



Dear Planning and Housing Team

This is the Northumberland Local Plan: Core Strategy Pre-Submission Draft – Schedule of proposed major modifications (June 2016) representation form on behalf of the Ponteland Green Belt Group (PGBG).

For clarity, this representation is made on behalf of over 1100 residents from Ponteland and surrounding settlements. Appendix 1 provides evidence of authorisations for residents represented as requested at point 3 of the representation form. This is an **increase** in the number of representations made on the Core Strategy Pre Submission Draft (October 2015).

A report to Economic Growth and Corporate Services Overview and Scrutiny Committee (23rd February 2016) did not accurately reflect the number of Ponteland respondents represented and made inaccurate assumptions –

Para 3 - Almost 1,850 comments were received from almost 400 respondents to the Pre-Submission Draft Plan consultation and consultation events were attended by almost 1,895 people. **The level of feedback was a lot less than the last consultation of the Core Strategy**

Para 4 - **It is hoped that the reduction in the level of comments and respondents is an indication that the Council has made changes to reflect previous feedback.**

The information provided by officers to full Cabinet omitted information that was readily available; the report did not fully reflect the number of representations made. Group representations were actually **2596 respondents** (not 400 as stated within the report); the majority of respondents were Ponteland residents.

Ponteland Green Belt Group challenged the inaccuracies and unfortunately were informed that the responsible officer would only provide a verbal correction to Full Cabinet and would not correct document inaccuracies before it was presented to Cabinet, even though there was time to do so. It is difficult to understand the rationale behind this action and does not demonstrate transparency.

Tony Noble

On behalf of the Ponteland Green Belt Group.



Northumberland County Council

Northumberland Local Plan Core Strategy Pre Submission Draft: Proposed Major Modifications (June 2016)

Representation Form

This is the form for making representations on the Northumberland Local Plan Core Strategy Pre Submission Draft: Schedule of Proposed Major Modifications.

Consultation will begin on **15th June 2016 for 6 weeks and end at 4pm on 27th July 2016**. Representations received after this date cannot be considered. Only representations received within this period have the statutory right to be considered by the Inspector at the subsequent examination.

Representations submitted online are preferable; however forms can be submitted by email or post to the address below. If you wish to submit a representation on a Proposed Major Modification, please either complete a form at http://northumberland-consult.limehouse.co.uk/portal/planning/core_strategy/csmm or complete and return to either the postal or email address given at the end of this form.

Please note:

1. All respondents need to provide their personal details.
2. The Council are only inviting comments on the Proposed Major Modifications to the Plan, which are shown in red within the consultation document. Representations must reference the modification to which the comments relate and comments must be on the basis of the 'soundness' or legal compliance of the Proposed Major Modification. Please read the guidance note before completing this representation form.
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: Personal Details

	1. Personal Details	2. Agent Details (if applicable)
Title		
Name	Tony Noble	
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If you are replying on behalf of a group, how many people does it represent?
(Where applicable, see point 3 above)

1100 +

Question 1

Which proposed Major modification does your response relate to? (For example MAJ/01/01)

MAJ/05/42 – Hierarchy of Centres

Question 2

Do you consider that this proposed Major modification meets the legal and procedural requirements?

No

Question 3

Do you consider that this proposed Major modification has met these tests?

No

Question 4

Do you consider this proposed Major modification to be unsound because it is not:

Positively prepared

Justified

Effective

Consistent with National Planning Policy

Question 5

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

Within the Hierarchy of Centres Ponteland is shown to be a Small Town.

Ponteland Green Belt Group (PGBG) welcomes the modification to show Ponteland, as a smaller town centre, which we feel, is the highest possible status for Ponteland taking into consideration existing and proposed facilities and infrastructure limitations.

However within the latest Core Strategy document and also within the Major Modifications document Ponteland is referred to as a Main Town to determine its housing allocation; this is conflicting. The Major Modifications document should address this by the consistent reference to Ponteland as a Small Town not as a Main Town; Ponteland housing allocation should be reduced to reflect this more appropriate classification.

The continued categorisation of Ponteland as a Main Town allows NCC to incorrectly justify a disproportionate allocation of housing to Ponteland relative to its actual size and function.

Categorising Ponteland as a Main Town conflicts with other NCC documentation as provided by the Ponteland Green Belt Group previous responses to the Core Strategy

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>

Within NCC Statement of Consultation at Annex 1 (page 182) NCC recognise the strength of opposition by Ponteland residents to the categorisations as a 'Main Town'.

There was much opposition to Ponteland being classified as a main centre at the 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 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' category.

This statement of NCC, whilst acknowledging the opposition of Ponteland residents, is misleading. The investment in Education and Leisure is merely a renewal of existing facilities. There will be no additionality to the facilities currently enjoyed by Ponteland residents, in fact NCC current plans for Ponteland will, in reality, offer a significant reduction in those facilities.

Proposed relocation of the schools and sharing of Leisure facilities will result in a reduction of the sports fields and a significant reduction in public access to the Leisure centre (Public access reduced to approximately 8% of the operating capacity - Source : Minutes of Leisure centre working group 14th July 2016)

Perhaps one reason behind NCC insisting Ponteland be incorrectly categorised as a Main Town can be found in annex 1 of NCC statement of consultation (October 2015) –

*At PSD stage, in recognition of the significant investment that will be made in education and leisure provision within the town and to better reflect its role, it was necessary to move Ponteland back into the 'Main Town' category – **considerably increasing the proportion of housing proposed for main towns (to 78%)***
[Emphasis added]

By moving Ponteland from a 'Service Centre' to a 'Main Town' NCC are able to manipulate the allocation of housing to Main Towns from 65% to 78% within the Central delivery area.

What impact does 'Main Town' status have on Ponteland residents?

As stated, in previous variations of the Core Strategy consultation process, Ponteland has fluctuated from being categorised as a Main Town (Tier 1) with a proposed minimum housing allocation of 850. Following 'consultation' Ponteland was then re categorised more appropriately as a Service Centre. Ponteland housing allocation was reduced to 640.

