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Consultee ID:

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Processed:

Northumberland Local Plan: Core Strategy Pre Submission Draft (October 2015)

Representation Form

This is the form for making representations on the Northumberland Local Plan: Core Strategy Pre Submission Draft.

Consultation will begin on **14th October 2015 for 6 weeks and end at midnight on 25th November 2015**. Representations received after this date cannot be considered.

Representations submitted online are preferable; however forms can be submitted by email or post to the address below. Only representations received within this period have a statutory right to be considered by the Inspector at the subsequent examination.

If you wish to submit a representation on the Plan, please either complete a form at http://northumberland-consult.limehouse.co.uk/portal/planning/core_strategy/cspds or complete and return this form to either the postal or email address shown below.

Please note:

1. All respondents need to provide their personal details.
2. Representation must be on the basis of the 'soundness' or legal compliance of the Plan. Please read the guidance note for further details.
3. It is recommended that groups that share a common view send a single representation rather than multiple copies. Please attach a list of the contact details of each person (include names, addresses, emails, telephone numbers and signatures) who supports the representation.
4. Separate forms should be completed for each representation.
5. By completing this form you agree to your details being shared and your name and comment (but not your address or other personal details) will be made available for public viewing. These representations cannot be treated as confidential.

Please expand the boxes as necessary or attach additional sheets. If attaching additional sheets, please clearly mark these with the part of the document the representation relates to and your name.

Section 1

	1. Personal Details	2. Agent Details (if applicable)
Title	Mr	
Name	Tony Noble	
Organisation/ group	Ponteland Green Belt Group	
Address 1	93 Cheviot View	
Address 2	Ponteland	
Address 3		
Address 4		
Post Code	NE20 9BH	
Telephone number	07702 185551	
E-mail address	tonynoblebvi@yahoo.co.uk	

If you are replying on behalf of a group, how many people does it represent (where applicable, see point 3 above)

700+

Section 2

3. To which part of the Plan does your representation relate?

Paragraph number	See attached letter
Policy number	
Figure	
Appendix	

4. Do you consider that this part of the Plan meets the legal and procedural requirements?

Yes

No

5. Local Planning Authorities should submit a plan for examination which is considered to be 'sound'. To be sound, the plan must be positively prepared, justified, effective and consistent with national policy. Do you consider this part of the Plan has met these tests?

Yes

No

If you have entered 'no' to 4 or 5, please continue to 6. In all other circumstances, please go to 7.

6. Do you consider this part of the Plan to be unsound because it is not:

Positively prepared

Effective

Justified

Consistent with national policy

7. Please give details of why you consider this part of the Plan is not legally compliant or sound or if you wish to support the legal compliance or soundness of the Plan please also use this box to set out your comments.

Please see attached letter (Please continue on a separate sheet / expand box if necessary)

8. Have you raised this issue during previous consultation on the Core Strategy?

Yes

No

If you have answered 'no' please explain why this issue has not been raised before:

(Please continue on a separate sheet / expand box if necessary)

9. Please set out what change(s) you consider necessary to make the Plan legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text.

It is extremely difficult for the Green Belt Group to give an opinion as to how the process of consultation could have been improved so as to make it 'more lawful'. We are not lawyers and so have a limited knowledge of this area.

However we take the view that the process has been far from satisfactory. We engaged in this process in good will.

We had objected to the proposed designation of Ponteland as a tier 1 settlement after the first version of the core strategy was released for consultation. NCC accepted the views of the residents and reclassified the settlement in the second version to a "main service centre".

This was carried through into the Full Draft Plan (NCC also reduced the proposed number of new houses from 850 to 640. On that basis we assumed that the settlement hierarchy issue had been resolved.

We had a legitimate expectation that NCC would not revisit the matter in the Pre Submission Draft.

In this light we are extremely dissatisfied with the decision of NCC in September 2015 to move Ponteland back into the highest level of settlement category and increase the housing allowance to around 900. A 40% increase from the Full Draft Plan (Albeit in reality it sits at 1006-1119 housing allocation which represents a 57% increase from the Full Draft Plan)

We feel that this decision fundamentally undermines the integrity of the consultation process carried out to date.

We have highlighted area's of inconsistency within a number of communications from NCC.

In order to be legally compliant and sound NCC need to re engage with the residents of Ponteland through the PTC and Neighbourhood Plan Group with goodwill, honesty, integrity, transparency and and to be open to any reasonable alternatives that may be suggested.

It is NCC blind, unshakeable insistence that there can be only one option for Ponteland and its refusal to even consider reasonable alternative outcomes that is at the root of why this plan is neither legally compliant nor sound.

Please continue on a separate sheet / expand box if necessary)

Please note your representation should cover all the information evidence and supporting information necessary to support/justify the representation and the suggested change.

10. If your representation is seeking a change, do you consider it necessary to participate in the Independent Examination? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the Examination)

Yes

No

11. If you wish to participate in the Independent Examination, please outline why you consider it to be necessary?

The Ponteland Green belt Group represents the views of a significant number of Ponteland residents.

These residents also represent a hugely significant percentage of the respondents to the core strategy process. NCC confirms that at the "drop in" sessions held throughout the

county the attendance figures for the Ponteland events were by far the highest in the County.

It is therefore clear that many Ponteland residents have fully engaged with the core strategy process.

