Local Planning Document Publication Draft

Additional Housing Allocations

Report of Responses (November 2017)



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Introduction

This report summarises the key issues arising from the comments received as a result of the consultation on the additional housing allocations in the Local Planning Document Publication Draft.

Consultation on the Extract of Local Planning Document Housing Allocation Policies and the accompanying Sustainability Appraisal Addendum 4 and the Addendums to the Habitats Regulations Assessment and the Equality Impact Assessment was held between September and October 2017.

Comments were invited on the previous Sustainability Appraisal Addendums that were published and added to the examination library after the Sustainability Appraisal Publication Draft was published and consulted upon in May 2016. Comments were also invited on the supporting documents: Housing Background Paper Addendum 2, Site Selection Document Addendums 2 and 3, Housing Implementation Strategy (updated September 2017) and Infrastructure Delivery Plan Background Paper Addendum. Comments on these documents are also summarised in this report.

	Number of Respondents	Number of Comments
Consultation Documents		
Extract of Local Planning Document Housing	59	72
Allocation Policies		
Sustainability Appraisal Addendum 4		
Addendum to the Habitats Regulations Assessment	9	13
Addendum to the Equality Impact Assessment		
Sustainability Appraisal Addendum, Addendum 2	4	5
and Addendum 3	4	5
Evidence Documents		
- Housing Background Paper Addendum 2		
- Site Selection Document Addendum 2		
- Site Selection Document Addendum 3		
- Housing Implementation Strategy (updated	19	31
September 2017)		
- Infrastructure Delivery Plan Background Paper		
Addendum		
TOTAL	73 ¹	121

A total of 121 comments were received as shown in the table below.

In addition, two petitions were received on the additional housing allocations in the Local Planning Document, one from residents of the community surrounding site X3 Land West of A60 B with 113 signatures and another with 97 signatures from residents concerning site X4 Flatts Lane in Calverton.

¹ Some respondents have commented on more than one part of the document or on several documents.

A more detailed breakdown of the number of respondents and comments received for individual policies is provided within the body of this report. For clarification, some comments have been addressed in a different part of the report to which they were made, for example where a comment made on a housing distribution relates to a specific site allocation and is more appropriately considered in conjunction with other comments relating to that site. However, the above table and other statistics provided within this report relate to the policy against which a comment was originally made.

Where the response states that a change will be made, the details of the change will be included in the next version of the Schedule of Changes to the Local Planning Document Publication Draft which will detail all proposed changes to the Local Planning Document Publication Draft.

Documents that have been referred to in this report are available on the Local Planning Document examination library webpage². Where Court of Appeal decisions and other documents are mentioned in this report, sources are included as footnotes.

Three community workshops for local residents were held close to where the additional sites are located. Officers were in attendance to explain the consultation, answer questions and to assist people in making representations. The workshops were as follows:-

- Redhill/Daybrook Tuesday 3 October 2017
 - X1 Daybrook Laundry
 - X2 Land West of A60 A
 - X3 Land West of A60 B
- Calverton Tuesday 17 October 2017
 - X4 Flatts Lane
- Ravenshead Tuesday 10 October 2017
 - o X5 Kighill Lane A
 - o X6 Kighill Lane B

See **Appendix 1** for key concerns raised at the three community workshops.

² www.gedling.gov.uk/lpdexamination

Extract of Local Planning Document Housing Allocation Policies

Introduction

Number of Respondents	Number of Comments
18	18

Calverton Parish Council referred to the Inspector's note dated 16th June (**EX/122**) and considered that the Council had ignored the Inspector's parameters and had concluded not to delete or reduce the allocation at Killisick Lane but instead proposed six additional housing sites. The consultation published by the Borough Council was considered misleading in that the Inspector did not invite the Council to just propose additional sites. She invited the Council to consider alternative sites to the allocation at Killisick Lane.

Response:

The Inspector requested the Council give consideration to reducing the size of the allocation at Killisick Lane and identifying an additional site or sites elsewhere to make up the shortfall, or deleting this site and identify an alternative site or sites elsewhere. The Borough Council sets out the justification for its approach in the Site Selection Document Addendum 3 (**EX/133**) which in summary confirms that the shortfall that needs to be addressed is to compensate for the homes not coming forward at Killisick Lane within the five year period plus the number of homes not coming forward within the five year period due to the delay in the adoption of the Local Planning Document.

Historic England stated that it had no concerns in respect of how the historic environment had been considered in relation to the additional sites proposed.

Woodborough Parish Council confirmed they are fully supportive of the additional housing allocation.

Sport England stated they had no comments to make.

Severn Trent Water provided general comments in the form of desktop assessments to indicate where proposed developments may have a detrimental impact on the performance of the existing public sewerage network. Severn Trent Water stated that in principle surface water should be manged sustainably and not connected to foul only sewers. Further detailed modelling would identify capacity improvements if required. Another utilities provider, National Grid who is responsible for electricity and gas submission, had no comments to make.

The Coal Authority commented that they lacked capacity to review all additional sites but assumed the sites have been considered against the GIS data supplied by them on Development Risk Plans. Highways England reiterated that its previous comments remained the same that development in the north western sector of the local plan area could have cumulative impacts on M1 J26.

Response:

Noted.

Nottinghamshire County Council considered that the Local Planning Document was sound, legally compliant and met the Duty to Co-operate.

Response:	
Noted.	

Local residents commented that they did not find the forms easy to follow or to identify where the general public could make comments.

Response:

The point about the complexity of the representation form is accepted although it is noted that this is a model form promoted by the Planning Inspectorate.

List of Respondents

Calverton Parish Council **Dexter Cooper** Hammond Trustees Highways England Historic England Joanne Trease Langridge Homes Ltd M F Strawson Ltd Michael Evans Mike Neilson N.J. Lichburn National Grid Nottinghamshire County Council Pat Simpson Severn Trent Water Sport England The Coal Authority Woodborough Parish Council

Policy LPD 64 Housing Distribution

Number of Respondents	Number of Comments
3	4

General Comments

Calverton Parish Council considered that the problem was a mismatch between the housing trajectory set out in Policy 2 of the Aligned Core Strategy and the availability and deliverability of housing sites on the ground. It was considered that Gedling Borough Council had ignored the advice in the NPPF that each local planning authority should produce a single Local Plan for its area. The Local Planning Document has reconsidered the distribution element in Policy 2 and needs to reconsider the delivery/trajectory element of Policy 2.

The Parish Council was concerned that the additional six sites would undermine the delivery of strategic sites perpetuating the supply of easier and smaller housing sites which can be cherry picked by developers. The overall housing strategy based on delivery of strategic sites needs to focus on the delivery of those sites and allocation of other sites should not undermine them.

The proposed revisions have increased the housing supply to 10,085 dwellings against the 7,250 requirement. It was argued that the government 'Planning for the right homes in the right places' (September 2017) consultation paper (**EX/136**) and provisional housing numbers will result in pressure post March 2018 for the strategic figure for Gedling Borough to be reconsidered through a Local Plan review and publication of the new NPPF in Spring 2018 will render the five year housing land supply out of date.

It was considered that the Local Planning Document examination should take a pragmatic approach, the options being to abandon the current Local Planning Document or to adopt the submission plan with a commitment to early review.

Response:

The two part approach to plan making with the adopted Aligned Core Strategy providing the strategic planning framework for Part Two Local Plans was accepted by the Inspector who examined the Aligned Core Strategy.

There is no evidence to support the argument that allocating smaller sites would hold back the delivery of larger strategic sites. The NPPF is clear about the importance of providing a five year supply of deliverable sites and to achieve a step change in housing delivery.

The Borough Council considers that providing both large and small sites provides more choice. The housing trajectory is largely based on evidence provided by developers and shows the delivery rates for both strategic and smaller sites and how these are expected to contribute to housing supply. There is also evidence that the larger sites are now coming forward as the Gedling Colliery/Chase Farm site has commenced with 33 plots started in July 2017. Construction has also commenced at North of Papplewick Lane, Hucknall. Persimmon the prospective developers of Teal Close have submitted the reserved matters application which is to be determined at the November 22nd Planning Committee.

Calculations in the Housing Background Paper Addendum 2 (**EX/130**) show that the total housing supply is 8,237 and not 10,085 as claimed by the consultee, which is 987 homes or around 14% above the Aligned Core Strategy target of 7,250 which is emphasised a minimum figure providing some headroom for flexibility.

No weight can be attached whatsoever to the government's provisional housing need assessment for each authority in its consultation paper. The consultation paper is clear that the provisional housing need numbers are for illustrative purposes only and subject to change.

Government has emphasised that planning authorities should get on with and speed up their plan making and are seeking to discourage authorities from delaying plans for technical reasons. The consultation paper is clear that to ensure stability and a consistent evidence base to inform plan making, local authorities should be able to rely on the evidence used to justify their local housing need for a period of two years from the date on which they submit their plan. Therefore the two years transition period is for the purposes of plan making only and does not mean a local plan housing requirement in adopted plan under the transitional arrangements would be rendered out of date.