Between the 'Draft Full Submission' and the 'Pre Submission Draft', NCC re-imposed the category of 'Main Town' for Ponteland and increased the 640 housing allocation by over 40% to 900 houses.

In reality Ponteland currently has a minimum increase of over 60% on the 640 housing allocation listed in the Core Strategy Full Draft Plan; NCC has failed to include housing that has already been delivered and which is to be counted within the plan period.

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 1. below – information supplied by NCC following FOI request.)

(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

Table 1.

NCC SHLAA figures indicate a housing figure of **1119** over the Plan period – with an additional **245** beyond the plan period.

NCC place great emphasis on the fact that 880 is the allocation of housing for Ponteland. This is an incomplete and misleading statement. The 880 figure is merely the amount of housing allocated to be built on the Green Belt that NCC propose to release in Ponteland.

NCC has failed to add the 126 net completions which also count within the plan period – simple maths 126 + 880 proposed to be built on Green Belt and the minimum housing allocation for Ponteland is therefore 1006. There are also over 500 approved planning permissions in progress.

Within the 'Preferred Options Stage 2' document (para 9.113 p.93) NCC make the following statement about the effect of the housing allocation in Ponteland.

'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.'

Ponteland Green Belt Group, by way of a FOI request, questioned the rationale/evidence that underpinned this key statement. NCC responded with:

'..... 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.'

In the Report to Cabinet dated 12 July 2016, Councillor Allan Hepple introduces the Garden Village proposal.

Within that report it is clearly stated that the NCC's, Objectively Assessed Need (OAN) figure represents a minimum housing requirement figure.

Even without the recently introduced Garden Village scheme the current proposed housing allocation to Ponteland will certainly be greater than the numbers listed (900) within the Core Strategy document.

The 'Preferred options – stage 2 document (para 5.11 p36) makes the following statement

*As part of this assessment consideration has been given to a number of issues, including...
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]*

Once again, in answer to a FOI request, NCC were 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:

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.

In response to PGBG FOI request NCC have also informed us that the [then] allocation of 850 houses would increase the population of Ponteland by 14.7%

When attempting to justify 850 houses and the excessive population increase (at 14.7%) NCC have stated:

The reasons for a higher level of development being proposed for Ponteland are as follows:

- *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*
- *The settlement has **a distinctive character** which provide an opportunity to attract entrepreneurs and economic activity close to the airport*
- *The location close to Newcastle makes it **a desirable place in which to live***

Ponteland residents are now faced with a minimum housing allocation of 1006 houses

[880 proposed on Green Belt + 126 already built within the plan period]

This represents a 37% population increase or put another way, a 94% + population increase over and above what NCC have previously stated is an acceptable increase for a Main Town, never mind that Ponteland is regarded as a Small Town in hierarchy of centres.

In correspondence NCC have stated;

*We have maintained our position that, **in acknowledgement of the need to accommodate proportionate growth in Ponteland over the plan period, an element of Green Belt deletion will be required [emphasis added]***

It is very difficult to understand how a 37% population increase representing a 94% increase over the upper limit of acceptable growth for a Main Town can ever be regarded as “proportionate”

Notwithstanding NCC subsequently claiming that the acceptable population increase figures presented were merely a guide and not indicative of a maximum population increase considered to be acceptable to the Council, this a huge increase in the population of Ponteland, it will without doubt change the very distinctive character of Ponteland; NCC have acknowledged that the distinctive character would be compromised if housing were to be over 1000.

The Pre Submission Draft is incorrect in showing 900 dwellings in the plan period and NCC clearly know this. It presents an inaccurate/false housing number both to the residents and to the Inspector.

It is hoped that the use of 900, when figures provided by NCC clearly show a minimum of 1026, is not a means of suggesting, incorrectly, that the minimum housing allocation in Ponteland will be below 1000.

One of the supporting documents supplied by NCC is EB06c - Strategic Land Review - Central Northumberland Delivery Area (June 2016)

Section 4 of this document describes Ponteland thus.

Ponteland sits in the Central delivery area. Ponteland is a town that provides services to a wider rural area, although not to the same extent as Morpeth and Hexham

This is almost identical to the terminology as the February 2013 Core Strategy Preferred Options document (Para 4.35 Page 21) which placed Ponteland as a key Service Centre. See below to compare

‘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.’

Section 4.3 justifies Ponteland designation as a Main Town.

The importance of Ponteland as a Main Town is exemplified by the range of services and facilities it offers.

It then provides the following range of services and facilities to support the reasoning.

- *The Town contains a high school*

- *A Leisure Centre*
- *Cultural Facilities include a library.*
- *Ponteland benefits from Emergency services Provision with Police and Fire stations.*

In response we would point out that the existing services and facilities do not support Ponteland as a 'Main Town'; Facilities in the neighbouring Main Towns of Hexham, Morpeth and Alnwick are significantly superior.

The EB06c - Strategic Land Review document also refers to the transport links to Callerton Parkway and to Newcastle.

Those very close transport links means that Ponteland will never be able to elevate to the level of Morpeth or Hexham due to its proximity to Tyneside. – (Kingston Park, Metro Centre, Newcastle City Centre and Hospital facilities etc.)

To categorise Ponteland as a Main Town is an exaggeration of the true nature of the current and future facilities likely to be available to the residents of Ponteland.

NCC are desirous to promote Ponteland into the Category of a Main Town as it provides it with (a false) justification to allocate a disproportionate amount of housing to Ponteland relative to its true size and function.

It is hoped that this misrepresentation will not be used by NCC as the 'exceptional circumstances' as required by The National Planning Policy Framework (NPPF) to remove Green Belt from Ponteland.

Why would NCC wish to have to justify an allocation of housing to Ponteland, which is disproportionate to its true size and function?

PGBG are concerned that NCC are being less than open and transparent with the residents of Ponteland.

