this support stretch to see an expansion in afforestation in the area? What takes precedence, support for forestry or openness of the landscape?	See point 6. Forestry is outside the scope of planning powers. It was not raised as a significant issue by the local community	No change
20	NNPA	TG15 p.54-55	Such development should also not impact upon the delicate biodiversity of the area e.g. if open fires are part of the attraction of the business then fuel wood should be sourced sustainably rather than foraged from nearby ancient semi-natural woodland where deadwood may be part of the delicate ecological balance	Agreed, but not controllable through planning policy. Policy TG2 part n) covers biodiversity and the need for overall positive impacts. Sourcing wood fuel will be outside the scope of the planning system.	No change
21	NNPA	TG15	What is the definition of sustainability? What would be defined as an unacceptable highways impact (ref part e) TG15	The definition of sustainability is defined in the NPPF. A change in wording proposed for part e)	Delete “unacceptable” and insert “adverse’ in part e) of TG15
22	NNPA	TG17	Criterion g) is outside the scope of planning	Agreed	Remove part g) of TG17

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23	NNPA	p.60	<p>powers</p> <p>Removal of Infrastructure: What is the definition of 'no longer required' Would it be where infrastructure was non-functional for a period of six months or more? Or something else?</p>	<p>This is normally managed through an appropriate planning Condition as standard. It is therefore perhaps unnecessary to have additional reference in NP policy. It is also mostly relevant to larger turbine applications, to which this policy does not apply.</p>	<p>Remove final sentence of TG17 and remove paragraph 'Removal of Infrastructure' on p.60</p>
24	<p>NNPA (supplementary)</p>	TG2	<p>Policy explanation (page 20) – Under the heading 'Signage' – it is not correct to say that <u>any illumination of signage</u> would have a detrimental impact on the Northumberland Dark Sky Park designation. It would be unreasonable to not permit any development of this kind, particularly if it was in accordance with the Northumberland Dark Sky Park Exterior Lighting Master Plan. It is suggested that the wording be amended as follows: <i>'inappropriate illumination of signage would have a detrimental impact on the Northumberland Dark Sky Park designation'</i> It is further suggested that criterion (o) be amended as follows: <i>ensure signage is kept to a minimum. Inappropriately illuminated signage will be resisted and;</i></p>	<p>Partially agree, although wording proposed is slightly different.</p> <p>Northumberland Dark Sky Exterior Lighting Master Plan received with thanks and will be added to Evidence Base.</p> <p>The document will be added to the Glossary of Terms.</p>	<p>'Change 'o' : Illumination of signs will be resisted to: <u>'Illuminated signs must be designed in accordance with the Northumberland Dark Sky Exterior Lighting Master Plan.'</u></p> <p>Change proposed to paragraph on p.20 (Signage). Last sentence changed. Delete: Any illumination of signage would have a detrimental impact on the Northumberland Dark Sky Park designation, and so will be resisted. Insert: <u>Any illumination of signage would be required to comply with the Northumberland Dark Sky Exterior lighting master plan which is available on the Northumberland National Park website.</u></p>
			<p>In order to help you provide more clarity on the IDSP in the policy text, criterion (h) and criterion (o) please see the Northumberland Dark Sky Park Exterior Lighting Master Plan (NDSPELMP) for further information. This document should also form part of the</p>		