It is therefore a great disappointment to the residents to learn that their views, comments and suggestions have been completely disregarded.

Promises made in written documentation to engage with the Ponteland Town Council and the Neighbourhood Plan Group in master planning of Ponteland were not kept

We had a legitimate expectation that NCC would not revisit the matters in the Pre Submission Draft.

We are extremely dissatisfied with the decision of NCC in September 2015 to move Ponteland back into the highest level of settlement category and increase the housing allowance to around 900. A 40% increase from the Full Draft Plan (Notwithstanding in reality housing allocation is 1006-1119 which represents a 57% increase from the Full Draft Plan)

Residents now cannot challenge the content of the Pre Submission Draft.

We feel that this decision fundamentally undermines the integrity of the consultation process carried out to date.

The Ponteland Green Belt Group as representatives of a significant number of residents would seek to raise this issue together with NCC conflicting statements and evidence at the examination

(Please continue on a separate sheet / expand box if necessary)

Section 3

Please tick the box if you would like to be notified at an address/email address of the following:

- The submission of the Northumberland Local Plan Core Strategy for Independent Examination;
- The publication of the recommendations of any person appointed to carry out an Independent Examination of the Northumberland Local Plan Core Strategy (the Inspector's Report); and
- The adoption of Northumberland Local Plan Core Strategy.

Please sign and date this form

Signature: 

Date: 24th Nov 2015

The Council would prefer it if you made your representation online, via the interactive website at: http://northumberland-consult.limehouse.co.uk/portal/planning/core_strategy/cspsd

An electronic version of the representation form can also be found at the above address. Hard copies of the representation form are also available from Council Offices, Information Centres, libraries and the drop in events taking place across the County. Details of the drop in events are available on the Council's website at: corestrategy.northumberland.gov.uk



Dear Planning and Housing Policy Team

Introduction.

This is the Northumberland Local Plan: Core Strategy Pre Submission Draft (October 2015) Representation Form on behalf of the Ponteland Green Belt Group (PGBG)

Items 1-3 are completed within the submission document.

Question 4 - Do you consider that this part of the Plan meets the legal and procedural requirements?

We answer NO

Our evidence for this is as follows.

Within the introduction of the NCC statement of consultation document it states;

1.8 In terms of engaging the public and stakeholders in the Local Plan process, the early, informal stages were crucial, as this is when the Plan was being formed and people could have a genuine say in its scope and content.

This is made clear in Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 – as follows:

Regulation 18

(1) A local planning authority must—

(a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and

(b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are—

(a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;

(b) such of the general consultation bodies as the local planning authority consider appropriate; and

(c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).

It is our view that from the Ponteland perspective NCC have failed to comply with their own statement that people “could have a genuine say in its scope and content”

NCC have also failed under Regulation 18 sub section 3 to take into account representation made to them by the Ponteland Town Council, The Neighbourhood Plan Group, the Ponteland Green Belt Group and most importantly of all the actual residents of Ponteland.

It should be noted that the residents of Ponteland are, by a significant majority, the largest respondents to the core strategy process and it is the experienced views of this largest group who NCC have disregarded.

I refer to the conflicting statements within NCC documents in support of this statement.

Date	Source document	Statement /comment
November 2014	Northumberland Local Plan Core Strategy - Full draft plan November 2014 Para 7.31	<i>“The Ponteland Neighbourhood Plan Group will be closely involved in the master planning of the site and the Neighbourhood Plan will define the Ponteland settlement boundary.”</i>
Sept 2015	Northumberland Local Plan Core Strategy Pre Submission Draft- Draft for Scrutiny and Cabinet Sept 2015 Para. 7.30	<i>“The Ponteland Town Council have had some input to the development of the Supplementary Planning Document and will continue to be involved in the master planning of the site. Where other Supplementary Planning Documents/ master planning activities are proposed for sites to be removed from the Green Belt, this will include input from the Town Council. The Neighbourhood Plan will define the Ponteland settlement boundary.”</i>
13. October 2015	Letter from Ponteland Town Council following Freedom of information request.	<i>“I can confirm that there have been no meetings of Ponteland Town Council (PTC) with NCC regarding the development of the Northumberland Local Plan Ponteland SPD nor any meetings to demonstrate PTC have been involved in the indicative master planning of the site located in the South East of Ponteland. I am unaware of any proposed or scheduled future meetings with the County Council that would support the statement that PTC will continue to be involved in the master planning of this site.”</i>
4 th November	NCC response following FOI request	<p><i>“An agenda was prepared by the CSCG for the first meeting. NCC did not take the notes but were consulted on the notes prior to them being finalised. The notes were used as the agenda for the subsequent meeting. Attached are:</i></p> <p><i>The agenda for the meeting on 17 July 2015</i></p> <p><i>Notes from meeting of 17 July 2015 – the notes capture that a draft structure for the Supplementary Planning Document was circulated to the group and feedback requested. No feedback was received.</i></p> <p><i>Notes from meeting of 14 August 2015 – the notes capture that the draft Supplementary Planning Document was circulated to</i></p>

		<p><i>the group – no feedback was received A further meeting took place with the CSCG on the 11 September 2015 – draft notes have been prepared and circulated, however these have not yet been reviewed by NCC. Following this meeting feedback was received on the draft masterplan framework from one member of the CSCG. Email attached. A meeting is scheduled for 16 October 2015 to allow the Council’s Capital Project Officer to present details on the school and education proposals.”</i></p> <p>This account by NCC is strongly disputed by Ponteland Town Council (PTC) and the Neighbourhood Plan Group. They are adamant that no consultation took place with NCC and we understand PTC have written a response to the Chief Executive of NCC to confirm this stance,</p>
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In the guidance notes provided by NCC to complete this submission it is suggested that the submitter view documents which include the Statement of Community Involvement.

