

## Haydon Parish Council Response to Comments on the Submission Draft Haydon Parish Neighbourhood Plan Plan

Responses received from: NCC, NNPA, Historic England, Natural England, Environment Agency, Coal Authority, National Grid and Haydon Bridge High School. Only those comments recommending changes to the plan are included in the table.

Consultee	Comment	Haydon Parish Council Response
<b>General</b>		
Northumberland National Park Authority	Officers first comment would be regarding consistency of policy formatting. Where a policy has more than two sections it is helpful if these can be subdivided using criteria such as a,b,c etc, and we note this happens in many policies. However H5 of Flood alleviation and H9 on Biodiversity do not. For example, when officers refer to policies in reports it is better to refer to part d) rather than the fourth paragraph.	<b>No change.</b> It is considered that the separate paragraphs in policies H5 and H9 would be appropriate to be identified as separate criteria and this approach would likely add more confusion.
<b>Policy H1: Sustainable development</b>		
Northumberland National Park Authority	NNPA raise no major issues with this policy which is similar to the NNPLP strategic policy ST1. The wording of Part h) causes a minor concern. Whilst design is extremely important, and reference to the Haydon Parish Design Code is considered appropriate within the policy wording. However, NNPA officers would query whether this part h needs to contain the additional documents of Building for a Healthy life <u>and</u> the National Design Guide. This means that each application needs to be considered against a huge amount of design criteria. The HP Design Code should have been designed to include the general principles within these national documents already. The current Building for a Healthy Life is 57 pages, National Design Guide another 50+ pages. This is on top of the requirement of assessing Policy H6 Design. It is considered the additional burden on applicants to address all of these documents to meet part h) would be	<b>No change.</b> The reference to Building for a Healthy Life and the National Design Guide are examples of relevant design documents; whose principles applicants should have regard to where this is relevant to the development proposed.

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	<p>disproportionate and we suggest that it is limited to the HP Design Code only.</p> <p>h. Have regard to the principles set out within the Haydon Parish Design Code <del>and other relevant documents such as Building for a Healthy Life and the National Design Guide.</del></p>	
<b>Policy H2: Sustainable location of new development</b>		
Northumberland County Council	<p>The County Council provided comments about the drafting of this policy as a whole at the pre-submission stage. We note that some modification has been made. However, the policy still presents some concerns regarding its purpose and the extent to which it would be appropriate having regard to national planning policy and guidance.</p> <p>Part a. supports affordable housing on rural exception sites. Whilst it is not necessary to repeat national policy it would be appropriate to recognise either in the policy or in the supporting text that paragraph 78 of the National Planning Policy Framework ('NPPF') requires consideration to be given to allowing some market housing on such sites if this helps to facilitate delivery of affordable housing to meet local needs. We would suggest an appropriate modification to the Plan to recognise this matter in order that the Plan has regard to NPPF.</p> <p>Parts b. to f. largely repeat paragraph 80 of NPPF. That part of NPPF relates specifically to an intention to avoid isolated homes in the countryside other than in defined circumstances (that is: those stated in parts b. to f. of Policy H2). In this respect, given that Policy H2 expressly supports those forms of housing development anywhere in the countryside, we would suggest that Policy H2 presents conflict with paragraph 80 of NPPF, which only concerns isolated homes; and with paragraph 174 b) of</p>	<p>Whilst it is accepted that the Northumberland Local Plan provides details regarding the sustainable location of new development, the inspectors report has not yet been received. It is therefore considered important to retain policy H2 (as amended).</p> <p><b>Amend</b> to delete the third paragraph of the policy (including criteria a-j) and replace with:</p> <p><i>'Outside the settlement boundary of Haydon Bridge and the small village of Langley, development will be supported that is compatible with other policies contained within the development plan'.</i></p> <p>Delete the fourth sentence of paragraph 5.9 and replace with two new paragraphs:</p> <p><i>'The NPPF is clear that the development of isolated homes should be avoided, unless one or more of the following circumstances apply: that there is an essential need for a rural worker to live permanently at or near their place of work; that the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets; the development would re-use redundant or disused buildings and enhance its immediate setting; the</i></p>