I would bring your attention to Councillor Davey statement in the NCC budget 2015-16 / 2016-17

'We will actively promote the construction of new homes and the generation of new businesses to maximise income through council tax and business rates.'

There is also the statement of Councillor Davey published on the NCC website dated 25 March 2015.

*'Ponteland's accessible location close to Major transport routes, the airport and Newcastle city centre makes it **vital to the economic growth plans of the county**' [emphasis added]*

Is the Green Belt land in Ponteland to be released on a sound planning footing or is it simply for political and financial gain? Is Ponteland being sacrificed as the cash cow for the County?

If that is the true reason behind Ponteland being given 'Main Town' status then NCC should be open and honest and inform Ponteland residents that the sacrifice of the distinctive character of Ponteland is a conscious decision made for commercial /political reasons.

Question 6

Have you raised issues during previous consultation on the Core Strategy?

Yes

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

Question 7

Please set out what change(s) to the proposed Major modification 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.

The Core Strategy needs to adopt a consistent approach to the correct hierarchy of Ponteland.

Ponteland can never be categorised as a Main Town. NCC has acknowledged the limitations of Ponteland previously.

The case for categorising Ponteland as a Main Town on the basis of the replacement/renewal of existing schools and leisure facilities, offering reduced facilities to a significantly increased population, is not made out. There is no evidence to justify this categorisation.

Ponteland Green Belt Group welcomes the modification to that of a smaller town centre, which we feel, is the highest possible status for Ponteland

Question 8

If your representation is seeking a change, do you consider it necessary to participate in the Independent Examination?

YES

Question 10

Please indicate below if you would or would not like to be notified at an address/email address of the following above.

Yes we would like to be notified

Question 1

Which proposed Major modification does your response relate to?

MAJ/06/03 – Housing Provision Scale and Distribution.

Question 2

Do you consider that this proposed Major modification meets the legal and procedural requirements?

No

Question 3

Do you consider that this proposed Major modification has met these tests?

No

Question 4

Do you consider this proposed Major modification to be unsound because it is not -

Positively prepared

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Effective

Consistent with National Planning Policy

Question 5

NCC County Wide Housing Numbers Excessive - unsound

NCC believes there is an objectively assessed need County wide for 'at least' 24,320 dwellings in the plan period to support the creation of 10,000 additional jobs in Northumberland.

County wide considerations on the plan.

Objectively Assessed Need ('OAN')

NCC's proposals County Wide are not supported by an Objectively Assessed Need and are unsound.

The Government/DCLG starting point based on 2012 ONS population projections is 12769 houses for Northumberland 2012-2031.

To that is added NCC's OAN aspiration of 11551: $12769+11551 = 24320$ houses 2011-2031.

That is a **91%** addition to the Government starting point.

At Planning Inspectorate their statistics demonstrate the average approved plan at EIP since 2012 is between **19%** (2011-2016 analysis) and **24%** (2011-2015 analysis) over the DCLG starting point.

A whopping **91%** addition to 12769 is simply not justifiable.

There is no proven need, and the unsoundness is exacerbated by the use of this excessive and aspirational County wide figure to purportedly justify the deletion of Green Belt. This is not a robust and justifiable Plan. The County wide numbers are aspirational, and are clearly excessive rather than being based on any reasonable objective assessment of need.

There is no evidence whatsoever to justify that a Government starting point of 12769 houses can be justifiably increased to 24320 dwellings.

The above analysis is on ONS 2012. However, the 2014 ONS figures are now published. These ONS population and consequent estimated housing projections should now be used as the OAN starting point.

The 2014 population projections are now lower. Based on the 2014 ONS figures the estimated DCLG starting point for Northumberland is now 11367 (compared to 12769 based on ONS 2012). This increases NCC's surplus over the DCLG starting point to **+114%**.

(NCC preferred option $24320-11367= 12953 = 12953/11367 =$ addition of 114%)

Compare old DCLG 2012 calculation;

NCC preferred option $24320-12770= 11550 = 11550/12770 =$ addition of 91%.

On either analysis that is a significant excess to the national average of 19%/24% addition to the DCLG starting point of local plans being approved by the Planning Inspectorate nationally.

NCC has not produced any robust or objective evidence to justify such excessive County wide numbers.

By comparison, what numbers on average could one reasonably anticipate for Northumberland?

Based on the new DCLG 2014 starting point of 11367:

11367 x Planning Inspectorate approved plan average addition (as at 2016) of 19% = 13527. NCC's supposed OAN is **10,793 over this figure**.

There is insufficient allowance for windfall sites or the release of large family homes back into the market as the increasing proportion of older people downsize.

Comments on Document EB04 County-Level Demographic Analysis and Forecasts (July 2015 Edge)

This document is not available on the NCC website in the supporting evidence tab where the public (as part of the Major Modifications consultation) is invited to comment.

Edge have used data which is now out of date. The analysis is based on 2012 ONS SNPP information as stated in paras 2.15 and 2.16. This overestimates the population increase. NCC must use the latest data for the Inspection: i.e. 2014 SNPP and DCLG 2014 Housing projections.

The Edge report extends the time frame beyond the plan period 2011-2031 to 2012 -2037. This is inappropriate, confusing and it is not clear if they have taken this into account in their analysis. [Paras 2.18, 2.24 and Fig 8. of the report.]

Projections based on out of date information and extended time-scales are unsound.

Para 3.1 states 'no single definitive view on the likely level of growth in Northumberland'. Any projections based on such an undefined view are unsound.

A number of sensitivity analyses are presented in section 3 and 4 of the Edge report which are all apparently ignored when the final numbers are produced.

The ONS 2014 population projection for Northumberland is 1.63% - down from the 2012 figure of 2.6%.