We note within that document that NCC places great significance on Consultation Values in the planning process - see extract below.

2.1 It is important that engagement in the planning process is guided by a set of consultation values, established specifically for planning matters. The SCI therefore defines a set of values based on how the Council believes it should work and how, through engagement you told us you would like the Council to work. Those values remain largely the same as those set out in the first SCI.

CONSULTATION VALUES – SERVICE STANDARDS

The Council will:

1. Involve people at the start of and throughout the decision-making process on planning applications and when developing new planning policy.
2. Engage with relevant people and organisations at the appropriate time using effective and appropriate engagement methods, allowing sufficient time for meaningful consultation and allowing all individuals and communities the opportunity to influence decisions.
3. Be adaptable, recognising that different consultation methods will be required in different circumstances.
4. Respect the diversity of people and their lifestyles and give people a fair chance to have their voice heard regardless of gender, age, race, abilities, sexual orientation, circumstances or wherever they live.
5. Communicate clearly with people using plain English and avoiding jargon.
6. Ensure that people's views are taken into account in reaching decisions on all planning matters using the most appropriate methods of community involvement as set out throughout this document.
7. Make documents publicly available on the Council's website and where appropriate across the networks of Council offices and libraries.
8. Be consistent in our approach, regardless of the location within Northumberland or the planning issue covered by the policy or proposal.

It is very difficult to reconcile NCC purported importance on its Consultation Values given the discourteous way NCC has treated the various Ponteland bodies and residents of Ponteland.

We question how, Para 1.1 of the Statement of Community Involvement, which states:

“Through the statutory Planning process the Council does all of this by:helping local communities draw up their own plans

sits with the distinct lack of help and complete disregard to the PTC and the Ponteland Neighbourhood Plan Group when preparing the Ponteland SPD

We suggest that NCC have been less than honourable with Ponteland residents by making hugely significant changes to the proposals for Ponteland between the Full Draft Plan stage and the Pre Submission Draft stage of the consultation process.

In previous variations of the core strategy process Ponteland has fluctuated from being categorised as a Main Town (Tier 1) and housing allocation of 850. Following “consultation” Ponteland was then reduced to that where it truly sits – a service centre. Ponteland housing was reduced to 640 .

Between the “Draft full Submission” and the “Pre Submission Draft”, the content of which **can no longer be commented upon**, (other than soundness etc.) NCC re-imposed the category of Main Town for Ponteland and increased the 640 housing allocation by over **40%** to 900.

In reality Ponteland now has an increase of over **60%** on the 640 housing allocation listed in the Core Strategy Full Draft plan. This is because NCC has failed to include housing that has already been delivered and which is to be counted within the plan period. (This false representation of 900 dwellings to the Inspector is subject to further comment later in this response.) The increase in housing allocation above the 640 indicated in the Full Draft Plan is an incredible **74%** if the SHLAA indicative housing is considered. (see table on page 10)

The reason for categorising Ponteland as a Main Town conflicts with other NCC documentation.

We provide the following information in support of this statement.

Date	Source document	Statement /comment
Feb 2013	Core strategy Preferred options Para 4.35 Page 21	<i>“Ponteland is a key service centre, which also provides services to a wider rural area, however not to the same extent as Morpeth and Hexham given its proximity to Tyneside and links on the A696.”</i> Comment: - Ponteland will <u>never</u> be able to elevate to the level of Morpeth or Hexham due to its proximity to Tyneside. – (Kingston Park, Metro Centre, Newcastle City Centre. RVI Hospital etc.)
Sept 2015	NCC Statement of Consultation Annex 1 page 7	<i>“There was much opposition to Ponteland being classified as a main centre at the[issues and options [I&O] stage. A re-examination of the evidence on its role allowed it to be reclassified as a Service Centre at the PO1 and FDP stages. However, at PSD [Pre Submission Draft] stage, in recognition of the significant investment that will be made in education and leisure provision within the town and better reflects its role, it was necessary, to move Ponteland back into the “Main Town”</i>