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	<p>NPPF which requires that planning policies should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside. That requirement is reflected in part in the second paragraph of Policy H2. However, this then presents some inherent contradiction in terms of whether the policy offers specific support to development or whether it seeks to provide for protection of the countryside.</p> <p>We would suggest that modification could be made to ensure that the policy better reflects the national policy expectation that isolated homes in the countryside are avoided and are allowed only in those express circumstances set out in NPPF. If the intention were to create a more permissive approach to development generally in the countryside this would require evidence to justify a departure from national policy and guidance, and an explanation about why that would be locally specific and relevant to Haydon Parish. This would not appear to be one of the aims of the Plan when the Objectives are read at face value, specifically Objectives 3 and 4</p> <p>Parts g. to j. generally repeat the expectations set out in paragraph 84 of NPPF which seek to enable support for a prosperous rural economy through appropriate planning policies. However, notwithstanding other relevant planning requirements set out elsewhere in the Plan (for example at Policy H1 on Sustainable Development and Policy H6 on Design), the way Policy H2 is currently expressed fails to recognise the limitations and controls provided at paragraph 85 of NPPF in regard to business, community, leisure and tourism development in the countryside beyond settlements. Specifically these require that such development should be sensitive to its</p>	<p><i>development would involve the subdivision of an existing residential building; or the design of the dwelling is of exceptional quality, being truly outstanding, reflecting the highest standards in architecture, significantly enhancing its immediate setting, being sensitive to the defining characteristics of the local area. The NPPF seeks to support a prosperous rural economy, which enables: the sustainable growth and expansion of all types of businesses in rural areas; the development and diversification of agricultural and other land-based rural businesses; sustainable rural tourism and leisure developments which respect the character of the countryside; and the retention and development of accessible local services and community facilities.</i></p> <p><i>Furthermore, the NPPF acknowledges that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements and in locations that are not well served by public transport. In these circumstances, it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable.'</i></p>

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	<p>surroundings, not have an unacceptable impact on local roads and exploit any opportunities to make the location more sustainable. Modification to the policy could achieve compliance with the basic conditions to address this matter.</p> <p>It may be helpful to modify the policy more generally to make reference only to the exceptions, conditions and limitations presented in NPPF. Such an approach would have the added benefit of guarding against the effect of any changes made to national policy in the future. We would suggest the following modification, or similar, could achieve what we understand to be the intention of the policy:</p> <p>Delete 3rd paragraph starting <i>'The following development...'</i> and ending <i>'...community facilities'</i></p> <p>Replace deleted text with:</p> <p><i>'Outside the settlement boundary of Haydon Bridge and the village of Langley development will be supported that is compatible with national and local strategic planning policy and subject to compliance with policies elsewhere in the Neighbourhood Plan.'</i></p> <p>It may then be helpful to add a short section of explanatory text to describe generally those forms of development that are supported through the current NPPF.</p> <p>Unless appropriate modifications are made to Policy H2 we would maintain that it fails to meet the basic conditions.</p> <p>It is also now appropriate to note that the matters addressed through this policy are addressed in the emerging Northumberland Local Plan which deals with the issues more completely and in a manner directly consistent with NPPF. It is currently anticipated that the Northumberland Local Plan will be</p>	

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	<p>adopted in spring 2022. Since significant progress has now been made on the Northumberland Local Plan, and because Policy H2 and its supporting text generally relies on that Local Plan (for example in regard to the definition of development that may be supported at Langley village), we would now question whether Policy H2 provides any policy control or additional local detail that would not be present in the Northumberland Local Plan. We would therefore ask that you give this matter due consideration in your examination of the Neighbourhood Plan.</p>	
<p>Northumberland National Park Authority</p>	<p>The designated Haydon Parish Neighbourhood Area lies across both authority areas (NCC &amp; NNPA). NNPA officers appreciate that the area of the parish within the National Park would fall as countryside, in line with our Strategic Policy ST4. The criteria set out in H2 mainly follows that set out in NNPF and Strategic Policy ST5 in relation to new housing in the open countryside.</p> <p>However, part g relating to <i>sustainable growth and expansion of all types of businesses</i> through new buildings in the countryside would not necessarily accord with our adopted spatial strategy policy ST4 which directs business development to named settlements or to re-use existing buildings. It is only if there is an essential need for development to meet the needs of farming, forestry, tourism, recreation and other rural enterprise or land management activities that the authority would consider it acceptable to approve business development in an unsustainable location.</p>	<p>See proposed amendment in response to the county council's comment on policy H2.</p>
<p><b>Policy H5: Flood prevention and alleviation</b></p>		
<p>Northumberland County Council</p>	<p>Suggest a grammatical change in first paragraph: insert '...the...' after '...by...' to read '...any adverse impacts caused by <i>the</i> new</p>	<p><b>Amend</b> as suggested.</p>