County Economic Strategy/Employment

The plan relies on a high level of employment growth accomplished by a high in-migration level over the plan period. It is based on aspiration rather than objectively assessed need. NCC's draft Plan seeks job densities above the NELEP (North East Local Enterprise Partnership) and higher than all of the 12 local

authorities in the North East region. NCC's unemployment rate is 6.1% (Dec 2015) which is better than any of the other 11 NELEP local authorities (average 8%, range 6.9% to 11.1% unemployment). This does not validate economic growth intervention of 24320 houses and 10,000 jobs in-migration. A policy to extract workers from adjacent local authorities with higher unemployment rates is not justifiable. That is zero economic growth for the NELEP. In the period 2005 to 2015 NCC's unemployment rate has always been the lowest of the 12.

Whereas the plan purportedly finds the need for, and aspires to, increased employment there is no strategy to attract business to justify the additional housing numbers. There does not appear to be any sound evidence at all that validates that policy. Houses do not create jobs. Investment creates jobs. It claims to be a Plan for economic development, but in fact it is all about housing.

The Secretary of State in his report dated 9 July 2015 in refusing the application of Lugano to develop on the Green Belt at Birney Hill also makes reference to the requirement for investment to create jobs.

*The Secretary of State acknowledges that although it is possible to legitimately give great weight to revitalising the North East economy, it is not clear how the release of Green Belt land for 280 dwellings would contribute to that without going hand-in-hand with other significant inward investment aimed at providing jobs.
(Para 24)*

The increase in over 65 year olds in the population is not addressed by Edge. i.e. building houses for commuters does not help with the ageing population. Brigit Rosewell author of the NELEP aspiration for 100,000 jobs NE by 2025 at the Birney Hill Inquiry had to accept that there is no research that building houses brings in workforce , and that it was mainly a flywheel affect.

Other authorities in the North East have also planned for significant growth. No meaningful attempt has been made to address competition from the other regional economic areas. However, such competition will clearly have a negative effect on achievement of NCC's ambitions. Substantially the North East authorities are all going to attempt to pull workers from neighbouring authorities. Additionally, available evidence is that there are 10,000 unemployed and 22000 commuters resident in Northumberland with dwellings. That makes an existing available workforce of 30,000 with Northumberland houses. The Draft Plan is in effect a commuters' charter.

NCC acknowledge the duty to work with other councils on a joint approach to sustainable development. However, the Majority of authorities seem to be endeavouring to claw back economically active households from adjoining

authorities; that is not sustainable. They cannot all be successful in that endeavour!

We would remind NCC of the comments by Inspector Harold Stephens in his Interim report of his inspection of the County Durham Plan (para 39)

*The reliance on high employment growth and associated high levels of in-migration that is built into the preferred economic scenario **represents an unacceptable risk which I cannot support on the basis of the evidence before me.** Although the chosen jobs target may accord with regional economic aspirations and the results of econometric forecasts, **it is imperative to take account of the fact that other authorities in the North East are similarly seeking growth** [emphasis added]*

NCC overambitious housing aspirations are not based on the correct analysis of the Objectively Assessed Housing Need. The 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 wishful thinking; the approach is aspirational and is not built on strategic plans for economic growth and development.

The use of the software tool scenarios, 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 also highlighted by Inspector Harold Stephens in his interim report (Para 38) of the examination of the County Durham Plan.

The commuter effect is a significant indication of there being more supply than demand in Northumberland as they have to commute each day. Why poach workforce from other authorities to Northumberland by building houses. That is no economic growth for the NELEP as it only moves the workforce around.

Jobs are created by investment and economic strategy not by house building, nor by 10,000 imported workers. Such a policy only exacerbates commuting, exacerbates traffic congestion, raises significant 'dormitory' issues, and places unnecessary stresses on the infrastructures of the County's main towns.

Ponteland excessive housing numbers

NCC (Councillor Hepple and NCC Chief Executive) have consistently portrayed the housing numbers for Ponteland to be significantly less than the reality as evidenced by responses to FOI requests made by Ponteland Green Belt Group; responses received evidence that NCC have failed to include housing that have completed or have outline planning permission within the current Plan period. Ponteland's true housing figures in the Pre Submission Draft are misrepresented; the Pre Submission Draft is NOT an accurate document to put before the Planning Inspector.

NCC have been inconsistent in their approach to Ponteland; within the Pre-Submission Draft Ponteland is classified as a smaller town centre. Ponteland is still listed in table 6.2 as a main town but on page 55 it is listed as a smaller town centre. [See also our response within the MAJ/05/42 – Hierarchy of Centres].

Allocated numbers for Ponteland of 900 have been based on Ponteland as a Main Town; this number is a minimum number of houses proposed for Ponteland. This allocation is flawed.

Northumberland County Council 'Field of Dreams'

Field of dreams is a Hollywood Fantasy movie with the catch phrase 'build it and they will come'.

Northumberland County Council are operating in their own fantasy world with their proposed 'build it and they will come' planning policy.

NCC plans are excessive and destructive.

Question 6

Have you raised issues during previous consultation on the Core Strategy?

Yes, Ponteland Green Belt Group and Ponteland residents have been consistent throughout each and every stage of the Core Strategy Consultation. We firmly believe that excessive housing numbers are based on flawed economic and population growth scenarios. NCC are prepared to erode Ponteland Green Belt with no justification to do so.

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

N/A

Question 7

Please set out what change(s) to the proposed Major modification 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.

Ponteland Green Belt Group request that housing numbers County wide are reviewed and are based on the most up to date DCLG and ONS data to ensure that they are in fact evidence based.

Reviewed County wide housing numbers should then be applied across the Central Area.

Ponteland housing numbers should reflect the classification of a small town centre and not a main town.

It is not enough for NCC to state that they want economic growth for the region; surely this sweeping statement needs to be supported with a clear explanation and defined economic strategies that will underpin what appears to be nothing more than aspiration.

Question 8

If your representation is seeking a change, do you consider it necessary to participate in the Independent Examination?

Yes

Question 10

Please indicate below if you would or would not like to be notified at an address/email address of the following above.

Yes, Ponteland Green Belt Group would like to receive these notifications.