		<p>category.” [Emphasis added]</p> <p>Comment – This investment is only to replace/renew what already exists in Ponteland. In fact evidence is emerging that the replacement facilities will be LESS than Ponteland currently enjoy. Given the fact that NCC proposals for Ponteland suggest a 25% population increase and with FEWER facilities to the current population levels, how does this become a sustainable solution? A resident has reported to us that at the NCC drop in event on 7 Nov 2015 the answer provided by an NCC planner to the increase of population v school capacity was to introduce Porta cabins – Contingency planning at this early stage does not bode well. How does that support sustainable development?</p>
E mail dated 23. June 2015	E mail released under FOI from NCC program manager for Schools and leisure	<p>“No decision has yet been taken to undertake construction of any new schools or leisure facility. The OBC [outline business case] will review the numbers & types of schools that could be included in the project, it will also look at feasibility studies, site option appraisal, affordability and delivery options available to the council. This piece of work is not likely to be complete until the beginning of next year” [Emphasis added]</p> <p>“IT WILL BE AFTER THIS PIECE OF WORK IS COMPLETE BEFORE THE COUNCIL WILL MAKE ANY DECISIONS ON WHETHER TO PROCEED ANY FURTHER WITH THE PROJECT” [Emphasis added]</p> <p>Comment -Is this not confusing? – On one hand NCC appear to have already made the decision – “The significant investment that will be made” . Yet the program manager states that no decision has been made whether to progress or not and indeed this decision cannot be made until the beginning of next year (at the very earliest we would suggest)</p>
October 15	Infrastructure Delivery Plan (IPD) Page 19 , 37	<p><i>Ongoing assessment of the option to redevelop schools in both Ponteland and Morpeth</i></p> <p><i>Provision of sports, leisure and recreation -Review of options for potential redevelopment or improvement of facilities at Morpeth and Ponteland.</i></p>

In the foreword of the Pre Submission Draft document Councillor Hepple places great store on how many residents have responded to the core strategy consultation process. An internal NCC report to Cabinet refers to Ponteland resident’s responses, as being *inflated* as a result of “standard responses.” We suggest that Cabinet was being invited to take less notice of Ponteland residents in the response to the core strategy. Why else would such a comment be made?

(Definition of Inflated –excessive or unreasonably high - To represent as greater or more important than is in fact the case)

Date	Source document	Statement /comment
9 th June 2015	NCC Core Strategy Update to Cabinet	<p><i>"It should be noted that the number of comments are inflated by several hundreds as a result of standard responses submitted by Ponteland residents in relation to 7 of the consultation questions set out within the draft Core Strategy."</i></p> <p>Comment – this statement needs to be read in conjunction with the row below to understand the context</p>
Oct 2015	Cllr Hepple statement in the Foreword of the Pre submission Draft.	<p><i>Since 2012, about 5,000 people have taken the opportunity to comment on stages of the Core Strategy</i></p> <p>Comment: NCC cannot have it both ways. Ponteland residents were the vast majority of the respondents to the core strategy and so make up a hugely significant percentage of the 5000 people Cllr Hepple is so proud to boast about in his foreword.</p> <p>It is that same vast majority of residents that have had their views disregarded /not taken into consideration</p> <p>NCC therefore cannot claim credit for 5000 comments in an official document to go before the Independent Inspector and also state Ponteland responses, which make up a vast majority of that 5000, are "inflated" by standard responses. (Definition of Inflated –excessive or unreasonably high)</p>
Oct 2015	Cllr Hepple statement in the Foreword of the Pre submission Draft.	<p><i>We are now fully confident that we are publishing a sound plan, influenced by your views and based on the best evidence available.....As always, the Council really values your participation.</i></p> <p>Comment: - As the row above – NCC cannot make this claim that the plan has been "influenced by your views" when the vast majority of the 5000 respondents to the core strategy have had their views ignored/disregarded.</p>

In summary, it is extremely difficult for the Green Belt Group to give an opinion as to how the process of consultation could have been improved so as to make it 'more lawful'. We are not lawyers and so have a limited knowledge of this area.

However, we do take the view that the process has been far from satisfactory. We engaged in the process in good will. We had objected to the proposed designation of Ponteland as a Tier 1 settlement after the first version of the core strategy was released for consultation. NCC accepted our submission and reclassified the town in the second version to a 'main service centre' with a subsequent reduction in the proposed number of new houses (850 to 640)

This designation was carried forward to the Full Draft Plan. On that basis we assumed that the settlement hierarchy issue had been resolved. We had a legitimate expectation that NCC would not revisit the matter in the Pre submission draft.

In this light we are extremely dissatisfied with the decision of NCC in September 2015 to move Ponteland back into the highest level of settlement category and increase the housing allowance to around 900. (Albeit in reality it sits at 1006-1119) We feel that this decision fundamentally undermines the integrity of the consultation process carried out to date. The Ponteland GB Group would seek to raise this issue at the examination.

In summary NCC have failed, as far as the residents of Ponteland are concerned, to comply with Regulation 18 sub section 3 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and have failed to comply with their own Consultation values as set out in their Statement of Community involvement document.

Question 5 *Local Planning Authorities should submit a plan for examination which is considered to be 'sound'. To be sound, the plan must be positively prepared, justified, effective and consistent with national policy. Do you consider this part of the Plan has met these tests?*

The Ponteland Green Belt Group submits that this plan is NOT sound.

Positively prepared, *Prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements"*

Policy 17 of the Pre submission draft states

In order to support the delivery of housing growth the following sites in Hexham, Ponteland and Prudhoe, as shown in Figures 7.2, 7.3 and 7.4 are allocated:

Ponteland

Land east of Callerton Lane (around 400 units)

Land west of Callerton Lane (around 180 units)

Police Headquarters site, North Road (around 300 units)

NCC overambitious housing aspirations are not based on the correct analysis of the Objectively Assessed Housing Need. The use of Pop Group scenarios to arrive at the housing figure of 24,350 to promote 10,000 new jobs is unsound. The "build it and they will come " business plan of NCC is just wishful thinking.

The use of the "Pop Group" software tool, aligned to the Core Strategy aim of ambitious employment creation, seems to create the perverse situation of, the lower the population input, the greater the population outcome. (Greater net migration is required to achieve the desired labour force. The greater the net migration required for 10,000 jobs the more houses NCC believe is required.)

