

Response to David English's comments of the 10th October 2017

The following is a response to comments made by David English upon the version of the Neighbourhood Plan dated 15th September 2017. The response reflects the view of the Longhorsley Parish Council Neighbourhood Plan Steering Group (LPCNPSG), including its independent consultant, Peter Biggers.

Comment from D.E.	Response
1.1 The lack of a narrative makes it difficult to understand the overall purpose of this report. The report comprises three tables - there is little to no explanation about the information presented in those tables, why it is presented and what it means. It is very difficult to follow.	1.1. The LPCNPSG believes the text is sufficient to explain to anyone likely to use the report what it means. The NPIERS examiner, who has no background in the local housing situation, was able to follow it well enough to conduct a health check without the need to have it explained.
1.2 There are a number of factual inaccuracies in the report in relation to dates, titles of documents, and details reported to be in quoted documents (e.g. date of withdrawal of Core Strategy, Position Statement, Full Draft Plan, OAN).	1.2. The LPCNPSG has asked for a list of these inaccuracies so that they can be corrected. On the specific example of the date for withdrawal of the Core Strategy, there are 4 dates to choose from – the 5 th was the decision, the 7 th was the date of the statement, the 10 th was the announcement and the 13 th was the date of the letter. The paper will be updated to just say July 2017.
1.3 While the paper states at the beginning that does not rely on Core Strategy evidence, references to such evidence are made throughout - e.g. Housing numbers from the Core Strategy; and the Central Area and Rural Central area (if this refers to the Rest of Central Area in the Core Strategy?) are areas defined for the purposes of the now withdrawn Core Strategy and should not be referenced.	1.3. The document only references the Core Strategy and its evidence in relation to the section 3. It clearly states that it is for illustrative purposes only and the numbers in it have not been used to derive the housing figures in the first two tables (ie those which feed into the Neighbourhood Plan)
1.4 It is unclear what the document is trying to demonstrate. It provides no particular methodology, perhaps because its purpose is not made plain. The report should provide a conclusion regarding the information gathered which,	1.4. This text is taken from the opening paragraph of the report. "...It demonstrates that there is a more than sustainable housing supply over the planning period (2017 to 2031) based upon a combination of permitted developments and windfall

<p>presumably, will be that Longhorsley has or will have contributed more than enough to delivering housing growth sufficient for the Parish over the life of the Neighbourhood Plan.</p>	<p>sites “</p>
<p>1.5 Once again, we can offer to help in drafting a brief and simple report that justifies the housing allocations proposed in the Neighbourhood Plan which should also help in supporting the creation of a defensible settlement boundary through the Plan. We would encourage you to now seriously consider taking up this offer of help before submitting the Plan.</p>	<p>1.5. The LPCNPSG have asked DE to produce a draft of such a document for their consideration.</p>
<p>2.1 It is inevitable, based on experience everywhere else nationally, that post-examination modifications will be required to the Plan. We would complete those modifications. We therefore need to be sure that the version of the Plan we receive is capable of modification – we have experienced some technical difficulties with some versions we have received when looking at formatting. This may be as a result of the use of different versions of software. We would like to agree with the parish Council that we will complete post examination modifications.</p>	<p>2.1. The policies have been changed from images to Word Tables and this appears to have resolved compatability issues.</p> <p>Bolding removed from text in policies</p> <p>The LPCNPSG is not aware of any choice in who makes changes post submission and had understood that this was NCC’s responsibility. That being the case it has no objection to them doing so.</p>
<p>2.2 We therefore want to ensure that the Plan submitted requires as few changes to the text and policies as necessary. If changes can be agreed now in terms of expression, layout and presentation of the Plan this will reduce work required later in the process. We have previously offered to make modifications to the Plan so that current inconsistencies can be ironed out – there are many cases of changes in font size and type appearing throughout the Plan which hinder ease of use. We would be pleased to support the parish Council by drafting a final submission version subject to reaching agreement on changes we think are still necessary to make the Plan more user-friendly, bearing in mind the main future audience will be</p>	<p>2.2. The plan has been through many iterations. It has been widely reviewed by many people, including the statutory and non-statutory bodies and an independent examiner. All comments received have been tracked through to either changes in the plan or reasons why changes have not been made.</p> <p>All processes require clear roles and responsibilities at all stages and hand-off points. The LPCNPSG will continue to carry out its editorial duties with all due diligence until the plan is submitted.</p>

