

Northumberland Local Plan – Proposed Main Modifications (MM’s) Consultation June-August 2021

Appendix 2.

Further Information Concerning the ‘Northumberland Sandstone Ridges and Vales – A Valued Landscape’ – Alison Farmer Associates January 2021 (‘the AFA value study’)

1. The full report and its summary can be accessed through the following links:

https://www.nandnsociety.org.uk/wp-content/uploads/sites/70/2021/02/Final-Technical-Report-for-Consultation-240121_compressed-dropbox.pdf

<https://www.nandnsociety.org.uk/wp-content/uploads/sites/70/2021/02/Final-Summary-Report-04-230121-dropbox.pdf>

2. The AFA value study was undertaken by Alison Farmer, one of the pre-eminent experts in her field and an advisor to Natural England, the Landscape Institute, numerous National Parks and many individuals and bodies associated or entrusted with some of England’s finest landscapes. The Northumberland & Newcastle Society commissioned it because of the lacuna resulting from NCC’s abandonment of the former Areas of High Landscape Value, referred to above, without carrying out the work recommended by LUC in Part D of the NCLA 2010 (see our main representations). Fortunately, the delay in the local plan process means that the study can, unexpectedly, inform the case against NCC’s flawed Identification. The study was funded, at very considerable cost, by private donations from a significant number of local people. We refer to the following paragraphs of the Final Technical Report as a guide to its contents:

Sections	What it covers	Further comment
Section 1.	The appointment of the consultants; the scope of their work; and their report’s structure.	
Section 2.	It explains the ‘study area’ and its designation history.	The designation history, alone, shows that the study’s conclusions (though based on tighter criteria) have considerable precedent.
Sections 3. & 4.	These explain the approach taken by the consultants and their methodology.	The approach and methodology take up and correct the shortcomings in their own desk-top-only/no consultation approach, identified by LUC in their 2010 advice to NCC – see main representations.

<p>Sections 5., 6., 7. & 7.</p>	<p>These cover: (1) the study’s actual evaluation of the identified ‘evaluation areas’ chosen by applying the above-mentioned approach and methodology; (2) the process of ‘boundary selection’; and (3) the ‘desirability’ of the recommended designation after stepping back <i>“...from the detailed evaluation and consider[ing] the identified valued landscape as a whole including...”</i> its <i>“special qualities”</i>.</p>	<p>As explained, our consultation enables Parish Council’s to adduce further evidence that, subject to the consultants’ guidance, may lead to an adjustment in those boundaries.</p>
<p>Section 8.</p>	<p>This contains the study’s conclusions.</p>	<p>These should be read in full but highlight: <i>“...the special qualities of the area which raise it above ordinary countryside and reaffirms the value of this landscape as previously identified in relation to the Northumberland National Park and Areas of High Landscape Value, reflecting a high degree of consensus over several decades.”</i>; the need to <i>“preserve and enhance”</i> those landscapes, (they require ‘protection’ not just ‘management’); and the need to recognise that <i>“...the landscapes concerned [should be attributed with] at least a local value equivalent to the former AHLV status previously applied although, as this assessment makes clear, parts of the area are strong candidates for national designation.”</i></p>

3. Having completed a detailed draft of the AFA value study and noting that, from a practical perspective, we do not have the names and addresses of every resident and business in the study area, our extensive consultation has been through Parish Councils because:

- a. Per its website and the publicly expressed assurances of its Director of Planning, NCC accepts that the role of Parish Councils in the planning context is “*pivotal*”;
 - b. Parish Councils comprise local people from all walks of life, including businesses and landowners. Parish Councillors can be assumed to have extensive knowledge of their landscapes; and
 - c. The matter being relatively technical, the use of Parish Councils enabled us to more easily explain the parameters, methodology and conclusions of the study (including through personal presentations to Parish Council public meetings).
4. To date, 27 Parish Councils¹ have formally resolved to support the findings of the AFA value study (i.e. that areas within their Parish Council boundaries comprise Valued Landscapes²). Of those, 5 are considering whether they wish to adduce further evidence to support an extension or adjustment of the recommended area’s boundaries³. Consultation is continuing with 6 other Parish Councils while 11 Parish Councils are, sadly, inoperative.
 5. Below is a plan showing the study area edged red, overlaid with Parish Council boundaries. The key to the plan explains its colouring but, for present purposes, it demonstrates the extent both of our consultation⁴ and the support for the study’s conclusions - in stark contrast to that in relation to the NCC sensitivity assessment; NCC’s Technical Paper; and the resultant Identification⁵.

