

Senior Planning Officer  
Planning and Housing Services,  
Northumberland County Council,  
Morpeth,  
Northumberland, NE61 2EF

10<sup>th</sup> February 2015

Dear Sir/Madam

### **Northumberland Core Strategy: Response**

Please find below the response from the Natural History Society of Northumbria to the latest consultation on the Northumberland Core Strategy. We welcome that the Core Strategy recognises some of the economic and health benefits that stem from protecting and enhancing the natural environment and that it contains policies designed to protect the most important sites.

However we are concerned that some of the wording in the strategy means that some of the policies are weaker than the strategy makes out. We know from past experience that developers will use words like “where appropriate” “where possible”, “to consider” “outweighs the impact” to argue that their development does not breach planning policy. This ambiguity can often lead to differences of professional opinion and planning appeals. We would like to see some of the policy wording tightened up and have recommended this in some of our detailed responses below:

### **Section 3: Spatial Vision, Objectives, and Outcomes**

The first three bullet points in section 3.9:

- ‘Northumberland’s natural and historic environment will continue to be experienced and valued by residents and visitors, within the scope that is possible to maintain their full protection and allow for their enhancement’;
- ‘wherever possible, development will have been directed away from our most sensitive and valuable natural assets, habitats and species, towards less sensitive locations’.
- ‘new development will have contributed to the delivery of priorities set out by the Local Nature Partnerships.’

We believe that the text we have underlined contains some equivocation in this wording – the phrases can mean all things to all men and thus do not afford the

protection that the general thrust of the text implies. We would like to see stronger wording in the first two bullet points, with an expressed presumption against development which does not fully comply with the intended outcomes. The wording 'provided there is no detrimental environmental impact', used in the fourth bullet point of section 3.11 (key outcomes for ensuring connectivity) is stronger wording of the type we are seeking.

Regarding the last bullet point, Local Nature Partnerships are a relatively new initiative with few resources or powers. Whilst we hope that they will be successful there is no guarantee that they will persist through the duration of this plan. In the event that one or both of them were to fold where would this leave this policy? We would advise that a caveat be included at the end of the sentence "...the Local Nature Partnerships or other strategic biodiversity initiatives".

### **Managing Natural Resources**

We request the omission of the word 'unacceptable' from the second bullet point in section 3.18: an adverse impact is an adverse impact, and does not need qualification.

### **Section 4: Delivering the Vision for Northumberland**

NHSN fully supports the wording of Policy 1 (d), (e), and (h). However we believe that Policy 2 (f) (v) is unsatisfactory. We assume that this is a re-working of the old 'Gummer Clause', a piece of supplementary government planning guidance (PPG7) from 1997 which, amongst other things, sought to allow the building of new mansions in the open countryside in the style of the old 'Stately Homes' as if we were back in the halcyon days of the 18<sup>th</sup> century when the national population was much smaller. 'Innovative and of the highest standard' is an extraordinarily loose phrase, even though it is based on the wording in para 55 of the National Planning Policy Framework (NPPF); and the wording contains no attempt to prevent development which would damage (for example) the natural or historic environment. The final bullet point of para 55 of the NPPF includes the wording '... such a design should ... be sensitive to the defining characteristics of the local area'. We object Policy 2 (f) (v) and at the very least would want to see wording added that would afford protection to the natural and historic environment and landscape character.

### **Section 5: Delivering a Thriving and Competitive Economy**

#### **Leisure Facilities**

Policy 12 (a) relates to large-scale facilities. There is no specific requirement in the Policy that there be no adverse impact on the natural environment, ecosystems, or to ensure adequate promotion of biodiversity. We ask that this to be inserted as Policy 12 (a) (vi); wording similar to that in Policy 11 (h) (ii) would suffice.