Development Management planners and Planning Committee.	
<p>3.1 The Plan makes reference at various points to the Core Strategy – described as NLPCS (i.e. Northumberland Local Plan Core Strategy). This has been withdrawn and the Council will not be preparing a Core Strategy. Instead, it is intended that a Local plan will be prepared. The Neighbourhood Plan should be modified to remove all references to ‘NLPCS’ or similar references. It is sufficient to mention briefly the position regarding the withdrawn Core Strategy at the start of the Plan at section 1.3 which should be retitled ‘Planning Policy Context’. The Plan need make no further reference to the Core Strategy. We recommend that section 1.3 is redrafted.</p>	<p>3.1. All references to NLPCS are to provide context for the plan itself and there is no reliance on the existence of the NLPCS for the plan to be executable. The LPCNPSG had a context setting conversation with the independent examiner who conducted the health check to explain the position regarding the NLPCS. He reviewed the plan with that specific context in mind and had no issue with the references which remain. The LPCNPSG are unaware of any formal announcement by NCC regarding the next iteration of the local plan or how to refer to it. However, where the context is to the future local plan it will be changed to say the “emerging local plan”.</p>
<p>4.1 The Neighbourhood Plan makes reference throughout to the ‘CMDLP’. This is relevant in the context of the ‘Basic Conditions’ tests which require the Neighbourhood Plan to be in <u>general conformity</u> with the <u>strategic policies</u> in the development plan.</p>	<p>4.1. Agreed. At meeting on 20/10 it was agreed to change these references to say “in line with” policies in the CMDLP</p>
<p>4.2 We consider that the context should be set in section 1.3 of the Plan and any further explanation reserved for the Basic Conditions Report.</p>	<p>4.2. Not agreed. By far the greatest percentage of comments made by the NPIERS examiner were to include not only references to he CMLDP but also the specific policies within it. The LPCNPSG agree with this approach and have, therefore, included all such references.</p>
<p>4.3 Section 5.2 sets out evidence to support the ‘Development Policies’ in the Plan. This includes reference to several CMDLP policies; and to Policy S5 of the Structure Plan. These are not ‘evidence’. They are policies that currently form part of the development plan. These references should be deleted.</p>	<p>4.3. The LPCNPSG considers these to be within its understanding of what is evidence. However, it will change all such sections to introduce these items as references and evidence which support the policies.</p>
<p>4.4 Elsewhere, throughout the Plan, reference is regularly made to LNP policies ‘supporting policies xx from the CMDLP’,</p>	<p>4.4. It is agreed that the context is incorrect and references should in fact say that the plan conforms or adds to those</p>

<p>for example at paragraphs 5.6.1; 6.4.1; and 7.5.1. The purpose of a neighbourhood plan is not to ‘support’ the policies in a Local Plan. Indeed, neighbourhood plans can create new policy approaches that differ from those in older Local Plans. We would therefore strongly recommend that these references are removed and any commentary is placed in the Basic Conditions Report. References to the CMDLP are relevant only in the context of ensuring that the Neighbourhood Plan can be found to pass the ‘Basic Conditions’ at Examination. Furthermore, leaving in such references will very quickly date the Plan once a new Local Plan for Northumberland replaces the CMDLP.</p>	<p>policies in the CMDLP. As stated above, the NPIERS examiner and the LPCNPSG have a contrary view and believe these references are required so that the plan can be used effectively in an operational environment. The LPCNPSG would be happy to review the LNP at the point that the new NCC Local Plan becomes available but feel that this will not, unfortunately, happen “quickly” as suggested here.</p>
<p>Section 1</p> <ul style="list-style-type: none"> • Map at Figure 1 is too small – resize. Map at Annex A.3 is not required if a sufficiently large map is displayed in the Plan showing the neighbourhood area. • 1.1.6 the term ‘Basic Conditions’ requires an explanation. • 1.3 redraft whole section • 1.3.4 delete all references to any Green Belt boundaries defined in the withdrawn Core Strategy • Figure 2 has no key and is not needed in any event – the Conservation Area is shown on the Policies Map. It is sufficient to make reference in that way • 1.5.8 ‘...450 plus local people..’ does this mean over 450 local people attended or 450 people attended in addition to local people? 	<p>Section 1</p> <ul style="list-style-type: none"> ➤ LPCNPSG does not want to include a full sized map in the body of the text. A link will be put into the text for anyone who needs to see the full map immediately ➤ 1.1.6. – will amend ➤ 1.3. – not agreed – except as required above ➤ 1.3.4. – Agreed will delete Annexes and redraft ➤ Figure 2 - Not agreed, provides a more informative view than in the Policies Map but will include a key ➤ 1.5.8. Yes, over 450 local people and will amend to clarify
<p>Section 3</p> <ul style="list-style-type: none"> • Title suggest change to ‘Definition of Our Development Strategy’ • 3.1.4 modify references to Core Strategy defining Green Belt boundaries 	<p>Section 3</p> <ul style="list-style-type: none"> ➤ Agreed but level 2 heading will also remain ➤ ➤ 3.1.4. Agreed ➤ 3.1.6. Not agreed – will modify as above.

