

LONGHOUGHTON, BOULMER AND HOWICK NEIGHBOURHOOD PLAN

**Report to Northumberland County Council of the Independent
Examination**

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1. Executive Summary

1. I was appointed by Northumberland County Council with the support of Longhoughton Parish Council to conduct the independent examination of the Longhoughton, Boulmer and Howick Neighbourhood Plan.

2. I undertook the examination by reviewing the submitted Plan, associated documents and written representations, and by making an unaccompanied visit to the Neighbourhood Area.

3. I consider the Plan to be an adequate expression of the community's views and ambitions for Longhoughton, Boulmer and Howick. It is based on an effective programme of public consultation which has informed a Vision to 2036. This is to be achieved through a set of seven objectives delivered through 12 planning policies dealing with matters distinct to the locality and a series of community actions (which are not considered by this examination for the purposes of meeting the Basic Conditions). The Plan is supported by a Consultation Statement and Basic Conditions Statement along with a full Strategic Environmental Assessment and an Appropriate Assessment addressing the risk of likely significant effects on European sites recognised by the Habitats Regulations. There is supporting evidence provided and there is evidence of community support and the involvement of the local planning authority.

4. I have considered the 13 separate representations made on the submitted Plan, including from Longhoughton Parish Council. These are addressed in this report as appropriate.

5. Subject to the recommended modifications set out in this report I conclude that the Longhoughton, Boulmer and Howick Neighbourhood Plan meets all the necessary legal requirements, including satisfying the Basic Conditions. I make a number of additional optional recommended modifications.

6. I recommend that the modified Plan should proceed to Referendum and that this should be held within the Longhoughton Neighbourhood Area.

2. Introduction

7. This report sets out the findings of my independent examination of the Longhoughton, Boulmer and Howick Neighbourhood Plan. The Plan was submitted to Northumberland County Council by Longhoughton Parish Council as the Qualifying Body.

8. I was appointed as the independent examiner of the Longhoughton, Boulmer and Howick Neighbourhood Plan by Northumberland County Council with the agreement of Longhoughton Parish Council.

9. I am independent of Longhoughton Parish Council and Northumberland County Council. I do not have any interest in any land that may be affected by the Plan. I possess the appropriate qualifications and experience to undertake this role.

10. My role is to examine the neighbourhood plan and recommend whether it should proceed to referendum. A recommendation to proceed is predicated on the Plan meeting all legal requirements as submitted or in a modified form, and on the Plan addressing the required modifications recommended in this report.

11. As part of this process I must consider whether the submitted Plan meets the Basic Conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended). To comply with the Basic Conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State; and
- contribute to the achievement of sustainable development; and
- be in general conformity with the strategic policies of the development plan in the area; and
- be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations, including the Conservation of Habitats and Species Regulations 2017.

12. An additional Basic Condition was introduced by Regulations 32 and 33 of the Neighbourhood Planning (General) Regulations 2012 (as amended) in 2018 that the making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017. I am also required to make a number of other checks under paragraph 8(1) of Schedule 4B of the Town and Country Planning Act 1990.

13. In undertaking this examination I have considered the following documents as the most significant in arriving at my recommendations:

- the submitted Longhoughton, Boulmer and Howick Neighbourhood Plan
- the Basic Conditions Statement
- the Consultation Statement
- the Strategic Environmental Assessment
- the Appropriate Assessment
- the relevant parts of the existing development plan, comprising the Northumberland Local Plan 2016-2036
- representations made on the submitted neighbourhood plan
- relevant material held on the Longhoughton Parish Council and Northumberland County Council websites
- National Planning Policy Framework
- Planning Practice Guidance
- relevant Ministerial Statements

14. The Plan was largely prepared prior to publication of the revised National Planning Policy Framework (NPPF) in December 2024 although this is used to inform the Basic Conditions Statement. The Plan was submitted to Northumberland County Council on 13 March 2025 and the policies of the December 2024 version of the NPPF apply for all neighbourhood plans submitted on or after 12 March 2025 (paragraph 239, NPPF).

15. No representations were received requesting a public hearing and having considered the documents provided and the representations on the submitted Plan I was satisfied that the examination could be undertaken by written representations without the need for a hearing.

16. I conducted an unaccompanied visit to the Neighbourhood Area on a weekday during August. I visited the main locations addressed in the Plan, including the Local Green Spaces, Protected Open Spaces, housing allocations, Boulmer Settlement Boundary, important views, identified services and facilities, a selection of public rights of way and the area of Boulmer proposed for a principal residence restriction.

17. Throughout this report my recommended modifications are bulleted. Where modifications to policies are recommended they are highlighted in **bold** print with new wording in “speech marks”. Existing wording is in “*italics*”. Other modifications, including to the supporting text, are also recommended and these are not in bold. The recommended modifications are numbered from M1 and are necessary for the Plan to meet the Basic Conditions. A number of modifications are not essential for the Plan to meet the Basic Conditions and these are numbered from OM1 and indicated by [square brackets]. Some further changes will also be needed to the supporting text and documents consequential to the modifications. These should be agreed between Northumberland County Council and Longhoughton Parish Council.

18. Producing the Longhoughton, Boulmer and Howick Neighbourhood Plan has clearly involved significant effort over many years led by the Steering Group. The process began in 2017 and is informed by significant community involvement. There is evidence of collaboration with Northumberland County Council and continuing this will be important in ensuring implementation of the Plan. The commitment of all those who have worked so hard over such an extended period of time to prepare the Plan is to be commended and I would like to thank all those at Longhoughton Parish Council and Northumberland County Council who have supported this examination process.