¹ N.B. In the interests of alignment, we have treated the Parish Councils shown on the map following paragraph 5 as individual Parish Councils. In fact some are combined for administrative purposes – e.g. Tillside incorporates Chatton, Chillingham and Lilburn while Belford and Middleton also sit together. In Appendix 1. Some Parish Councils are listed as composites while others are not – either way, the extent of Parish Council support for both the AFA value study and our representations in this MM consultation is striking.

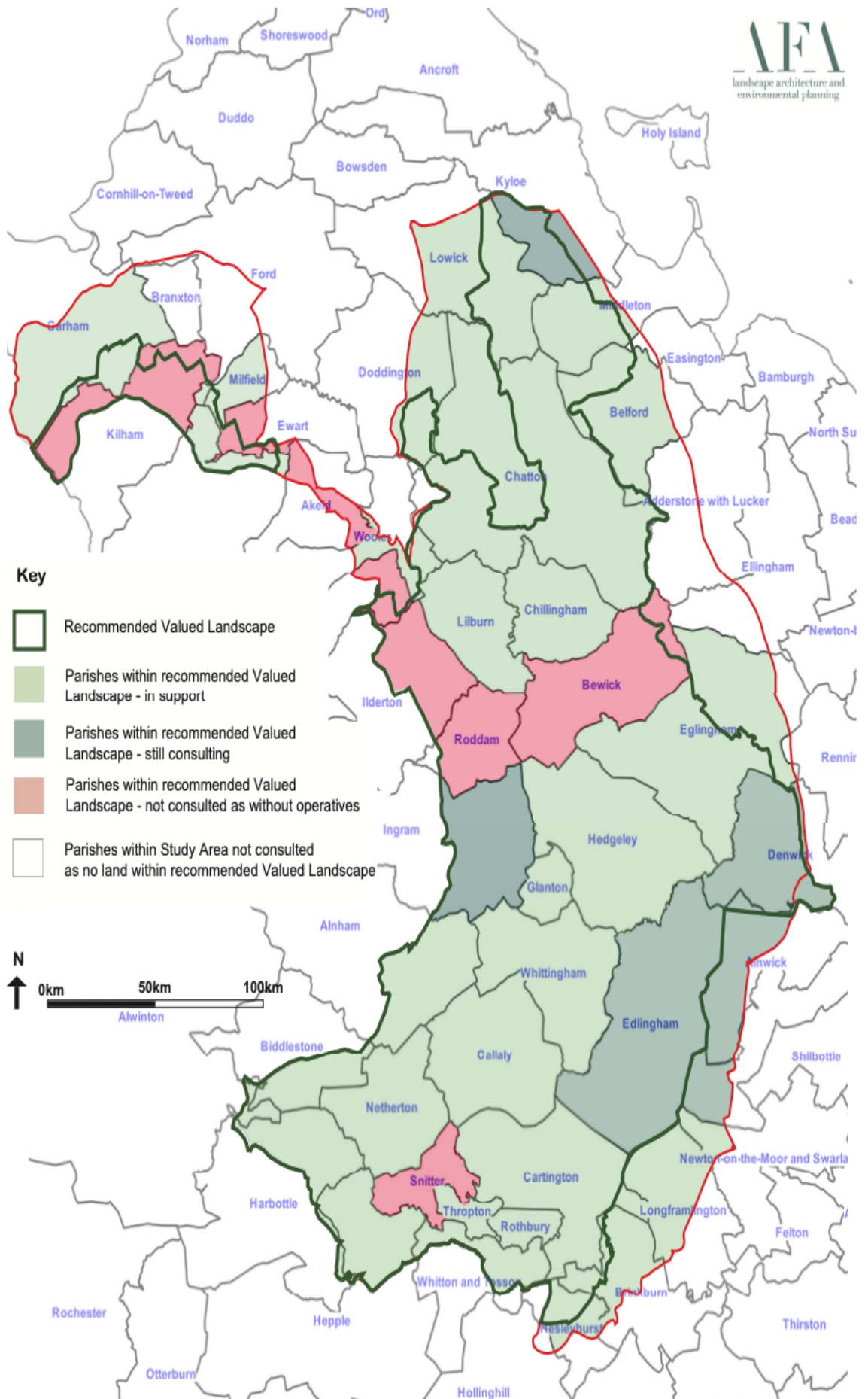
² The name given to that valued landscape is: the ‘*Northumberland Sandstone Ridges and Vales*’ which, for the purposes of continuity with the former but wider designations of the former Alnwick and Berwick District Local Plans, are described as an ‘Area of High Landscape Value.’