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	structure(s) including...etc'. This allows proper use of '...structure(s)...' in the singular and plural.	
Northumberland National Park Authority	Whilst it is appreciated that Haydon Bridge suffers from flooding, NNPA are unsure whether this policy adds anything to existing government policy and guidance set out in the NPPF and NPPG. However, given the flood alleviation schemes are likely to be outside the national park area officers are satisfied that this is not relevant to the national park area.	<b>No change.</b> Flooding is of significant concern to the local community and HPC considers it is essential to highlight within the neighbourhood plan that the development of flood prevention and alleviation schemes will be supported.
<b>Policy H6: Design</b>		
Northumberland County Council	Suggest part k. could be better phrased as follows: <i>'k. Provides sufficient appropriately sited car parking and cycle storage to serve the needs arising from the development;'</i>  This modification removes repetition of the term 'to the satisfaction of the local planning authority which appears earlier in the policy, and allows for circumstances where off-site provision may be acceptable.	<b>Amend</b> as suggested.
<b>Paragraph 5.33</b>		
Northumberland County Council (Environment and Design Team)	Page 25, para 5.33 - it says there are 403 non designated heritage assets in the HER for Haydon. This is incorrect and needs to be clarified or removed - there might be 403 HER records for Haydon but not all of them are NDHAs. Also, it would be useful for it to note that not all NDHAs are in the HER and others can be identified as a result of a planning assessment or further research - it cannot be regarded as a fixed figure.  Page 25, footnote 10 - points to Keys to the Past as a data source. This website is unlikely to be in existence in a year or two as the	<b>Amend</b> footnote 10 to link to the Heritage Gateway. Paragraph 5.33 does not state that all of the HER records for the parish are NDHA, it states that the HER contains many NDHA and that there are 403 entries. Agree that it would be helpful to explain that additional entries can be added to the HER. Amend the fourth sentence of paragraph 5.33 to read:  <i>'For Haydon Parish there are currently 403 entries, not all non-designated heritage assets are included, additional</i>

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	<p>host (Durham County Council) are looking to replace it. It would be better pointing to the Heritage Gateway instead (<a href="https://www.heritagegateway.org.uk/gateway/">https://www.heritagegateway.org.uk/gateway/</a>)</p>	<p><i>entries could be added in future as a result of further research.'</i></p>
Historic England	<p>The changes made as a result of our and others' comments on pre-submission draft Policy H7 and Annexe 4 are noted but appear to be a retrograde step. The NPPF and Planning Practice Guidance (PPG) make it clear that it is possible to identify non-designated heritage assets (NDHAs) in a neighbourhood plan, which had been done here, and I referred in my September letter to our Advice Note 7 (Local Heritage Listing) to ensure the process had been through. It is important to note that a planning judgement by a plan-making body (such as Haydon Parish Council) is needed to identify a NDHA. Inclusion of an asset in the local Historic Environment Record does not itself make it a NDHA unless that planning judgment is made and recorded in another appropriate way. This might include a local list, but a NDHA does not need to be included in a local list for it to have NDHA status. In the absence of a local list, appropriate identification in a neighbourhood plan is a suitable way of clearly identifying NDHAs.</p>	<p><b>No change.</b> The non-designated heritage assets that the parish council were looking to identify within the pre-submission draft policy H7 are included on the HER. It is accepted that inclusion on the HER does not automatically result in a non-designated heritage asset. However, both the Northumberland Local Plan and the National Park Local Plan contain policies which refer to the Northumberland HER (NLP policy ENV7, table 10.1, paragraph 10.45, NNPLP policy DM14, paragraphs 5.5.19, 6.11.4, 6.14.1, 6.14.13, 6.14.16 and 6.15.2).</p> <p>The neighbourhood plan also includes a number of community actions regarding heritage assets.</p>
<b>Policy H7: Haydon Bridge Conservation Area</b>		
Northumberland County Council (Strategic Estates)	<p>Strategic Estates object to the following proposed designations:</p> <ul style="list-style-type: none"> <li>• Haydon Lodge as a conservation area asset (CA14). Strategic Estates opposes any designation that would limit the potential redevelopment and use of the building.</li> </ul>	<p><b>No change.</b> Haydon Lodge is identified in the Haydon Bridge Conservation Area Character Appraisal as a key building. In accordance with the NPPF and strategic policies of the development plan, any future redevelopment of the building would need to consider the impact of this on the significance of the conservation area.</p>
Haydon Bridge High School	Ref CA14 Haydon Lodge and CA15 Haydon Park House. These buildings and associated land is in the ownership of Haydon	<b>No change.</b> Haydon Lodge and Haydon Park House are identified in the Haydon Bridge Conservation Area