Question 1

Which proposed Major modification does your response relate to?
MAJ/06/06 - Additional Housing allocations

Question 2

Do you consider that this proposed Major modification meets the legal and procedural requirements?

No

Question 3

Do you consider that this proposed Major modification has met these tests?

No

Question 4

Do you consider this proposed Major modification to be unsound because it is not

Positively prepared

Justified

Effective

Consistent with National Planning Policy

Question 5

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

As outlined in the response to the MAJ/06/02 NCC objectively assessed need for housing is fundamentally flawed.

If this statement is accepted by the Inspector at EiP it then follows that Green Belt land will no longer need to be released for additional housing allocation in Ponteland.

This current proposal to release Green Belt land to provide for additional housing in Ponteland is at complete odds with NCC Policy 24 – Strategic approach to the Green Belt which clearly states The Tyne and Wear Green Belt within Northumberland as defined in Figure 7.1 will be protected to

Prevent the merging of: Newcastle upon Tyne with Ponteland...

The area to the south and south east of Ponteland, and West of Callerton lane is the closest point to Newcastle; it is currently protected by the Green Belt and is important in fulfilling the main purposes of Green Belt as outlined in Policy 24.

The importance of this area of Green Belt is further highlighted within the Major Modifications document at Policy 56 where NCC discuss Coal extraction. In this section NCC state proposals will be required to address the following key matters:

.....The impact on the openness of the Green Belt to the south and east of Ponteland,

This is further evidence of the inconsistency of approach to the Green Belt in Ponteland, In MAJ/06/05 NCC advocate the removal of Green Belt land to the south and east of Ponteland and West of Callerton Lane. NCC also emphasize the importance of any impact on the openness of the Green Belt in this same area.

As evidenced earlier NCC are providing misleading information as to the amount of housing to be allocated to Ponteland in the plan period.

The additional housing allocations indicate 880 houses to be built of Green Belt Land.

At Major Modification MAJ/06/02 table 6.2 indicative scale and distribution of housing the housing figure for Ponteland is shown as 900.

The following table supplied by NCC as part of an FOI request show that there are already 126 completions to be counted within the plan period. There are currently over 500 planning permissions at various stages of development within the Ponteland area.

(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

NCC has failed to add the 126 net completions which also count within the plan period – simple maths 126 + 880 proposed to be built on Green Belt and the absolute minimum housing allocation for Ponteland is therefore 1006.

We have already outlined the significant detrimental impact that this amount of housing will have on the distinctive character of Ponteland. (See response to MAJ/05/42 Hierarchy of Centres)

Question 6

Have you raised issues during previous consultation on the Core Strategy?

Yes

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

N/A

Question 7

Please set out what change(s) to the proposed Major modification 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.

Ponteland Green Belt Group would propose an acknowledgement that the OAN for housing in the County as excessive and to adjust the housing distribution accordingly. This would negate the need to release excessive Green Belt land in Ponteland.

NCC also need to acknowledge as a minimum the 126 completions that already count as having been delivered within the plan period. PGBG would like NCC to go further and to take into account the 500 + approvals for housing since 2011.

Presenting a housing distribution to Ponteland of 900 is a false and misleading statement.

Question 8

If your representation is seeking a change, do you consider it necessary to participate in the Independent Examination?

Yes

Question 10

Please indicate below if you would or would not like to be notified at an address/email address of the following above.

Yes, PGBG would like to receive these notifications.

Question 1

Which proposed Major modification does your response relate to? (For example MAJ/01/01)

MAJ/07/01 Strategic approach to the Green Belt

Question 2

Do you consider that this proposed Major modification meets the legal and procedural requirements?

No

Question 3

Do you consider that this proposed Major modification has met these tests?

No

Question 4

Do you consider this proposed Major modification to be unsound because it is not:

- . Positively prepared
- . Justified
- . Effective
- . Consistent with National Planning Policy

Question 5

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

PGBG would bring to the attention the recent comments of the new secretary for Communities and Local Government Sajid Javid MP

The green belt is absolutely sacrosanct. We have made that clear: it was in the Conservative party manifesto and that will not change. The green belt remains special. Unless there are very exceptional circumstances, we should not be carrying out any development on it.

(Hansard 18th July 2016)

We would also point out the minutes of the meeting of NCC Economic Growth & Corporate Services Overview and Scrutiny Committee on Tuesday 23 February, 2016 which record the following

That Green Belt should be defended to the best of the Council's ability wherever possible

The purposes of Green Belt are defined in the NPPF Paragraph 80 as follows:

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

NCC Policy 24 – Strategic approach to the Green Belt which clearly states The Tyne and Wear Green Belt within Northumberland as defined in Figure 7.1 will be protected to

Prevent the merging of: Newcastle upon Tyne with Ponteland..

This Policy therefore clearly accords with purposes (1) and (2) since the boundary of Newcastle are, at this point, no more than one kilometre from the Ponteland settlement boundary.

Purposes (3) and (4) are also extremely important in the context of Ponteland and PGBG group would refer you to previous comments made by NCC regarding the character of the settlement

- *The settlement has **a distinctive character** which provide an opportunity to attract entrepreneurs and economic activity close to the airport*
- *The location close to Newcastle makes it **a desirable place in which to live***

It is the Green Belt protection that continues to provide Ponteland with the distinctive character. It is the Green Belt protection preventing the merging of Newcastle that makes the location a desirable place to live.

It is this character and desirability that NCC could use to its economic advantage by ensuring the settlement does not lose those qualities by the allocation of a disproportionate amount of housing relative to its true size and function.

The importance of this area of Green Belt is recognised by NCC within the Major Modifications document at Policy 56 where NCC discuss Coal extraction.

In this section NCC state proposals will be required to address the following key matters:

.....The impact on the openness of the Green Belt to the south and east of Ponteland,

PGBG refer to the Appeal (APP/P2935/A/14/2217815) in relation to the application by Lugano Ltd. in which similar circumstances applied.