This was highlighted by Inspector Harold Stephens in his interim report (Para 38) of the examination of the County Durham Plan. (Durham County Council also used the "Pop Group" software scenario tool)

We know of one resident who has been relentlessly seeking the base information behind the Pop Group software analysis to independently determine where NCC gets their 24,350 houses. The resident still awaits that information.

We refer once again to the consultation values in the NCC Statement on Community Involvement. Value 5. States

...the Council will communicate clearly with people using plain English and avoiding Jargon.

NCC have failed considerably in this regard to communicate in any way clearly on how the objectively assessed housing need for Northumberland sits at 90% over official government statistics.

It is this overambitious housing number linked to aspirational economic growth that NCC have determined is justification for the release of the Green Belt in Ponteland.

It is noted that other than suggesting the replacement of existing facilities on a new site, requiring the release of the Green Belt, there is no infrastructure provision for the significant growth in the population that would occur should NCC be allowed to continue with this plan for Ponteland.

We note that within (Draft) Infrastructure Delivery Plan (IDP) October 2105 there is precious little mention or actual commitment to planned infrastructure improvements for Ponteland to cater for the proposed huge increase in Population (25% +). We would expect that this would be fundamental to meet NCC excessive growth scenario.

The suggested proposal for improvement to the A696/North Road and Town centre are just that, “proposals” and are under listed the category of “Further Investigation Necessary” (page 99)

We would bring to your attention further conflicting statements from NCC regarding the population growth of Ponteland

Date	Source document	Statement /comment
October 2013	Preferred options stage 2 Para 5.11 page 36	<p>As part of this assessment consideration has been given to a number of issues, including:.....</p> <p>Projected population change - as a guide, it has been considered than on average an acceptable increase in population for Main Towns is between 10% and 19%, 4% and 8% for Service Centres and around 4% in the rest of the County. [Emphasis added]</p> <p>Comment: -This document has Ponteland categorised as a Service Centre but with a housing allocation of 850 – This gave Ponteland the population increase at the upper level of a Main Town – see NCC response in next row</p> <p>640 houses put Ponteland’s population increase at 16% (Source NCC confirmation email dated 18th Dec 2014).</p> <p>Therefore 1026 houses ((900 + 126 already delivered) = 25.6 % increase.</p> <p>SHLAA indicative 1119 = 27.9 % Population Increase</p> <p>No infrastructure plans to accommodate such a massive increase</p>

13. Dec 2013	Freedom of Information reply	<p>When challenged as to why Ponteland was expected to accept a doubling of an acceptable population increase for a Service Centre (as Ponteland was then categorised) the response of NCC was to state.</p> <p><i>As indicated in Para 5.11, the projected population changes for main towns and service Centre's presented, are a guide only. They do not indicate the maximum of what the Council considers acceptable.</i></p> <p>Comment – so Para 5.11 says an acceptable increase in population isyet the answer above from NCC says They do not indicate the maximum of what the council considers acceptable – how confusing is that?</p> <p>NCC went on to state that one of the reasons for a higher level of development being proposed for Ponteland was the fact that:</p> <p><i>Ponteland not only serves its residents but also a wider rural hinterland than other service centres, and contains many of the facilities and services indicative of a Main Town.</i></p> <p>Comment – In this response NCC have placed Ponteland as a service Centre yet NCC still want to treat Ponteland as “indicative” of a Main Town. It is clear that NCC suggestion that Ponteland is to be allocated Main Town status to justify “the significant investment” is simply not correct. NCC have <u>always</u> intended that Ponteland have a large allocation of housing; they have had a pre-determined plan. Throughout the core strategy “consultation”, have randomly selected any justification to try to dupe the residents of Ponteland.</p>
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Justified - the Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate, robust and credible evidence. The Plan should show how its policies and proposals help to ensure that the social, environmental, economic and resource objectives of sustainability will be achieved.

From the Ponteland perspective NCC have been consistent in their approach in that there will be **no reasonable alternatives** placed before the residents of Ponteland.

NCC failure to engage with various bodies in Ponteland, as expressed earlier, has prevented any reasonable alternatives seeing the light of day. We are aware that the Ponteland Neighbourhood Plan Group has put reasonable alternatives forward but these alternatives were not given any serious consideration by NCC. Evidence of the reasonable alternatives suggested to NCC can be brought to the attention of the Inspector should we be permitted to be heard.

At a recent users group meeting of the Ponteland Leisure Centre it was questioned why the only consideration for the replacement of the facility was to move to a new location. The answer provided by a representative from Active Northumberland and also a representative of an architect company was that that was the only option that had been allowed by NCC.

We are unaware of any serious business or institution, when considering options to carry out a business case, will only allow the one option to be the focus of investigation. Unfortunately that is the reality in the case of NCC and the Ponteland Green Belt.

We would also question how NCC justifies “how its policies and proposals help to ensure that the social, environmental, economic and resource objectives of sustainability will be achieved. “ as far as Ponteland is concerned.