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	<p>Bridge High School and ownership would revert to Northumberland County Council if the school were no longer required, who is also the planning authority.</p>	<p>Character Appraisal as key buildings. In accordance with the NPPF and strategic policies of the development plan, any future redevelopment of the buildings would need to consider the impact on the significance of the conservation area.</p>
<b>Policy H8: Landscape</b>		
<p>Northumberland National Park Authority</p>	<p>NNPA are supportive of this policy, which includes reference to the NNPA Landscape Assessment (2019). Officers consider the specific reference to certain areas in the Parish in part c) is unnecessary and suggest deletion of parts of this criteria as below:</p> <p>c. Seeks to conserve and enhance important local landscape features such as rolling landforms, hedgerows and woodland <del>to the east of Haydon Bridge as well as the western approaches, distinctive gateways including Low Hall Farm, as well as regular field patters with woodland parcels;</del></p>	<p><b>No change.</b> The design code highlighted the importance of the landscape features to the east of Haydon Bridge and on the western approaches. Reference was also made to Low Hall Farm.</p>
<b>Policy H9: Biodiversity</b>		
<p>Northumberland National Park Authority</p>	<p>NNPA are supportive of this policy. There is a slight concern that the first sentence referring to those sites of the policies map may mean that biodiversity on sites not identified are overlooked. Biodiversity can be everywhere and the NNPA are expecting all proposals to provide proportionate biodiversity net gain. As such it is suggested the first paragraph is amended.</p> <p>Development should protect and enhance biodiversity, <del>including sites identified on the policies map,</del> by seeking to ensure no loss or significant harm to sites of biodiversity value, protected and priority species, their habitats or the corridors that connect them, support will be given to proposals...</p>	<p>It is clear that the important biodiversity is not only a feature of those sites identified on the policies map, but is also why the text states 'including'. <b>No change.</b></p> <p><b>Amend</b> to remove one 'where appropriate'. It is considered appropriate to leave one 'where appropriate' in the policy as this requirement would not be required for all development. Also delete reference to swift bricks.</p>



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	<p>The fourth paragraph has two <i>where appropriate</i>s, neither of which are required as development schemes should be embedding enhancements:</p> <p><del>Where appropriate</del>, development schemes should embed proposals which look to enhance existing natural features and increase biodiversity within the wider site where appropriate and by providing a habitat for wildlife within the built environment (e.g. swift bricks).</p> <p>Examples of wildlife habitats could be included with the supporting text rather than included within the policy.</p>	
<b>Policy H10: Green infrastructure</b>		
Northumberland County Council	<p>We made comments about the drafting of this policy at the pre-submission stage and would reiterate those comments which have not been addressed in the Consultation Statement:</p> <p>For clarity, we suggested deleting ‘<i>When determining planning applications...</i>’ from the second sentence of the first paragraph. This is unnecessary and misleading since, as drafted, it could imply that decisions are being made by applicants. This therefore fails to meet the basic conditions because it is imprecise. This should be deleted to meet the basic conditions.</p> <p>The same sentence also contains the term ‘<i>...relevant development proposals...</i>’. There is no definition of this term in the Plan. It is therefore unclear and is not precise to allow the policy to be used consistently and effectively. We would recommend modification to demonstrate when the requirements of the policy would be engaged, since all of the policy requirements could not reasonably be sought from all forms or scales of development.</p>	<p><b>Amend</b> the second sentence to read:  ‘<i>Applicants must demonstrate, to the satisfaction of the local planning authority, how development proposals should, where relevant and in a proportional way.</i>’</p> <p>Amend criterion ‘b’ to read:  ‘<i>Where applicable, contribute new elements of green infrastructure appropriate to the location;</i>’</p> <p>Amend criterion ‘e’ to read:  ‘<i>Allow the movement of wildlife and provide habitats for species in the design of gardens, boundary treatments and other relevant features, using locally native species</i>’</p> <p>It was a drafting error that this policy was not amended to reflect the county council’s comments prior to submission of the plan. The amended wording better reflects Northumberland Local Plan policy STP6.</p>

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	<p>We advised that part b. seemed difficult to interpret. It is still unclear precisely what is meant by the term ‘...and draw the rural character...’. It may be appropriate to seek clarification again on this matter which is not addressed in the Consultation Statement.</p> <p>We also advised that providing examples within a policy is not necessary and not helpful to the policy’s interpretation. It is better for the policy to be definitive since this aids in its application. This comment applies to parts b. and e. We recommended reviewing the policy in this regard and, if necessary, strengthening expectations on interpretation through the supporting text.</p>	
<b>Policy H11: Local green space</b>		
Northumberland County Council (Strategic Estates)	<p>Strategic Estates object to the following proposed designations:</p> <ul style="list-style-type: none"> <li>• The Haydon Bridge High School Buildings designation as Community facilities. The buildings are for the use and benefit of the school, and any use by the public should be based on agreement with the school administration to suit school needs and practical considerations. There should not be a presumption of public use or onus on the school to provide facilities given the potential burden on the school.</li> <li>• The Haydon Bridge High School playing field as public open space, (LGS09 and LGS05) opposed for the reason given above.</li> </ul>	<b>No change.</b> The proposed designation as local green space would not create a presumption that the sites would have a public use. It is highlighting that they are demonstrably special to the local community (for the reasons set out within the background paper).
Northumberland County Council (Education and Skills)	<p>Subject to their being adequate consultation with Haydon Bridge High School regarding access to any of the following areas cited in the plan, the Education Group has the following comments.</p> <ul style="list-style-type: none"> <li>• Para. 5.71 Policy H11 Local Green Space, ref LGS09 Cricket Pitch at Haydon Bridge High School. Access to cricket pitch in the</li> </ul>	<b>No change.</b> The proposed designation as local green space would not create a presumption that the site would have a public use. It is highlighting that they it are demonstrably special to the local community (for the reasons set out within the background paper).

