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**Northern Farmers and Landowners Group response to**

**Northumberland County Council’s**

**Local Development Plan – Core Strategy Issues and Options**

**Consultation**

1 There are several things wrong with this vision. It describes “communities” without defining them. The words “strong” and “resilient” are used although these seem to describe natural qualities and not matters which are influenced by planning strategy. It states that a “diverse economy” will be an aim and yet for the north and west of the County the vast majority of the “communities” are in tier 3, 4 or 5 locations which will be allowed very little development and in which few activities other than tourism and agriculture seem to be envisaged.

It seems therefore that the strategy as drafted is not informed by the vision and will not achieve the stated objective.

2 The greatest issue for the County in the coming years will be employment and economic growth. While this would appear to be reflected in Objective 1, the term “sustainable development” can be used by all people to mean all things, and has been used as a barrier to development in the past. There should be a clear and unambiguous definition of “sustainable development” contained within the document.

In the past, “sustainable development” has been used to block development that may increase the use of a motor car. This has been particularly damaging in Northumberland, given its rural nature, lack of public transport and the need for car use. Sadly, I see this thinking carried through into Objective 8, which will effectively condemn large areas of the county to the economic wilderness. The phrase “……..and also reducing the need to travel where appropriate.” should be removed.

3 Disagree.

The text refers to the need for the plan to be flexible, which it must be. It then choses a “targeted” approach which suggests inflexibility. Why should the Council target development? Why not let the market decide within defined “sustainable development” parameters laid out in the strategy?

4 Disagree.

Option C assumes no significant development north of Morpeth, which potentially leaves the entire North of the county without the possibility of growth and development. How does this help us achieve the vision of resilient communities with diverse economies? There needs to me a greater emphasis on development in smaller communities which can have a much greater proportionate effect than locating the same development in a larger conurbation. See my earlier comments about targeting and “sustainable development”, which lead me more towards Option B.

Although only in the early pages of the document, it has covered some major issues, but I am disappointed that there has been no mention of ITC and how it is changing how we live, learn, socialise, work, play and access services. In the period until 2030, rapidly improving ITC will continue to affect how we live and County has a real challenge as to how it makes the most of this opportunity via its policies. There is as yet no evidence that the Council has even recognised this challenge, let alone is rising to it. The document appears to be weighed down with archaic thinking, with the authors unable to move out of their comfort zones.

5 I applaud the desire to nail down the meaning of “sustainable development” and this is in line with my earlier comments re setting parameters for development, rather than targeting areas. The thinking is undermined by the last bullet point. The parameters should inform the objectives, rather than the definition of “sustainable development” being twisted by weasel words contained in the objectives.

6 Yes, although it seems a little odd if they are not matching local political boundaries.

7 The only distinction between tier 3 and 4 is the existence of a first school. This is an arbitrary criterion which does not stand up to scrutiny, as first schools tend to be located by historical accident and serve a wider community. For example Glanton does not have a first school and yet Branton has, although Glanton is larger, has a shop and a pub which Branton does not. How does this make Branton more suitable for development than Glanton?

It would seem to be a better approach if tiers 3, 4 and 5 were merged, as the distinction between larger and smaller villages and indeed hamlets is not significant in planning terms. In the unlikely event that a business wants to set up in a hamlet, why is it much better if it sets up in the next small village which happens to have a first school?

However, I fundamentally disagree with this entire approach. It would appear that ITC provision has been totally ignored when assessing settlements. Thus the process is based on criteria which are becoming less and less relevant.

8 No. See my comments above.

I do not recognise that development should be channelled to larger settlements automatically. The market will tend to do that anyway, but if a development is proposed in a smaller settlement which contributes to the overall vision, strengthens the economy and improves the community why should it be refused on that ground alone?

The assumption is stated that employment use generates car journeys, and therefore if a business sets up in the countryside there will be lots of extra journeys. This does not stand scrutiny, the fact is that many people live in the countryside and travel a long way to their place of work, if there were employment possibilities locally this would save journeys not create them. See my earlier comments regarding ITC.

 The possibility of increased car usage should not be a main criteria for assessing planning applications as it will condemn much of the county to the economic wilderness. If small communities are to be sustained then they need the opportunity to grow when it is appropriate and opportune for them to do so. The proposed policies strangle that growth and condemn villages to becoming retirement communities which does not accord with the vision of them being strong, resilient and economically diverse.