### **Section 6: Housing**

NewcastleGateshead Council have already submitted their Core Strategy which plans for a significant increase in house building. Their stated justification for this increase is based on stemming an outflow of working families to surrounding districts,

including Northumberland. We can see no evidence in the Core Strategy or supporting documents that Northumberland has correspondingly reduced its housing requirements for working age families despite the duty to co-operate statement. It is our view that both authorities are competing to house the same population for economic reasons with a corresponding over supply of land above the actual need for this population group.

## **Section 7: Green Belt**

We repeat the comments made a year ago, on the Strategic Land Review, relating to land at Prudhoe and north of Morpeth where we are concerned about the impact of development on:

- (a) the conservation of ancient woodland in the valley of the How Burn north-east of Morpeth; and
- (b) the ecological value of the woodland on the site of Prudhoe Hospital and the adjacent nature reserve of Priestclose Woods.

Before these sites are included in any plans we would want to see ecological work carried out that would demonstrate that these sites could be developed without contradicting the Core Strategy and NPPF regarding biodiversity loss. In particular we are concerned that the role of the Local Plan (as set out in the NPPF) is to locate development to sites where there will be least impact (unless suitable alternatives are not available). In this case there are other less damaging sites available and so we question whether the inclusion of these sites is compliant with NPPF guidance.

## **Section 8: Protecting and Enhancing Northumberland's Distinctive and Valued Natural, Historic, and Built Environment**

Sections 8.93 to 8.96 deal with the concept of Sustainable Urban Drainage Systems (SuDS). In the Core Strategy the text and the relevant Policy (32) make no reference to the concept that SuDS should be designed and implemented so as to promote the conservation of the natural environment in a manner wider than simply to ameliorate flooding; indeed such an aim is included in the Government's National Standards on the subject (December 2011). We ask that wording to this effect is added to the policy.

## **Section 10: Community well-being**

Policy 45. Recreational open space. We support the inclusion of:

- i. Where a scheme of more than 10 dwellings and/or holiday homes is proposed within 6km of the coast, consideration is given to providing additional informal open space, over and above local standards, in order to divert pressure from protected areas along the coastline itself.

However we would like to see "consideration" replaced with wording that gives more emphasis, eg:

"Where a scheme of more than 10 dwellings and/or holiday homes is proposed within 6km of the coast, additional informal open space, over and above local standards will be expected, in order to divert pressure from protected areas along the coastline itself."

We would also like to make the point that some of the impact of mass recreation on the coastline could be mitigated if resources were made available for better

recreational management at the coastline. This could include for example a coastal ranger service or temporarily restricting access in sensitive locations at certain times of the year, as happens with the Little Tern colony at High Newton. Arguably these measures may be just as effective, if not more so, than the proposal put forwards in the policy. We would like to see this policy broadened to include scope for other suitable mitigation measures. Eg:

“Where a scheme of more than 10 dwellings and/or holiday homes is proposed within 6km of the coast, additional informal open space, over and above local standards will be expected or other appropriate mitigation in order to divert or reduce pressure on protected areas along the coastline itself.”

Policy 46. We would ask that the words ‘where appropriate’ in the first sentence of the second paragraph of the Policy be omitted: given that this is a key strand of the plan and it is so broad and easy to achieve we can not see a situation where it would not be appropriate.

In relation to Policy 46 we are aware of instances in the UK where developers have offered to increase public access to adjacent semi-natural greenspace as part of their development proposal in order to enhance or increase green infrastructure – in line with policies such as this. However in some cases this can be to the detriment of wildlife living in these semi-natural greenspaces due to the impacts of increased human disturbance. This creates a problem in planning terms as the proposal is in line with the policy for green infrastructure but not for biodiversity. For this reason we would like to see additional wording added to policy b. “Secure improved access to green infrastructure, including rights of way, cycle routes and bridleways and high quality provision for the widest possible range of ages, abilities and interests, where this is not to the detriment of biodiversity or other environmental or heritage assets”.

We trust that you will consider our views and act accordingly.

Yours faithfully,



James Littlewood  
Director