3. Compliance with matters other than the Basic Conditions

19. I am required to check compliance of the Plan with a number of matters.

Qualifying body

20. The neighbourhood plan has been prepared by a suitable Qualifying Body – Longhoughton Parish Council – which being a parish council is the only organisation which can prepare a neighbourhood plan for the area.

Neighbourhood Area

21. I am satisfied that the Plan relates to the development and use of land for a designated neighbourhood area which was first designated by Northumberland County Council on 26 October 2018. Following a change to parish boundaries a small area was added and the revised neighbourhood area was designated on 11 August 2021. It is noted that the name of the neighbourhood area is Longhoughton and the neighbourhood plan is Longhoughton, Boulmer and Howick.

22. The boundary of the neighbourhood area is shown in Figure 1 and accompanying Policies Map. A detailed map of the boundary is also available on the online Northumberland Development Plan Policies Map.

Land use issues

23. I am satisfied that the Plan's policies relate to relevant land use planning issues

Plan period

24. The period of the neighbourhood plan runs to 2036. The period is shown on the Plan cover and is consistent with the Vision. It aligns with the Northumberland Local Plan.

Excluded development

25. I am satisfied that the neighbourhood plan makes no provisions for excluded development (such as national infrastructure, minerals extraction or waste).

4. Consultation

26. I have reviewed the Consultation Statement and relevant information provided on the Longhoughton, Boulmer and Howick Neighbourhood Plan website. It provides a clear record of the consultation process that has been undertaken since the prospect of a neighbourhood plan was first developed in 2017. This was guided by a Steering Group once the neighbourhood area had been designated and this included members of local organisations and the local community.

27. The preparation of the neighbourhood plan has been open and transparent with good levels of participation. A number of different engagement methods have been used, including a website, public meetings, surveys, drop-in events, banners, social media, films and community newsletters. At least 60% of resident households contributed to key elements of the consultation process. Updates have been provided in the Longhoughton Parish Council Newsletter which is distributed to every household. Special efforts were made to continue consultation during periods of lockdown through the production of short films on aspects of the emerging plan. There have been door drops to every household and information has been published in summary form as well as providing full documents in public places.

28. The process has been informed by consultation on evidence relating to sustainable development, natural environment, heritage, green spaces, community facilities, housing, tourism and employment and transport and access. Background papers have been produced on key aspects of the Plan which provide necessary evidence to support its contents. There has been technical and other support provided by experienced consultants. Northumberland County Council has been involved during the consultation process.

29. The Plan was subject to Regulation 14 consultation between 29 September 2023 and 13 November 2023. The consultation included circulation of a summary leaflet to every household, four drop-in events and promotion online, through local publications and media outlets and via banners. There is evidence of the consultation including the required

statutory and other consultees. Landowners of affected sites were included. Physical copies of the Plan were made available. Multiple channels for making comments were provided. There were responses from 88 residents, 10 consultation bodies and seven other organisations, including landowners.

30. A comprehensive report on the issues raised is provided in the Consultation Statement and there is significant evidence of changes being made to the Plan.

31. 13 separate representations have been made on the submitted Plan, including from residents and statutory bodies. These include representations from Longhoughton Parish Council seeking an amendment to the submitted Plan. All the representations have been considered as part of the examination and are addressed as appropriate in this report. Longhoughton Parish Council was given an opportunity to comment on the representations received.

32. Representations from MOD Defence Infrastructure Organisation highlight safeguarding policies which would apply to RAF Boulmer. I am content that the issues raised do not require any modification to the Plan. Relevant matters are already addressed in Local Plan Policy ECN17 and would be addressed when development proposals come forward. The general comments from the Marine Management Organisation encourage reference to the North East Marine Plan. This is not necessary in relation to any of the Plan's policies in order to meet the Basic Conditions but it would be appropriate to include a reference in the supporting text.

- OM1 – [Consider including a reference to the relevance of the North East Marine Plan in an appropriate location in the supporting text]

33. Northumberland County Council has made significant representations on the Plan and these are addressed in relation to the relevant policies. It has made a number of more "*General Comments*" (paragraph 27, NCC representations) and I agree with those identified as General and relating to paragraphs 4.6, 5.4 and 5.12.

- OM2 – [Amend the Plan in response to representations from Northumberland County Council as indicated]

34. I am satisfied with the evidence of the public consultation undertaken in preparing the Plan. The Plan has been subject to appropriate public consultation at different stages in its development. Participation rates have been very good and appropriate opportunities to shape the Plan as it has developed have been provided. Local landowners, statutory consultees, other stakeholders and the local planning authority have been engaged through the process.

5. General comments on the Plan's presentation

Vision and Objectives

35. The Plan includes a Vision for Longhoughton Parish in 2036. This presents a positive ambition and reflects the feedback received through consultation. It is consistent with the aims and policies in the Plan. The overall approach is based on sustaining the unique and distinctive character of the villages of Longhoughton, Howick and Boulmer with future needs being met in a sustainable way, including through development that minimises environmental harm and addresses future climate change. The Vision is consistent with sustainable development and this is complemented by the Plan's aims.