I am disappointed that residential re-use of existing buildings does not seem to be much of a consideration in more remote areas. In many cases, this is the only viable use for such buildings, which would prevent house building on green field sites and utilise a major underutilised asset in the county.

9 Fundamentally disagree with the approach.

10 The evidence is not clear, but I would hope that flexibility can be maintained in regard to housing. The market should really be able to decide how many houses go where, within the parameters laid down by the Council planning policies, rather than having fixed quotas per area.

There does not seem to be any consideration of the issue of second homes, which can skew the market in many parts of the county. If you plan simply on the basis of residential need, then every home bought for holiday use effectively excludes a local buyer.

11 The numbers used should be reviewed and amended if necessary every few years, it is not possible to plan in such a precise way for a 15 year period.

12 The plan should be flexible enough not to set maximum criteria – if there is sufficient demand why should more houses not be built? The market must be allowed to play a part in this process.

13 The distribution of new housing needs to be more dispersed. For example, in the North area there are only six tier 1 and 2 towns. If you follow your draft policies the whole of the rest of the area is condemned to ossify and there is little scope for the conversion of redundant buildings.

14 The re-use of previously developed land would appear to be a sensible approach, but in much of the county there will be relatively little previously developed land, and so such a policy loses its relevance unless redundant farm buildings are to be included.

15 Not all gardens need protection, there may be some which are large enough to be suitable for a development, it seems an artificial restriction and the decision about the suitability of the development should be assessed on objective rather than arbitrary grounds.

16 Density is a matter which should be assessed on a case by case basis and not proscribed in a central county wide plan.

17 There is undoubtedly a need for affordable housing in many parts of the county, but applying an arbitrary figure across the county may well be detrimental. It is very likely that such an approach will make many schemes unviable and may not be applicable to smaller developments. A favoured approach will be to work on a case-by-case basis in attempting to meet proven need.

It is a great frustration that there is no national policy to preserve the existing supply of affordable and intermediate rental homes. The fiscal system is not conducive to these properties remaining in the private rental sector and only serves to drive such homes onto the open sale market.

18 No comment.

19 There should be a minimum threshold. If a single house is being developed or converted it will usually be by an owner occupier or small builder and a significant tax to support affordable homes may well prevent the development and make achieving the vision of the strategy less likely.

The imposition of some form of development tax on all residential development to fund affordable housing elsewhere should be resisted. In the current economic climate, the Golden Goose of planning gain is virtually dead and can lay no more eggs. Such an approach would not encourage development led regeneration.

20 There may be many proposed developments where the provision of on-site affordable housing would not be suitable, especially in smaller developments. As mentioned in 17 above the county should asses where the need is and address it there. To suggest that it has to be in the same ward or parish might, in small settlements where only small developments are likely to be allowed, result in one or two units and it may be difficult and inefficient for a social landlord to take on single widely dispersed properties and there may or may not be demand for them anyway.

See comments in 19 above regarding a levy.

21 Rural exception sites may be very useful, but we cannot see the justification of removing permitted development rights if the affordable qualification is suitably robust. It should be recognised that in most cases, cross subsidy from market housing will be required in order for the development to be viable and attractive to the landowner.

22 Yes, but only if such scenarios can be robustly evidenced and the requirement does not affect the viability of the scheme.

 23 Most older people live quite happily in unadapted housing, and people with disabilities have many differing requirements depending on the particular problems they have to overcome. It would be much better to have a decent system of grants and assistance to allow people with serious issues to adapt the house in which they already live. Again, the increased use of ITC will create changes and opportunities in this sector, which do not appear to be recognised.

24 Any policy must take into account the needs and desires of the local communities affected. This appears to have been overlooked in the draft County Travellers Policy.

25 The growth of the private sector economy should be the County Council’s principal objective in the coming years. The amount of land available for commercial enterprise should not be allocated by a plan; there should be an overriding assumption of favour of any such development wherever it is, provided it falls within sensible sustainability criteria. The projected figures appear to be rather arbitrary based on percentage growth of the existing economy but in fact the county should be seeking to expand the economy by offering incentives to entice new businesses into the county and encourage start-ups, hopefully in association with initiatives such as the Rural Growth Network.

Again, the approach does not seem to reflect the economic opportunities that new ITC presents to the county. The “men in sheds” approach hardly seems in tune with the digital age. What of live/work facilities and the growth in existing home working?