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	ownership of the School to be agreed on the terms of the school Governing Body.	
Haydon Bridge High School	Ref LGS09 Cricket Pitch at HBHS. This land is in the ownership of Haydon Bridge High School and as such any access to this land for any community purpose can only with the permission of the school.	<b>No change.</b> The proposed designation as local green space would not create a presumption that the site would have a public use. It is highlighting that it is demonstrably special to the local community (for the reasons set out within the background paper).
<b>Policy H12: Protected open space</b>		
Northumberland County Council (Strategic Estates)	Strategic Estates object to the following proposed designations: <ul style="list-style-type: none"> <li>• The Haydon Bridge High School Playing field as protected open space (POS02). The use of the field should not be limited in any way that would impact on the future development of new or alternative facilities for the school. Also, given the adjacency to open fields, the designation does not seem reasonable. On that basis, we object to the proposed designation.</li> </ul>	<b>No change.</b> The designation of protected open space does not change the use of the site, it is not seeking to limit its current use. It has been identified as it is used for sport and recreation and is important to the character of the local area. Policy H12 defines the criteria against which any proposal for the change of use of the site would be considered.
Northumberland County Council (Education and Skills)	Subject to their being adequate consultation with Haydon Bridge High School regarding access to any of the following areas cited in the plan, the Education Group has the following comments. <ul style="list-style-type: none"> <li>• Para. 5.74 Policy H12 Protected Open Space, ref POS02 Haydon Bridge High School Rugby pitches. Access to rugby pitches in the ownership of the school to be agreed on the terms of the school Governing Body.</li> </ul>	<b>No change.</b> The designation of protected open space does not change the use of the site, nor grant public access. It has been identified as it is used for sport and recreation and is important to the character of the local area.
Haydon Bridge High School	Ref POS02 HBHS Rugby pitches. This land is in the ownership of Haydon Bridge High School and as such any access to this land for any community purpose can only with the permission of the school.	<b>No change.</b> The designation of protected open space does not change the use of the site, nor grant public access. It has been identified as it is used for sport and recreation and is important to the character of the local area.

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<b>Paragraph 5.94</b>		
Northumberland County Council (Flooding & Coastal Erosion Risk Management)	The use of SuDS for all developments could also be emphasised in paragraph 5.94.	<b>Amend</b> criterion 'i' of paragraph 5.94 to add 'sustainable' prior to 'drainage' in the second sentence.
<b>Policy H14: Land west of Langley Gardens and north of Ratcliffe Road</b>		
Northumberland County Council	<p>Policy HOU6 of the emerging Northumberland Local Plan, as modified, addresses the need for and ability to deliver affordable housing as a policy cost to development by reference to housing value areas. Haydon Parish falls into a medium value area where the evidence supporting the emerging Local Plan demonstrates that development could not support more than 15% affordable housing. We note that the policy has been modified to delete its earlier reference to the expectation that 22% affordable housing should be delivered on this site and this is welcomed. However, the policy is now drafted with the expectation that '<i>...at least 15% affordable housing...</i>' is delivered on the site.</p> <p>Policy HOU6 of the emerging Northumberland Local Plan and the evidence that supports that policy, specifically in regard to the impact of development costs on viability, does not set the affordable housing requirements in the four defined different value areas as minimum proportions. Notwithstanding evidence of local need, the Neighbourhood Plan cannot increase policy costs without evidence that this would not undermine the deliverability of the Plan. Use of the term 'at least' therefore leads to the policy failing to meet the basic conditions in that, considering the available evidence that supports the emerging Local plan, this does not have regard to paragraph 34 of NPPF.</p>	<p><b>Amend</b> – remove reference to 'at least' from policy H14 a.i. and from criterion b of paragraph 5.94. This was a drafting error.</p> <p>With regard to updating the housing background paper, it is understood that the purpose of the paper is to provide evidence to support the submission plan and does not need to be further updated. HPC would be happy to update the paper if this is necessary. Perhaps the county council could provide the updated housing information and the Examiner could decide if the paper requires updating.</p>