We again refer to the conflicting statements of NCC

Date	Source document	Statement /comment										
October 2013	Preferred options stage 2 Para 9.113 page 93	<i>‘It is considered that the higher housing growth option, requiring 1,000 new dwellings over the plan period could begin to compromise the character of the town’.</i>										
Dec 2013	FOI response from NCC	<p>When we questioned the rationale/ evidence that allocation of housing over 1000 would begin to compromise character it was answered with <i>the measured views of experienced Chartered Town Planners, based on all of the evidence available. Before the document was published for consultation it was signed off firstly by the Strategic Management Team and then by the Council’s Policy Board.’</i></p> <p>Comment:- The relevance of this is that there is obviously going to be housing greater than 1000 over the plan period and so according to NCC experienced Chartered Town Planners this is going to compromise the character of the town. The Pre Submission Draft is incorrect in showing 900 dwellings in the plan period and NCC clearly knows this.</p> <p>It presents an inaccurate/false housing number to the Inspector. And to residents.</p>										
19 October 2015	FOI response from NCC	<table border="1" data-bbox="688 1304 1468 1560"> <thead> <tr> <th data-bbox="688 1304 883 1518">(A) Completions 2011-2015 (net additional dwellings)</th> <th data-bbox="883 1304 1019 1518">(B) Five Year Supply 2015-2020</th> <th data-bbox="1019 1304 1156 1518">(C) SHLAA Supply 2020-2025</th> <th data-bbox="1156 1304 1292 1518">(D) SHLAA Supply 2025-2030</th> <th data-bbox="1292 1304 1468 1518">(E) SHLAA Supply 2030 and beyond</th> </tr> </thead> <tbody> <tr> <td data-bbox="688 1518 883 1560">126</td> <td data-bbox="883 1518 1019 1560">319</td> <td data-bbox="1019 1518 1156 1560">421</td> <td data-bbox="1156 1518 1292 1560">253</td> <td data-bbox="1292 1518 1468 1560">245</td> </tr> </tbody> </table> <p>Comment: - NCC has failed to add the 126 net completions within the 900 – simple maths add 126 onto the 900 in the table and you are already at 1026. (NCC SHLAA figures provided with this FOI in table above indicate a housing figure of 1119 over the Plan period – with an additional 245 beyond the plan period)</p>	(A) Completions 2011-2015 (net additional dwellings)	(B) Five Year Supply 2015-2020	(C) SHLAA Supply 2020-2025	(D) SHLAA Supply 2025-2030	(E) SHLAA Supply 2030 and beyond	126	319	421	253	245
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We find it very difficult to understand “how its policies and proposals help to ensure that the social, environmental, economic and resource objectives of sustainability will be achieved. “ when it is the

intention to increase the population of Ponteland by a factor of 25% to almost 28% without any infrastructure investment other than to suggest replacing the Schools and Leisure facilities with what appears to FEWER facilities than the residents of Ponteland currently enjoy.

In Para 9. 113 Core strategy Issues and Options Housing and Green Belt it states.

The Council has also considered alternative growth scenarios, requiring 360 and 640 dwellings over the plan period, it is considered that neither of these alternatives would realise the important contribution that Ponteland can make to the overall prosperity of the County, given its attractiveness in the housing market and potential to identify Northumberland as a destination for entrepreneurs in the new economies

So on one hand you have NCC recognising the fact that, given its attractiveness in the housing market, it has potential to attract entrepreneurs, and yet on the other they are imposing a level of housing (in excess of 1000) that NCC planning experts have determined will compromise the character of Ponteland. The irony of this is simply breath-taking.

The leadership of NCC seem determined to play politics with the true likely housing for Ponteland.

Ponteland's true housing figures in the Pre Submission Draft are misrepresented and so it is NOT an accurate document to put before the planning Inspector.

Policy 17 of the Pre submission draft states

In order to support the delivery of housing growth the following sites in Hexham, Ponteland and Prudhoe, as shown in Figures 7.2, 7.3 and 7.4 are allocated: ...

Ponteland

Land east of Callerton Lane (around 400 units)

Land west of Callerton Lane (around 180 units)

Police Headquarters site, North Road (around 300 units)

This is clearly misleading the residents (and the Inspector)– NCC have failed to include housing that has been delivered or has outline planning permission and is to be counted in the Plan period.

When this was pointed out by the PGBG to the residents Cllr Hepple was quick to defend the figures in his press statement to local media.

The plan clearly shows the provision for 880 additional new homes – nowhere near the figure's quoted by the local MP and the Green Belt Group

Even the Chief Executive Mr S. Mason in his letter dated 22 Sept 2015 to the PGBG confirmed the 880 figure.

"It identifies the following sites:

Land east of Callerton Lane – delivery of around 400 houses;

Land west of Callerton Lane – delivery of around 180 houses; and

Land at the Police Headquarters – delivery of around 300 houses; “

When asked to provide a likely housing maximum for Ponteland Mr Mason states

“There is no statutory requirement to identify maximum housing numbers, this is clear in national policy and guidance, the Core Strategy is therefore in accordance with this guidance;”

It is not known why Councillor Hepple and the Chief Executive of NCC are so determined to portray the housing numbers for Ponteland to be significantly less than the reality as evidenced by the FOI response.

The figures provided within Policy 17 of the pre submission draft do not represent the real and actual housing allocation for Ponteland. (Currently 1006 –that is minimum - not 880) To present such misleading housing figure within this Pre Submission Draft and then to suggest that NCC have engaged in an open transparent and honest consultation with the residents of Ponteland is disingenuous.