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			evidence base for your Neighbourhood Plan.		
25	NNPA (Supplementary)	TG4	Whilst it is noted that reference has already been made to paragraph 55 of the NPPF, it would be beneficial to also refer to the guidance set out in paragraphs 28 and 54.	Agreed	Change policy TG4 to include paragraphs 28 and 54 to read: ... with <u>Paragraphs 28, 54 and 55</u> of the NPPF...
26	NNPA (Supplementary)	TG5	The use of the phrase ‘presumption against development’ conflicts with national policy. This draft policy should be to reflect the guidance set out in paragraphs 28, 54, and 55 of the NPPF.	Agreed	Changes made (see comment number 13)
27	NNPA (Supplementary)	TG7	This policy would benefit from a more explicit reference to the special qualities of the National Park. It is suggested that an additional criterion be added to the policy worded as follows: <i>“The converted building contributes to the special qualities of the National Park”</i>	Noted. However, reference is made within Policy TG7 to TG2, and TG3, both of which have specific reference to the special qualities of the Parish. An additional paragraph has been inserted in the policy explanation to explain what these special qualities are. These special qualities are consistent with those identified in the National Park Core Strategy. The Plan area is not entirely within the National Park, and special qualities are defined in relation to the Plan area as a whole.	Page 18 Additional Policy Explanation paragraph inserted: <u>Special and distinctive qualities</u> <u>New development must be carefully designed in order to protect the very special and distinctive qualities of Tarset and Greystead including: its tranquillity, open spaces, views into, out of and across the Parish , dark skies as well as historical and ecological features. These qualities are evident throughout the Parish and are not confined to the part designated as Northumberland National Park.</u>
28	NNPA (Supplementary)	p.36	The Tarset Atlas of Archaeological Sites (2006) provides very useful information but may need to be reviewed when compiling the Tarset and Greystead Local List. When completed this should be in a format compatible with the Historic Environment	Noted	No change

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			Record		
29	NNPA (Supplementary)	TG8	The wording of this policy will need to be amended in order to ensure that the policy would no longer conflict with paragraphs 132-136 of the NPPF. The wording changes suggested by NCC in their response would achieve this.	Agreed	Changes made (see response to 37)
30	NNPA (Supplementary)	TG10	The wording of this policy will need to be amended in order to ensure that the policy would no longer conflict with the NPPF. The wording changes suggested by NCC in their response would achieve this.	Agreed	Changes to be incorporated in line with NCC comments (see response to NCC)
31	NNPA (Supplementary)	TG14	Using the phrase 'planning permission will not be given where...' conflicts with national policy. It is suggested that the wording be amended to reflect national guidance. The wording changes suggested by NCC in their response would achieve this.	Agreed	<p>Policy TG14 wording changed as follows:</p> <p>Planning permission will not be given where:</p> <ul style="list-style-type: none"> i. The new use will not compromise the tranquillity of the area; and ii. The new use will not compromise the Northumberland Dark Sky Park designation and iii. The new use will not have a negative impact on the amenity of nearby properties or on the Landscape Character in the Area etc.. and iv. There would not be a negative impact on highway safety...etc. <p>Change TG1 criteria a) to read.. 'to meet the objectively assessed local housing needs of the Plan area as defined in Table 1;</p>
32	Northumberland County Council (NCC)	TG1	Reference in criteria 'a' to detail being 'defined on the next page' – suggest this is replaced with a specific reference table x	Agreed	Change TG1 criteria a) to read.. 'to meet the objectively assessed local housing needs of the Plan area as defined in Table 1;

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					p.16 – Insert: Table 1: Definition of Local Need
					Change TG3 criteria a) ... <u>(beginning on the next page)</u>
33	NCC	TG2	Criteria ‘h’ – suggest more explanation is needed of what is meant by the design ‘must respect the Northumberland International Dark Sky Park designation’		Change: to “ design must be compatible with ” instead of ‘ design must respect ’. Detail about what this means is included in the supporting text.
34	NCC	TG4	As currently worded, this policy suggests that no development, of any type, will be permitted in the open countryside. This may present a conflict with national policy. To assist in redrafting it would be appropriate to refer to paragraph 28, 54 and 55 of the NPPF and redraft the policy accordingly	Agreed	Changes made (see 25)
35	NCC	TG5	This policy introduces a ‘presumption against development’. This expression is not in accordance with national policy and guidance. It would be appropriate to consider re-drafting this policy so that it is positively worded allowing development other than in specific circumstances having regard to advice provided in paragraphs 28, 54 and 55 of the NPPF	Agreed	Changes made (see 13)
36	NCC	p.19	Reference might usefully be made in the paragraph on Heritage Assets to the fact that there may also be potential in the area for unrecorded or currently undiscovered heritage assets of archaeological interest	Reference to this matter is covered on page 43	No change
37	NCC	TG8	To ensure consistency with the provisions of NPP it is suggested that Policy TG8 is slightly	Agreed	Changes made as suggested