NCC objected to the planning application by Lugano. Subsequently NCC, supported by the PGBG made very strong objections at the appeal.

The Secretary of State ruled then that 'the very special circumstances necessary to justify a grant of planning permission for inappropriate development in the Green Belt do not exist.'

The Community Character Appraisal and its accompanying Landscape Character Assessment prepared by Ponteland Civic Society and, now in the Neighbourhood Plan evidence base, attach high importance to the area of Green Belt bordered by Rotary Way, Callerton Lane and Cheviot View. The community have consistently objected to proposed development in this area.

Garden Village

NCC announced on 8 July 2016 that they are working with a developer on a proposal for a 'Garden Village'; the impact on Ponteland and the neighbouring settlements will be significant; there is absolutely no evidence that NCC have considered this new proposal in conjunction with the effect that the growth proposed within the Core Strategy will have on Ponteland residents and the existing (limited) infrastructure.

NCC propose further significant deletion of Green Belt land to accommodate 1800 houses; this is in addition to the already excessive number of proposed houses and Green Belt removal.

The criteria within the Department of Communities and Local Government's (DCLG) prospectus for 'Locally-Led Garden Villages, Towns and Cities is clearly defined. This additional proposal does not meet the following criteria: -

- The Dissington Hall Garden Village proposal is not a discrete settlement but is an extension of Ponteland;
- The proposal does not have community support
- The proposal is not on Brownfield land; it will not make effective use of previously developed land.

Ponteland Green Belt Group have received comments from a high proportion of local residents who have raised justified concerns that NCC are determined to destroy the special character of Ponteland and the surrounding settlements, as an example, 100% of residents living in Dalton are against this Garden Village

proposal due to failure to meet the DCLG criteria and the apparent complete disregard of NCC to protect Green Belt land.

Research demonstrates that there are other Expressions of Interest submitted nationally that are underpinned with the concept and values of Garden Villages -

- Long Marston Airfield (Stratford District Council)
- Otterpool Park Garden Village (Shepway District Council)
- East Cullompton Garden Village (Mid Devon District Council)

There are also more appropriate sites within Northumberland that are able to fulfil the ethos of Garden Village development. A site which fits the Government criteria near Widdrington (and whose residents we understand are keen for such a proposal) was mentioned by Councillor Peter Jackson at Cabinet 12th July 2016.

It is difficult to understand NCC rationale for supporting further removal of swathes of valuable Green Belt land within Northumberland and, in particular, Ponteland; NCC approach is not aligned with Government or Planning Policy.

Question 6

Have you raised issues during previous consultation on the Core Strategy?

Yes

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

N/A

Question 7

Please set out what change(s) to the proposed Major modification 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.

The proposal to build housing on Green Belt land on the basis of NCC's flawed excessive OAN does not satisfy the exceptional circumstances test as per the requirements of the NPPF.

The renewal of the Schools and Leisure facilities can be completed on the existing site.

We refer NCC to the fact that the Ponteland Neighbourhood Plan Steering Group, supported by the Civic Society has proposed to the Council that land forming part of the Police Headquarters site, but not released, should be considered for any additional houses as an alternative to the targeted proposed sites.

The PGBG would be fully supportive of this alternative proposal.

Question 8

If your representation is seeking a change, do you consider it necessary to participate in the Independent Examination?

Yes

Question 10

Please indicate below if you would or would not like to be notified at an address/email address of the following above.

Yes - I would like to receive these notifications

Question 1

Which proposed Major modification does your response relate to? (For example MAJ/01/01)

MAJ/07/06 Para. 727 & Fig. 7.3 Green Belt Deletions.

Question 2

Do you consider that this proposed Major modification meets the legal and procedural requirements?

No

Question 3

Do you consider that this proposed Major modification has met these tests?

No

Question 4

Do you consider this proposed Major modification to be unsound because it is not:

- . Positively prepared
- . Justified
- . Effective
- . Consistent with National Planning Policy

Question 5

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

It is noted that this modification is described 'minor' i.e.

to delete unnecessary text (Minor modifications) and to reflect the changes proposed to Green Belt deletions for the settlement.

The PGBG would bring to the attention the recent comments of the new secretary for Communities and Local Government. Sajid Javid MP

*The green belt is absolutely sacrosanct. We have made that clear: it was in the Conservative party manifesto and that will not change. The green belt remains special. Unless there are very exceptional circumstances, we should not be carrying out any development on it.
(Hansard 18th July 2016)*

We would also point out the minutes of the meeting of the Economic Growth & Corporate Services Overview and Scrutiny Committee on Tuesday 23 February, 2016 which record the following

That Green Belt should be defended to the best of the Council's ability wherever possible

How can any deletions to the Green Belt ever be described as a 'minor' modification? NCC seem to rather casually move areas of land in or out consideration for Green Belt deletion and also to casually decide if land is to be allocated for sport and recreation or for housing.

If NCC is being true to their ethos to defend the Green Belt to the best of their ability then ANY change in the Green Belt status of an area of land, allocating land for sports and leisure facilities then quietly placing it back into consideration for housing MUST be a Major modification.

One of the exceptions in the NPPF for building on the Green Belt is:

- *provision of appropriate facilities for outdoor sport, outdoor recreation*

Allocating land for housing does not constitute an exception as per the NPPF and the 'exceptional circumstances' test MUST be met.

Allocating land for education, sports and leisure in an SPD with significant detail, presenting for consultation and then subsequently reallocating that same area to incorporate housing within this Major Modifications document, providing very limited detail and then describing it as 'Minor' could be regarded as underhand.

NCC amended statement is also not correct. NCC state that:

*Further consideration has been given to how to plan for the future development needs of the town, **taking into account the feedback received on the pre submission draft** [emphasis added]*

This is a misrepresentation. The opposite is the case. NCC have taken **no** account of the feedback from the residents or the representative bodies in Ponteland.

Within NCC Statement of Consultation at Annex 1 it confirms.