The consultation paper also makes it clear that in the absence of an up-to-date local or strategic plan then it is proposed that after March 31st 2018 the new method for calculating housing need would apply as a base line for assessing five year land supply. On this basis this would not apply to Gedling Borough.

The Borough Council would accept the need to commence a review of the Aligned Core Strategy (adopted in 2014) in the light of new household projections expected in spring 2018 and likelihood of a more transparent method of assessing housing need becoming government policy. In the context of Greater Nottingham this would be undertaken jointly with the other Nottingham Housing Market Area Councils through a timetable yet to be agreed.

Alternative Sites

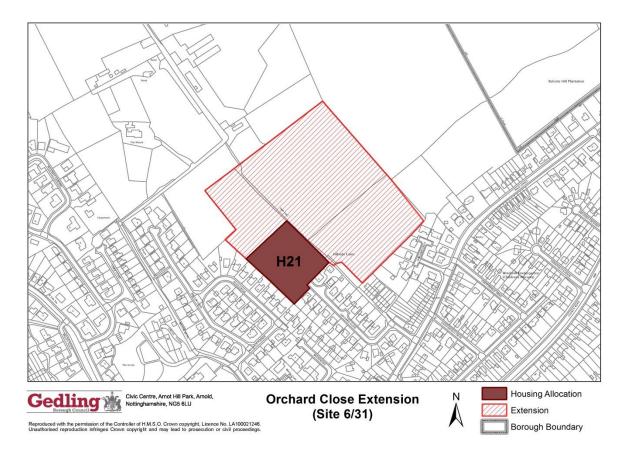
Additional land for residential development was promoted at:-

- Land at Orchard Close (sites 6/31 and 6/923); and
- Glebe Farm, Burton Joyce (site 6/539).

Land at Orchard Close

The landowner promoting two sites at Orchard Close (sites 6/31 and 6/923) raised concerns over the content of the document as follows:-

- Access to the wider site can be achieved including for large refuse vehicles;
- Existing topography of the site can be used to inform road structure and development parcels;
- Development is likely to require cut and fill in order to achieve required access but this need not affect the site's integration with the adjoining area
- Potential impacts on residential amenity on Orchard Close/Langham Drive can be mitigated; and
- Surface water is currently un-attenuated and potential solutions available to reduce risk of flooding elsewhere.

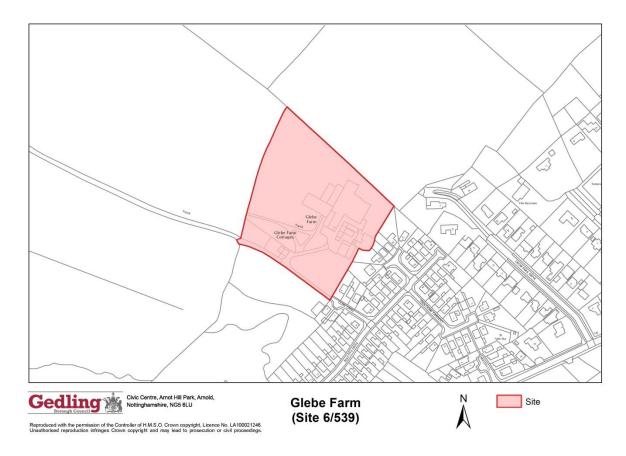


The Borough remains of the opinion that the site is unsuitable for allocation for the reasons set out in the Site Selection Document Addendum 3 (September 2017) (**EX/131**).

Glebe Farm, Burton Joyce (site 6/539)

The landowner for Glebe Farm made representations in opposition to sites X4, X5 and X6 in support of an alternative allocation at Glebe Farm. It was considered that the Council did not provide enough evidence to justify the shortfall of housing in the other villages and not conform to the Aligned Core Strategy. The consultee considered that three of the additional sites X4, X5 and X6 are in inappropriate locations.

In relation to Kighill Lane, it was considered that the allocations would be out of character and detract from the character of the village. The sites are in multiple ownership and the boundaries do not fit together very well.



Response:

The site was re-considered as one of the reasonable alternatives in the Site Selection Document Addendum 3 (September 2017) (**EX/131**) and there are concerns about the suitability of this site for development on Green Belt and highway grounds.

List of Respondents

Calverton Parish Council Northern Trust Oxalis Planning Limited

<u>Policy LPD 65 Housing Allocations - Urban</u> <u>Area and edge of Hucknall</u>

Number of Respondents	Number of Comments
17	18

The residents of the community surrounding site X3 sent in representations which were accompanied by a petition of 113 signatures.

General Comments

The County Council commented that proposals should take into account the actions set out in the Greater Nottingham Landscape Character Assessment Policy Zone MN45 Dumbles Rolling Farmland. The additional housing allocations X2 and X3 and proposed allocations H2, H7 and H8 will add up to a considerable loss in area of this sensitive quality landscape and significant mitigation measures should be considered collectively across the three groups of sites with mitigation potentially secured through planning obligations.

Nottinghamshire North and East Clinical Commissioning Group identified additional demand for primary and community services and expect developer contributions towards these estimated at £550 per dwelling.

Langridge Homes and a local landowner raised concerns about the Borough Council's five year land supply which they considered insufficient to address current shortfalls over the five year period 2017 - 2022. In support of this argument they provided the following reasons:-

- Over optimistic assumptions on delivery from large sites. For Teal Close and Gedling Colliery/Chase Farm the increase in supply of 71 units (Teal Close) and 187 units (Gedling Colliery/Chase Farm) within the five year period was challenged in terms of there being no valid justification. It was also considered that lack of progress on Top Wighay Farm would mean it unlikely to deliver any homes in the five year period; and
- A discount rate has not been applied to sites which should be 10% resulting in a reduction of 75 dwellings.

Langridge Homes also referred to the proposed housing formula in the government 'Planning for the right homes in the right places' consultation paper noting the provisional estimate for Gedling Borough is 468 homes per annum compared to the Aligned Core Strategy figure of 426. In this context it was argued that whilst the Borough Council could achieve the target over the plan period based on the assessment of housing need by DCLG the housing provision was marginal and reinforced the need for reserve sites and safeguarded land. The landowner has promoted new sites/extended sites on the edge of the urban area (see below for section on Alternative Sites) and at Calverton (see below for the Borough Council response to Policy LPD 67). Northern Trust who is promoting alternative sites considered that no explanation had been given for the projected increase in delivery rates assumed in the housing trajectory for Gedling Colliery/Chase Farm from 72 homes to 96 homes p.a.

Local residents also raised general concerns about the loss of Green Belt and countryside and were in favour of utilising brownfield sites and vacant commercial premises.

Response:

In relation to concerns about loss of Green Belt and greenfield land, the Borough Council has followed the urban concentration and regeneration approach to site selection set out in the adopted Aligned Core Strategy. In general, as much development has been directed to sites within the urban area including previously developed land as possible. For example, Daybrook Laundry and the former County depot at Rolleston Drive have been allocated. The threshold for allocation within the urban area is 50 homes and above but the numerous development sites below this size which include redevelopment and reuse of previously developed land including commercial premises such as former public houses are included in the housing supply.

Concerns relating to the Borough Council's five year housing supply, progress on strategic sites (including Gedling Colliery/Chase Farm) and the government consultation on housing need are dealt with in the response to the Housing Background Paper Addendum 2.

The County Council's suggestion about the need for a collective approach to mitigate against the cumulative landscape impacts from the various allocations is noted. The Local Planning Document acknowledges that mitigation including screening will be required at sites H8 and H7 in order to screen the housing from the operational mineral working on adjacent land. A landscape buffer is recommended for sites X3 and site H5 and the Borough Council considers there is an opportunity to implement the actions recommended in the Dumbles Rolling Farmland Policy Zone through the planning application process. The recent planning permission subject to the signing of the s106 at X2 Land West of A60 A (2016/0854) includes a condition that before development is commenced full details of both hard and soft landscape works should be submitted to and approved in writing by the Borough Council.

Site X1 – Daybrook Laundry

The Environment Agency commented that a site specific flood risk assessment, focusing on sustainable surface water management is required. The advice of Nottinghamshire County Council should be sought for surface water disposal. They also commented that given surface water flood risk in the Day Brook catchment which is heavily urbanized, new development on both green and brownfield sites should have improved means of sustainable drainage, that goes beyond mimicking the natural rate of runoff, to one that actually reduces this rate of runoff.

Severn Trent Water stated that the surface water would drain toward existing storm network and noted highway flooding upstream and downstream of the development along the A60 but considered the size of the development and the recurrence of flooding incidents meant that the development would have a low impact in terms of flood risk.