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			<p>amended as follows:</p> <p>Development affecting a designated heritage asset or its setting which will damage <u>its significance, including the</u> quality and distinctiveness of the asset... Historic Environment Record, must be sensitively designed with regard to the <u>significance of</u> the heritage asset <u>including its archaeological,</u> historical and architectural interest and its setting...</p> <p>c) where any changes are proposed, the opportunity should be taken to <u>record and</u> provide information interpreting it</p>		
38	NCC	TG10	<p>To ensure consistency with the provisions of NPPF it is suggested that Policy TG10 is slightly amended as follows:</p> <p>Proposals which have <u>the potential to</u> impact <u>either</u> on <u>known heritage assets which include</u> archaeological remains in the Plan area <u>or heritage assets with archaeological remains which become evident</u> must ensure that information is submitted <u>proportionate to the significance of the asset</u> to enable a full understanding of the significance of <u>it in accordance with the provisions of the National Planning Policy Framework.</u> This should ensure that archaeology which is of schedulable quality is not adversely affected.</p>	Agreed	Changes made as suggested
39	NCC	Tourism	<p>This section may want to consider giving protection from any new development along the old Border Counties railway line between Hexham and Hawick, to allow potential future</p>	<p>This is covered in TG11 part h) which states: “ensure the route of the Border Counties railway line is protected from any development</p>	No change

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			use for improvements to walking and cycle routes. The Council have no imminent plans to look at this route but would support protection of the alignment for future aspirations	that would prejudice its future use as a walking/cycling route	
40	NCC	TG16	Does this policy need to explain that the community assets listed are the current community assets to acknowledge there may be others in the future?	Agreed	Insert in last line of first part of Policy TG16: <u>Current</u> Community Assets in Tasset and Greystead are:
41	NCC	TG17	The policy only makes reference to the National Park Core Strategy – is this intentional?	Not intentional – change proposed	TG17 to read: “... the special qualities of the area as outlined in the Landscape section of this Plan, and section three of the NNPA’s Local Development Framework.
42	NCC	General	A number of the policies state ‘planning permission will not be given where...’ in order that the plan is positive, it is suggested that this is reworded to say ‘planning permission will be granted when...’ “e.g. for policy TG14 – ‘...when the use will not compromise the tranquillity of the area’	Agreed	TG14 amended (see Comment 31). TG5 has also been amended (see Comment 13). No other policies have this approach
43	NCC	Glossary	For clarification consideration might also be given to adding the following definitions to the glossary. These definitions are taken from NPPF: (definitions shown in changes box)	Agreed	Add to glossary: <u>Archaeological interest: There will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.</u> <u>Setting of a heritage asset: The</u>

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					<u>surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.</u>
44	NE	General	The following Sites of Special Scientific Interest (SSSIs) are triggered by Natural England's Impact Risk Zones (IRZs). Therefore an assessment to clarify whether there are any potential impacts on these SSSI's interest features is recommended. (Full response appended to this document)	The SSSIs in Natural England's letter are: Kielderhead and Emblehope Moors, Thorneyburn Meadow, Greenhough Meadow and Kielder Mires. The other two sites (Butterburn Flow and Lampert Mosses) are outside the Plan area. No sites are allocated for residential development in the Neighbourhood Plan, and therefore the Impact Risk will be applied on a case by case basis on developments over the thresholds referred (which are in excess of any likely development in the Plan area, being 10 or more houses)	No change
45	NE	General	Chirdon Burn, Carritheth Dene, Tyne River North – South Stokoe, Sundaysight Cleugh and Tarsset Burn Local Wildlife Sites (LWSs) are located within the neighbourhood plan boundary. You should ensure you have sufficient information to fully understand the impact of the plan on the LWSs.	The Plan takes a positive approach to biodiversity. No sites are allocated in the Plan area, so no impact on LWSs as a result of the plan. Policy TG2, Criteria n) requires an overall positive impact on biodiversity in Tarsset and	Insert, in p.19 under 'Biodiversity' heading: The Plan area has three SACs, three SSSIs <u>and a number of Local Wildlife Sites: (Chirdon Burn, Carritheth Dene, Tyne River North, South Stokoe, Sundaysight Cleugh and Tarsset Burn. It also contains and a</u> number of ancient