Other issues

36. The Plan is clearly structured and has a consistent format. The general approach is to focus on issues where the Plan can add value to existing Local Plan and national planning policy. This is commendable. It addresses the expectation in national Planning Practice Guidance that neighbourhood plans should *"be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared"* (Paragraph: 041 Reference ID: 41-041-20140306,NPPG). The Policies are clearly identified by green tinted boxes and generally supported by evidence although there are issues which I address in relation to individual policies. The Plan references background papers and other documents which make up the evidence base. It would be helpful if links were provided to all documents and the main evidence base documents were brought together in an Annex. There is a single instance in Part 5 where the heading in the Contents is not the same as that used in the body of the Plan (*"within"* or *"in"* Boulmer).

37. The Plan references a *"Policies Map"*. This is available as a separate document, including with insets to show the detail in and around Longhoughton and Boulmer. It would be helpful to include copies in the body of the Plan and to provide a direct link to the map online wherever it is mentioned. Northumberland County Council has committed to including all relevant neighbourhood plan policies on its Development Plan Policies Map once they have been made.

- OM3 – [Provide an Annex containing the evidence base with links to the documents]
- OM4 – [Include the Policies Map (including insets) in the Plan and provide a link wherever it is mentioned]

6. Compliance with the Basic Conditions

National planning policy

38. The Plan is required to “*have regard*” to national planning policies and advice. This is addressed in the Basic Conditions Statement which relates each of the Plan’s policies and objectives to the National Planning Policy Framework (NPPF). The Basic Conditions Statement relates the Plan to the December 2024 version of the NPPF.

39. The Basic Conditions Statement includes a table that relates each of the Plan’s policies to relevant paragraphs of the NPPF and provides a short commentary. No instances of conflict are identified and the assessment concludes that “*the policies have had regard to national policy and guidance*”.

40. I agree with the Basic Conditions Statement that the Plan has regard to national planning policy and guidance with some exceptions as addressed in my consideration of individual policies. I recommend some modifications. These include areas where the drafting of the Plan’s policies needs to be amended in order to meet the NPPF’s principles regarding the clarity of policies, the need for policies to be positively worded, to serve a clear purpose and to avoid duplication. I also address the requirement expressed in national planning policy and Planning Practice Guidance that “*A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.*” (NPPG Paragraph: 041 Reference ID: 41-041-20140306). The Plan’s policies do not always meet these requirements and a number of recommended modifications are made as a result.

41. I am satisfied that the Plan meets this Basic Condition other than where identified in my detailed comments and recommended modifications to the Plan policies.

Sustainable development

42. The Plan must *“contribute to the achievement of sustainable development”*. This is addressed in the Basic Conditions Statement by relating relevant Plan policies and aims to each of the economic, social and environmental objectives of the planning system which contribute to sustainable development. It concludes that this *“illustrates the alignment of aims and policies of the LBHNP with the three objectives of sustainable development”*. I am satisfied that the overall contribution of the Plan to sustainable development is positive and that the Plan meets this Basic Condition.

Development plan

43. The Plan must be *“in general conformity with the strategic policies of the development plan”*. The Basic Conditions Statement addresses this by identifying the Local Plan’s strategic policies and relating each of the Plan’s policies to relevant ones with a brief commentary. It concludes that this *“sets out how the LBHNP policies are in general conformity with the relevant strategic development plan policies”*.

44. I am satisfied the Plan meets this Basic Condition.

Strategic Environmental Assessment (SEA)

45. The Plan must be informed by a Strategic Environmental Assessment if it is likely to have significant environmental effects. A screening assessment of the policies in the submitted Plan was undertaken by Northumberland County Council which concluded a Strategic Environment Assessment was required because an Appropriate Assessment was needed in accordance with the Habitats Regulations.

46. An SEA was undertaken by AECOM of the pre-submission draft Plan in 2023 with appropriate consultation on its scope including statutory environmental bodies. This concluded that the majority of effects will be positive and identified no neutral effects. An addendum was published in February 2025 to address changes made to the Plan’s policies in response to consultation feedback, including removal of a site allocation. This did not alter the conclusions of the original assessment.

47. Minor changes were made to the SEA in response to feedback from Historic England and Natural England agreed with its approach. Environment Agency made no response and has expressed no objections.

48. I am satisfied by the Strategic Environmental Assessment and conclude that the Plan meets this Basic Condition.

Habitats Regulations Assessment (HRA)

49. The Plan must be informed by a Habitats Regulations Assessment if it is likely to lead to significant negative effects on protected European sites. A screening assessment of the policies in the submitted plan was undertaken by Northumberland County Council. This concluded that a number of policies have a credible risk of a likely significant effect on European sites and an Appropriate Assessment was therefore undertaken. The Appropriate Assessment included Policy LBH6 although this is not referenced in the summary of conclusions as to which policies may have a significant negative effect.

50. The HRA report, including the Appropriate Assessment, was published by Northumberland County Council in January 2025. It concluded that “*adverse impacts on site integrity of European Sites will not occur with the proposed mitigation*”. The mitigation involves an addition to Policy LBH3 for relevant development to contribute to the Northumberland Coastal Mitigation Service or alternative mitigation of demonstrable effectiveness. I address this in my consideration of Policy LBH3.

51. Natural England agreed with the conclusion of the Appropriate Assessment subject to the relevant mitigation measures being secured in any planning permissions.