There was some positive support for the allocation of this brownfield site which was considered an "eyesore" by some and others queried why it had been left vacant so long. The residents of the community surrounding X3 had no significant comments to make on site X2 as it is a brownfield site and instead focussed their comments on site X3.

Response:

The comments of the Environment Agency and Severn Trent Water about the need for sustainable drainage systems are noted. A site specific flood risk assessment will be required as part of any planning application. The support from some consultees for the development of this site is also noted.

Site X2 – Land West of A60 A

Residents of the community surrounding site X3 confirmed that the majority considered that development of site X2 to be a positive step.

According to the Environment Agency, site X2 drains into the Day Brook from the Mansfield Road direction. The latest surface water flooding maps indicate that surface water flooding flows along the Mansfield Road, and affects adjacent land and property to the highway. New development on both green and brownfield sites should have improved means of sustainable drainage that goes beyond mimicking the natural rate of runoff, to one that actually reduces this rate of runoff. Severn Trent Water commented that both sites X1 and X2 would drain to the separate storm and foul water systems on Larkspur Avenue. Severn Trent Water noted there was surface water flooding downstream along the A60 and Springfield Road.

Nottinghamshire County Council stated any proposals should take into account the Landscape Actions included in the Greater Nottingham Landscape Character Assessment.

Nottinghamshire County Council stated that the site is within the clay minerals safeguarding area but is at a sufficient distance from the lbstock Brickworks and Quarry to not risk sterilising the site. Prior extraction of clay should be considered.

Response:

A flood risk assessment was submitted as part of the planning application for 72 homes on this site. Planning committee has resolved to grant permission subject to a s106 agreement being signed. Severn Trent Water confirmed there was capacity to connect to the existing foul sewer. In terms of surface water drainage the approved scheme is designed to achieve a significant reduction in surface water runoff from the existing situation prior to connection to the existing storm drain. The

development would also lead to a significant decrease in the impermeable area of this previously developed site and includes sustainable drainage techniques including permeable drives. The drainage scheme is designed to protect up to the 100 year plus 40% flood event and includes on-site storage of flood water.

In relation to the clay resource, the site has planning permission for housing subject to the signing of a s106 agreement and any issues relating to the clay resource have been addressed through that process.

Site X3 – Land West of A60 B

Nottinghamshire County Council stated any proposals should take into account the Landscape Actions included in the Greater Nottingham Landscape Character Assessment.

The landowner fully supported the allocation of the site Land West of the A60 for 150 homes. The landowner considered it has demonstrated the deliverability of 150 homes in the Vision Document submitted at the publication stage in May 2016. The landowner agreed with the trajectory for housing delivery as set out in the Housing Background Paper Addendum 2 (**EX/130**).

Another landowner raised concerns about site X3 as a standalone development which could prejudice the development in the longer term of the wider New Farm site at Redhill. The agent considered that the New Farm and other land in the vicinity required a comprehensive approach to development especially access.

Local residents, the residents of the community surrounding the site X3 and a local councillor raised a number of concerns including:-

- The detrimental impact upon residential amenities;
- X3 would be overbearing on the residents of Henry Street, Harberton Close, Larkspur Drive and Lodge Close;
- Impact on local amenity including for walkers and cyclists who use this area;
- In terms of heritage and design, it would not respect, maintain and strengthen local character and distinctiveness;
- Residents also queried what sort of housing would be built and if these would be apartments and 2 storeys;
- Dust and noise from building works and construction vehicles;
- Concerns over security and fly tipping; and
- Noted that the site was 8.07 ha but indicative plans were clear that not all the land would be developed and the density of the housing plans was a concern.

Response:

The Borough Council has policies in place, notably Policy LPD32: Amenity and Policy LPD35: Safe, Accessible and Inclusive Development that will address the impact of development on local amenity and seek to ensure potential impacts are acceptable. The layout and design of the development would be a matter for a detailed planning application should the allocation be confirmed. Other policies in

the Local Planning Document will seek to secure a mix of housing types, sizes and tenure and at this point no decisions have been made on the type of housing. Policy LPD36 requires 30% of the homes to be affordable housing.

The Council requires Construction Environmental Management Plans for all major developments which include measures to control vibration, noise and dust emissions during construction.

The assumed capacity of the site is 150 homes resulting in a density of around 18 homes per hectare which is lower than the policy requirement of 30 homes per hectare. This reflects the need to provide a landscape buffer as recommended in the Landscape and Visual Analysis of Potential Development Sites (December 2014) (LPD/NAT/01).

Flood Risk

The Environment Agency commented that site X3 drains into the Day Brook, from the Mansfield Road direction. The latest surface water flooding maps indicate that surface water flooding flows along the Mansfield Road, and affects adjacent land and property to the highway. New development on both green and brownfield sites should have improved means of sustainable drainage that go beyond mimicking the natural rate of runoff, to one that actually reduces this rate of runoff. Severn Trent Water commented both sites X1 and X2 would drain to the separate storm and foul water systems on Larkspur Avenue which were 225 mm and were not predicted to flood in up to 40 year return period storm. Severn Trent Water noted there were a cluster of surface water flooding incidents downstream along the A60 and Springfield Road. Severn Trent Water also confirmed that further hydraulic modelling would be required at the planning application stage which would indicate if capacity improvements were required and referred to Severn Trent Water having a statutory duty to accommodate additional development.

Local residents raised the following concerns in relation to flood risk:-

- Surface water flood risk from the X3 site due to topography;
- Drainage discharges to a chamber on Larkspur Avenue and then piped to Mansfield Road surface water sewer. The pipeline has overflowed at times of heavy rainfall to the rear of Larkspur Avenue;
- Water runoff and surface water flooding reference to ponding and reddish mud behind the backs of properties on Larkspur Rise;
- Questions whether the drainage system could cope with extra development; and
- Questions whether the foul sewer under Lodge Close and Larkspur Avenue could cope with the extra development.

Response:

In terms of foul water drainage Severn Trent Water confirmed that further hydraulic modelling would be required at the planning application stage for site X3 (site X2 already has planning permission subject to the signing of the s106 agreement, see below) and necessary improvements sought. Severn Trent Water also confirmed the company has a statutory duty to accommodate new development. Turning to

surface water flood risk, the comments of both the Environment Agency and Severn Trent Water are noted including the expectation that surface water flow should be sustainably managed on site including, for example, using permeable drives, infiltration techniques and onsite water attenuation storage. Policy LPD 4 requires all development to include measures to manage surface water including sustainable drainage systems.

As part of a detailed planning application a site specific flood risk assessment would be required for site X3 and an appropriate level of protection against surface water flood risk would need to be agreed with the Local Lead Flood Authority normally up to at least the 100 year plus 30% flood event. The Vision Document submitted by the landowner indicates that the location of attenuation ponds would be on the southern edge of the site. In respect of site X2 the situation is different in that planning permission has been granted (subject to the signing of the s106 agreement) and a site specific flood risk assessment already undertaken. This planning permission for site X2 provides for an approved drainage scheme with protection up to the 100 year plus 40% flood event.

Pollution

Local residents raised the following concerns:-

- Detrimental effect upon air pollution;
- Proximity to existing active farm and processing factory would cause on-going noise to new residents and in turn impact on business; and
- Impact on air quality, on the Air Quality Management Area (AQMA) where air pollution is a problem.

Response:

Policies are in place that will seek to prevent unacceptable levels of pollution. Policy LPD 11 states that planning permission will not be granted for development that has the potential to adversely impact on air quality unless there are measures to mitigate or offset their emissions and impacts have been incorporated in accordance with the Borough Council's Air Quality and Emissions guidance.

The site is an acceptable distance from the processing plant and is no nearer than the existing properties to the north east and is also screened to a significant degree by intervening topography.

Highways and traffic

Local residents raised the following concerns:-

- Additional development proposed on X3 would have a negative impact on the junction design required to access site H5 and no account has been taken of the cumulative impact of this new junction with the proposed site access to serve H5 on the opposite side of the road;
- Knock on effects of development particularly in relation to traffic congestion on the Mansfield Road which can tail back as far as Leapool Island;

- A signalised junction on the A60 would not entirely mitigate against the problems that a further 150 homes would cause;
- Existing bus stops to serve the X2/X3 sites are presently located at the Ram Inn (Nottingham bound) and at Leapool Island (north bound) and that there would be pressure to include new bus stops close to the development where stopping buses and pedestrian crossings may affect traffic flow;
- "Additional" access points being opened up into the neighbouring estate roads and reassurance sought that this would not be the case;
- Access would be sought through Larkspur Avenue and Lodge Close; and
- Security issues if pedestrian links were opened up.