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				Greystead. Additional information can be inserted into the Policy Explanation about this on p.19	and semi-natural woodland sites.– <u>These sites are listed in Appendix 4.</u>
46	NE	General	We advise that the neighbourhood plan includes criteria based policies for the protection and enhancement of the international, national and locally designated sites present. This is in line with para 113 of the NPPF which makes it clear that distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to the wider ecological network. The neighbourhood plan should always seek to avoid environmental impacts by directing development away from the most sensitive areas with mitigation considered only when this is not possible	Noted. There are no sites allocated, so this level of detail is not considered necessary in the Neighbourhood Plan. Neighbourhood Plans are not required to cover every area of planning policy. Existing strategic policies are in place for designated sites. An Appropriate Assessment has been carried out to ensure that the NP does not impact on protected species and habitats. More information is contained in the Environment Report submitted with other Examination Documents	No change
47	NE	General	BAP (Biodiversity Action Plan) Priority Habitat. NE note that there is a BAP Priority Habitat within the boundary of the NP. Further comments (see attached document)	Noted. See comments above. An Appropriate Assessment has been carried out to ensure that the NP does not impact on protected species and habitats. More information is contained in the Environment Report submitted with other Examination Documents	No change
48	NE	General	Green Infrastructure. (see attached document)	Noted. The NP is not required to cover all areas of planning policy.	No change
49	NE	General	Protected Species (see attached document)	Noted. There are no impacts on	No change

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				protected species, as no sites have been allocated. An Appropriate Assessment has been carried out to ensure that the NP does not impact on protected species and habitats. More information is contained in the Environment Report submitted with other Examination Documents	
50	NE	General	Opportunities for enhancing the natural environment (see attached document)	The Neighbourhood Plan, through criteria based policies, seeks opportunities to enhance the natural environment	No change
51	NE	General	Opportunities to incorporate features into new build or retro fitted buildings which are beneficial for wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes should also be considered as part of any new development proposal.	Noted. These matters are dealt with through the planning application process, and are not necessarily a matter for detailed policy. Policy TG2 part n) require an overall positive impact on biodiversity in Tarsset and Greystead. Suggest adding information to policy justification to suggest these measures.	Insert in Policy Explanation for TG2 in Biodiversity (p.19): <u>In development proposals, opportunities should be taken to incorporate beneficial wildlife features into the scheme, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes</u>
52	NW	General	See attached letter which generally welcomes approach taken in the Neighbourhood Plan. Suggestion to include Flood Risk and Water Management Policy	Noted. The Neighbourhood Plan is not required to cover every aspect of planning. There are no sites allocated and it is not considered necessary to have a full blown policy on Flood Risk and Water Management	No change.
53	NW	TG2	Strongly support the inclusion of point 'f' within general development principles that will guide new development in the plan area,	Support welcomed	No change