³ In particular, Parish Councils at Tillside, Doddington and Lowick have made a case for the inclusion of further land within or adjacent to their Parish areas to be included in the recommended designation. Those representations will be assessed against the Landscape Institute’s criteria by Alison Farmer Associates, in early course.

⁴ N.B. We have not yet consulted Parish Councils whose jurisdictions, while extending into the study area, do not contain any landscapes meeting the Landscape Institute’s ‘valued landscape’ criteria.

⁵ Where Parish Councils, through the consultation, may adduce further evidence to support a possible extension or adjustment of the presently recommended designation boundary in relation to their Parish Council area, Alison Farmer Associates will assess the strength of that evidence against the relevant criteria before finalising the designation boundaries.

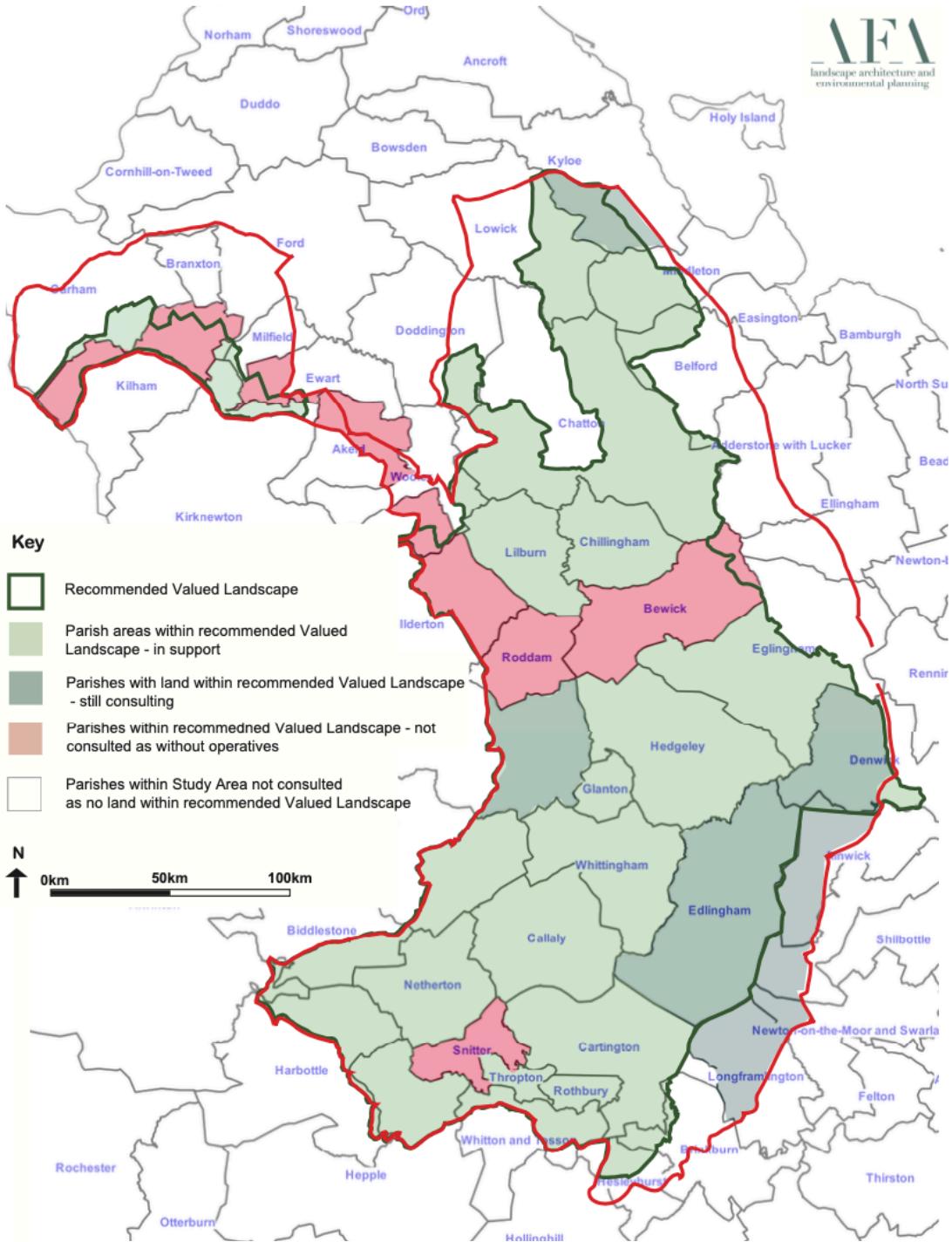
Drawing 12:
Valued Landscape and Parishes



