

PONTELAND CIVIC SOCIETY.

RESPONSES TO THE NORTHUMBERLAND CORE STRATEGY ISSUES & OPTIONS CONSULTATION ending 2ND Jan. 2014

Comments on the Questions in the above Consultation provided by the Ponteland Civic Society are as given below; where no answer is given it may be assumed that we have no comment additional to any earlier submissions.

1. Introduction

Question 1 Comment re. Methodology:

The process of consultation detailed in the Introduction to Stage 2 of the Core Strategy would appear to be adequate to enable residents to comment on the various proposals.

We note that the foundation of the Core Strategy owes much to the estimated future housing requirements. We do not in any way dispute that there will be an ongoing requirement for housing both in the short and long-term future, more particularly for *Affordable Housing*, which we regard as an essential component of housing delivery for Ponteland. We concede that some part of the Green Belt around Ponteland may eventually have to be given up for housing and limited employment uses, but we do not, however, consider that this point has yet been reached. (See also our response to Q. 8.)

However, we are very concerned that estimates of future housing delivery may not have been carried out in a wholly rigorous or mathematically logical manner and that this has resulted in (a) an apparent failure by NCC to fulfill its Five-Year housing supply and (b) an inflated figure of the need for housing land over the 20 year period covered by the Plan.

It is a particular source of concern that in 2012 Northumberland had **1,103** potential dwellings with planning permission but unsigned S106 Agreements, whilst the former Castle Morpeth district had no less than **913** in which Ponteland accounted for **150** [1]. It would appear that none of these dwellings has been included in estimates of forward housing delivery. A number of other Authorities are able to consider a proportion of such dwellings to be deliverable in their forward estimates [2] so we question why Northumberland appears unable to do so. Such inclusion would appear to be a requirement of the National Planning Policy Framework (NPPF) [3] as is the requirement for flexibility in overcoming stalled developments [4].

We also observe that the requirement in the NPPF for the addition of a "20% buffer" is very poorly defined and has been interpreted in a simplistic manner by NCC; other Authorities have adopted more rational interpretations of this

2. A spatial portrait of Northumberland

Question 4 Comment:

Ponteland is described (2.32) as providing services to a lesser extent than Morpeth or Hexham, and we are also told that it "looks to Newcastle upon Tyne for its main employment, retailing and services." Therefore the statement that "Ponteland is a key service area" would appear to contradict the facts and cannot be justified.

It has also been stated that: "... Future growth in the town (Ponteland) is currently restricted by the Green Belt." This misleading statement ignores the planned 150 dwellings on land at the former Police Site – which it is now proposed to extend to 350 – as well as an as yet unspecified number on the former Ponteland Mart Site. Both these sites are on Brownfield land, which should properly be developed before Green Belt land is considered.

3. The economy of Northumberland

Question 7 Comment:

Whilst we fully concur with the view (3.4) that "the expansion of indigenous firms and inward investment opportunities need to be positively supported" we consider that the reference to "larger firms" and the implied possibility of somehow getting larger employers to appear in the County is unrealistic. We point to the loss, in past decades, of virtually all the Heavy Engineering and Deep Mining employment, etc., in Northumberland; in our view the return of any such large employers goes against current trends and could only take place with massive Government backing.

Question 8 Comment:

The employment growth forecasting by St. Chad's College would appear to give such a wide spread of possibilities that no appropriate long-term planning for employment can be properly justified by these projections; any requirements become no more than a matter of opinion. It has however been stated that NCC will review progress and revise future requirements at intervals. A more realistic review should therefore be undertaken in five years' time (or less) in accordance with recommendations [5] when the trends may become clearer. In the meantime, we suggest that over-ambitious development plans for the long-term should be held in abeyance until initial progress has been properly evaluated.

In the light of the above, we consider that Policies should be put in place whereby NCC have the authority to refuse or postpone planning applications on Green Belt sites where housing on Brownfield sites is achievable. We consider that NCC has a duty to pro-actively bring forward Brownfield sites wherever possible.

We further consider that adequate recognition should be given to the fact that a number of small businesses in Ponteland either operate from home and/or by means of the Internet – a trend which can only grow. This situation will reduce the need for specific land requirements.

We would also highlight the benefits to be obtained from emerging 4G

technology, with particular reference to the recent roll-out of this technology in Cumbria. Fast Broadband access has thereby been provided to many rural areas at some 10% of the cost of employing wired technology, so improving the efficiency and sustainability of existing businesses as well as facilitating the setting-up of new ones.