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			whereby development proposals must demonstrate that they do not negatively impact on drainage, and that sustainable drainage methods should be used. We further welcome the principles contained within point 'j' with surface and ground water quality, quantity, ecology and drainage being protected. Having said this, we believe that there is the opportunity within Policy TG2 to incorporate greater reference to flood risk from all sources and sustainable drainage as considerations within their own right.		
54	NW	TG2	Suggest addition of Sustainable Drainage criteria to Policy TG2 to read: "To ensure that growth can be accommodated sustainably by the water infrastructure, the policy requires that in all locations the separate, minimise and control approach to surface water management must be applied. The priority is to avoid using public sewers wherever possible for the disposal of surface water. If connection to the public sewerage network is the only option, there is a need for on site mitigation to attenuate surface water to minimise and control surface water flows."	Noted. However, this is a principle that can be applied at application stage, and it is considered that Policy TG2 contains sufficient information. It is suggested that this information is included in the relevant section of the Policy Explanation on p.19	p.19 under 'Water' insert new paragraph after 'facility.': <u>"To ensure that growth can be accommodated sustainably by the water infrastructure, development in all locations must take the 'separate, minimise and control' approach to surface water management. The priority is to avoid using public sewers wherever possible for the disposal of surface water. If connection to the public sewerage network is the only option, there will be a need for on site mitigation to attenuate surface water to minimise and control surface water flows."</u>
55	NW	TG3	In a similar vein to our comments relating to Policy TG2, we suggest that there is the opportunity to reference the requirement for the incorporation of sustainable drainage systems in new developments within Policy TG3, alongside design and construction	Noted. Addition incorporated into Policy TG3	h) incorporate sustainable design, <u>and</u> energy efficiency measures <u>and</u> <u>sustainable urban drainage systems.</u>

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			details already contained within the policy wording. We recognise that reference is made within the supporting policy explanation regarding drainage of hard surfaces, and welcome the principles contained within this section, however we would consider it useful if reference to sustainable drainage systems were made within the policy itself		
56	NW	General	Notwithstanding the comments set out above, we are pleased to see a Neighbourhood Plan moving through the system and praise the efforts of the Steering Group in achieving this. We support the broad content of the Plan subject to the specific amendments we propose being incorporated.	Support welcomed.	No further changes.
57	HE	General	Abbreviated – full response attached: 1. Strategic Priorities for the historic environment: Taken together, these statements and commitments amount to recognition that the historic environment and its heritage assets are to be regarded as a strategic priority for the Plan, thereby satisfying that part of the NPPF paragraph 156.	Noted and welcomed	No change
58	HE	General	2. Strategic Policies for the Conservation of the Historic Environment: English Heritage is satisfied that the Plan contains policies for the conservation, enhancement and enjoyment of the historic environment which respond to the presumption in favour of sustainable development as it relates to NPPF Core	Noted and welcomed	No change

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			Principle 12 and paragraph 156.		
59	HE	General	3. A positive strategy for conservation of the historic environment: English Heritage is satisfied that the Plan is written in a positive way with regard to the historic environment but could go further. Were it to more pro-actively address, for example, the issue of heritage at risk, I would conclude that it would fully satisfy paragraph 126 of the NPPF.	Noted and welcomed. The Heritage at Risk register does not contain any buildings within the Plan area	No change
60	HE	General	4. Gathering Evidence: English Heritage is satisfied that although not articulated precisely in the manner prescribed above, the Plan has given appropriate consideration to the likely/possible effects of development upon those heritage assets in the vicinity which may be impacted upon.	Noted and welcomed.	No change
61	HE	Part 1	Historic England notes that detailed evidence was commissioned to help identify what is important about the Parish in terms of building design, the historic layout of settlements and important views and landscapes. It is clear that evidence has also been gathered, not least by the Tarsset Archive Group, regarding the historic environment generally and the heritage assets within it.	Noted – evidence gathered has been integral to the development of the Plan	No change
62	HE	Part 2	No comments	Noted	No change
63	HE	Part 3	Issues identified by people in the Local Community: The community view, as expressed in the section on the Historic Environment, is that a number of historic features that are not ‘listed’ should be protected in some way. The word ‘designated’ may better reflect the various	Agreed – see change	Change Part 3: Historic Environment: ... it is apparent that the community thinks that a number of historic features that are not listed designated should be protected.