Effective – *The Plan must be deliverable over its plan period, embracing sound infrastructure delivery planning; having no regulatory or national planning barriers to delivery; delivery partners who are signed up to it; and based on effective joint working on cross-boundary strategic priorities.*

We refer to the answers provided earlier. NCC has not considered any infrastructure delivery planning to a settlement upon which, it intends to impose the greatest population increase in the county. (Somewhere between 25% to almost 28% . Far far greater than what is considered acceptable for a Main Town never mind a Service Centre)

Any suggestion by NCC that the relocation of the schools represents infrastructure delivery is completely false. Any investment in Schools and Leisure is merely a replacement/renewal of existing facilities. Indeed it is becoming clear that the replacement facilities will offer FEWER facilities than the residents of Ponteland currently enjoy. This is even before the increase in population that is proposed.

We are also disappointed by way NCC have treated the Ponteland Town Council and the Neighbourhood Plan Group. Despite stating in the consultation documents that NCC will, and have engaged with PTC in the masterplanning for Ponteland, it is clear from PTC response to an FOI request that NO such engagement actually took place.

The significant investment that, according to NCC, has necessitated Ponteland to be placed into Main Town status has yet to be decided. NCC planners have prematurely assumed that the Schools and Leisure project will be approved. Yet it is clear from the email from the NCC program manager that NO decision has been taken as to the viability or affordability of the site. This work will not be completed until sometime next year.

We are unclear how NCC can state that their primary plan for Ponteland is deliverable when the plan is predicated on the approval of the outline business case? The work on the feasibility, site

option appraisal, affordability and delivery options has not been completed nor has any decisions on whether to proceed any further with the project been taken by NCC.

To be consistent with national policy, the Core Strategy must:

Accord with the National Planning Policy

National Policy

The Government attaches great importance to Green Belts. The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Section 79 National Planning Policy Framework – (NPPF)

Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NCC suggests that the Green belt it proposes to be released is of “less landscape sensitivity” and so is sufficient justification for its release. We disagree with NCC assessment of the site.

NCC suggests that the sites at Rotary Way do not increase the risk of merger. Yet the land that is being suggested for release from the Green belt as mentioned above is only 0.45 miles from the closest part of Newcastle, which is not part of the Greenbelt.

We submit that this is the closest part of Northumberland Green Belt to any other neighbouring encroachment, yet this is the area NCC proposes to release?

Notwithstanding any fundamental disagreement we have with NCC as to the degree of sensitivity of the Green belt land to be released, the purposes of the Green Belt as per National Policy MUST be hugely applicable to the land NCC propose to release,

In the recent Birney Hill appeal NCC strongly objected to their proposal (as did the Greenbelt Group who joined forces with NCC to oppose that application) yet that proposal was 1.4 miles from Throckley or any of the new residential allocations in Newcastle, which are deemed to increase the risk of merger. This is clearly inconsistent. It raises a significant question mark on the consistency of approach by NCC.

The proposals for development on the Ponteland Green Belt will cut across natural and historic features in a visually harmful way making as substantial urban intrusion into local landscape

The existing settlement has a ragged edge, which adds to the sense of separation from the Tyneside conurbation as well as separating the A696 approach into the Village where it passes through Cheviot View and Clickemin Farm from the Darras Hall Estate. The wedge of open countryside here separates the south east edge of Ponteland from Darras Hall and the suburban approach and is a living link to Ponteland's agricultural past

The area is considered of importance in The Northumberland County Council Land Use Consultants Key Land Use Impact Study September 2010 which lists priorities to

- Protect the parkland landscape at Birney Hall and retain views from the southern settlement edge to Callerton Common
- Guide development to areas of lower landscape sensitivity, to the east of the settlement
- Seek to retain the characteristic views from Callerton Lane and the B6545 to Callerton Common, High Callerton and Black Callerton Hill

Village Centre for the good reason of protecting the countryside in that part of the County closest to the Tyneside conurbation, where pressures for development are strong.

The Green Belt around Ponteland has been assessed using standard methodology and the area of open space to the south and south east of the Parish is considered to be of exceptional strategic importance by the Neighbourhood Plan Group and Ponteland Civic Society. They attach great weight to its role because of the separating function it fulfils in addition to the other purposes of Green Belt

Although this gap is narrow it has been effective both in allowing Ponteland to remain separate from the conurbation and also in enabling it to retain the identity and character of a rural settlement surrounded by countryside

The majority of Ponteland including Darras Hall sits in the valley between the River Pont and the Fairney Burn whilst most of the surrounding countryside is higher ground. This means that views into and out from the village are comparatively restricted: there is little or no intervisibility between the village and the conurbation and importantly, the highway link with it. It also means that the village itself quite unobtrusive so that there is a quite remarkable degree of landscape continuity, particularly in the unrestricted views across Ponteland from the south towards Simonside, The Cheviot, the border with Scotland and the Northumberland National Park

By bringing development out of the River Pont Valley the continuity of the landscape to the north and south of the village would be broken

The proposed developments would cause real and severe harm to the Green Belt. The narrow, vulnerable gap between Ponteland and Newcastle would be physically reduced by characteristic urban sprawl. There would be encroachment into the countryside. The present visual continuity between the landscape to the north and south of Ponteland would be broken. There would be the perception that Newcastle and Ponteland had merged. There would be conflict with each of the basic purposes of the Green Belt as per the NPPF.