County Highways considers that the development can be satisfactorily accessed through the adjoining site allocation X2 only. The developer has undertaken a transport assessment which demonstrates that the level of traffic from both sites X2 and X3 can be satisfactorily accommodated up to 175 homes subject to the provision of a signalised junction onto the A60. In terms of the cumulative effect of traffic from both X3 and H5 (Lodge Farm Lane), County Highways have advised this likely to be acceptable subject to appropriate junction design for the respective developments. As the sites are opposite each other, the design of the junction arrangements would need careful consideration so as ensure that each development would be deliverable.

A transport and travel plan will be required at the more detailed planning stage. Policies are in place, including Policy LPD61 Highway Safety to address highway safety.

Whilst vehicular access will be through the adjoining site X2 some pedestrian links may be required linking the new development to existing residential areas. Policy LPD 35 Safe, Accessible and Inclusive Development is in place which provides guidance on the need for natural surveillance of publically accessible spaces.

Infrastructure

Local residents raised the following concerns:-

- Impact on services including GPs and schools including the comment that Stenhouse and Daybrook Health Centres are unable to register new patients and Highcroft appearing to have problems recruiting sufficient doctors;
- An extra 1,460 houses over sites H1-H8 and X1-X3 would add 4,500 extra residents and would mean Arnold's infrastructure would buckle;
- Questions whether Council charges of £500 per dwelling is to provide extra class rooms and whether these would be spent in existing school sites or new school locations;
- Query whether contributions towards health would be spent locally; and
- Level and type of affordable housing and whether it would actually be provided.

The Infrastructure Delivery Plan Background Paper Addendum (September 2017) (**EX/133**) identifies the broad requirements for infrastructure needed to support the additional site allocations. Appropriate financial contributions for the additional school places generated by the development will be required. Details of how contributions will be spent and the additional school places required to be delivered will be agreed as part of planning agreements at the detailed planning stage. It is clarified that reference to £500 plus costs per dwelling is the standard applied by the Nottingham North and East Clinical Commissioning Group towards health services and is not related to schools. Nottinghamshire County Council generally seeks £11,455 per primary education place and £17,260 for each secondary education place. The Nottingham North and East Clinical Commissioning Group has identified there is likely to be a need for additional capacity at Arnold GPs and is seeking financial contributions of approximately £550 per dwelling.

Loss of Green Belt, greenfield, recreational value, countryside and wildlife

The Nottinghamshire Campaign to Protect Rural England considered the allocation of site X3 conflicts with Policy LPD 20 – Protection of Open Space as the accompanying text defines open space as all open space of public value and this applies as the site is well used valued local amenity and forms part of the link between the urban area and Bestwood Country Park.

Nottinghamshire Wildlife Trust did not support the inclusion of this Green Belt site and would seek retention of hedges and substantial greenspace along the northern and eastern boundaries.

Local residents raised the following concerns:-

- Allocation of a greenfield site what are the exceptional circumstances justifying release?
- Detrimental impact on the Green Belt;
- Harm to wildlife and protected species and biodiversity;
- Loss of agricultural land and poorer quality agricultural land should be used in preference to better quality land and why was site X3 being considered when it was grade 2 and grade 3;
- Impact on landscape to the Bestwood Park Area and impact on the Miner's path to Bestwood Colliery; and
- Footpath should be retained.

Response:

The Inspector who examined the Aligned Core Strategy agreed that meeting the objectively assessed need for housing would require the use of Green Belt land. The Aligned Core Strategy sets out a strategy of urban concentration with regeneration but the urban area has insufficient capacity to meet the objectively assessed housing needs for the Borough and there are exceptional circumstances for removing land to the West of the A60 B. The evidence for this approach is set out in the Site Selection Document.

There are no protected wildlife sites on the proposed allocation. Certain species are

protected under legislation. The planning application will need to be accompanied by an ecological survey identifying risks to any protected species together with a mitigation strategy.

The Sustainability Appraisal considered the likely impact of the proposal on agricultural land and the Site Selection Document (**LPD/GRO/01**) balances a range of factors and acknowledges that the loss of agricultural land is a negative impact but does not consider it to be significant. However, the amount of land lost is not significant being substantially below the 20 ha threshold for notification to Natural England as a statutory consultee and is outweighed by the benefit of providing houses in accordance with the Aligned Core Strategy.

The Landscape and Visual Analysis of Potential Development Sites (December 2014) (**LPD/NAT/01**) concluded that the site could be developed without significant landscape or visual impacts subject to including a landscape buffer at its northern end and planting along the western boundary.

The site is not protected open space but is in agricultural use and includes some grazing of horses at the northern end. There is no public access to the site at present although an existing right of way runs part way along the southern boundary which is important in terms of public access links to the wider path network close to Redhill Farm. The importance of maintaining the right of way network to Bestwood Park and Bestwood Colliery is acknowledged and these would be retained.

<u>Minerals</u>

Nottinghamshire County Council stated that the site is within the clay minerals safeguarding area but is at a sufficient distance from the lbstock Brickworks and Quarry to not risk sterilising the site. Prior extraction of clay should be considered.

Response:

The need to consider the prior extraction of clay is accepted on site X3 Land West of A60 B and a reference to this effect will be introduced as a modification to the Local Planning Document.

General comments

Local residents raised the following concerns:-

- Disappointed that whilst site X3 had been ruled out in the previous consultation but was now being considered as an additional site and that an alternative site should be found elsewhere if needed; and
- The need for additional housing in this area had not been explained and there were no specifics of the number or type of housing needs.

Response:

The site was re-considered in the Site Selection Document Addendum 3 (September 2017) (**EX/131**). The document explains why it was necessary to revisit and reconsider the reasonable alternative sites identified as being considered for allocation previously but subsequently were not allocated in the submission

Publication Draft of the Local Planning Document. The document explains that the reason that the site was reconsidered was due to the change in circumstances arising from the grant of planning permission (subject to signing of the S106 agreement) on site X2 Land West of A60 A.

The Aligned Core Strategy sets out the overall housing targets for the Borough and requires at least 4,045 homes to be located within and adjoining the urban area. The Housing Background Paper Addendum 2 (**EX/130**) sets out the detail of how the housing distribution is to be met.

Site H8 – Killisick Lane

Nottinghamshire County Council noted that Gedling Borough Council had specifically consulted the County Council as Minerals Planning Authority on matters in advance of the formal consultation and there was agreement. The County Council confirmed they are able to attend the examination and clarify matters relating to minerals sites and housing sites.

The landowners for site H8 Killisick Lane stated that they were fully supportive of the site being allocated for housing and the proposed changes to the supporting text (paragraph 3.15 on page 9). In particular the landowner supported the phasing of the housing delivery and the collaborative approach to deliver this site between landowners and lbstock Brick Ltd.

Ibstock Brick Ltd. commented that having made extensive representations on earlier iterations of the Local Plan in relation to site H8, they welcomed the subsequent dialogue with the Borough Council. Ibstock confirmed that the proposed amended policy text now served to identify a position providing certainty for mineral protection through the planned prior extraction of adjacent reserves within a defined southern extension. The proposed wording was useful in identifying the phasing of extraction/restoration and housing but considered there was some confusion in the text and Ibstock offered a revised wording. In particular the proposed change indicated that progressive restoration would restore the land by the mid-2020s and not early 2020s as set out in Extract of Local Planning Document Housing Allocation Policies (**EX/126**).

Northern Trust who is promoting an alternative site considered that the Local Planning Document relies on a letter from Ibstock which in their view contends that a phasing of the housing development alongside extraction is achievable so that 230 dwellings could be delivered by 2028. This was considered by Northern Trust to be highly ambitious and fraught with uncertainty. They also argued that the Council's reference to the impact on the five year housing supply as justification should not be a significant factor as if the site was at risk of not being deliverable then alternatives sites should be considered and allocated. A more reasonable stance should be taken towards H8, namely a lesser allocation aligned with Brechin Close and limited to 80 homes.

The comments of the landowner are noted. Ibstock Brick Ltd's proposed changes are accepted and paragraph 3.15 of the Local Planning Document will be modified accordingly.

The achievement of a five year housing supply is considered to be a key factor in the decision on the selection of additional sites for the reasons set out in the Site Selection Document Addendum 3 (September 2017) (**EX/131**). The Borough Council is confident that by working in partnership with Ibstock Itd. and the County Council as Minerals Planning Authority that the whole housing allocation is deliverable by 2028 with 125 of these homes built within the first five years. However, the proposed delivery rates reduces the reliance on this site in terms of the five year supply as previously it had been assumed all 215 homes could be delivered.

Good progress has been made as the Borough Council has met with Ibstock and other interested parties and a high level of agreement has been reached on working together to deliver both mineral extraction and housing development. The results of the joint working have been published in the Statement of Common Ground agreed between the parties available in the examination library. This document sets out the agreed timetables for delivery with a start for housing on phase 1 set for 2019/20 and phase 2 housing commencing 2022/23 with the minerals extraction complete in 2021. As the phase 2 housing development is closer to the proposed mineral workings this is the critical phase timed for 2022 onwards and so this allows for some slippage in the programme. The clay extraction itself commencing summer 2018 is also phased so to remove clay closer to the housing allocation in the earlier stages (extraction phases 1 and 2) before extraction is due to finish in 2021 (see Appendix 2 of the Statement of Common Ground for the indicative plan for phased working). At the time of writing, Ibstock Ltd. are currently preparing their planning application for a southern extension to the existing guarry and will shortly submit a scoping request for EIA to the County Minerals Planning Authority.