In this developing technological environment it may well turn out that the widespread provision of small premises in "Industrial Estates" is not the only, or even the best, way of achieving sustainable development in Northumberland generally. This would apply especially in small settlements such as Ponteland.

4. The population of Northumberland

Question 9 Objections re. Population Predictions & Methodology:

Official Government forecasts give a figure of a 13,000 population increase in Northumberland in the period up to 2031. NCC, however, have decided to plan for a target figure of 33,000 but no adequate justification for this discrepancy has been provided. We would also note that it is a requirement to consult fully with adjacent Authorities in preparing the Core Strategy, and we see no evidence that adequate consultation has taken place on these aspects.

The text at the beginning of this Section states that "Population and household projection information is provided by the Government" but insufficient information has been provided as to exactly which versions have been used, and what mathematical techniques have been employed, with appropriate justifications. We consider the use of limited or provisional data in conjunction with simple linear projections to be inadequate to estimate the future trends over 20 years.

It would appear to us that NCC may have, by such means, erroneously concluded that Ponteland will experience a population growth in the order of 18% whereas the generally projected increase for Service Centres in the County is only one third of this figure. The NPPF sets out the guiding principle of "using sound science responsibly" [6].

In the light of this stricture we strongly recommend that the methodology which has up to now been used for population prediction should be reconsidered and, where appropriate, revised calculations undertaken. Methods used to justify such revised results should also be clarified. Any population, housing and employment figures thus arrived at by NCC should be discussed with, and agreed by, adjacent Authorities in accordance with recommendations [7]. Where the predictions lead to a spread of possibilities, sound reasons for the choice actually made should be given.

Question 10 Comment:

It is projected that Northumberland will, over the next 20 years, have an increasing population of the *over-65s*, many of whom will have migrated into the County after retirement; this is particularly likely to affect Ponteland as it appears to be regarded as a desirable retirement location. It is necessary to assess what type/size of housing will be required for these people and to what extent their downsizing from 3-4 bedroom properties may (or may not) increase the supply of housing for younger families.

5. The preferred strategic development option for Northumberland – planning for economic

growth

Question 12 Objection:

We consider that the projected provision of 6,270 dwellings (2011 to 2031) for the Central Delivery Area is excessive and not justified by the arguments presented; neither is the projected number for Ponteland.

In support of the proposed 850 dwellings for Ponteland (alluded to in Para. 5.11) it has been asserted that: "Ponteland not only serves its residents but also a wider rural hinterland than other Service Centres, and contains many of the facilities indicative of a Main Town."

This statement is not supportable by any objective criteria. Although Ponteland has elected to be called a "Town" it is essentially still a Village, in which shopping facilities are restricted to everyday requirements. It has, for example, no stores selling White Goods or other domestic appliances.

Unlike Hexham and Morpeth, Ponteland has no large supermarkets, department stores or footware shops; there are only one or two (very small) clothing shops. There are no Main Agents for motor vehicles in Ponteland and only two filling stations. Further growth of shopping facilities would be severely restricted by lack of parking space, which is already a significant problem.

Cultural life in Ponteland is restricted to the Churches and voluntary/amateur organizations; it does not have the capacity to run Annual Festivals and "Gatherings" as do Hexham and Morpeth. Ponteland has no Theatre or Museum, as has Hexham, and no permanent Art Gallery, as has Morpeth. Ponteland Library is located in a small worn-out building and the facilities available in no way compare to those in Hexham or Morpeth. Bus services through Ponteland are quite limited and there is no bus or train station, whilst Hexham and Morpeth have both.

Ponteland does have good schools – commensurate with its population – but so do Hexham and Morpeth. The one single aspect where Ponteland has uniquely adequate facilities lies in the number of cafes and restaurants; these, however, mostly serve the local populace and those travelling out from Newcastle.

We would ask that the Council reconsider its view of Ponteland in respect of its presumed importance to a "rural hinterland" in the light of the above facts.

7. Housing

Question 14 Objection:

We consider that the projected provision of 850 dwellings (2011 to 2031) for Ponteland is excessive and has not been justified by the arguments presented.

It is not adequately explained how this number also "accounts for sites with planning permission expected to deliver housing ... etc." It should be made clear, for example, how many of these 850 dwellings are due to a proportion of previously granted planning permissions held up by unsigned S106 Agreements (See also Comment re. Question 1).

Question 15 Agree:

Whilst we agree, this is within the context of the Answers above.