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	<p>We recommend that Policy H14 a.(i) is modified to delete the words ‘...at least...’. Consequent modification to the supporting text at paragraph 5.94 b. would also be required.</p> <p>In addition, we would advise that the supporting text and the Housing Background Paper are updated to reflect more recent changes regarding housing supply and delivery in the Parish. We would be happy to support the Parish Council by providing more recent data.</p>	
<b>Policy H15: Community services and facilities</b>		
Northumberland County Council	<p>We note the modifications made to the policy in regard to naming facilities and the revision to clarify which facilities this policy will apply to. These changes are welcomed.</p> <p>In reviewing the drafting of the Plan as a whole and the purpose of Policy H15 specifically we would question whether the first paragraph and parts a. to c. are necessary since they would generally repeat matters covered elsewhere in the Plan.</p> <p>This approach would not have regard to paragraph 16 f) of NPPF which seeks to avoid unnecessary duplication of policies. As drafted, the first paragraph would apply to the determination of proposals to enhance community services and facilities anywhere in the Neighbourhood Area. Appropriate controls already exist to address development impacts from such proposals where they are located within the settlements through Policy H1 part c. and through Policy H6 (parts j, k, o and p.) of the Plan.</p> <p>Where development is proposed to be located in the countryside beyond existing settlements then the controls provided in Policy H2 would be sufficient to manage development when read in</p>	<p><b>Amend</b> to remove the first paragraph of the policy, including policy criteria a-c as these matters would be addressed through policy H6.</p> <p>With regard to development in the open countryside, the proposed amendments to policy H2 and the suggested additional supporting text suggested to be added in advance of the policy should address this issue.</p> <p>It is considered that the third paragraph does what is required by paragraph 93 of the NPPF. It identifies those valued facilities and services, all of which are identified by the local community through the household survey. Specific businesses were not referred to within the policy as it is considered that this would limit flexibility as the services could be provided in different ways; for example it might not be essential that they were provided in separate buildings.</p> <p>Amend the fourth paragraph of the policy to address the issue of permitted development rights, as follows:</p>

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	<p>conjunction with Policies H1 and H6, provided Policy H2 is modified to address our concerns referred to above regarding the need to make reference to requirements set out at paragraph 85 of NPPF. There is no need to repeat requirements within the Neighbourhood Plan. The first paragraph would not meet the basic conditions since policies should be drafted to be concise.</p> <p>The 3rd paragraph of the policy also retains a general approach to the protection of virtually all facilities that provide a service to the community and it lists these generically as ‘...newsagent/ convenience store, pharmacy...’ etc. While we recognise that paragraph 93 of NPPF allows for planning policies to guard against the unnecessary loss of valued facilities, and allows for policies to ensure that established shops and other services and facilities are retained for the benefit of the community, we would suggest that because national policy refers specifically to ‘established’ facilities it would be more appropriate if the policy was more specific by directly referencing those shops, services and facilities to which the policy would apply.</p> <p>In reviewing the 3rd paragraph of policy H15 it should also be noted that recent changes to the Use Classes Order, particularly the creation of Use Classes E, F1 and F2 may allow opportunities for existing facilities to change their use to another within the wider use class definitions now created. This change to legislation should be reflected in the drafting of the policy by, for example, modifying the policy to confirm that it would apply to those proposals where planning permission is required. Whilst this may be evident to decision makers such a modification would add clarity for the local community about the extent to which the policy may be engaged in future decisions. A modification would also address recent and any future changes</p>	<p><i>‘Where planning permission is required for a development that would result in the loss...’</i></p>

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	in permitted development rights regarding permitted changes of use.	
Northumberland County Council (Strategic Estates)	<p>Strategic Estates object to the following proposed designations:</p> <ul style="list-style-type: none"> <li>• The Haydon Bridge High School Buildings designation as Community facilities. The buildings are for the use and benefit of the school, and any use by the public should be based on agreement with the school administration to suit school needs and practical considerations. There should not be a presumption of public use or onus on the school to provide facilities given the potential burden on the school.</li> </ul>	<b>No change.</b> The identification as the school as an important community facility does not suggest that there will automatically be public access.
Northumberland County Council (Education and Skills)	<p>Subject to their being adequate consultation with Haydon Bridge High School regarding access to any of the following areas cited in the plan, the Education Group has the following comments.</p> <ul style="list-style-type: none"> <li>• Para. 5.98 Policy H15 Community Services and Facilities, ref CF6 - Haydon Bridge High School; Objective 5 Vibrant and thriving communities. If the school closed, the land and buildings would revert to the local authority.</li> </ul>	<b>No change.</b> The policy has no implications regarding property ownership.
Haydon Bridge High School	Ref CF6 - Haydon Bridge High School; Objective 5 Vibrant and thriving communities. In the event of Haydon Bridge High School either in partly or wholly no longer being needed ownership will revert to the Northumberland County Council who are also the planning authority.	<b>No change.</b> The policy has no implications regarding property ownership.
<b>Paragraph 5.110</b>		
Northumberland National Park Authority	Reference is only made to the policies of the Northumberland Local Plan that relate to retention and growth of local businesses, there is no difference to the NNPLP policies. Officers are satisfied that Policy DM7 of the NNPLP is sufficient to promote home working and promoting and protecting local businesses, but	<b>Amend.</b> Add a new sentence prior to that in paragraph 5.110: <i>'The National Park Local Plan also includes policy support for the retention and growth of local businesses.'</i>