<ul style="list-style-type: none"> • 3.1.6 delete first sentence • 3.1.7 first bullet should not make reference to ‘Five Year Land Supply Report’, this is adopting an inappropriate approach for a neighbourhood plan. The strategy for the Plan is surely to plan for the delivery of sustainable levels of housing growth including through implementation of current permissions (or similar). • 3.1.7 suggest modification to second bullet to read: ‘Define the Settlement Boundary, distinguishing Longhorsley village from the open countryside which should be protected for its intrinsic character and beauty’ • 3.1.7 suggest delete ‘control’ from fourth bullet and insert ‘manage’ 	<ul style="list-style-type: none"> ➤ 3.1.7. Agreed will amend ➤ 3.1.7. Partly agreed – include part of this but retain Green Belt ➤ 3.1.7. Agreed
<p>Section 4</p> <ul style="list-style-type: none"> • 4.1.2 – delete. This repeats 1.3.1 • 4.1.3 needs modification. It is not necessary for decision makers to take ‘all’ policies into account, only those relevant to the determination of an application 	<p>Section 4</p> <ul style="list-style-type: none"> ➤ 4.1.2. – Not agreed – is different from 1.3.1 and helps set context for this section ➤ 4.1.3. – Agreed will amend
<p>Section 5</p> <ul style="list-style-type: none"> • 5.2.1 not sure why Northumberland Public Access is given as a source of evidence? This is simply a record of planning applications and decisions • 5.3.1 is it necessary to repeat in full each of the relevant objectives. Plan would be more concise if it just referenced the objective numbers (there are only 5) • 5.4.1 can’t rely on withdrawn evidence to justify defining settlement boundary. Suggest this needs to be included in the Housing Technical Report which can explain how much housing is being planned and why and how a settlement boundary can be defined in that context – it is 	<p>Section 5</p> <ul style="list-style-type: none"> ➤ 5.2.1 – see earlier comment about evidence. NPA is a record of all of the houses in the technical report and this plan, other than windfall sites ➤ 5.3.1. Not agreed. Also, this is providing planners with information “in line” as previously requested and agreed ➤ 5.4.1. – Will remove green belt ref. Otherwise it is the CMDLP defined boundary plus agreed changes due to permitted developments already.

<p>not relevant necessarily to proposals for Green Belt insets. There is a current settlement boundary defined in the CMDLP. The Neighbourhood Plan is a modification and expansion of that boundary to take account of current circumstances.</p> <ul style="list-style-type: none"> • 5.4.3 The Policies Map is a separate document. We would suggest producing this at A2 printed size. It would not be necessary to refer to a separate Annex – it is sufficient to simply reference the Policies Map as necessary. 	<ul style="list-style-type: none"> ➤ 5.4.3. – Will change to reference policies map separately. Will continue with A3 size map which folds well into back of A4 plan. <p>At meeting on 20/10 it was agreed that NCC would produce an A2 version of the map and would include on it the LGS key and identify the two permitted development sites with policy numbering</p>
<ul style="list-style-type: none"> • Policy LNP1 <ul style="list-style-type: none"> ○ Formatting and font size needs attention ○ Much of a) is superfluous – suggest the policy should concentrate on supporting development inside the settlement boundary. Making reference to small restricted gaps and other small sites is generally meaningless, unless the intent is to refuse permission on other sites – can't think what they might be? ○ Last paragraph repetition of 'scale' 	<ul style="list-style-type: none"> • Policy LNP1 <ul style="list-style-type: none"> ○ All Arial 11pt ○ Will change to 'or which fill a small site well related to the development pattern of the village' (At meeting on 20/10 it was agreed to remove the word "small") ○ Agreed – will remove
<ul style="list-style-type: none"> • Policy LNP 2 <ul style="list-style-type: none"> ○ Fails to follow para 28 of NPPF which supports the sustainable growth of <u>all types of business and enterprise</u> in rural areas including well designed new buildings. Failure to reference this challenges the basic conditions ○ Formatting issues with font and paragraphs 	<ul style="list-style-type: none"> • Policy LNP 2 <ul style="list-style-type: none"> ○ Amended to be inclusive of all businesses and to allow for new builds. ○ All Arial 11pt – will resolve indentations