52. I am satisfied with the approach and conclude that the Plan meets this Basic Condition.

Other European obligations

53. The Plan must be compatible with European Convention on Human Rights (ECHR) obligations. The Basic Conditions Statement asserts compliance and no contrary evidence

to the Plan meeting this Basic Condition has been presented. There is good evidence of changes being made to the Plan during its preparation. I consider that there has been adequate opportunity for those with an interest in the Plan to make their views known and representations have been managed in an appropriate manner with changes made to the Plan.

54. I conclude that the Plan meets this Basic Condition.

7. Detailed comments on the Plan policies

55. This section of the report reviews and makes recommendations on each of the Plan's policies to ensure that they meet the Basic Conditions. I make comments on all policies in order to provide clarity on whether each meets the Basic Conditions. Some of the supporting text will need to be amended to take account of the recommended modifications.

Sustainable Development

Climate change

56. **Policy LBH1** – This supports development proposals which can demonstrate a sustainable approach to design and sensitive retrofitting of historic buildings for improved energy efficiency.

57. The Policy drafting is generally positive and supportive. It enables more sustainable development without being unduly restrictive. The expectation that development proposals “*must*” provide sufficient information is not consistent with the need for plan policies to be “*prepared positively*” (paragraph 16, NPPF) and I agree with Northumberland County Council's representations that this part of the Policy can also be made clearer.

58. The Policy drafting of criterion f. and Part 2 can be improved to “*serve a clear purpose*” (paragraph 16, NPPF). Given all relevant development plan policies are considered when determining a planning application it is unnecessary to reference compliance with other policies on heritage assets in criterion f. Planning policies are only relevant where a planning application is required for development and so limiting Part 2 to cases “*where planning permission is required*” serves no purpose.

59. The drafting of Part 2 can be improved to align with the approach to considering harm to heritage assets.

60. Policy LBH1 does not meet the Basic Conditions.

- **M1 – Amend Policy LBH1 to:**
 - Replace “*Applications must be supported by sufficient information to demonstrate how, where appropriate and relevant to the proposal,*” with “Where appropriate and relevant, proposals will be supported where” in the introduction to Part 1
 - Delete “*subject to compliance with other relevant policies on historic assets*” in criterion f.
 - Replace “*this does not result in harm to the significance of a heritage asset*” with “having appropriate regard to the scale of harm to the significance of any heritage asset”

Location of new development

61. **Policy LBH2** – This provides general support to development within settlement boundaries, including defining a settlement boundary for Boulmer, and treats development outside settlement boundaries and the village of Howick as being in open countryside.

62. The approach is informed by supportive feedback during public consultation and seeks to support the Local Plan’s intention to focus new development in sustainable locations. It supports the settlement boundary for Longhoughton defined in the Local Plan and defines a settlement boundary for Boulmer. Informed by public consultation no settlement boundary is proposed for Howick given its dispersed nature and definition of the village would need to be considered in relation to individual planning applications in the context of Local Plan Policy STP1.

63. The definition of a settlement boundary for Boulmer is located on the Policies Map and informed by a Background Paper. The role of neighbourhood plans in identifying settlement boundaries is supported in Local Plan Policy STP1 1e. The approach to defining the settlement boundary summarised in the Background paper is systematic and logical and the proposals have been subject to specific public consultation. It addresses existing planning consents and future development needs. There have been no representations objecting to the proposed boundary and it has received significant support through the process. I have visited the proposed boundary and am content with the approach.

64. I share Northumberland County Council's view that the Plan should do no more than define the settlement boundary and avoid any ambiguity resulting from an alternative wording to achieve the same ends as Local Plan Policy STP1.

65. Part 2 of the Policy seeks to recognise the particular circumstances of Howick while recognising it is not appropriate to define a settlement boundary due to its dispersed nature. This create unhelpful ambiguity over how development proposals will be considered and I agree with the conclusion reached in paragraph 4.9 that Local Plan Policy STP1 "*would effectively manage development proposals*". Part e.of Policy STP1 addresses development adjacent to the built up form of "*Small Villages*" which include Howick. As a result Part 2. serves no clear purpose. My recommended wording avoids making reference to other development plan policies as this also serves no clear purpose as all development proposals are considered against all relevant policies. The supporting text may explain the role of Local Plan Policy STP1 in addressing development coming forward adjacent to Howick and outside settlement boundaries if desired.

66. The revised scope of the Policy will require a change to its title (e.g. to "Settlement Boundaries"), to be agreed by Longhoughton Parish Council and Northumberland County Council.

67. Policy LBH2 does not meet the Basic Conditions.

- **M2 – Amend Policy LBH2 to:**
 - **Replace Part 1 with "A settlement boundary for Longhoughton and for Boulmer is identified on the Policies Map."**
 - **Delete Part 2**
- **M3 –Amend the title of Policy LBH2 to reflect its scope**
- OM5 – [Provide additional supporting text explaining the relationship with Local Plan Policy STP1]

68. **Policy LBH3** – This addresses the impact of residential and tourist development on designated coastal sites as a result of recreational disturbance.

69. The Appropriate Assessment of the Plan recommended inclusion of a policy addressing the impacts of recreational disturbance and supporting mitigation. The whole of the neighbourhood area falls within the 10km threshold identified for having a possible impact on a European Site.

70. The title of Policy LBH3 is wider than its content which is to address impacts on protected coastal sites and while not a matter for the Basic Conditions I suggest this is reflected in an amended title such as “Mitigating the impact of residential and tourist accommodation on coastal sites”. A change in title should be agreed by Northumberland County Council and Longhoughton Parish Council.