6. Accordingly, the AFA value study and the support that it has attracted are relied upon, in full, in support of our response to the MM's. However and for those purposes, the study's importance is less in its specific findings than in the fact that: applying up-to-date guidance⁶; against the background of the NPPF's paragraph 174 (formerly 170); following extensive field work (as well as desk-top study and research); with the input of a significant number of local people; and following extensive consultation with their Parish Councils, it concludes that there are large areas within the study area which meet the requisite tests to warrant recognition as a 'valued landscape'. That evidence-based recognition and the need for additional protection it imports has not been taken into account by NCC's Identification.
7. The conclusions we invite the Inspectors to draw from the AFA value study and the consultation in relation to it are as follows (see, further our main representations):
 - a. It comprises work that, in 2010, LUC advised NCC would be necessary but which NCC did not carry out.
 - b. It 'puts flesh on the bones' of the arguments we advanced at the E.i.P. and represents compelling evidence that the failure of NCC's Identification to follow the NE sensitivity guidance (which LUC's advice effectively anticipated, although the assessment of 'sensitivity' has, anyway, "evolved") is far from incidental: it is critical.
 - c. Given LUC's advice and NCC's failure to listen to our arguments in the run up to and throughout the local plan consultation process, NCC has only itself to blame for the fact that its Identification remains unsound (and cannot be made sound). A desire to save NCC's blushes cannot justify allowing its Identification to stand when the evidence and decision-making process supporting it has been and remains deficient.
 - d. REN 2 is not a strategic policy and the removal of Identification from it would not be inconsistent with national policy provided, as we suggest, the policy allows for Identification through Neighbourhood plans. Conversely, allowing it to stand as part of REN 2, per the MM's, would be unsound.
 - e. Perhaps most importantly, the fact that local people have been willing to fund the work and that so many of their Parish Councils have chosen to formally adopt the findings and recommendations of the AFA value study (we have no doubt, with more to follow) demonstrates the democratic deficit of NCC's Identification and, we would suggest, the very real astonishment that the Inspectors' confirmation of Identification would cause. Such confirmation would ride roughshod over due process; evidence; and government guidance – in short, it would leave the NLP open to judicial challenge.

⁶ Notably: 'Technical Guidance Note 02/21 - Assessing landscape value outside national designations – The Landscape Institute' [N.B. Alison Farmer contributed to this guidance].

Landscape Value Assessment
Drawing 12:
Valued Landscape and Parishes



- Key**
- Recommended Valued Landscape
 - Parish areas within recommended Valued Landscape - in support
 - Parishes with land within recommended Valued Landscape - still consulting
 - Parishes within recommended Valued Landscape - not consulted as without operatives
 - Parishes within Study Area not consulted as no land within recommended Valued Landscape