<ul style="list-style-type: none"> • 5.6.1 delete reference to NLPCS and reword paragraph 	<ul style="list-style-type: none"> • 5.6.1. Will replace, as above
<p>Section 6</p> <ul style="list-style-type: none"> • 6.2 Conservation area map is not evidence 	<p>Section 6</p> <ul style="list-style-type: none"> • 6.2. As above for evidence
<ul style="list-style-type: none"> • Policy LNP4 <ul style="list-style-type: none"> ○ Grammatical corrections needed ○ Para c) and d) cover essentially the same thing ○ Final paragraph repeats most of other parts of policy and LNP1 with exception of reference to 'spacing'. Suggest redraft policy • 	<ul style="list-style-type: none"> • Policy LNP4 <ul style="list-style-type: none"> ○ Agreed ○ Agreed will delete d ○ Will retain but reword final para removing ref to scale and mass as we haven't talked about footprint before and spacing. Will stop the policy after 'spacing between buildings'.
<p>Section 7</p> <ul style="list-style-type: none"> • 7.4.2 needs greater explanation and justification for deciding that small scale development comprises no more than 3 dwellings. What evidence is there to justify this definition? Why would four dwellings need to be refused. Would 6 or 9 dwellings not be acceptable inside the settlement boundary provided they were well designed. Suggest this is too restrictive and without evidential support • 7.4.2 makes reference to 'around 76' houses. Why does policy then say 77 houses. • Table 1 – what is this demonstrating and what value does it add? • 	<p>Section 7</p> <ul style="list-style-type: none"> • 7.4.2. The figure of 3 was derived from the experience of the period 2011 to 2016. The SHLAA (2016) defines small sites as no more than 5 (so not 6 or 9). Will change this to 5 to come in line with the SHLAA. Following meeting on 20/10, references to small scale and how calculated have been removed from text and policy • 7.4.2. Will change policy to 76 (later changed to 80) • Table 1 - Just what it says. Table removed following changes to number of dwellings calculated (76) and reflected in policy (80) as a result of meeting on 20/10
<ul style="list-style-type: none"> • Policy LNP5 <ul style="list-style-type: none"> ○ Reference to '..a total of around 77 houses...' implies a ceiling through use of the word total. This should be deleted. Suggest change 'houses' to homes or dwellings (presume we would also grant permission for flats and bungalows?) 	<ul style="list-style-type: none"> • Policy LNP5 <ul style="list-style-type: none"> ○ No – it implies it is a "total" of the things it is adding up. ○ Yes, will change to dwellings

<ul style="list-style-type: none"> • 	
<ul style="list-style-type: none"> • 7.5.1 not sure what relevance para 28 of NPPF has to housing policy? • 7.5.2 not acceptable to make report on housing site assessments 'available on request'. This implies some secrecy. The availability of this and all other documents should be widespread. 	<ul style="list-style-type: none"> • 7.5.1. Yes agree, will remove text • 7.5.2. Will amend and put on line with other documents
<ul style="list-style-type: none"> • Policy LNP6 <ul style="list-style-type: none"> ○ Does reference to para 54 of NPPF mean that the parish Council wants to actively support the construction of new market dwellings in the countryside to supplement the provision of affordable housing? Need to be very clear about the intent and potential outcome of such a policy 	<ul style="list-style-type: none"> • Policy LNP6 • Agreed – will remove ref to para 54
<p>Section 8</p> <ul style="list-style-type: none"> • 8.1.1 the Plan does not closely follow para 28 – it does not reflect the first bullet point on supporting <u>all</u> business and allowing <u>new buildings</u> • 8.3.1 type face changes? • 	<p>Section 8</p> <ul style="list-style-type: none"> • 8.1.1. Don't understand the point being made and see nothing wrong with 8.1.1. It was agreed at the meeting on 20/10 that resolving the issues raised with LNP2 and LNP10 would mean this para is ok as written • 8.3.1. Will amend
<ul style="list-style-type: none"> • Policy LNP9 <ul style="list-style-type: none"> ○ Delete – repeats Policy LNP1 • 	<ul style="list-style-type: none"> • Policy LNP9 <ul style="list-style-type: none"> ○ Disagree – policy will be kept ○ Agreed at the meeting on 20/10 to delete this policy and renumber all subsequent policies
<ul style="list-style-type: none"> • Policy LNP10 <ul style="list-style-type: none"> ○ Conflicts with para 28 of NPPF which supports all types of business including new buildings. Policy may already be covered in LNP2. Suggest review and modify or delete with modified LNP2 • 	<ul style="list-style-type: none"> • Policy LNP10 <ul style="list-style-type: none"> ○ This policy is not the same as LNP2 by any means. It expands on one line within that policy and is in the right place here in the business development section. ○ It was agreed at the meeting on 20/10 that this