Alternative Sites

Additional land for residential development was promoted at:-

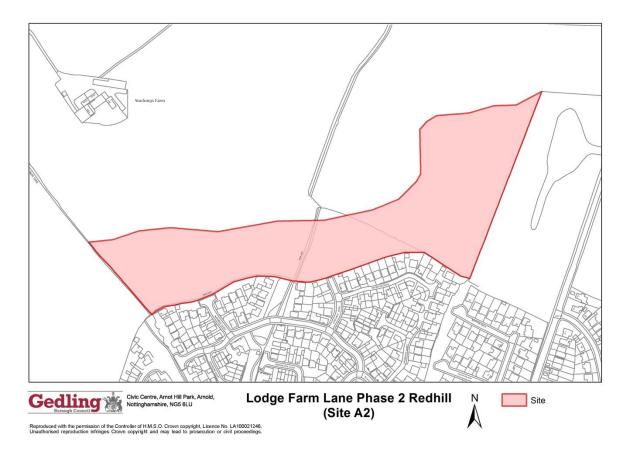
- Lodge Farm Lane Phase 2 (site A2); and
- Lambley Lane (Willow Farm) (site 6/459).

Lodge Farm Lane Phase 2 (site A2)

Langridge Homes and a local landowner promoted the Lodge Farm Lane Phase 2 site as they considered it represents a sustainable location for development and accords with Policy 2 of the Aligned Core Strategy. The site extends to 4 ha with a capacity of 108 dwellings and was not considered to have any constraints. Reference was also made to the Site Selection Document Addendum 3 (September 2017) (**EX/131**) and its assessment where it could contribute to the five year supply and be accessed. The promoters noted that the same document (**EX/131**) also refered to the site being within the Minerals Safeguarding Area and within 100 m of

the operational Dorket Head Brickworks to the potential detriment of prospective occupiers and Ibstock Ltd.'s operations.

The promoters stated that they have since approached lbstock Ltd. and adjusted the size and shape of their proposed site and lbstock has indicated that this might offer a sensible compromise. Again with reference to the assessment in **EX/131**, the promoters acknowledged that there were no physical features to define the northern site boundary but stated that the development would sit below the 125 m contour line below the ridge and suggested structural tree planting could screen new homes.



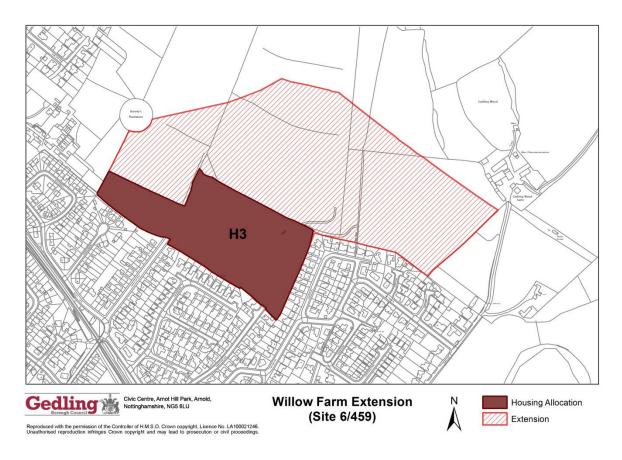
Response:

The site was re-considered as one of the reasonable alternatives in the Site Selection Document Addendum 3 (September 2017) (**EX/131**) and was considered for allocation. The document concluded that the boundaries of the site would need to be amended to reflect the recommendations of the Landscape and Visual Analysis of Potential Development Sites (December 2014) (**LPD/NAT/01**). The shape of the remaining site is such that the site would not form a natural extension to the existing built up area. Further adjustments to meet Ibstock Ltd's concerns would also be needed and are likely to limit the site's capacity and ability to form a natural urban extension further. There is no firm defensible northern boundary and a contour would form a significant part of the proposed boundary.

Lambley Lane (Willow Farm) (site 6/459)

Langridge Homes promoted an extension to the Willow Farm (H3 allocation) which they consider should be dealt with comprehensively. The promoters noted that as it

was dependent upon the Gedling Access Road (GAR) it would not contribute to the five year supply. However, they argue it would contribute to the second half of the plan period. They argue that given the agreed alignment of the permitted GAR it would be logical to allocate or designate safeguarded land up to the line of GAR. The promoters also consider that the entire site should be accessed from the GAR. In conclusion they consider there are no constraints to this site and it should be allocated in its entirety for 290 dwellings.



Response:

The site was considered as one of the reasonable alternatives in the Site Selection Document (LPD/GRO/06) and only part of the site was considered suitable for allocation. The Housing Background Paper Addendum 2 (EX/130) shows the Borough Council's housing supply with the additional sites is 8,237 dwellings and the extended site at Willow Farm is therefore not needed to meet Aligned Core Strategy requirements and would not contribute to the five year housing supply.

It is understood that the principle of accessing the site from the Gedling Access Road has not been agreed by County Highways.

List of Respondents

Dionne Arnold Environment Agency Gedling Borough Council, Mr Norman Foster and the Trustees of Constable's Field Foundation Ibstock Group Ltd James Kirkpatrick John Broadley Kevin and Jane Mitchell Kevin Blakey Michael Payne Norman Foster Northern Trust Nottinghamshire Campaign to Protect Rural England Nottinghamshire County Council Nottinghamshire Wildlife Trust P & B Bryant Residents of the community surrounding Site X3 Veronica Murphy

<u>Policy LPD 67 Housing Allocations -</u> <u>Calverton</u>

Number of Respondents	Number of Comments
16	16

In addition, one petition (97 signatures) concerning site X4 Flatts Lane was received.

General Comments

The landowner of site 6/665 (Warren Place) requested that the previously developed area within the site is removed from the Safeguarded Land designation. Given that the northern area of Safeguarded Land at Calverton is not being safeguarded for future development, they considered that it was unsound to sterilise the development of a previously developed site. (Also see 'Alternative Sites' section).

Response:

It is recommended to amend the supporting text to LPD16 to note that planning applications for the permanent use of Safeguarded Land will be considered, on a case-by-case basis, against Green Belt policy balancing this with the requirement for development on Safeguarded Land not to prejudice the ability of the site to be developed in the longer term.

Site X4 – Flatts Lane

Northern Trust, the promoter of the site, considered that the allocation of site X4 was appropriate and justified, and provided a Vision Document setting out how site X4 could be developed. They raised concerns with regards to paragraph 5.8 of the Local Planning Document which requires the northern field of site X4 to remain as a landscape buffer. In their Vision Document, Northern Trust provided a rebuttal of the evidence underpinning the landscape buffer requirement. (Also see 'Alternative Sites' section).

Response:

Noted. The Borough Council considers its evidence base related to landscape and Scheduled Monuments to be robust.

Nottinghamshire County Council as Minerals and Waste Authority commented that site X4 is unlikely to have safeguarding implications. They also commented that site X4 should take into account the Greater Nottingham Landscape Character Assessment Policy Zone SH17 and that site X4 is preferable in landscape terms than sites to the south and east of the settlement.

The Environment Agency commented that site X4 had no constraints related to fluvial flooding from main watercourses (main river) and that a site specific flood risk assessment focusing on sustainable surface water management would be required

and that the advice of Nottinghamshire County Council should be sought for surface water disposal.

Response:

Noted. Comments on flood risk are addressed by Policies LPD3 and LPD4.

Nottinghamshire Wildlife Trust commented that the narrow pasture and hedge that forms the eastern boundary to site X4 was an important wildlife corridor that should be protected. They advised that a hedgerow and wildlife survey be undertaken prior to any planning application and suggested that hedges are retained with adequate space for maintenance. The release of Green Belt land was not supported and noted that the hedge on the site is historically important given that it is identified in the 1835 Sanderson's Map.

Response:

Where development proposals are likely to affect biodiversity, Policy LPD18 requires an up-to-date ecological assessment and advice from Natural England. The hedgerow on site X4 is not protected on biodiversity grounds and has not been protected by the 'Retain Open Frontage' notation in the emerging Calverton Neighbourhood Plan. The design and layout of the site will be determined at the planning application stage. It is acknowledged that the eastern boundary of site X4 is evident on the 1835 Sanderson's Map (see **Appendix 2**) and the status of the hedgerow will need to be considered to establish whether it is historically important. Development proposals impacting on hedgerows will be appropriately considered against the Hedgerow Regulations 1997 as part of the determination of any planning application relating to the site.

