



**Development Management,
Northumberland County Council,
Planning Department,
County Hall,
Morpeth NE61 2EF**

8th March 2013

Dear Sirs,

**Planning Application 13/00132/OUTES by Lugano Developments Ltd. for
280 dwellings on a site at Birney Hill, Ponteland**

On behalf of the Ponteland Civic Society I object to the above Application for the reasons given below.

Northumberland County Council (NCC) has stated that “The former Castle Morpeth local authority does not identify a deliverable five year supply of housing The lack of deliverable housing land supply is considered attributable to current market conditions rather than a lack of land supply.” [1]. There is no defined housing requirement specifically for Ponteland at the present time, and claims that specific housing numbers will be necessary in the near future are not supportable.

The Inspector in the South Loansdean Appeal [2] ruled that Retained Castle Morpeth Policies, of which the statutory adoption took place in 2004, [3] remain in force until the Northumberland Local Development Plan is approved; it is therefore incorrect to assert or imply that these Policies are out-of-date and can therefore be ignored.

The development for Birney Hill lies outside the Ponteland Settlement Boundary; it also lies in the Green Belt and is therefore contrary to Policy C1. There are no “exceptional circumstances” as defined in Policies C17 and H1 which could justify alteration of the boundary, as defined by Policy C16 [4].

We emphasise that that the Green Belt is specifically protected by the *National Planning Policy Framework* (NPPF) [5] and is further supported by the emerging Local Development Plan (NLDP) [6]. This view has been supported on several occasions by Government Ministers speaking in Parliament and elsewhere.

The development now proposed is located to the south of the Darras Hall Estate, and at its most south-easterly point is only a few hundred yards from the Newcastle City boundary and barely 1.4 miles from the north-western limit of the City where a development of approximately 3,400 houses is planned. There is therefore a serious possibility that the proposed development will lead to the eventual joining-up of Newcastle and Ponteland.

The NLDP currently in preparation is expected to identify not only preferred County locations for future housing but also the latest estimate of required numbers. To allow the proposed development *before* the NLDP has been adopted would pre-empt the establishment of the optimum housing allocations for Ponteland as a whole and would therefore not serve the interests or wishes of the wider community.

Whilst we are fully aware of the need in Ponteland for more Affordable Housing, the proportion of such housing in the proposed development does not meet the expected future NCC target of 30% [7]. It is also not clear how this housing would “include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative housing provision” as is required by the NPPF, [8] nor how the proposals for a “Community Trust” would be implemented. It is understood that NCC envisage having 95% of Affordable Housing in the form of Social Rented and only 5% as Intermediate. [9]

In seeking to provide any Affordable Housing in close proximity to the Darras Hall Estate, there are considerable problems with regard to the cost. The average price of housing in the Darras Hall Estate is reported as £433,650 whilst rental figures are at least £1k pcm and more typically £4k pcm [10] so exceeding half the average National income of £23,450 [11]. The average price for a semi-detached house in Northumberland over the past year is reported to be £125,600 [12] whilst an Affordable Rent is considered to be no more than 80% of the local market rent. [13] The proposed development does not address these problems in a sustainable manner.

A development of the size proposed would lead to serious problems in terms of traffic increase and infrastructure requirements in Ponteland and also on the strategic regional road network. Whilst it might well provide good access to Newcastle to the East, and Corbridge and Hexham to the West, there would be a considerable increase in traffic accessing schools and shops in Ponteland and Darras Hall. The village centre is in a Conservation Area and is too compact to allow significant improvements in the road structure, without which the traffic problems at known black spots would become both unsustainable and intolerable. Prior to determination, a full Traffic Impact Assessment (TIA) by an approved transportation consultant should be commissioned to assess the full effects of the proposal.

The Application makes errors in a number of instances – for example in respect of the proposals for access by footpaths and/or cycleways. It does not appear to recognise that almost all roads on Darras Hall either only have one footpath or none at all. Thus, for example, the proposed footpath from the Birney Hill site on to Callerton Lane would not give acceptable access of 1.8 miles to the Village centre because there is no footpath along Callerton Lane. This proposal is not sustainable.

The location of the proposed development is on an area of high ground which lies directly under the flight path of aircraft landing on and taking off from Newcastle International Airport, so giving rise to noise levels of 48dB (night time) and 57dB (day time) [4]. With future traffic increases noise levels are not only likely to increase but will become seriously detrimental to the quality of life of residents in the proposed development. So-called “soundproofing” which requires almost permanently closed doors and windows is unsatisfactory and unsustainable.