71. The Policy makes provision for alternatives to contributing to the Northumberland Coastal Mitigation Service. This is appropriate although it may be helpful to ensure any such measures should explicitly be at least as effective as a contribution to the Service.

72. Policy LBH3 meets the Basic Conditions.

- OM6 – [Amend Policy LBH3 to replace “*of demonstrable*” with “that is demonstrably of at least equivalent effectiveness”]
- OM7 – [Amend the title of Policy LBH3 to align it more closely with its scope]

Design

73. **Policy LBH4** – This seeks high quality designs which respect and respond to local character and are informed by the Longhoughton, Boulmer and Howick Design Code, including demonstrating how this has been done in Design and Access Statements.

74. The Policy is informed by the support in national planning policy for neighbourhood plans to address design considerations – “*Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should*

be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers” (paragraph 132, NPPF). It also supports Local Plan Policy QOP6’s requirement for Design and Access Statements to demonstrate how design considerations have been addressed.

75. This is addressed by providing a range of relevant design related considerations in the Policy and through production of a Design Code for the neighbourhood area. AECOM has produced design guidance and codes for the area under the Neighbourhood Planning Support Programme. This has been subject to public consultation. I am content with its approach and the policy drafting is not prescriptive in how the design guidance and codes should inform development proposals.

76. I recommend that the Policy is redrafted to be clear that it references both the design guidance and the codes it contains. A link to the design guidance and codes should be provided.

77. In addition to the expectations of the design guidance and codes the Policy includes 16 separate design related considerations which all need to be addressed for support to be given to development. There is significant duplication between these and what is contained in the design guidance and codes, in Local Plan policies, including Policy QOP1, and in national planning policy and guidance. The detailed considerations are all of a general nature and do not relate to the particular circumstances of the neighbourhood area and given this overlap I do not consider them to serve a clear purpose.

78. Policy LBH4 does not meet the Basic Conditions.

- **M4 – Amend Policy LBH4 to:**
 - **Replace “Code” with “Design Guidance and Design Codes” in Part 1**
 - **Delete Part 2**

- M5 – Provide a direct link to *The Longhoughton, Boulmer and Howick Neighbourhood Plan Design Guidance and Design Codes* document
- OM8 – [Be consistent in referencing the “Design Guidance and Design Codes” in the supporting text and throughout the Plan]

Housing

Site allocations

79. **Policy LBH5** – This allocates three sites for housing development which should have regard to the Design Code and masterplan work and be of a size, type and mix that meets identified local needs.

80. The Plan is informed by an analysis showing that completions and outstanding planning consents in the neighbourhood area more than meet Local Plan housing requirements and are well ahead of what is required by 2036. The Plan also identifies a continuing need for further homes as identified in the Housing Needs Assessment for the parish undertaken by AECOM to inform the Plan. This highlighted particular needs for affordable homes and two bedroom bungalows and two and three bedroom homes.

81. To meet the further need for homes an assessment of potential sites has been undertaken, including consultation with the community and landowners. An open approach was taken to identify potential sites from across the neighbourhood area. The approach is summarised in a background paper which shows how they have been informed by community feedback. It includes particular assessment of the scope to deliver more affordable homes through negotiation with a significant local landowner.

82. Three sites with capacity for 34 dwellings are identified and included on the Policies Map from an assessment process that explored 19 options. The three sites are each accompanied by a high level “Masterplan” summarising a preferred approach. This has been developed through community consultation and the overall approach and individual application to the allocated sites is published as a background paper. The masterplan work should be referenced in the supporting text with a link provided.

83. The policy drafting is not prescriptive by requiring applicants to have regard to the Masterplan. To avoid any ambiguity I recommend the Policy references the “individual” masterplan layouts” included in the Plan which bring together the salient issues from the background paper. I am content that the requirement for “*principal residence*” dwellings on the Boulmer south allocation is robust and consistent with Policy LBH6.

84. Given the level of engagement with landowners there is a reasonable prospect of the sites being delivered within the Plan period. I have visited the sites and the approach seems reasonable for each of the allocated sites. I have recommended the Policies Map showing the location and boundary of the sites is included in the main body of the Plan.

85. The Policy should reference to most recent versions of key documents.

86. Policy LBH5 does not meet the Basic Conditions.

- **M6 – Amend Policy LBH5 to:**

- Replace “*policies map*” with “Policies Map” in Part 1
- Add “incorporate” before “open” in Part 1c.
- Replace “2018” with “2024” in Part 2
- Replace “*delivery*” with “deliver” in Part 3
- Replace “*Residential Masterplan*” with “individual masterplan layouts for each site” in Part 3

- **M7 – Insert “layout” after “Masterplan” in the title of Figure 5**

- **OM9 – [Use capitals to name the “Old Recreation Field” in the subheading before paragraph 5.16]**

New housing as principal residence

87. **Policy LBH6** – This restricts new housing within Boulmer Parish Ward to that which is occupied only as a principal residence unless the share of second homes, holiday homes and commercial holiday lets is below 20%.

88. The Policy is informed in part by evidence of the impact of second and holiday homes on local communities which informed adoption of Local Plan Policy HOU10 that:

“Within Parishes identified in the most up-to-date Census as having 20% or more household spaces with no usual (i.e. permanent) residents, new market dwellings 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'. This restriction will be secured through a planning condition or Section 106 agreement.”