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	maybe reference should be included to these supporting paragraphs for completeness.	
<b>Policy H17: Tourism</b>		
Northumberland National Park Authority	<p>The second part of this policy is relevant to NNPA. It does not reflect the strategic spatial policy of ST4 of the NNPLP (page 30) which requires an essential need to be provided for tourism development to be considered acceptable in an unsustainable location. It is also unclear whether tourism facilities and visitor accommodation development should only make use of previously developed land and buildings or whether it allows new buildings. It is suggested that the second part is clarified and our suggestion would be</p> <p>In the open countryside tourism facilities and visitor accommodation development will be required to respect the <i>local landscape</i> character of the countryside and should make use of <del>previously developed land and existing</del> buildings where suitable opportunities exist, <del>as well as complying with other relevant policies in the development plan.</del> <i>New buildings will only be allowed in accordance with Policy H2 and other relevant policies.</i></p>	<p>Whilst the changes proposed by NNPA may reflect policy ST4 of the NNPLP it is considered that this would not reflect the provisions of paragraph 84 of the NPPF. Suggest <b>amendment</b> of the second paragraph to: <i>'Outside Northumberland National Park and in the open countryside...'</i></p>
<b>Policy H18: Agriculture</b>		
Northumberland National Park Authority	<p>This policy is considered too simplistic. The policy states that development that supports the agricultural industry and farm diversification schemes will be supported where they meet other policies. Whilst the National Park supports farm diversification in principle this will depend upon the scale of such development, but also the consideration of wider issues such as the special qualities of the National Park including landscape character,</p>	<p><b>No change.</b> Whilst the concerns are noted, the agricultural industry is very important to the local community in terms of its management of the countryside and as a local employer. The policy does not support agricultural developments at all costs; it specifically refers to the need to comply with other development plan policies.</p>



Consultee	Comment	Haydon Parish Council Response
	tranquillity, biodiversity and cultural heritage which does not come across within the policy. It is more than just local character and local amenity that is relevant to farm diversification schemes, such as consideration of noise, odours; level of activity and highways access to be considered.	
<b>Policy H20: Walking and cycling network</b>		
Northumberland County Council	We support the intention to provide planning policy support for a dedicated cycle route and footpath between Haydon Bridge and Hexham and note the work the Parish Council and others are involved in to facilitate the creation of that route. However, we remain concerned about the identification of a route on the Policies Map, even as a general extent as indicated in the policy. There is no specific evidence that demonstrates that this ‘general extent’ route is available or deliverable, or that this would necessarily be the best option to secure the desired outcome. It is indicated at paragraph 5.120 that feasibility work is yet to be funded. We would advise that Policy H20 should be modified to provide support for a dedicated segregated cycle and pedestrian route between Haydon Bridge and Hexham and reference to any general extent being defined should be deleted. The Policies Map should be modified accordingly.	<b>No change.</b> There is strong community support for the route and the general extent of the route has been informed by detailed work of members of the steering group in discussion with key stakeholders.
<b>Annex 1</b>		
Northumberland County Council (Public Health)	Feedback on Annex 1 (Community Actions): <ul style="list-style-type: none"> <li>Objective 1a and 1b (sustainability and climate change): consider involvement of Northumberland County Council’s climate change team in the delivery of these objectives.</li> <li>Objective 1b: consider liaising with Northumberland County Council’s Cold Homes Group to support information provision on renewable energy heating and power for domestic homes. This</li> </ul>	<p><b>Amend</b> objective 1a, add the words ‘<i>and NCC’s climate change team</i>’ in the ‘Who’ column.</p> <p><b>Amend</b> objective 1b, add the words ‘<i>and NCC’s climate change team and Cold Homes Group</i>’ in the ‘Who’ column.</p>