The Flatts Lane Petition Group (FLPG) and Calverton Parish Council objected to the allocation of site X4. The FLPG petition was supported by 97 respondents. The FLPG stated that 'Gedling Borough Council is required to ensure that its Local Planning Document is in conformity with Calverton's Neighbourhood Plan' as the basis for their objection, noting that Policy G1 of the Neighbourhood Plan required a masterplan setting out the comprehensive development of the 'North-West Quadrant Urban Extension'. The key concern was that the allocation of site X4 equated to adhoc development rather than a comprehensive approach. Calverton Parish Council's comments echoed the point that site X4 is contrary to Policy G1.

Response:

The Calverton Neighbourhood Plan is not an adopted development plan and must be approved by Referendum on 30th November 2017 and then subsequently 'made' by Gedling Borough Council. Once adopted, Policy G1 of the Calverton Neighbourhood Plan, which requires an overall masterplan for any application within the North West Quadrant, will be given significant weight in determining planning applications. The allocation of X4 at this stage establishes the principle of residential development on the site and it is considered that the delivery of X4 as part of a comprehensive development in order to accord with Policy G1, once adopted, would be considered as part of a future planning application for site X4.

It is recommended to amend paragraph 1.4 of the Local Planning Document for clarity, to acknowledge that policies in the Local Planning Document should be read

in conjunction with all policies within the Development Plan including adopted Neighbourhood Plans.

In their objection, Calverton Parish Council commented that it was unrealistic for site X4 to be delivered early in the plan period given that Northern Trust were not promoting site X4 in isolation. They raised concern that the capacity of site X4 would be reduced by the requirement to widen Flatts Lane to accord with the 6C's Design Guide; to include a footpath; provide adequate privacy distances from existing dwellings and consider the potential for nuisance and complaints from the sports facilities at the adjoining park. They also commented that the existing dwelling, Long Acre Lodge, should be retained thus reducing the capacity of the site to 35 dwellings.

Response:

Site X4 has been promoted as a distinct site through the SHLAA process (ref. 6/37) and the promoter of the site has stated that the site is appropriate for development, albeit whilst promoting a larger site. The existing dwelling on the site is included within the SHLAA site 6/37 and it is understood that this forms part of the development site. County Highways have indicated that access to the site can be achieved subject to the provision of a footway and, potentially, the widening of the road. Comments relate to the amenity of the allocation will be considered through the planning application process. Matters relating to transport arrangements will be considered in detail by County Highways at the planning application stage.

One respondent queried why the northern boundary site X4 does not align with James Drive in accordance with the findings of the Landscape and Visual Analysis of Potential Development Sites (December 2014) (LPD/NAT/01).

Response:

Paragraph 5.8 of the Plan states that the northernmost field of the X4 allocation should be left open as a landscape buffer in order to minimise landscape and visual impact. This area has been included within the allocated site to allow flexibility in delivering open space on the site and to ensure that the Green Belt follows a robust defensible boundary.

A number of local residents objected to the allocation of site X4 and raised the following issues:-

- Traffic, highways and parking:
 - Development would exacerbate existing traffic and parking issues along Flatts Lane, resulting in highway safety issues;
 - Access to the X4 Site is unsafe and would exacerbate traffic congestion;
 - Flatts Lane would require widening to accommodate additional traffic and parking requirement from development;
 - Existing parking in Calverton village centre is an issue. The edge-ofvillage location of site X4 would place additional strain on parking;
 - Concerns that the proposal would impact on highway safety/capacity generally in Calverton including on Mansfield Lane, Oxton Road, Collyer Road, Hollinwood Lane, the Flatts Lane/Whinbush Lane junction, and the Flatts Lane/ Park Road staggered junction;

- Concern that additional traffic along Flatts Lane would be hazardous for horse-riders;
- Concern that a high-density proposal would not adequately accommodate parking provision on site;
- Concern that if Flatts Lane was widened, residents would park on both sites of the highway without road markings; and
- Suggestions that a one-way system is incorporated on Flatts Lane;
- Existing infrastructure is not adequate to accommodate growth including the doctor's surgery, education facilities and the leisure centre;
- No confidence that financial contributions/ mitigation measures would compensate for the development;
- Concern regarding the loss of Green Belt land;
- Impact on the amenity of existing development on Flatts Lane including loss of privacy, impact on the view of the surrounding landscape, reduction of natural light and loss of rural village character;
- Concerns regarding noise arising from the construction process;
- Impact upon flooding and water drainage systems;
- Development would have an adverse impact on environmental factors:
 - The area falls within the pSPA;
 - If Flatts Lane was widened, habitats within the hedge would be lost. Suggestions that a biodiversity study of the site be undertaken prior to development;
- Social housing would increase anti-social behaviour in the area;
- Development would reduce house prices in the area;
- Enough development has been proposed in Calverton;
- Suggestions that another site should be identified in place of site X4 which is sensitive to the landscape;
- Suggestion that the Council 'agrees to a buffer zone'; and
- Suggestion that development should be focused in other surrounding villages that have more predominantly elderly populations.

The general impact of site X4 upon highways has been considered through the Site Selection Document (May 2016) in consultation with County Highways. This states that access to site X4 can be achieved subject to the provision of a footway along the western side of Flatts Lane and, potentially, the widening of Flatts Lane. A more detailed assessment of impact upon highway safety and capacity and parking will be considered in consultation with County Highways through the planning application process. The Borough Council's Parking Provision for Residential Development Supplementary Planning Document (May 2012) (LPD/TRA/07) provides guidance on appropriate parking provision and is used to determine planning applications.

Financial contributions to mitigate the impact of site X4 upon education and health infrastructure will be sought through the planning application process.

With regards to the impact upon the amenity of existing properties, Policy LPD32 of the Local Planning Document will ensure this is addressed. Other material planning considerations will be considered accordingly through the planning application stage. Policies LPD3 and LPD4 of the Local Planning Document consider the management

of flood risk and surface water. Where development proposals are likely to affect biodiversity, Policy LPD18 of the Plan requires an up to date ecological assessment and advice from Natural England.

Where appropriate, planning conditions accompanying any future planning permission will be included to manage the impact of the construction phase upon local amenity.

In her letter dated 16 June 2017, the independent Planning Inspector examining the Local Planning Document asked the Borough Council to identify additional housing sites in Gedling Borough to ensure that the housing requirement is met. The Aligned Core Strategy (2014) identified Calverton as a Key Settlement to accommodate 'up to' 1,055 homes and the Local Planning Document proposes 820 in Calverton, which is considered an appropriate amount of proposed development. The allocation of additional housing at site X4 was considered against all other potential sites in Gedling Borough in the Site Selection Document Addendum 3 (September 2017) (**EX/131**).

It is assumed that the request related to buffer zones relates to the emerging Calverton Neighbourhood Plan. No such zone is identified along Flatts Lane in the Neighbourhood Plan.

All comments noted.

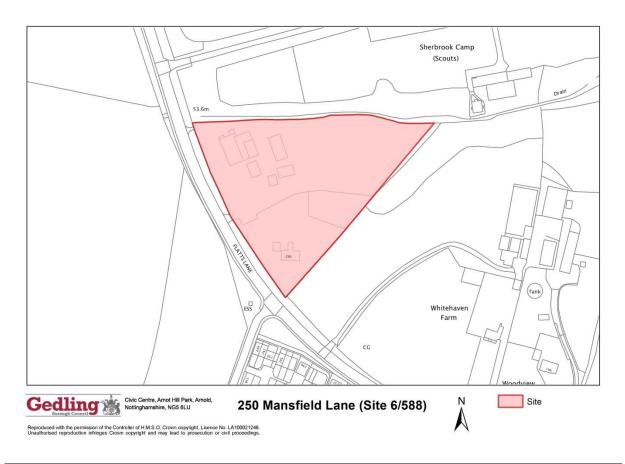
Alternative Sites

Additional land for residential development was promoted at:

- 250 Mansfield Lane (Site 6/588);
- Flatts Lane (Site 6/35);
- Warren Place (Site 6/665); and
- Hollinwood Lane/Long West Croft (Site 6/33).

250 Mansfield Lane (Site 6/588)

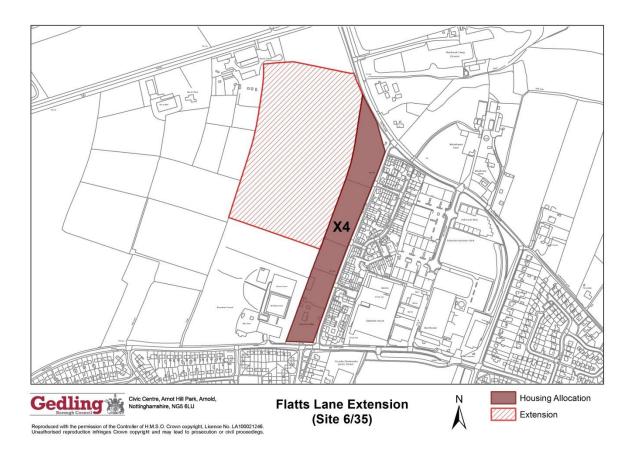
The landowner of site 6/588 considered that insufficient weight had been given to the allocation of brownfield sites, and that their site is preferable to site X4 which is greenfield land. Allocations on brownfield land are more sustainable, have less visual impact and reduce highway impact. The allocation of a greenfield site over a brownfield site was considered unsound. It is suggested that 250 Mansfield Lane be allocated for 50 dwellings.