89. The effect of Policy LBH6 is to confirm that such conditions apply in Boulmer Parish Ward. This is supported by a background paper providing the necessary evidence which goes beyond that used in preparing the Local Plan to provide parish level information. The background paper confirms the principal residence restriction would apply whether the data is as used for implementing the Local Plan or whether it includes the additional local insight into the number and type of dwellings provided by Longhoughton Parish Council.

90. Effective implementation of the Policy will depend on the continuing publication of relevant data and Northumberland County Council has confirmed it will monitor the percentage of second homes/holiday homes and commercial holiday lets in the area covered by Longhoughton Neighbourhood Plan Policy LBH6 on an annual basis and will publish a note explaining how the policy will be implemented.

91. I consider the Plan’s intention to extend the approach provided by Local Plan Policy HOU10 to a sub-parish area to be fair and reasonable. It addresses marked variations within the parish and is a logical application of the expectation that neighbourhood plans should *“be distinct to reflect and respond to the unique characteristics and planning context of the*

specific neighbourhood area for which it has been prepared” (Paragraph: 041 Reference ID: 41-041-20140306,NPPG) when supported by relevant evidence.

92. The title of Policy LBH6 is drawn very widely and I recommend it is changed to reflect the focus on the principal residence restriction, such as “Principal residences” . The revised title should be agreed by Northumberland County Council and Longhoughton Parish Council.

93. Policy LBH6 meets the Basic Conditions.

- OM10 – [Clarify in the supporting text that the evidence used to support delivery of Policy LBH6 is the same as that used to support delivery of Local Plan Policy HOU10 – Northumberland County Council has proposed the following “Policy LBH6 limits all new housing in Boulmer Parish Ward to principal residency dwellings, where the County Council’s annual monitoring shows that the net number of second homes, holiday homes and commercial holiday lets in that area exceeds 20% of the total housing stock.”]
- OM11 – [Amend the title of Policy LBH6 to align it more closely with its scope]

Small scale rural exception sites

94. **Policy LBH7** – This applies a range of criteria which must all be met by development of affordable housing on exception sites outside settlement boundaries.

95. The stated intention is to support Local Plan Policy HOU7 for the delivery of affordable homes on exceptions sites while providing more detail in response to community feedback and evidence of need. I content with the overall approach, including the need for evidence that there are no other more suitable sites. In places the drafting is unduly restrictive in stating that development “*will only be permitted*”. The 2024 Northumberland Strategic Housing Market Assessment should be referenced as the most up to date document. The Policy includes a repeat sentence.

96. Policy LBH7 does not meet the Basic Conditions.

- **M8 – Amend Policy LBH7 to:**
 - Replace *“only be permitted”* with *“be supported”* in the first line
 - Replace *“2018”* with *“2024”* in d.
 - Delete the second instance of *“In such case, a viability assessment will be required to be submitted to demonstrate that cross-subsidy is necessary.”* in f.

Natural and historic environment

97. **Policy LBH8** – This requires development to maintain and enhance identified landscape character and address relevant planning considerations, including *“important views”* in three areas.

98. The overall approach is sound and responds to consultation feedback. It is supported by background papers on both the natural environment and on heritage. There is adequate evidence provided by the design guidance and codes for recognising *“important views”* which are provided in Figures 9-11. I visited each of the views and support their inclusion. Effective implementation of the Policy will require clarity over what is significant in the views and so I recommend direct reference is made to the detail provided in the design guidance and codes. This will also address representations from Northumberland County Council.

99. The reference to the Design Code should reference the Design Guidance consistent with Policy LBH4. It would be helpful to provide links to the Landscape Character Assessment and AONB Management Plan. Given these documents are likely to be reviewed during the Plan period with the Landscape Character Assessment dating to 2010 and the Management Plan for the national landscape already under review the Policy should reference *“successor documents”*. This is also consistent with the approach taken in other policies.

100. Policy LBH8 does not meet the Basic Conditions.

- **M9 – Amend Policy LBH8 to:**
 - **Replace “Code” with “ Guidance and Design Codes” in Part 1**
 - **Add “or their successor documents” to the end of Part 1**
 - **Add “and described in Design Code CC-03” after “9-11” in Part 2c.**

Community

101. **Policy LBH9** – This identifies specific facilities and commercial services of importance to the local community and requires planning applications resulting in the loss of any building or land in public or community use to meet relevant planning criteria.

102. The intention of Policy LBH9 is to take forward national planning policy for valuing community services and facilities at a local level. It builds on Local Plan Policy INF2 protecting against the loss of community facilities and services and INF3 protecting against the loss of village convenience stores and public houses. The services and facilities were identified through the consultation process and Longhoughton Parish Council has prepared an Action Plan to recognise and strengthen their contribution. As highlighted by Northumberland County Council the approach is more restrictive than Local Plan policies INF2 and INF3 which do not require the community services and facilities to be of “*great importance*” or “*essential*” to be afforded protection. I recommend a consistent approach.

103. The eight community facilities identified are named and included on the Policies Map. The identification of the services in Part 2 is much less clear. They are listed generically and not included on the Policies Map. It is also unclear whether the services are afforded the same protection in Part 3 of the Policy as the community facilities. As evidenced by Local Plan Policy INF3 which addresses both retail uses and public houses the key consideration is the contribution being made to the community rather than whether the facility or service is commercially run. This needs also to be reflected in the title of the Policy which goes beyond community services and facilities with any change to the title being agreed by Northumberland County Council and Longhoughton Parish Council.