	policy is inclusive of para 28 criteria and all that was needed was to swap around bullets ii and iii
<ul style="list-style-type: none"> • Policy LNP12 • Delete 'Planning permission will be granted for...' and insert 'Support will be given for development comprising... 	<ul style="list-style-type: none"> • Policy LNP12 • Agreed
<p>Section 9</p> <ul style="list-style-type: none"> • 9.2.3 repeats 9.2.1 • • 9.4.1 makes reference to '..The proposals map...' Check and alter throughout to ensure common use of Policies Map. Delete reference to Annex A1 • Policy LNP15 <ul style="list-style-type: none"> ○ Delete – repeats Policy LNP1 • 	<p>Section 9</p> <ul style="list-style-type: none"> • No it doesn't – 9.2.1 says two types, 9.2.2. is one type and 9.2.3 is the other. Agreed at meeting on 20/10 to further clarify this in text • 9.4.1. Agreed – will replace throughout document and all references to Annex as above • Policy LNP15 <ul style="list-style-type: none"> ○ No – extends LNP1 line and is in right place / context here
<p>Section 10</p> <ul style="list-style-type: none"> • Delete references to Geodiversity – no sites • 10.4.2 not particularly helpful – is it possible to show relevant sites on a separate map – we can produce a map in necessary • Note under policy LNP17 – what is the purpose of this. It should either be incorporated with explanation in the text or policy should be modified as necessary. Serves no useful purpose as currently presented. 	<p>Section 10</p> <ul style="list-style-type: none"> • Will delete references • 10.4.2. – No – this is in direct response to a comment from a statutory body, which also provides this service. See no reason to change it. • Note under LNP17 - We will insert the second sentence starting development in as new part d) of the policy as it relates to SWD and just delete first sentence. We will remove the note.
<ul style="list-style-type: none"> • Policy LNP18 <ul style="list-style-type: none"> ○ iv) suggest insert description of views rather than reference to 10.6.2 for ease of application 	<ul style="list-style-type: none"> • Policy LNP18 <ul style="list-style-type: none"> ○ iv) Not agreed
<ul style="list-style-type: none"> • Policy LNP19 	<ul style="list-style-type: none"> • Policy LNP19

<ul style="list-style-type: none"> ○ See paragraph 118 of NPPF – need correct references to trees and woodland. Correct terms are ‘ancient woodland’ and ‘aged or veteran trees’. • 	<ul style="list-style-type: none"> ○ Will change text, policy and glossary to reflect 118 •
<p>Annex A 1</p> <ul style="list-style-type: none"> • Delete. Policies Map will be a free-standing map and it is sufficient to refer to it as such. • 	<p>Annex A 1</p> <ul style="list-style-type: none"> • Yes agreed as above
<p>Annex A 3</p> <ul style="list-style-type: none"> • Delete. Put larger scale neighbourhood area map in Plan. Insets of Longhorsley Village and Linden Hall serve no purpose and are too small to be of any use. No key on map. 	<p>Annex A 3</p> <p>Plan to keep the map in this Annex. Happy to replace it with a “better” map if NCC have one but none provided to date</p>
<p>Annex D</p> <ul style="list-style-type: none"> • Delete both maps. Core Strategy withdrawn. These maps are irrelevant 	<p>Annex D</p> <ul style="list-style-type: none"> • Agreed