26 The County should be offering incentives and helping businesses in all sectors. The low carbon and renewable sector is welcome as is any other employer. Unless there is a significant benefit to the industry in locating such businesses together then there does not seem to be any necessity make specific spacial plans for them.

27 The paragraphs in section 7 appear to demonstrate the futility of attempting to target particular land for particular uses. A less prescriptive approach within a set of defined parameters may be of more use to the county. After all, we are hardly swamped with large scale industrial developments.

The assessment of the amount of employment land in the North area assumes that there will be no new businesses coming in to this area, merely an organic growth of the existing ones. Since these are predominantly agriculture, tourism and services, the stated vision of a diverse economy is unlikely to be achieved. In our view employment uses should be allowed on most locations if there is a business wanting to set up. The growth of broadband may well bring new opportunities for different types of business to locate in the North area where many people would perceive the quality of life to be attractive, and this should not in any way be inhibited by this plan.

See my comments re ITC under 25.

28 There is clearly a growing hub in the BEREZ area, but this should not preclude low carbon sector developments elsewhere in the county.

29 At last! Para 7.17 finally acknowledges that improved ITC may have a part to play in the economy of Northumberland! However, the support for rural businesses is half-hearted at best. The comment that you “acknowledge” that re-use of existing buildings “could” be acceptable is completely contrary to the stated aim. There are many disused and underused farm buildings, many of attractive stone and slate construction, which are falling down for lack of an economic use. Current planning policies have created this situation. There is every reason to allow a conversion of any existing building and indeed appropriate new build in the countryside if it fills the needs of a business wanting to locate there. Sustainability is about much more than car journeys. Communities in the countryside cannot be “strong” “resilient” and “economically diverse” if you do not allow them to develop, and broadband is the key to this. The people who will want to work in rural areas already live there and so your assumptions about sustainability are based on a false premise.

The supply of redundant and near redundant traditional buildings, coupled with improving ITC, present a real opportunity for the county to provide locations for low impact, high value live/work facilities, as well as more traditional activities.

30 No. It is perfectly possible that new build accommodation proposals could come forward that would be very positive in all regards for tourism in the county. Such proposals should not be excluded by a general policy.

It should also be recognised that, like it or like it not, the majority of the tourism industry in the county is based around the private motor car and its use should not preclude developments.

31 It is not clear what the purpose is of identifying “Strategic Tourism Areas”. The suspicion must be that such an approach may preclude tourism developments outside such areas, which would not be desirable as most visitors come to visit the county, rather than just one particular part. It does also seem odd to take such an approach when the National park is excluded.

32 You will not achieve development by allocating space; retail development will only follow demand. Attracting development to the tier 1 towns helps them, but in the rural North and West area the real problem for sustainability is the drain on the smaller towns like Wooler and Rothbury where traders lose market share to big developments in Berwick and Morpeth, as well as the on-line home delivery services offered by ASDA, Tesco etc. If these small towns cannot keep their local shops then many more car journeys are created, older people and those who rely on public transport are severely disadvantaged and the heart will go out of many communities. Policies should be created to support such businesses, including adequate car parking facilities within the towns.

33 No. New development must be in town centres as has been done in Morpeth, however difficult this may be to achieve. Out of town shopping and supermarkets drain trade away from town centres and create a downward spiral of empty units, charity shops etc. There is not sufficient population in the County to sustain out of town development and town centres alike.

34 Your plans correctly identify the current position. They do not look at possible future provision, and as such the policies in the strategy should not be constrained by them.

35 Such development may be all very well for the South East, but don’t forget that it is not accessible for the majority of the County, who will continue to head to Tyneside.

36 You should be open to such uses where they want to operate in town centres but your policies should not restrict them to town centres

37 It is essential that small scale offices be allowed either by development or change of use in rural areas, this is one area where diversification can be successful in conjunction with improvements in broadband. Many small office users have businesses which their clients never need to visit, and as such having them close to the workers’ homes is more sustainable than making them locate in tier 1 towns.

38 No. It would appear that the County seek to have a Green Belt just to say it has one. Such a policy is designed to prevent urban sprawl, which is not applicable in the vast majority of Northumberland.

39 This appears to be a complete mis-use of the Green Belt concept. In virtually any other county, the likes of Netherwitton and Hartburn would be viewed as deep rural. The Morpeth Green Belt, if really required, should have its western boundary as the A1.

