



Dear Northumberland County Council and Active Northumberland

This is the Ponteland Green Belt Group (PGBG) response to the New School, Leisure and Community Facilities document seeking views of the proposals from residents.

As the whole concept is reliant on a large amount of Green Belt being deleted from Ponteland and, as we represent the views of over 1100 Ponteland residents, we believe we are able to comment on the proposals.

In the opening comments of the document reference is made to the request for a new school site with shared facilities having been instigated by the Ponteland Schools Partnership.

This is not an accurate statement, NCC are fully aware of the highly controversial circumstances in which NCC contacted the School heads in February 2016 and whereby Governors were not fully informed of NCC proposals.

The site for this proposal, situated on the Ponteland Green Belt has been imposed. NCC have not allowed any other options to be considered, in particular the rebuilding of the schools and leisure on their existing, separate sites.

This failure has been highlighted on a number of occasions, including by the local MP Mr Guy Opperman as far back as January 2015, his spokesman stated at that time;

Guy does passionately believe our schools need upgrading. Compare the condition of Ponteland's High school to Kenton or Walbottle.

However there is no reason greenbelt needs to be used for new schools.

Guy's successful campaign for the rebuilding of Prudhoe High School will see the school built on exactly the same existing site. No reason why that can't happen in Ponteland.

It is clear that NCC have deliberately restricted the location for the Schools and Leisure proposal to a site of their own choosing; they have consistently denied residents the opportunity to suggest alternative and more suitable solutions.

The relocation of the schools and leisure facilities will have significant consequence to Green Belt land not only on the existing sites but also the rest of the identified 'green

wedge'; It is NCC intention to excessively delete Green Belt land in Ponteland for housing.

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 detailed within the NPPF; the 'exceptional circumstances' test MUST be met and it is not.

NCC has previously allocated land for education, sports and leisure in a Supplementary Planning Document (SPD); providing significant detail within proposed plans and presenting this for consultation. Following considerable public objection to that proposal we now have this document to which the public are being asked to comment.

NCC has now reallocated that same area of land to incorporate housing within a Major Modifications document. Very limited detail is provided, the change is described as Minor.' By so doing NCC now claim not to have any requirement to carry out public consultation for this deletion. This could be regarded as an underhand way of slipping a large amount of housing development onto Green Belt land under the radar of the local residents; NCC approach lacks transparency and has led to a complete lack of trust.

The imposition of the site with no other options being allowed, together with the trickery by way the larger site is now proposed for release for housing is clear evidence of a failed and disingenuous approach to the consultation process.

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.

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.

This current document suggests that the concept is a *fait accompli*. We wish to point out that the Green Belt in Ponteland cannot be altered except through the Core Strategy process and this will be vigorously challenged at the EiP stage by a number of interested parties. How can planning permission be granted for this proposal when the Core Strategy has not yet reached EiP? The current proposal far exceeds the current footprint.

NCC have publicly stated that the schools and leisure proposal is completely inter dependant on a significant amount of Green Belt land being released for housing via the Northumberland Core Strategy. Ponteland Green Belt Group suggest that NCC will not be able to satisfy the high hurdle of the exceptional circumstances as required by the NPPF.

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 (dedicated public access reduced to approximately 8% of the operating capacity - Source : Minutes of Leisure centre working group 14th July 2016). It has been extremely difficult (bordering on impossible) to gain clarification relating to facilities and access arrangements on a shared school site. **Residents of Ponteland have never been consulted on shared facilities on this proposed site.**

NCC proposals for the deletion of Green Belt to accommodate a grossly disproportionate amount of housing will see an increase in population growth of at least 37% within our small town.

Therefore this latest NCC proposal for leisure facilities will provide fewer facilities

combined with a huge reduction in accessibility to accommodate a significant increase in population. (Issues of safeguarding school pupils with shared public access to the facility are noticeably absent from the document.)

It is noted with interest NCC cautionary small print rider at the bottom on the glossy wish list and graphics on public display at the current leisure centre:

“IMPORTANT NOTICE The above pictures are for reference only and not a true reflection of what the desired facilities would look like in the new Leisure and Entertainment complex”

This proposal **is not** an improvement on the facilities that the residents currently enjoy.

The Governments “**Consultation Guidance Principles 2016**” and the Department of Education document “**Making ‘prescribed alterations’ to maintained schools - Statutory guidance for proposers and decision-makers**” both recommend the following

Consultations should be informative -Give enough information to ensure that those consulted understand the issues and can give informed responses

Consultations should last for a proportionate amount of time Consulting too quickly will not give enough time for consideration and will reduce the quality of responses

Consultations should take account of the groups being consulted - When the consultation spans all or part of a holiday period, consider how this may affect consultation and take appropriate mitigating action.

This consultation period is only 3 weeks and coincides with school holidays; this consultation involves the shared use of facilities with the local schools. This flawed approach was used by NCC for the schools consultation and does not provide Ponteland residents with appropriate opportunity to make an informed response. NCC have intentionally adopted a fragmented approach to integrated proposals; all of those proposals are dependent on Core Strategy argument for Green Belt release. NCC are premature and appear determined to assume EiP outcome.

The “Neighbourhood Planning Road Map Guide” gives guidance on what to avoid when engaging with consultation.

“Consultation is often done badly”.....[when]

The ‘consultant producing options before consulting anyone’ approach. It is poor practice to commission consultants to produce options before consulting the local community.

We raised this point earlier - It is clear that NCC have deliberately restricted the location for the Schools and Leisure proposal to a site of their own choosing; they have

consistently denied residents the opportunity to suggest alternative and more suitable solutions.

The 'publish and defend' approach. *This applies where policy or master plans are produced first, before consultation takes place.*

See above – residents are presented with one option- NCC's

The 'people are too stupid' approach. *The fact that many planning issues are complex is all the more reason why there is a need to draw on the knowledge and understanding of the wider community.*

Anyone who has had a modicum of engagement with NCC will relate to this statement as far as NCC and its engagement of residents are concerned

The 'outcomes predetermined' approach. *There is no point wasting time and money on 'consultation' if there is not an opportunity to influence what happens.*

This is the main allegation that the PGBG have consistently made against NCC, any analysis of the Core Strategy process will quickly identify that NCC have had a predetermined outcome for Ponteland. This is despite the fact that the residents of Ponteland are the majority of the respondents to the core strategy document (NB the majority by a significant margin).

This huge majority of residents have overwhelmingly rejected NCC proposals - yet here we are, 4 years later and still NCC have not considered residents views.

We submit this response to the shared leisure facility to show consistency in our approach; we have no expectation that NCC will take note of it.

Tony Noble

Chair

Ponteland Green Belt Group.