Consultee	Comment	Haydon Parish Council Response
	<p>objective also links with Public Health’s Joint Strategic Needs Assessment – which will include a chapter on fuel poverty.</p> <ul style="list-style-type: none"> <li>Objective 5 (vibrant and thriving communities): considering high proportion of older people living alone, consider investing in and developing activities for this population.</li> <li>Objective 7 (accessibility and transport): consider involvement of Northumberland County Council’s climate change team in the delivery of such goals as public electric car charging points in the village.</li> </ul>	<p><b>No change</b> to objective 5b relating to services for older people. The Development Trust already runs a luncheon club with activities which includes older people living alone, and is considering whether there would be a need or demand for additional activities’</p> <p><b>Amend</b> objective 7b - add the words ‘<i>and NCC’s climate change team</i>’ in the ‘Who’ column</p>
Northumberland County Council (Education and Skills)	Annex 1, Objective 5, Vibrant and thriving communities, ref 5a – secure access to the High School facilities outside school hours etc. The Governing Body and headteacher of the school set the terms and conditions of access to the school's facilities outside of school hours. We suggest this is reworded to state increased access would be sought with the Governing Body of Haydon Bridge High School.	<b>Amend</b> objective 5a - add the words ‘ <i>in conjunction with the Governing Body of Haydon Bridge High School</i> ’ in the ‘Who’ column.
Haydon Bridge High School	Ref 5a - secure access to the High School facilities outside school hours etc. This land, buildings and incorporated facilities are in the ownership of Haydon Bridge High School and as such any access to the land, buildings and incorporated facilities for any community purpose can only with the permission of the school. Any venture to increase access to any facilities that the school may have can only occur where there is full agreement between the parties. The school has the right to control access to its facilities at all times.	See response above to the Northumberland County Council Education and Skills comment on this matter.
<b>Policies Map</b>		
Northumberland County Council	The Conservation Area is not shown on the conservation area assets map. This should be modified.	<b>Amend</b> as suggested.

Consultee	Comment	Haydon Parish Council Response
	<p>It would be helpful to identify the settlement of Langley on the Policies Map by providing a name adjacent to the settlement on the Map. This would aid in navigating the Map for those unfamiliar with the locality.</p>	
<b>Basic Conditions Statement</b>		
<p>Northumberland National Park Authority</p>	<p>NNPA is satisfied with the general content of the Basic Conditions Statement with the following comments.</p> <p>In relation to the Strategic Policies of the Northumberland National Park Local Plan (adopted July 2020) Table 5 General Conformity with the strategic policies does not make reference to the relevant strategic NNPLP policies in relation to the proposed Neighbourhood Plan policies.</p> <ul style="list-style-type: none"> <li>• H3 Energy efficiency and renewable energy should include reference to NNPLP ST1 and ST2</li> <li>• H5 Flood prevention should include reference to NNPLP ST1 and ST2</li> <li>• H6 Design should include reference to NNPLP ST2</li> <li>• H8 Landscape should include reference to NNPLP ST1 and ST2. Landscape is identified as one of the designated special qualities of the National Park.</li> <li>• H9 Biodiversity should include reference to NNPLP ST1 and ST2</li> <li>• H17 Tourism should include reference to NNPLP ST4</li> <li>• H18 Agriculture should include reference to NNPLP ST4</li> <li>• H19 Sustainable transport should include reference to ST2</li> </ul> <p>It is noted that Appendix 2 only refers to Tynedale Core Strategy and not the strategic policies of the Northumberland National Park Local Plan adopted July 2020. These Strategic policies should be added to the Basic Conditions Statement for completeness.</p>	<p><b>Amend.</b> An addendum to table 5 could be prepared to refer to these policies if this is considered to be required by the Examiner.</p>

Consultee	Comment	Haydon Parish Council Response
<b>Design Code</b>		
Northumberland County Council (Environment and Design Team)	<p>Section 4.5.2. Farmstead Conversions/ Extensions We would seek to reuse existing openings and resist new openings as much as possible so we would expect a little more than <i>'Retain existing apertures in place to inform the overall design'</i></p> <p>Regarding <i>'Use a consistent material palette across a farmstead development so that properties appear as a unified settlement rather than a collection of individual properties. For example, the use of the same windows and doors.'</i></p> <p>We would advise a more subtle approach so that if a farmstead had a variety of existing door types, it would be possible to replicate those. Also with windows, if a window pattern is mixed, this may also need to be replicated rather than a standardised style which would create a more homogenised form of development.</p> <p>Section 4.6.2. Carbon Neutral Homes Figure 102 could be expanded to include SuDS. In particular rainwater harvesting, water butts, permeable paving and rain planters to name a few.</p>	AECOM has been contacted to check if the design code can be updated to reflect these comments.
<b>Natural Environment Background Paper</b>		
Northumberland National Park Authority	It is noted that reference is only made to Northumberland County Council policies in section 2.10 and any reference to Northumberland National Park Authority policies have been omitted. For completeness the NNPLP policies should be included, these would be ST1, ST2, DM10, DM11, DM12.	The NNPLP policies were omitted in error and the background paper can be updated if this is considered necessary by the Examiner.