There are very serious problems with regard to the run-off of surface water from this site. The land shelves Northwards, and the year 2012 saw problems arising from very heavy rain falling on previously saturated ground. Certain properties along Edge Hill, including some at Hadrian Court and Greenacres were affected, with inundations spreading down to Lynwood Close and beyond. Run-off down Callerton Lane also caused problems in Callerton Court and for dwellings on the North side of the roundabout where Middle Drive joins Callerton Lane. The NPPF makes it clear that development should not increase the risk of flooding elsewhere. [14] The Applicant’s proposals appear however to be based on “estimates” rather than a scientific appraisal. We consider that the proposed attenuation by swales, ponds, etc., with the

sizes and levels proposed, will not provide an adequate solution and therefore the SuDS drainage system will not be sustainable.

An up-to-date assessment of the number of dwellings required in the period 2012 to 2017 together with their locations across the County has still to be completed for inclusion in the *Core Strategy*. Until that time, the specific need for housing in Northumberland in general, and Ponteland in particular, will remain undefined. We note, however, that NCC has stated that “.... forecast underperformance of 2176 deliverable dwellings is considered to be largely attributable to the current housing and financial market conditions rather than the undersupply of housing land...” [15]

The Ponteland Civic Society is anxious that the future housing assessment should be carried out as accurately as possible and with due recognition of the market conditions. We note, in particular, that there are 1,103 dwellings in Northumberland – 913 of them in the former Castle Morpeth region – for which a resolution to grant planning permission has been approved but which are held up due to failure to sign an S106 Agreement. [16] None of these is included in forward estimates of deliverable housing, thereby leading to a probable over-estimate of the shortfall.

Of the above 913 dwellings, one site is for 150 houses on the former Northumbria Police HQ site (CM20080775). This site could, if brought forward, provide dwellings on a Brownfield site to meet housing needs for the present five-year period in Ponteland. We note that Planning permission has also been granted recently for a further 38 dwellings on the adjacent Care Village site.

The NPPF states that “where obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled.” [17] It also implies that any sites with planning permission should be included in estimates unless it is clear that they will *not* be implemented within five years. [18]

A lack of clarity in the NPPF appears to have led to different interpretations by various Authorities not only of the treatment of unsigned S106 Agreements but also of the way in which a “failure to deliver” should be implemented, so requiring an added “20% buffer” to be applied. [19] We have found that many Local Authorities interpret the NPPF Criterion for “failure to deliver” in a manner which takes account of when long-term delivery targets have been achieved or exceeded rather than simply looking at annual pass/fail figures [20]. We commend such an approach as providing a better justified estimate of future housing requirements.

The need for local planning authorities to be “sufficiently flexible” to clear outstanding obligations has been identified as highly important by HM Government [21] and in pursuance of this policy the *Growth and Infrastructure Bill* [22] is being introduced as soon as possible to encourage Local Authorities to be more pro-active.

Yours truly,

Philip Ham,
Chairman, Ponteland Civic Society.

REFERENCES:

- [1] **Northumberland Five Year Supply of Deliverable Sites: 2012 to 2017, July 2012.** *Section 6.1.4.*
- [2] **South Loansdean Appeal APP/P2935/A/12/2170840**
- [3] **Castle Morpeth District Local Plan.** Ratified 27th February 2003, *statutory notice of adoption 19th February 2004.*
- [4] **Ponteland Proposals map inset No. 26.**
- [5] **National Planning Policy Framework March 2012.** Department for Communities and Local Government . *Para. 79*
- [6] **Northumberland Local Development Plan** Core Strategy Issues and Options, May 2012, [Para. 9.4.](#)
- [7] **Northumberland Local Development Plan** Core Strategy Issues and Options, May 2012, *Para. 6.34.*
- [8] **National Planning Policy Framework March 2012.** Department for Communities and Local Government *Annex 2: Glossary.*
- [9] **Northumberland Local Development Plan** Core Strategy Issues and Options, May 2012, *Table 6.3.*
- [10] <http://www.rightmove.co.uk> as at 3rd December 2012.
- [11] <http://www.mysalary.co.uk/averagesalary.php> as at 3rd December 2012.
- [12] **Northumberland Local Development Plan** Core Strategy Issues and Options, May 2012, *Para. 6.31.*
- [13] *ibid.* para. 6.36.
- [14] **National Planning Policy Framework March 2012.** Department for Communities and Local Government *Para. 100 & Footnote 19.*
- [15] **Northumberland Five Year Supply of Deliverable Sites: 2012 to 2017, July 2012.** *Section 6.*
- [16] *ibid.* *Appendix C: Sites Contributing to the Five Year Supply of Deliverable Sites.*
- [17] **National Planning Policy Framework March 2012.** Department for Communities and Local Government. *Para. 205.*
- [18] *ibid.* *Footnote 11.*
- [19] *ibid.* *Para. 47.*
- [20] **A Survey of Local Authority Practices in Meeting some Requirements of the NPPF.** Ponteland Civic Society. March 2013.
- [21] **Laying the Foundations: A Housing Strategy for England. November 2011.** Department for Communities and Local Government. Chapter 2 *Paras. 29 & 30.*
- [22] **Growth and Infrastructure Bill** (In preparation) *Section 5.*