104. I visited each of the services and facilities and am content that they provide for the needs of the community.

105. The scope of services and facilities identified goes further than the Local Plan and so it is appropriate for the Policy to set out criteria for their protection against loss as well as identifying them. In the absence of any contrary evidence to support a different approach it is necessary for these criteria to be consistent with the approach in the Local Plan to avoid any ambiguity. Part 3 of the Policy also extends beyond those facilities and services that have been identified. The reference to *“where planning permission is required”* serves no purpose.

106. I am content that the Policy as amended is consistent with Local Plan policies INF2 and INF3, including the requirement in Policy INF3 that a test of need and/or viability for local convenience shops and pubs is for the building to have been marketed at an appropriate price for a period of not less than six months prior to any planning application being submitted. Specific reference to this requirement could be included in the supporting text if desired.

107. Policy LBH9 does not meet the Basic Conditions.

- **M10 - Amend Policy LBH9 to**
 - **Replace the first two lines in Part 1 with “The following services and facilities provide for the needs of the local community and are identified on the Policies Map:”**
 - **Add the services identified in Part 2 to Part 1 by listing them individually and delete Part 2**
 - **Replace Part 3 with “Development proposals that would result in the loss of services or facilities that provide for the needs of the local community should demonstrate:**
 - a. equivalent accessible provision is available locally; or**
 - b. there is no longer a need for the service or facility to serve the community in its existing use or as an alternative use; or**
 - c. the continued use is no longer economically viable.”**

- M11 – Include the services currently identified in Part 2 on the Policies Map
- OM12 – [Amend the title of Policy LBH9 to align it more closely with its scope – e.g. Local services and facilities]

Local Green Space

108. **Policy LBH10** – This designates eight Local Green Spaces to be protected in a manner consistent with the Green Belt.

109. The location of each Local Green Space is identified on the Policies Map. Local Green Space and Protected Open Space Background Papers address the reasoning behind designation of each Local Green Space in accordance with the requirements of the National Planning Policy Framework (paragraph 107). This is a comprehensive document which also records the process through which the Local Green Spaces have been identified and consulted on. Eight sites were included as Local Green Spaces in the pre-submission draft Plan of the 33 sites which were assessed. The proposed boundaries of Local Green Spaces have also been amended through the process. The process has included all the landowners and no issues have been raised other than with LGS06 which is dealt with below. I am content with the rigour of the approach.

110. I visited each of the proposed Local Green Spaces and agree with the rationale and proposed boundaries in a majority of cases. There are detailed considerations relating to:

111. LGS03 – Woodland to the north of Tedder Place – Northumberland County Council has made representations questioning the importance of this space beyond the contribution made by allotments. I am content with the rationale provided in the background paper and note the influence of the woodland on the arrival into Longhoughton from the north through a corridor of trees and the sense of enclosure it provides to the north of the village which contrasts with the open views to the coast in the east.

112. LGS06 – Boulmer Hall Farm – Subsequent to submission of the Plan there have been discussions between Longhoughton Parish Council and Northumberland Estates as

landowner regarding the extent of the area proposed for designation as Local Green Space at Boulmer Hall Farm. An alternative has been proposed which has been agreed by the Parish Council and the landowner. I have considered this amended proposal and agree it more closely aligns with national planning policy and anticipates a need to provide parking at Boulmer Memorial Hall which is also a Community Action in the Plan. There is insufficient information to assess the area of most wildlife value south of Boulmer Road. I am content with the revised proposal (below):

Suggested amendment to LGS06



113. To be afforded protection Local Green Spaces need only be designated by the Plan. This follows a Court of Appeal case relating to a Local Green Space policy in a neighbourhood plan (Lochailort Investments Limited v. Mendip District Council and Norton St Philip Parish Council, [2020] EWCA Civ 1259) which means it is inappropriate without clear justification to include any wording that sets out how development proposals should be managed. No such justification has been provided in the submitted Plan and its supporting documents.

114. I have considered representations from Northumberland County Council on the issue which seek to justify an amendment to the Policy and supporting text. I agree that there is a lack of clarity in the way the supporting text describes how planning applications in Local Green Space should be determined. I do not consider the representations to support an amendment to the Policy wording but am content with the additions proposed to the supporting text where they do not duplicate existing content and accurately describe the effect of Policy LBH10 to be designating sites as Local Green Space. These are not necessary to meet the Basic Conditions.

115. Policy LBH10 does not meet the Basic Conditions.

- **M12 – Amend Policy LBH10 to replace “*policies map*” with “Policies Map” and delete “*which will be protected from development in a manner consistent with the protection of land within the Green Belt*”**
- M13 – Amend the boundaries of LGS6 as recommended
- OM13 - [Add the following new paragraphs after paragraph 8.10:

“The local green space and protected open space background paper includes an assessment of each of the sites which are designated as Local Green Space in Policy LBH10 below. The background paper follows the guidance set out in both national planning policy and planning practice guidance, regarding the purposes of designation and the reasoning behind the designation of each site through this Plan. Appendices 1 and 2 of the background paper set out the site assessments and the reasons why each site is considered to be demonstrably special.