The site was re-considered as one of the reasonable alternatives in the Site Selection Document Addendum 3 (September 2017) (**EX/131**) and was considered for allocation alongside adjacent sites. Although it is acknowledged that this site is brownfield it lies beyond a clear defensible boundary (Flatts Lane) and was not proposed for allocation.

Flatts Lane (Site 6/35)

Northern Trust, whilst supporting the allocation of site X4, has promoted site 6/35 as an extension to the site X4 allocation to deliver up to 250 new homes across the combined sites. They considered that Calverton is a highly sustainable location close to existing services, that this development would contribute towards the priority of regenerating Calverton and that it would contribute towards the requirement of 81 affordable homes in Calverton over the plan period. Northern Trust provided a detailed rebuttal of the Borough Council's landscape evidence base within their response and considered that this justifies the allocation of site 6/35 with regards to the surrounding landscape and the nearby Scheduled Monument.



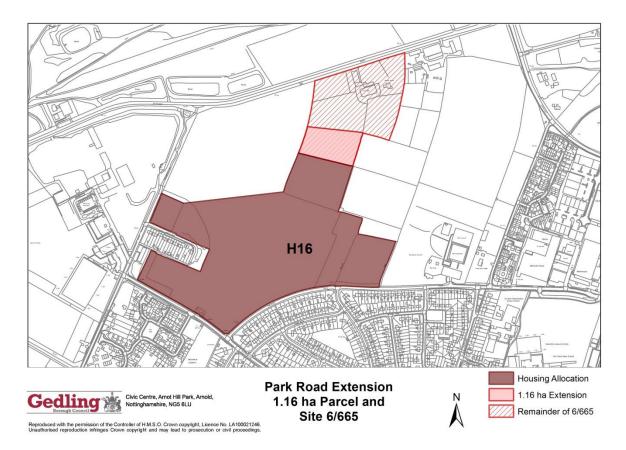
It is broadly accepted that site 6/35 is sustainable. Consideration was given to allocating the site in the Site Selection Document Addendum 3 (September 2017) (**EX/131**) but it was not considered necessary to meet the housing numbers identified for Calverton. The application of a consistent approach on matters such as landscape, impact on heritage and flood risk means that the site is considered suitable for around 140 homes (based on a density of 25 dph) not the 250 homes identified by Northern Trust. The Borough Council is confident that its evidence base in particular those related to landscape and Scheduled Monuments is robust. County Highways have concerns about access along Flatts Lane due to the presence of parked cars which reduce the width but it is considered that highway improvements could be made including the provision of a footway and, potentially, the widening of the road.

Warren Place (Site 6/665)

The landowner raised continued objection to the omission of the 1.16 ha parcel of land to the north of housing allocation H16 for 29 dwellings. They noted that the allocation of this parcel of land would bring the allocation in line with the findings of the Landscape and Visual Analysis of Potential Development Sites (December 2014) (LPD/NAT/01) and would offset the dwellings lost as a result of the open space designation at North Green set out in the emerging Calverton Neighbourhood Plan.

Alternatively, the landowner requested that site H16 is extended to include the entirety of site 6/665 in favour of housing allocations H15 and X4. They consider

that this approach is supported locally and in the emerging Calverton Neighbourhood Plan.



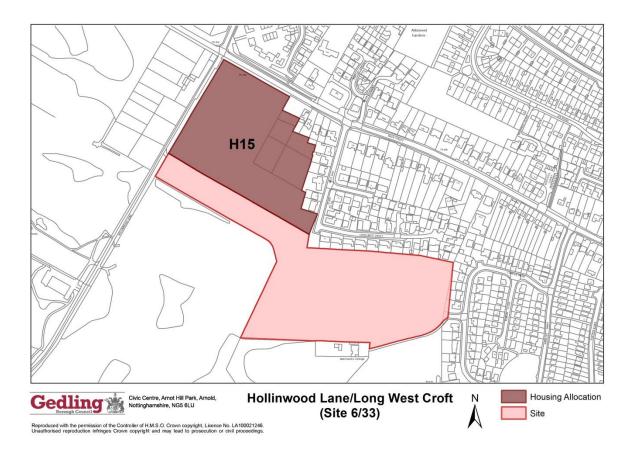
Response:

It is considered that the 1.16 ha parcel of land may be suitable for residential development and it is acknowledged that it could provide an additional 29 homes (based on a density of 25 dph).

With regards to both the 1.16 ha parcel of land and the wider site 6/665, this land is currently identified as Safeguarded Land. It is concluded in the Site Selection Document Addendum 3 (September 2017) (**EX/131**) that the allocation of this land is not necessary at this time as it would not contribute to the Five Year Housing Land Supply. In addition, the allocation of the wider 6/665 site would need to take into account landscape, heritage and flooding evidence. It is considered appropriate to provide a range of sites rather than rely on a single large allocation.

Hollinwood Lane/Long West Croft (Site 6/33)

Langridge Homes raised concerns related to the Borough Council's Five Year Housing Land Supply and the non-delivery of strategic sites. The site 6/33 was promoted for the allocation of 136 dwellings on the grounds that it can contribute to the five year housing land supply and has no significant known constraints.



It is considered that this site is unsuitable for allocation as more suitable sites are available in Calverton to meet the Borough Council's housing requirement as set out in the Site Selection Document Addendum 3 (September 2017) (**EX/131**). Whilst the 'Southern Ridge Area' (Policy NE4) has been deleted from the emerging Calverton Neighbourhood Plan, there remains significant local objection to development to the south of Calverton.

List of Respondents

Calverton Parish Council David Roper **Doreen Seaton Environment Agency** Flatts Lane Petition Group Helen Kendall Jan Deebank **Janice Morris** John Morris Karen Summerfield Kevin Duncan Northern Trust Nottinghamshire County Council Nottinghamshire Wildlife Trust Patricia Rockley **Ryan Morris**

<u>Policy LPD 68 Housing Allocations -</u> <u>Ravenshead</u>

Number of Respondents	Number of Comments
16	16

General Comments

Nottinghamshire County Council stated that any proposals should take into account the landscape actions included in the Greater Nottingham Landscape Character Assessment. NCC considered that planning obligations should be entered into and ensure the sites are integrated into the village character and impacts on policy zone mitigated.

A local resident considered the document process was complicated to navigate.

Response:

The County Council's comments on the need to take into account the landscape Actions included in the Greater Nottingham Landscape Character Assessment are noted. Policy 10 of the Aligned Core Strategy and Policy LPD 19 of the Local Planning Document are in place to protect landscape character in accordance with the Landscape Character Assessment and will be applied at the detailed planning application stage including a requirement for planning obligations.

The Council welcomes the feedback on the consultation and accepts there was a lot of documents out for consultation in part because of concerns raised during the examination and will seek to learn from the feedback to improve on consultation methods in future.

Sites X5 and X6 - Kighill Lane A and Kighill Lane B

The landowner for site 6/841 which forms part of X5 supported the allocation of the whole site which they considered was free of constraints. They noted that the previous Local Wildlife Site designation had been removed by the Nottinghamshire Biological and Geological Records Centre following the completion of an ecological scoping survey. The landowner has consulted with the other landowners of the X5 allocation and produced plans to show how the various land parcels could come forward and the plans show how seven dwellings could be developed on their plot and indicated that a potential access could serve both their plot and the adjoining plot.

The landowners of the adjoining plot, which forms the remainder of X5, confirmed that there had been dialogue with the adjacent landowner for site 6/841 and agreement on mutual cooperation reached. It was considered that the properties demolition would be unlikely to be commercially realistic but with both properties remaining in situ 12/13 properties could be added around them across the two plots.

The development would be ideal for self-build or custom build and as evidenced by strong demand for self-build plots in Ravenshead. It was considered 12/13 homes could be accommodated with access through private drives or a new access. An option showing access through the adjoining plot (site 6/841) was also referred to shown in the plans produced on behalf of the Executors of Anne Nightingale.

Response:

The Council welcomes and notes the cooperative approach between the various landowners.