Over 1000 responses were received and most opposed the preferred option. However, of the 90% who stated that they objected to the distribution, 9 out of 10 (81% of total responses) were standard responses specifically objecting to the housing figures for Ponteland

NCC issued a Supplementary Planning Document for Ponteland. A drop in event was arranged for the residents.

NCC was overwhelmed by the negative response to the SPD.

It was made absolutely clear to NCC that the case for relocating schools and leisure was simply not made out.

Whilst hugely supporting the much needed investment in the Ponteland schools, the overwhelming view was that this could be accommodated within the land on the existing school sites.

It is to be noted that MAJ/07/08 makes reference to an emerging SPD.

It is of significance that NCC have denied Ponteland residents the opportunity of a drop in event to this Major modification document to allow feedback to be given; events were organised for Hexham and Morpeth.

The suggestion that this will facilitate improvements to the Education and Leisure facilities is questionable.

As outlined previously NCC's Objectively Assessed Need for housing is fundamentally flawed.

If this is accepted as flawed by the Inspector at EiP it then follows that a significant amount of Green Belt land will no longer need to be released for additional housing allocation in the Ponteland area.

As evidenced earlier NCC are already misleading residents with the amount of housing that will be allocated to Ponteland.

The additional housing allocations indicate 880 houses to be built of Green Belt Land.

At Major Modification MAJ/06/02 the indicative scale and distribution of housing the housing figure for Ponteland is shown as 900 houses.

The following table supplied by NCC as part of an FOI request show that there are already 126 completions to be counted within the plan period. (We are aware that there are also currently over 500 planning permissions at various stages of development within the Ponteland area)

(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

NCC has neglected to add the 126 net completions which also count within the plan period – simple maths 126 + 880 proposed to be built on Green Belt and the absolute minimum housing allocation for Ponteland is therefore 1006.

It should be noted that there are currently over 500 planning approvals since 2011. How many of those approvals will be built prior to EiP remain to be seen but they will undoubtedly add significantly to the true quantity of housing to be imposed on Ponteland

We have already outlined the significant detrimental impact that this amount of housing will have on the distinctive character of Ponteland. (See response to MAJ/05/42 Hierarchy of Centres)

Suggesting that 900 houses is the allocation of Ponteland when NCC have supplied the figures which clearly show that the true number will be far greater, also suggesting that feedback has been taken into account when the opposite is the case, indicates the lack of an open and transparent process. This brings into question the credibility of the Core Strategy documents and the consultation process.

The following comparisons give some idea of the excessive scale of Green Belt deletion proposed by NCC for Ponteland

Northumberlandia
19 Hectares

Vatican City
44 Hectares

Disneyland Park Paris
57 Hectares

Disney's EPCOT Park Florida
121 Hectares

NCC proposed Ponteland Green Belt Deletion
183 Hectares
(262 Hectares including Garden Village proposal)

Question 6

Have you raised issues during previous consultation on the Core Strategy?

The SPD was not part of the consultation on the Core Strategy; PGBG have previously raised concerns that SPD and Schools and Leisure Consultations are integral to the Core Strategy. NCC have separated off consultation areas in a way that has unfortunately introduced segregation and confusion.

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

There was no opportunity within the Core strategy as this modification relates to a separate SPD consultation, which was overwhelmingly rejected by Ponteland residents. NCC have now reintroduced a similar concept within this Major Modifications document. Ponteland residents have been denied a drop in event to provide feedback. PGBG are suspicious that the drop in event was denied to prevent further negative feedback on this latest proposal.

Question 7

Please set out what change(s) to the proposed Major modification 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

The amended wording is incorrect and misleading.

This is a distortion to show NCC taking account of the local residents view when in fact the opposite is true. NCC has taken no account of the feedback from the residents or the representative bodies in Ponteland.

Question 8

If your representation is seeking a change, do you consider it necessary to participate in the Independent Examination?

Yes

Question 10

Please indicate below if you would or would not like to be notified at an address/email address of the following above.

Yes - I would like to receive these notifications.

Question 1

Which proposed Major modification does your response relate to? (For example MAJ/01/01)

MAJ/07/08 Green Belt boundary/Green Belt deletions.

Question 2

Do you consider that this proposed Major modification meets the legal and procedural requirements?

No

Question 3

Do you consider that this proposed Major modification has met these tests?

No

Question 4

Do you consider this proposed Major modification to be unsound because it is not:

- . Positively prepared
- . Justified
- . Effective
- . Consistent with National Planning Policy

Question 5

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

It is noted that this modification is described 'minor' i.e.

to delete unnecessary text (Minor modifications) and to reflect the changes proposed to Green Belt deletions for the settlement.

The PGBG would bring to the attention the recent comments of the new secretary for Communities and Local Government. Sajid Javid MP

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(Hansard 18th July 2016)*

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How can any deletions to the Green Belt ever be described as a 'minor' modification? NCC seem to rather casually move areas of land in or out consideration for Green Belt deletion and also to casually decide if land is to be allocated for sport and recreation or for housing.

If NCC is being true to their ethos to defend the Green Belt to the best of their ability then ANY change in the Green Belt status of an area of land, allocating land for sports and leisure facilities then quietly placing it back into consideration for housing MUST surely be a Major modification.

One of the exceptions in the NPPF for building on the Green Belt is:

- *provision of appropriate facilities for outdoor sport, outdoor recreation*

Allocating land for housing does not constitute an exception as per the NPPF and the 'exceptional circumstances' test MUST be met.

Allocating land for education, sports and leisure in an SPD with significant detail, presenting for consultation and then subsequently reallocating that same area to incorporate housing within this Major Modifications document, providing very limited detail and then describing it as 'Minor' could be regarded as underhand.

Revising and thereby removing Green Belt requires the high hurdle of 'exceptional circumstances' as per the NPPF to be overcome.

NCC appear to place great reliance on their excessive Objectively Assessed Need for housing to be the means by which they intend to overcome the 'exceptional circumstances' hurdle.

As outlined previously NCC's Objectively Assessed Need for housing is fundamentally flawed.