The NPPF require exceptional circumstances to justify Green Belt deletion. In the Ponteland Supplementary Planning Document (SPD) issued by NCC it is stated, **“the Council considers the need to provide land in the correct places, to deliver sustainable development, constitutes exceptional circumstances.”**

Any review of the Ponteland residents overwhelming response to NCC, including teachers, parents, Civic Society members, various Sports Clubs members etc. have all told NCC that this is the wrong site and the wrong location for the proposed community campus. (Over 730 residents attended NCC drop in session on 7th November 2015)

The indicative plan is not a high quality or sustainable design. It moves the main facilities (and smaller facilities enjoyed by the community) further away from the village centre, increasing dependency on journeys by car, urbanises a sensitive land parcel edge, and proposes massive overdevelopment of a sensitive site

All the schools are grouped together within one building with the First and Middle schools reduced to being but a row of classrooms set either side of a long corridor. As it stands the two smaller schools will cease to have a unique identity, something that may have contributed to their success

Some people in the community with education experience believe such a large integrated campus will have possible detrimental psychological effects on children.

Closure of Darras Hall First School would impact on Broadway shops footfall and viability.

The proposed development will not address flood risk issues and indeed part is situated within a flood risk area. At the workshop on 7 November 2015 the community was informed by Northumbrian Water that they had not been consulted regarding proposed development on this site. If there were no development sustainable drainage systems would not be needed

Enhanced opportunities for sustainable access to community and leisure facilities cannot be achieved by moving them further away from the community that they serve

The foundation upon which NCC intend to hang the hat of exceptional circumstances ie *“the need to provide land in the correct places, to deliver sustainable development”* is seriously undermined by its determination to release Ponteland Green Belt at all costs despite overwhelming evidence that is land in the wrong place that will not deliver sustainable development.

We support national policy for brownfield sites to be prioritised for development.

NCC does not seem to embrace National Policy. For example, at the Police HQ site and at Meadowfield Industrial estate, many residents have suggested to NCC that they take a more strategic view to the growth of Ponteland. NCC has been repeatedly encouraged to develop a strategy that would release the Meadowfield industrial estate for housing. We are in no doubt that Ponteland residents would work with NCC to help them deliver this preferred and sustainable

development.

This particular site is hugely sustainable, being in the centre of the village and immediately adjacent to the main medical and shopping facilities in the settlement. NCC must consider this in preference to other housing development in Green Belt. (Another reasonable alternative not considered by NCC?)

Annex A of the Planning Update Newsletter sent out by the DCLG in January 2015 refers to the Town Centre First Policy. This requires main town centre uses to be located in main town centres, and consideration of out-of-town locations should only be made if suitable sites are not available.

Notwithstanding our objection to the designation of Ponteland as a Main Town status, NCC are insistent that we are a Main Town or “indicative of a Main Town “ they then simply ignore the fact that this makes them non compliant with the Town Centre First policy.

Once again NCC cannot have it both ways.

The present site of the Library is perfectly suitable for a new and improved multifunctional Library.

The guidance note ‘Ensuring the vitality of town centres’ states:

Local planning authorities should plan positively, to support town centres to generate local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work.
Paragraph: 001 Reference ID: 2b-001-20140306

In our view, NCC are NOT supporting Ponteland Town centreto create an attractive, diverse place where people want to live, visit and work.

This is further evidence of NCC determination to go their own way, no matter how many Ponteland residents’ objections.

The proposal for a new “community campus” will place essential community facilities at the furthest reach of the Town centre.

Conclusion

We understand that there is a view, widely held at County Hall, that the residents of Ponteland “Say No to everything”

May I state very loudly and very clearly from the PGBG perspective. We are most definitely NOT against development. We are in fact very supportive of proportionate development in the settlement. We absolutely agree with NCC statement that it needs to be in the right place and sustainable.

All we have ever sought to achieve was that NCC engages with the Ponteland residents with good will, integrity, honesty and transparency.

I hope we have highlighted within this response areas where we say NCC have fallen short in

their dealings with various representatives of the Ponteland community or have provided conflicting information.

NCC have failed to be receptive to, or have considered any reasonable alternatives

Ponteland Green Belt Group is NOT against new Schools or Leisure facilities. It is our position that replacement Schools and Leisure can be re built/improved on the existing site.

Planning permission for substantial amount development already exists, including on the Police HQ site. NCC insistence that Ponteland accept a hugely disproportionate allocation of housing is the issue. Strategic planning to enable the release of a large brownfield site in the centre of the settlement is absent.

The foundation upon which NCC intend to "hang the hat" of exceptional circumstances, i.e. *"the need to provide land in the correct places, to deliver sustainable development"* is seriously undermined by NCC determination to release Ponteland Green Belt land at all costs.

The evidence is clear. NCC are imposing too much housing and proposing placing community facilities on the wrong site in the wrong location; the concept is the polar opposite to being able to deliver sustainable development.

NCC need to demonstrate "exceptional circumstances" to release Green Belt land. We believe the "exceptional circumstances" test is not made out.

Submitted on behalf of the residents and supporters of Ponteland Green Belt Group

A handwritten signature in black ink that reads "Tony Noble". The signature is written in a cursive, flowing style.

Tony Noble

Chair

Ponteland Green Belt Group.