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			ways in which heritage assets can be given statutory protection.		
64	HE	Part 3	Historic England welcomes the requirement under <i>Design and Location of New Development</i> , for new development to have regard to context. Historic England also supports the re-use of redundant and under-used buildings as a means of securing their proper maintenance, especially where they are of heritage value.	Noted – support welcomed	No change
65	HE	Part 4	The Vision for the Plan is to maintain and enhance the ‘special qualities’ of the landscape and environment. This is a phrase which first came to notice in the National Park’s Core Strategy and to this extent is generally understood by those familiar with it. For those who might not be, however, it may be useful for this section to explain briefly what those qualities are considered to be in the context of the Neighbourhood Plan.	Noted.	Changes made (see comment 27)
66	HE	Part 4	Historic England welcomes Objective 1 which seeks to conserve and enhance the cultural heritage of the Parish, making clear that ‘cultural’ heritage includes the historic environment in its broadest sense. Historic England also welcomes Objective 2 regarding the quality of new development, and Objective 4 which concerns itself with the promotion of skills and craftsmanship to help maintain the Parish’s heritage	Noted. Support welcomed	No change
67	HE	Part 5	1. Development Principles: We are advised that in principle existing buildings may be utilised by those wishing to proceed down the	Noted. The Plan is to be read as a whole, and other NP policies would apply.	No change

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			self-build route. Some such buildings may be of heritage value and will therefore need to satisfy other Neighbourhood Plan policies.		
68	HE	TG1	As regards the definition of local need, those wishing to occupy a newly created dwelling whilst establishing a business in the parish should firstly satisfy both functional and financial tests before being allowed to do so. Established planning practice normally requires such persons to live in temporary accommodation until viability is proven.	Noted. However, TG1 refers to 'location' in terms of other policies within the Plan, and the Definition of Local Need refers to 'viable' businesses. The viability tests suggested in the comment are usually applied to new dwellings associated with forestry or agriculture in the open countryside, which would be subject to National Policy in the NPPF in any case.	No change
69	HE	TG2 e)	The word 'unduly' is perhaps unhelpful, rendering acceptable development which is prominent, but not unduly so.	Agreed	Delete 'prominent' in TG2 e) to read in second half of sentence: ..."New development must not be unduly prominent in the local and wider landscape;"
70	HE	TG2 m)	Policy TG2(m) requires development not to impact negatively on heritage assets or their settings. Whilst this is an admirable aspiration, it goes beyond what the NPPF advocates. Although great weight should be given to safeguarding the historic environment, harm to, or loss of, the significance of a heritage asset may in some circumstances be acceptable if it is necessary to achieve public benefits that outweigh it and which cannot be met in any other way.	Agreed	Policy TG2m) changed to read: <u>ensure any negative not negatively</u> impact on designated and non-designated heritage assets and their settings <u>is kept to a minimum</u> in accordance with Policy TG8
71	HE	TG2	The explanation for the policy is useful. One	Noted. However these points are	Add to the end of 'Site Factors' Policy