We would expect that NCC would apply the provisions of the NPPF with rigour in respect of Affordable Housing [8] since we observe that Developers appear to be able to find numerous ways of avoiding a full commitment to Affordable Housing. In this regard we favour the use of Housing Associations in achieving Inheritability – a property required by the NPPF definition [9] – to ensure that dwellings are truly Affordable.

8. Green Belt

Question 16 Comment:

The Methodology as defined in Section 8.15 appears only to have considered each location in isolation and has not taken into account projected developments in adjacent areas. In particular, Newcastle Airport, in their *Masterplan 2030* envisage a "business park complex of office accommodation which will provide 2,150 direct jobs and a total GVA impact of £120 million by 2030." This is bound to have an effect on both housing and business development proposed for Ponteland, and many businesses might regard the Airport location as preferable to Ponteland.

Question 21 Comment:

It appears to us that the deletion of such a large area of Green Belt around Morpeth is unjustified, and could well lead in the long term to over-development of the Town and an alteration in its historic character.

Question 35 Objection and Critical Comment:

We do not accept that in Ponteland "an average of 8 new dwellings per annum have been built in recent years" coupled to a separate statement that this was over a very short period of three years. We point out that, within the last 18 months, some 80 dwellings have been completed at the Peel House and McCarthy & Stone sites alone. Your quoted figure would appear to have arisen from the choice of too small a sample of years (3) and we suggest that, as such, it would be very unwise to use it to justify any particular conclusions.

We are however entirely in favour of the re-designation for housing of the former Police Headquarters site, noting that it is a *Brownfield site* and therefore should be given precedence for development before any housing is allowed on any former Green Belt sites. It is our view that the existing approval should, where possible, be implemented prior to any incursion into Green Belt land but that a degree of flexibility should be retained in respect of this option in order to facilitate the best overall design solution, as required by the NPPF. [10]

We also favour the expansion of this site into Green Belt land to accommodate additional housing development, up to possibly 350 dwellings. However, we would ask that further consideration be given to the overall layout of the total development likely to be accommodated in this vicinity, with the aim of ensuring that such development is capable of contributing to the provision of a ring road (or North-South bypass) serving the northern confines of the Village.

Your proposal to remove Green Belt status from a triangular portion of land bounded approximately by Rotary Way and Cheviot View is, in our view, an error. It would be a step in the direction of ribbon development along the A696 and towards the Airport and Newcastle. The projected developments at the Airport already envisage going westwards up to the Prestwick Road nearly as far as Prestwick itself, and southwards virtually along the B6918 almost to Woolsington. Newcastle itself has proposals for approximately 3500 dwellings on

land between the A696 and the A69 spreading out towards Woolsington in a North-westerly direction towards Ponteland.

Such developments could clearly result in the ultimate joining up of Ponteland with these areas – in contrast to the provisions of the NPPF which seeks to protect individual settlements, to keep them separate and to preserve their individuality [11].

We also point out that part of this proposed site is a Flood Plain which receives run-off from a significant area of land at Birney Hill as well as land to the East of Callerton Lane. It has suffered serious and persistent inundations in the recent past, as evidenced by crop failures in low-lying parts adjacent to the Fairney Burn.

We are, however, in favour of housing and *some* office development to the North of Ponteland Settlement, with some sacrifice of Green Belt for this purpose. This would, in the medium term, be necessarily be associated with the provision of a North-South Bypass linking the Dobbies Roundabout with the Berwick Hill Road, and a possible future Westward extension to join up with the A696.

We are well aware of discussions currently in progress with the Ponteland Neighbourhood Plan Group on these proposals and are fully supportive of them.

REFERENCES:

- [1] "Northumberland Five Year Supply of Deliverable Sites: 2012 to 2017
 Published July 2012." www.northumberland.gov.uk
- [2] "A Survey of Local Authority Practices in Meeting Some Requirements of the NPPF." Ponteland Civic Society Report. 14th March 2013. www.pontcivicsociety.pontelandonline.co.uk
- [3] NPPF. Footnote 11. p.12.
- [4] NPPF. para. 205. p. 47.
- [5] NPPF. para. 22. p. 7.
- [6] NPPF "Achieving sustainable development". p.2.
- [7] NPPF "Planning strategically across local boundaries". paras. 178 181. pp. 42 & 43.
- [8] NPPF para. 50. p.13.
- [9] NPPF Annex 2: Glossary, "Affordable housing". p.50.
- [10] NPPF Section 7. p. 14.
- [11] NPPF para. 80. p.19.