If the Inspector at EiP finds that NCC's OAN is excessive then it follows that a significant amount of Green Belt land will no longer need to be released for additional housing in Ponteland.

The Green Belt boundary for Ponteland will no longer require such a drastic amendment.

The investment in the schools can be accomplished on the existing sites. There is no need to remove any further land to the South, East and West of Callerton Lane, in Ponteland for housing.

It is difficult to understand the rationale of not releasing the brownfield site at the Meadowfield industrial estate, which sits in the centre of the settlement; a significant amount of affordable and sustainable housing could be provided without removing an excessive amount of Green Belt land.

As evidenced earlier NCC are already presenting misleading information in the amount of housing to be allocated to Ponteland.

The additional housing allocations indicate 880 houses to be built of Green Belt Land.

At Major Modification MAJ/06/02 table 6.2 indicative scale and distribution of housing the housing figure for Ponteland is shown as 900

The following table supplied by NCC as part of an FOI request show that there are already 126 completions to be counted within the plan period. (We are aware that there are also currently over 500 planning permissions at various stages of development within the Ponteland area)

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Suggesting that 900 houses is the allocation of Ponteland when NCC have supplied the figures which clearly show that the true number will be far greater, also suggesting that feedback has been taken into account when the opposite is the case, indicates the lack of an open and transparent process which brings into question the credibility of the Core Strategy documents.

Garden Village

Subsequent to the release of the Major Modifications document NCC announced, on 8 July 2016, that they are working with a developer on a proposal for a 'Garden Village'.

This proposal would require the Green Belt boundary for Ponteland to be redrawn. It is therefore appropriate to comment within this Major modification reference.

The impact on Ponteland and the neighbouring settlements by this Garden Village will be significant; there is absolutely no evidence that NCC have considered this new proposal in conjunction with the effect that the proposed growth within the Core Strategy will have on Ponteland residents and the existing (limited) infrastructure.

This lack of careful consideration was evident when the proposal was put before Cabinet on the 12th July. Councillor Davey described the Garden Village development as being "somewhere near Ponteland".

NCC propose further significant deletion of Green Belt land to accommodate 1800 houses; this is in addition to the already excessive number of proposed houses and Green Belt removal.

The criteria within the Department of Communities and Local Government's (DCLG) prospectus for 'Locally-Led Garden Villages, Towns and Cities is clearly defined. This additional proposal does not meet the following criteria: -

- The Dissington Hall Garden Village proposal is not a discrete settlement but is an extension of Ponteland;
- The proposal does not have community support
- The proposal is not on Brownfield land; it will not make effective use of previously developed land.

Ponteland Green Belt Group have received comments from a high proportion of local residents who have justified concerns that NCC are determined to destroy the special character of Ponteland and the surrounding settlements, as an example, 100% of residents living in Dalton are against this Garden Village

proposal due to failure to meet the DCLG criteria and the apparent complete disregard of NCC to protect Green Belt land.

Research demonstrates that there are other Expressions of Interest submitted nationally that are underpinned with the concept and values of Garden Villages -

- Long Marston Airfield (Stratford District Council)
- Otterpool Park Garden Village (Shepway District Council)
- East Cullompton Garden Village (Mid Devon District Council)

There are also more appropriate sites within Northumberland that are able to fulfil the ethos of Garden Village development. Widdrington (whose residents we understand are keen for such a proposal) was mentioned by Councillor Peter Jackson at Cabinet 12th July 2016.

It is difficult to understand NCC rationale for supporting further removal of swathes of valuable Green Belt land within Northumberland and, in particular, Ponteland.

Question 6

Have you raised issues during previous consultation on the Core Strategy?

Yes

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

N/A

Question 7

Please set out what change(s) to the proposed Major modification 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

The case for the disproportionate allocation of Housing in Ponteland is based on significantly flawed data. NCC have overestimated the OAN by a staggering 114%.

NCC have also significantly underreported the amount of housing to be actually delivered in Ponteland.

Should NCC use realistic OAN figures the amount of housing throughout the County would be reduced including Ponteland.

The Green Belt land to be released at Police HQ combined with already completed houses in the plan period, the 500 + planning permissions that are in various stages of progress, and the high probability of additional windfall sites will provide NCC with a significant housing contribution from the Ponteland area.

The drastic redrawing of the Ponteland Green Belt, which will destroy the character of Ponteland, would then not be necessary.

Question 8

If your representation is seeking a change, do you consider it necessary to participate in the Independent Examination?

Yes

Question 10

Please indicate below if you would or would not like to be notified at an address/email address of the following above.

Yes - I would like to receive these notifications.

Question 1

Which proposed major modification does your response relate to?

MAJ/07/09 Master Planning

Question 2

Do you consider that this proposed major modification meets the legal and procedural requirements?

N/A

Question 3

Do you consider that this proposed major modification has met these tests?

N/A

Question 4

Do you consider this proposed major modification to be unsound because it is not:

N/A

Question 5

Please give details of why you consider this proposed major modifications is not legally compliant or sound or if you wish to support the legal compliance or soundness of this proposed major modifications please also use this box to

set out your comments.

Ponteland Green Belt Group are pleased to note the amended wording that now states that Ponteland Town Council and the Ponteland Neighbourhood Plan Group will be involved in master planning.

The previous wording stated that both Ponteland Town Council and Ponteland Neighbourhood Plan Group had been involved in master planning.

Freedom of Information requests to NCC and to Ponteland Town Council evidenced that this statement is incorrect and had potential to mislead; it is reassuring to see that this has now been amended.

Question 6

Have you raised issues during previous consultation on the Core Strategy?

Yes, both within the SPD response and through a Freedom of Information request.

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

N/A

Question 7

Please set out what change(s) to the proposed major modification 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.

N/A

Question 8

If your representation is seeking a change, do you consider it necessary to participate in the Independent Examination?

N/A

Question 10

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Yes, PGBG would like to receive these notifications.