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			factor to take into account is the need to keep disturbance of the natural landscape to a minimum. This should also be interpreted as keeping to a minimum the area given over to the creation of new curtilages and the careful application of restrictions on permitted development rights to reduce as far as possible the suburbanisation of the countryside.	covered in TG2 e), TG7 and the Landscape Policies. However, a further sentence could be added to the Policy Explanation in relation to TG2e)	Explanation after TG2 (p.18):setting, and soil conservation. <u>New residential curtilages created in association with new developments or conversions should be kept to a minimum to avoid suburbanisation of the countryside.</u>
72	HE	TG3 h)	Requires development to incorporate sustainable design and energy efficiency measures. Whilst the policy advocates energy conservation as well as the use of energy efficient and renewable technologies to reduce consumption, the commentary accompanying the policy does not.	There is a paragraph in the Policy Explanation, entitled “Sustainable design and energy efficiency” on page 26 which covers this matter.	No change
73	HE	TG7	I would suggest the following minor amendment to the policy intention: “...to maintain the any historic integrity of the building may possess and...”	Agreed	Change Policy Intention TG7 to read (second sentence): “...to maintain the any historic integrity of the building may possess and...”
74	HE	TG7c)	Historic England welcomes the requirement to preserve or enhance any historic character any building subject to the policy may have. The observation in respect of Policy TG2 m) above applies	Agreed	Change to part c) of TG7 to read: The conversion and any extension must is designed to preserve and enhance the scale, form, historic character, fabric, architectural features, design and setting of the original structure, incorporating wherever possible maximising the re-use of existing materials.
75	HE	TG7	Commentary advises that historic features should be retained <i>where possible</i> . The caveat is unhelpful: it provides neither clarify as to the circumstances in which the policy might or might not apply, nor allows more flexibility	Agreed	Reference to ‘where possible’ has been deleted from the following sections: p.36 3rd bullet of ‘General Principles’ p.36 ‘New openings’ (3rd line), p.37 ‘Roof lights and Northumberland Dark Sky Park

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			than is provided for in planning legislation. It is not applied to other criteria.		(penultimate line).
76	HE	TG8	Policy TG8 does not follow the tests set out in paragraphs 132 – 136 of the NPPF. In particular the NPPF focuses on the importance of safeguarding the <i>significance</i> of both designated <i>and</i> non-designated heritage assets whilst setting out what the exceptional circumstances are allowing harm or loss to be permitted might be. Even less-than-substantial harm to a non-designated heritage asset will not be justifiable or sustainable if it is not outweighed by public benefits	Agreed	See changes made (see comment 37)
77	HE	TG8	Policy explanation – The NPPF does not use the word ‘preserve’. It instead uses the word ‘conserve’. The former implies a reluctance to countenance change, whereas the former allows for careful maintenance and management, and additionally allows for preservation where necessary and appropriate	Agreed	Change second paragraph of Policy Explanation to read: ‘The Plan promotes the preservation conservation , enhancement and enjoyment...
78	HE	General	Non-designated heritage assets are described as those which are neither nationally designated nor to be found on the local list. Non-designated assets, however, which are of local importance, but not important enough to justify statutory designation, should be on a local list if at all possible. That said, inclusion is not a prerequisite for a building to be regarded as a non-designated heritage asset.	Agreed. A local list is being compiled as part of the Community Actions contained in Appendix 2.	No change
79	HE	TG10	Is not fully NPPF compliant. See letter for details.	Agreed	Changed (see comment 38)

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80	HE	Landscape	Reference to Historic Landscape Characterisation, and its inclusion on the Historic Environment Record. The Plan should advocate its deployment	Agreed	Paragraph inserted on p.44, second paragraph. Insert after first sentence: <u>Historic Landscape Characterisation work has also been undertaken by Northumberland County Council which is now part of the Historic Environment Record, and is available to decision-makers who wish to assess the impact a development may have on landscape character.</u>
81	HE	TG12	Policy Explanation – we are advised that the Parish contains archaeological sites from Roman times to the medieval.	Agreed	Change wording in Policy Explanation for TG12 ‘Historic Environment’ to read: There are archaeological sites of all periods <u>ranging from pre-Roman</u> native settlements <u>to settlements</u> during the Roman occupation; to medieval baronial holdings...
82	HE	TG14 a)	Reflects Policy TG1 inasmuch as it seeks to give support to those people wishing to create new businesses in the parish. Consent for any new residence should be the consequence of confirmed viability and soundness of the business	Disagree. That is not the approach the Plan is seeking to take. There are circumstances where residences may be appropriate for Local Needs without a business. Policy TG1 does refer to ‘viable’ businesses.	No change
83	HE	TG15 d)	Development should not give rise to any unacceptable or <i>unjustified</i> harm to the significance of any heritage asset, including that which may be derived from its setting	Agreed	Wording change as suggested to TG15 d) – incorporate <u>or unjustified</u> after ‘unacceptable’
84	HE	General	Community Assets – TG17 – the observation in respect of Policy TG15 is applicable in respect	Noted. However, there is strong feeling about the protection of	No change