40 Is an inner and outer really needed? I suggest just sticking with the inner.

41 See above comments.

42 No comment

43 No. The Council has a long history and in-depth knowledge of coal extraction in the county. This experience should be brought to bear rather than relying on broad national guidelines.

44 Yes.

45 Option 2.

46 Yes.

47 The County should be able to utilise its past experience when determining separation distances on individual sites.

48 The concern is that a MSA could sterilise an area with no real prospect of the minerals being extracted in a sensible timescale. It seems rather a blunt tool to complicate the already complicated planning system. Why is it not left to the owner of the mineral rights to make a suitable representation?

49 No comment.

50 No comment.

51 Yes, but I would also add water storage. There is a possibility that such sites can play a part in climate change mitigation by storing water for flood prevention and also for later release for environmental and abstraction purposes.

52 Yes. However, the document seems to view “waste” purely as “waste”, where those in the industry are no seeing it as a resource. Perhaps there would be greater benefit to the county if this material was viewed as a resource.

53 Yes.

54 Yes, but let’s get away from calling it “waste management facilities”.

55 The County should be seeking to maximise the use of this resource, rather than viewing it as waste and looking for holes to put it in.

56 Yes.

57 Yes. Extend the approach to all “waste” materials.

58 While I fully appreciate the need for renewable energy, and the economic opportunities that it offers, the County’s approach to wind generated electricity is unacceptable. The document states that the county has already over delivered on the RSS target by 36%, but does not go on to state how it is doing in terms of generating its own needs. The approach of not being open with the figures and not setting targets leaves the door open for large scale developers who are put off from applying in other counties with more robust policies.

The passive acceptance that the landscape can be despoiled by these huge industrial structures, generating electricity miles away from where it is needed, needs a complete review. It is totally unacceptable to meekly follow national targets and not to have robust policies about where and how the turbines can be located. Given how contentious these applications are, and how expensive they are for the County, it seems extraordinary that the County is apparently willing to have such an open door policy approach.

59 What about communities that are affected by such applications? Should not the effect on them have a high consideration rather than being ignored? There should also be consideration of the effect on tourism and the many businesses which rely on that industry.

60 Why should turbines not be located in populated areas? It would seem entirely appropriate that such developments are situated where the power will be used, hence increasing their efficiency and role in replacing carbon generated electricity. In addition, there will be fewer landscape concerns. Those turbines situated at Lynemouth look entirely appropriate in the setting. The same cannot be said of those in remote locations, where even the required infrastructure appears intrusive. South East Northumberland appears to be the ideal location.

A clear distinction needs to be made in the document between turbines of differing sizes. A 120m turbine will need to be treated rather differently to a 20m turbine.

61 Yes. There is considerable evidence available on this subject.

62 (b).

63 Yes.

64 Yes, but with the caveat that such measures need to be sensibly costed. An overly zealous approach could easily threaten the viability of development schemes.

65 Option 1 will only apply to a small % of properties. Option 2 amounts to a further tax on development. That leaves Option 3. Such schemes have been running for some time, and many people have taken advantage of them, to the point that cheap options are becoming exhausted.

The particular requirements of heritage properties need to be appreciated in this context. Any approach should also be “rural proofed” as much of the rural housing stock is pre 1900 and there is only so much that can be done. Unreasonable demands on landlords will result in further sales and erosion of the private rental stock.

66 Rely upon national building regulations only.

67 I have little understanding of what these acronyms mean in reality. The policy should not commit to any standards which cannot then be altered in the light of experience over the life of the policy.

68 Most definitely not. In much of the county (i.e. the rural areas) you have to accept that for many people and many locations there is no practical public transport alternative, and the reality is that the private car is the only viable option. Communities are literally not sustainable without it. Policies should accept this and plan for it.

The likes of para 14.4 will simply condemn large parts of the county to the economic wilderness and perpetuate the misguided approach of the RSS. The ability to carry out developments must not be linked to public transport.

69 In certain areas that may be appropriate, but is this really the document in which to try and address this large and complex issue? There is already a Right of Way Improvement Plan, which is a statutory obligation and would seem a better place in which to address such issues.

70 Yes, parking standards are necessary but should be used to ensure adequate provision, not to restrict provision to attempt to deter car use.

71 Yes.

72 Yes.

73 Yes.

74 I am not very clear on what this really means. What are development management decisions? If this is an attempt to pass road infrastructure responsibilities to developers, then the answer is no. If it means that the developer should contribute towards the cost of accessing the network from the development, then yes.