“The NPPF (para 106) states that the designation of land as Local Green Space allows communities to identify and protect green areas of particular importance to them. It states that designating land as Local Green Space should be consistent with the local planning of sustainable development and

complement investment in sufficient homes, jobs and other essential services; the Parish Council considers that the Neighbourhood Plan strikes a balance between planning for growth in terms of new housing within the parish, together with protection of important Local Green Spaces. These have been carefully assessed and considered to be capable of enduring beyond the end of the plan period.

“Development in Local Green Spaces should be managed in a way that is consistent with national Green Belt policy. Policy LBH10 does not disallow categories of development that would be permitted in the Green Belt. Rather, a further level of requirement is added to ensure that proposals deemed not inappropriate in the Green Belt, would also be compatible with the continued use of the land as Local Green Space. Development that is ‘not inappropriate’ in the Green Belt will be supported on Local Green Spaces where it complies with the criteria set out in Policy LBH10. All other development will only be permitted where very special circumstances exist in accordance with national Green Belt policy.”]

Protected open space

116. **Policy LBH11** – This identifies 14 areas as Protected Open Space included on the Policies Map and sets out criteria to be met by development which would result in their loss. The Policy is supported by a background paper setting out the reasoning for identifying each of the locations and the process through which they have been proposed and assessed. They are sites which are valued by the local community but do not qualify for being designated as Local Green Space. Of the original 33 sites examined eight are designated as Local Green Space and 14 as Protected Open Space. A number of the other sites are already identified as Open Space in the Local Plan and where the sites in Policy LBH11 are included in the Local Plan it is noted that they do not feature in the work to update the Northumberland Open Space Assessment. The process has included all the landowners. I am content with the rigour of the overall approach.

117. There are a number of the proposed areas where other adjacent verges perform the same function as those being identified as Protected Open Space, including POS02, POS04 and POS05 as examples, but I am content that the areas that have been identified warrant protection with one exception. The boundary of POS01 should align with the playground and exclude the open land along Tedder Place. The function of this space cannot be distinguished from the open space on the other side of the road and it does not form part of the recreation/play area which is used to justify identification. I note that the proposed “*East Moor*” spaces are along a road signed “Eastmoor” and recommend whichever is the correct name is used.

118. Representations from MOD Defence Infrastructure Organisation draw attention to an error in Figure 12 showing sites identified as Protected Open Space in the Local Plan. These do not include a site at RAF Boulmer.

119. The policy approach for protecting open space from loss is broadly consistent with that provided in Local Plan Policy INF5. I share Northumberland County Council’s view that the drafting of Part 2c. could more closely align with national planning policy (paragraph 104 c), NPPF) but do not consider this to be a matter for meeting the Basic Conditions.

120. Policy LBH11 meets the Basic Conditions.

- M14 – Amend the boundary of POS01 to align with the boundary of the playground
- M15 – Update Figure 12 to show the sites identified by the adopted Local Plan as Protected Open Space

- OM14 – [Replace “*needs for*” with “benefits of” in Part 2c.]
- OM15 – [Use the correct name for the Eastmoor/East Moor open spaces]

Transport and access

Walking and cycling network

121. **Policy LBH12** – This supports development improving or extending the walking and cycling network, including identified greenways and sets out relevant criteria for protecting Public Rights of Way.

122. The approach to protecting Public Rights of Way goes beyond Local Plan Policy TRA1 to provide criteria to be met by development which impacts on it. The policy drafting can be improved to be clear the criteria relate only to development which results in the loss of an element of the network.

123. The Definitive Map rather than the Policies Map is the best location to show the Public Rights of Way and be sure it is up to date. This includes all forms of route, including for cyclists and horse riders, and addresses the need for the Policy to be clear and unambiguous (paragraph 16, NPPF). A link to the Definitive Map should be provided. The policy drafting can also be improved to address the role of planning decisions in protecting the Public Rights of Way network. The Policies Map can continue to show the Public Rights of way network, with a note in the Legend that these are defined on the Definitive Map and providing a link

124. There is significant community support for the principle of creating greenways which are described in four locations along with an additional category of *“other circular routes”* for which examples are provided. There is limited information about the feasibility of the greenway proposals or their deliverability within the period of the Plan. Nevertheless, the policy drafting is enabling and positive and I am content with the approach. There have been representations from local residents living near to the route of one of the greenways. These raise issues about the line of route that would be considered as detailed routes are considered and in the event that a greenway proposal comes forward and I note that those making representations support the principle of greenways. Any greenway proposal would need to be consistent with existing development plan policies relating to local amenity, security and wildlife among other issues.

125. Policy LBH12 does not meet the Basic Conditions.

- **M16 – Amend Policy LBH12 to replace the last sentence of Part 1 with:**

“Development proposals which would result in the loss of any part of the Public Rights of Way Network (as defined by the Definitive Map) should provide:

- a. A clear and demonstrable justification for the loss**
 - b. A suitable alternative route within an agreed timescale”**
- M17 – Whether or not the Public Rights of Way Network is shown on the Policies Map there should be a link to the Definitive Map and an indication that this is where the Network is defined

8. Recommendation and Referendum Area

126. I am satisfied the Longhoughton, Boulmer and Howick Neighbourhood Plan meets the Basic Conditions and other requirements subject to the modifications recommended in this report and that it can proceed to a referendum. I have received no representations on the referendum area and recommend it matches that of the Neighbourhood Area.