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			of this policy	Community Assets and it is considered important to retain the strength of this policy	
85	HE	Appendix 1	ID reference 11 on the key for scheduled monuments should read – Black Middens	Noted.	Change ‘Black Middings’ to ‘Black Middens’
86	MOA	TG12	Paragraph e) of TG12 should not refer to TG17 Small Scale Renewable Energy Infrastructure does not relate to telecommunications installations but renewable energy infrastructure. These two types of development differ greatly. Suggest change in paragraph e) to read: domestic scale turbines must be closely related	Agreed	Take out second half of part e) closely related to existing buildings and farmsteads. <u>In line with SSREI policy TG17 and its policy explanation</u>
87	MOA	General	Include a Telecoms Policy	Noted – however, the NP does not need to cover all aspects of planning, and it is not considered necessary to have an additional policy on telecoms development. However, the policy explanation after TG14 has been added to:	Add in page 53...”Current broadband provision <u>and mobile telephone reception</u> in the Plan area is poor, and proposals which will enhance provision...
88	MOA	General	Comments made in relation to Draft Landscape and Design Assessment	Noted – however, this is an Evidence Base document, and does not form part of the NP.	No change
89	EA	General	General support for Vision, Objective 1 and policies	Support welcomed	No change
90	EA	TG2	Add in flooding criteria add more info.....	Agreed	Additional criteria (now ‘k’) added to TG2 to read: <u>‘ensures that development is located away from areas at risk from flooding and flood management measures are included within the development to ensure flood risk in the surrounding area is not increased;’</u>
91	EA	General	The Water section on page 19 seeks to ensure there is no impact on the water quality or	Agreed	Additional paragraph inserted in explanatory text after TG2 under heading ‘Water’: <u>In order to</u>

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			<p>quantity of drinking water supplies. We welcome references to this issue. In order to protect the quality and quantity of drinking water supplies, any development that is located within close proximity to a drinking water supply, must be located at least 50m away from the drinking water source. It should also be noted that within the National park area, there is a greater likelihood of groundwater dependent ecosystems and groundwater connectivity to surface water watercourses. We would welcome reference to this within the Neighbourhood Plan.</p>		<p><u>protect the quality and quantity of drinking water supplies, any development that is located within close proximity to a drinking water supply, must be located at least 50m away from the drinking water source. Within the NNPA there is a greater likelihood of groundwater dependent ecosystems and groundwater connectivity to surface watercourses.</u></p>
92	EA	TG3	General support expressed, particularly to criteria g) and h)	Support welcomed	No change
93	EA	TG3	Informative regarding ground source heat pumps and EA licences.	Noted – but outside planning policy remit – would be a note to applicant on any permission	No change
94	EA	General	Landscaping – contact Forestry Commission regarding planting of Ash trees	Noted – but outside planning policy remit – would be a note to applicant on any permission	No change
95	EA	General	Water Framework Directive – The Steering Group should take this into account when preparing Neighbourhood Plan	Noted – River Basin Management Plans are included in the Evidence Base documents and have been taken note of during the preparation of the Plan. No site allocations are made, and each application in the Plan area would be considered on its own merits.	No change
96	Coal Authority	General	Information regarding surface coal resources and risks from past coal mining activity in Lanehead, with acknowledgement that as there are no sites allocated, these matters can	Noted	No change

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			be dealt with on a case by case basis		
97	Coal Authority	TG2	Support for Policy TG2 criterion f)	Support welcomed	No change

Abbreviations:

NNPA = Northumberland National Park Authority

NCC = Northumberland County Council

HE= Historic England

EA = Environment Agency

NW = Northumbrian Water

MOA = Mobile Operators Association