

KYLOE PARISH COUNCIL

Clerk: Mrs Sheila Henderson, West Kyloe, Beal, Berwick upon Tweed TD15 2PG
Tel: 01289 381321 (4westkyloe@gmail.com)

NORTHUMBERLAND LOCAL PLAN – CONSULTATION DOCUMENT

COMMENTS FROM KYLOE PARISH COUNCIL

The following comments have been developed and reviewed by members of Kyloe Parish Council, following the overall Plan structure.

4. Delivering the Vision for Northumberland

Settlement Hierarchy/Role of Settlements

- *The plan seems to envisage no development in role for settlements as they exist.*

Spatial Policy (STP1)

- *This does not provide an ambitious vision for North Northumberland, even though there 'a presumption in favour of sustainable development'.*

5. Economic Development

- *Although there is nothing intrinsically wrong in supporting the areas that have the highest current levels of economic activity, the focus of the Plan appears to be weighted heavily in favour of SE Northumberland.*
- *The designation of the Ramparts Business Park as an Enterprise Zone in 2017 is the main reference to N Northumberland; with only "support and encouragement" to be given.*
- *The implication for the future, in the Plan, is that there is little appetite for halting a slow decline in the economic development of North Northumberland.*
- *Agriculture (including diversification) and tourism are to be encouraged as long as nothing else is changed too much.*
- *Inevitably this is likely to drive young people away from the area for further education and employment.*

6. Housing

- *Targets for housing development are set out for Berwick and Belford, but nothing in between, including Kyloe parish; what inferences can be drawn from this?*
- *The populations of Kyloe and other nearby parishes are increasing in age. How will the policies for older and vulnerable people be applied to these areas?*
- *There is clearly a tension between the need/desire for economic development and the policies that are concerned with maintaining the visual character of the area in support of tourism. Smaller communities are more likely to wither if the planning constraints are so severe that dwellings that meet modern standards of space and amenity cannot be built at an affordable cost.*

- *The proposal that ‘new dwellings in parishes with 20% or more household spaces with no usual residents will only be supported where first and future occupation is restricted in perpetuity to ensure that each new dwelling is occupied only as a principal residence’ is supported by the Parish Council.*

7. Connectivity (incl digital) & Movement

Wireless & Broadband Communication: Policies ICT 1; ICT 2; ICT 3; ICT 4

- *This is probably the most disappointing section of the Plan, particularly in respect of internet and wireless communications.*
- *The policy statements are entirely concerned with new infrastructure (masts, dishes etc.)*
- *There does not appear to be any recognition of the reality that, for rural areas to survive in even the medium-term future, it is vital that high capacity, reliable digital and wireless communications must be available. Existing industries, such as agriculture and tourism are increasingly dependent on these technologies; new, home-based businesses that can attract younger populations to the rural areas will arise only when the connectivity is available.*
- *There is no expression of ambition to provide maximum levels of speed / bandwidth / capacity for the county overall, let alone rural areas like N Northumberland*

Transport: Policy TRA1

- *The emphasis on reducing the need for travel and encouraging cycling, walking and public transport is highly relevant to urban/suburban areas and is to be supported. However this wholly ignores the needs of rural communities where vehicular transport is essential.*
- *The Plan also ignores the impact of the mandated requirement for all new vehicles to be either electric or zero-carbon hybrid four years after the end of the planning period. What is the strategy for installation of charging points in rural areas?*
- *Emphasis on public transport alone will simply serve to disconnect rural communities further and add to decline.*

Northumberland core road network: Policy TRA3

- *The focus on the needs of SE Northumberland is reflected in this policy, with highly specific improvements spelled out for A1/A19.*
- *Full dualling of both the A1 and A69 are limited to “Supporting and identifying acceptable lines and areas of improvements”.*

8. Environment

Northumberland Coast AONB: Policy ENV5

- *The plan does not really address the issue of redundant farm steadings, many of them listed, which are currently decaying because of limited opportunities for re-use. The Plan is crying out for a bold approach in this case; the historic and natural environment can / should be reconciled with a degree of development. However, it requires a sympathetic and nuanced approach that may be difficult to legislate for.*

- *It is not clear that policy statements under one heading (e.g. that the intervisibility between the AONB, the seascape and the landscape beyond, including the Kyloe and Cheviot Hills is a development consideration or constraint) can be in conflict with policies under another heading (e.g. the policy maps for REN2 show suitability for the repowering of Wandylaw turbines at 25-40m and Barmoor turbines at 40m+.*

9. Water

Water Supply & Sewerage: Policy WAT2

- *It is not clear that the implications of the water supply issues of the Berwick and Fowberry Water Resource Zone have been fully appreciated.*
- *What is Northumbrian Water's plan? How far will it be realised? Is the aquifer capable of delivering the amount of water implied by the housing and industrial developments envisaged in the Plan? Will this be a serious constraint on development?*

11. Managing Natural Resources

Minerals - Environmental Criteria: Policy MIN1

- *Is it a reasonable inference from the wording of this policy statement, and the policy statements relating to the environment, that proposals for extraction of minerals in areas adjacent to the Northumberland coast AONB (e.g. Kyloe parish) will be automatically denied?*
- *Would a similar denial be applied in respect of any proposal to develop a shale gas 'fracking' site in a sensitive area?*

Renewable & low carbon energy: Policy REN2

- *The same question arises for onshore wind turbines as for mineral extraction set out above. Namely, how robustly can the criteria set out in this policy statement be linked to environmental policies in order to avoid an adverse impact on the Northumberland Coast AONB or other settlements?*
- *Why do the policy maps for this policy statement show areas "suitable for wind turbines" of heights in areas where there is obvious intervisibility with AONB?*
- *It is not made clear whether the height bands used in the Plan refer to either the hub height or blade tip height*
- *The assumption that existing consented developments will be re-powered with the same, or larger, turbines sets a dangerous precedent. It does not take account of other constraints (e.g. cumulative impact), and, in the case of Barmoor, actually includes an additional area (Brackenside) not covered in the original consents. Note: Brackenside involved judicial reviews (plural) which failed and for which the County was required to pay substantial costs.*

General

- *There is frequent reference in the Plan to the North of Tyne Combined Authority. It is understood that this is to have a focus on rural matters. However it is not yet in operation; is there any way of defining what its role and powers will be together with the timeframe in which it will be functioning?*