75 Yes to a and b, but c seems to be similar to the above comments. I am not clear on the thinking behind the para 14.25. This seems to suggest that all developers in South East Northumberland, North Tyneside and Newcastle will be required to pay Northumberland some sort of levy to fund roadworks. I am not sure how this could be done or the validity of the principle. I would suggest that ensuring the effective operation of the strategic highway routes is a key priority for the Council in order to facilitate economic development, and should be budgeted for in an appropriate manner.

A key component of economic regeneration has always been for the public sector to provide the infrastructure in order to attract private sector investment. This document seems to be trying to reverse that concept by suggesting that private sector development will provide public infrastructure. In most economic climates, and particularly in the current climate, I would suggest that this is not a recipe for success.

76 Yes.

77 Yes.

78 Yes. While I welcome the inclusion of chapter 15, it is disappointing that the only consideration given to ICT in the document is the infrastructure provision. As I have already stated, there seems to be no consideration as to how ICT will shape our lives in the next 18 years, and what that means from a planning perspective.

79 Most definitely. Poor mobile coverage is a significant problem in much of the county, which has economic and social impacts. It appears to be getting worse rather than better.

80 Yes, but note comments above. This should not become a barrier to the provision of better services.

81 Yes.

82 No comment.

83 Yes.

84 This sounds sensible but then I am not aware of the intricate details of the existing documents. There is a danger that if existing “guidance” is given greater importance in the planning process; it may be too restrictive, having been written as “guidance” and not as a planning policy. Can it be justified if it were to be re-written as planning policy? Then what of Neighbourhood Plans? I would keep it simple and keep it as guidance only.

85 No. I can’t see what there is to be gained by putting landscapes into clusters. Arguably, outside parts of the south east, all of the county is of landscape value and should be treated accordingly.

As an aside, these paragraphs on conserving the landscape do not seem to sit very comfortably with the earlier proposal to have an open door policy for wind farm development.

86 Paragraph 17.14 should not be used for guiding planning decisions. Many of the areas labelled as “Protect” appear absurdly small, and the central “Plan” areas appear illogical. A more flexible approach is required.

87 It is right that environmental considerations are given the correct weighting when considering sustainable development. I note the reference to existing environmentally focussed management plans lying outside the Council. This must be the correct approach as there are numerous bodies, including statutory, in this field within the county and many existing documents. Therefore, there should be no need for the County to attempt to “re-invent the wheel.”

88 The suggested approach seems to be a list of many possible approaches. They cannot all operate simultaneously. There would appear to be the need for some decisions and prioritisation. I would suggest an integrated approach with risk minimisation.

89 A general policy is more realistic.

90 There appear to already be two county strategies in this regard, so surely there is no need for further strategy content. The Core Strategy could simply seek to implement existing strategies.

91 See comments above.

92 Yes, ensuring that it is in keeping with the scale of development. There should be a focus on children’s play park facilities, which encourage unsupervised recreation. These facilities are absent in many settlements across the county.

93 Yes.

94 No. Such an approach should be community led via Neighbourhood Plans and not dictated at a County level.

95 How up to date are the CFMPs? I seem to recall that they were put together prior to 2007. The result is that they are based on computer models rather than actual flood experience. One advantage of the weather over the last few years, is that we know really know where it floods and where it doesn’t. The CFMPs should be utilised, but there should be the provision to allow them to be over ridden by experience.

96 Yes, but note my comments above re experience v. computer modelling.

97 Yes.

98 Only where it lies within the authority and budget of the County. There is little point having much of a policy if it relies on the Environment Agency for delivery and funding from Defra.

99 Yes. Is there a role for the Northumberland Community Flood Partnership?

100 This seems to be a sensible approach as long as it is practical and that derogation is permitted where it is not.

101 It would appear so. As there is already an existing Shoreline Management Plan, is there need for the Core Strategy to say much more?

102 Again, the work on this has been done elsewhere under the Water Framework Directive. Does the Core Strategy need to say anything more?

103 Yes.

104 Yes, but with clear reference to the evidence base as mentioned in 19.5. The Core Strategy must not impose further restrictions on heritage assets. There must also be a recognition that in order to survive, heritage assets will often need to have an economic use that may only achieved with some development, alteration or addition. It is important to conserve Northumberland’s heritage for the future, not to attempt to preserve it in the past.

105 Yes. It is important that the Core Strategy reflects the work that has already been done to put together the Hadrian’s Wall Management Plan.