Highways and traffic

A number of local residents raised the issue of extra traffic as a result of the proposed development sites in addition to those previously consulted on. Specific comments included:-

- Kighill Lane is a busy short cut (or rat run) and already dangerous with vehicles emerging from both sides of the road and additional dwellings would greatly add to congestion;
- The junction at Kighill Lane/Longdale Lane has frequent traffic accidents;
- The extra traffic would need a roundabout at the Kighill Lane/Longdale Lane/Chapel Lane junction;
- Increase in vehicular traffic at the garage is a flash point as there have been several near misses;
- Increase in population would put pressure on local facilities and was too far away from the shops for walking and would cause parking problems in the village centre;
- The Kighill Lane/A60 junction would need to accommodate the extra traffic; and
- The village has been ruined due to over expansion, car parking issues around the shops and not be regarded as a village but a small town without the necessary facilities to make a small town.

Response:

The sites have been assessed to consider whether satisfactory access to the site can be gained from local highways and whether any access constraints could be overcome through mitigation work including in particular for any off site highway works that would add significantly to development costs. This initial assessment indicates that access from Kighill Lane is likely to be acceptable and acknowledges that the existing grass verge should be incorporated as a pavement.

This assessment is for the purposes of plan making only; detailed proposals submitted as part of future planning applications will include a transport statement addressing trip generation and safety.

Policies setting out parking standards are in place in the form of Policy LPD 58 and the Borough Council's Parking Provision for Residential Development Supplementary Planning Document (May 2012) (LPD/TRA/07).

Infrastructure

Nottinghamshire North and East Clinical Commissioning Group identified additional demand for primary and community services and expect developer contributions towards these estimated at £550 per dwelling.

Local residents mentioned that existing infrastructure such as the local schools and doctor could not cope with the additional demand for their services. One resident mentioned that the catchment area for Abbey Gates primary school would not include the new developments. NCC noted that there were appropriate mechanisms in place for developer contributions towards educational places.

Response:

The impact of development on services such as GPs and schools is acknowledged. The relevant service providers have been consulted and mechanisms are in place for developers to make contributions towards the additional demand created by the development. The Nottinghamshire North and East Clinical Commissioning Group has responded stating that financial contributions would be expected from the developments towards primary and community care services.

Minerals and Waste

Nottinghamshire County Council confirmed that the site was within 650 m of Bestwood 2 Quarry and the risk of impact was considered unlikely given the distance to the quarry.

Response:	
Noted.	

Ecology and wildlife

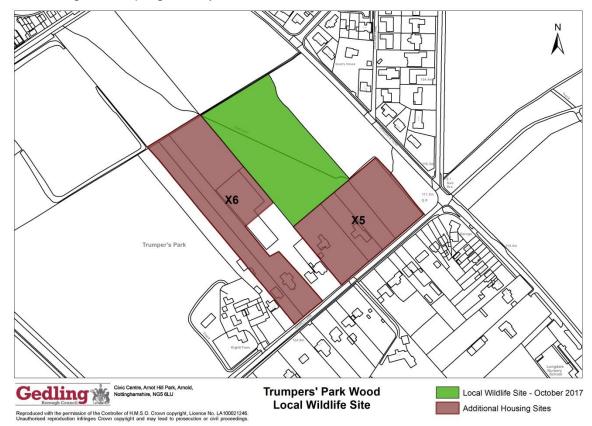
In relation to site X5, the Nottinghamshire Wildlife Trust states the eastern part of it is designated as a Local Wildlife Site (part of Trumpers' Park Wood LWS) and supports important remnant areas of acid grassland and heath. Together with the main part of Trumpers' Park Wood LWS this is an important wildlife area and is given policy protection due to its LWS status. It was considered all the more important to retain the LWS as adjacent land was lost from the LWS in recent years when it was ploughed and do not support inclusion of this allocation. In relation to site X6 Nottinghamshire Wildlife Trust stated it supports woodland / dense tree cover and therefore complements the adjacent Trumper's Park Wood LWS in terms of ecological function.

Nottinghamshire County Council requested that preliminary ecological appraisals will be required and that Trumpers Park Wood would be surrounded by development affecting connectivity and potentially leading to greater recreational pressure from additional residents. The County advises that mitigation including buffer zones be incorporated into the proposals. Local residents also mentioned that there could be impact on protected species such as owls, bats and badgers.

A local resident mentioned that the land around the sites is rare Sherwood Forest heathland which should be protected and that there were limited parks and open space within the village.

Response:

In relation to the Nottinghamshire Wildlife Trust comment on site X5, it is noted that part of the site was previously identified as a Local Wildlife Site. However, the Borough Council was notified in May 2017 that the designation was removed by the Nottinghamshire Biological and Geological Records Centre following the completion of an ecological scoping survey.



Nottinghamshire Wildlife Trust have been contacted to confirm the Borough Council's understanding that their comment is based on information that is now out of date.

An ecological appraisal will be required at the planning application stage and will look at potential impact on the adjoining Local Wildlife Site and potential mitigation measures such as a buffer.

Policy LPD21 (Provision of New Open Space) confirms that the provision of a minimum of 10% open space will be made either within the development or provision of off site through the negotiation of a s106 agreement through the determination of the planning application.

<u>Drainage</u>

Severn Trent Water commented that surface water flows would gravitate towards Longdale Lane where there are reported flooding incidents on the highway and that there appeared to be a hydraulic issue with the site although due to the developments small size it is unlikely to exacerbate the issue noticeably. In the absence of a local storm system the development will need to deal with surface water storm flows on site. Severn Trent Water have also commented that in general they would not expect surface water to be connected to the foul sewer system.

The issue of surface water flooding on Longdale Lane from Vernon Avenue was mentioned by several local residents where, after heavy rain, the road completely floods to the extent that the entrance to the Leisure Centre is inundated.

The Environment Agency stated that a site specific flood risk assessment focusing on sustainable surface water management is required and the need to refer to Nottinghamshire County Council for advice on surface water disposal. The surface water flood risk maps indicate a potential surface water flow route adjacent to Main Road.

Response:

In terms of surface water the comments of Severn Trent Water are noted, including the expectation that surface water flow should not be connected to mains sewers but dealt with sustainably on site. Policy LPD 4 requires all development to include measures to manage surface water including sustainable drainage systems. A site specific flood risk assessment will be required focussing on surface water flood risk, as was the case for site H19 Longdale Lane C which has outline planning permission.

The expectation would be that the Kighill Lane sites manage surface water flood flows on site to the satisfaction of the Lead Local Flood Authority. As mentioned above, Site H19 has planning permission and is designed to deal with surface water flood flows up to the 1 in 100 year event plus a 30% increase for climate change. This includes soakaways for highways drainage, infiltration techniques, attenuation ponds and porous paving materials etc.

Pollution

Some consultees referred to the proposed development being in the same location which would cause severe disruption and pollution and limit choice in terms of housing locations.

Response:

Policies are in place that will seek to prevent unacceptable levels of pollution including cumulative effects on health and general amenity. Policy LPD 11 states that planning permission will not be granted for development that has the potential to adversely impact on air quality unless there are measures to mitigate or offset their emissions and impacts have been incorporated.

The Borough Council requires Construction Environmental Management Plans

(CEMP) for all major developments and in its experience these are effective tools for managing the impacts of construction.

The Site Selection Document Addendum 3 (**EX/133**) confirms the Council's approach to the allocation of additional housing sites.

<u>Amenity</u>

Local residents considered the proposed development would be inappropriate in terms of density and be overdevelopment or not in keeping with the area. Comments included that there are far too many houses in the wrong place and a light open wooded area will become densely populated. The existing dwellings and density were in keeping with the style of housing and provision of even small estates would spoil this. Reference was made to a recent planning appeal decision (APP/N3020/W/16/3158440)³ on land at Kighill Lane which had been turned down for reasons of loss of openness and harm to the character and appearance of the area. Local residents also raised concerns about loss of Green Belt and garden land, visual impact and the impact of proposals on residential amenity.

Response:

Policies are in the Local Planning Document to protect local amenity and character from inappropriate development relating to design, density, massing, scale and local amenity.

The recent appeal decision (APP/N3020/W/16/3158440), which was dismissed in February 2017, was on land to the south of Kighill Lane and the site was considered as part of the site selection to the publication draft of the Local Planning Document and was not allocated due to concerns that it would breach a defensible Green Belt boundary and undermine the purpose of the Green Belt in this broad location.

Alternative Sites

Additional land for residential development was promoted at:-

- Land to the rear of sites X5 and X6; and
- Land at 183 Nottingham Road (site 6/536).

Land to the rear of sites X5 and X6

A local resident suggested that the land behind the proposed allocations at X5 and X6 be used as an alternative.

Response:

It is not totally clear what land is being referred to. However, the land immediately to the rear (north) of sites X5 and X6 is either proposed for allocation in the Local Planning Document as sites H17, H18 and H19 (site H19 has outline planning permission) or is a protected Local Wildlife Site with the latter being unsuitable for development.

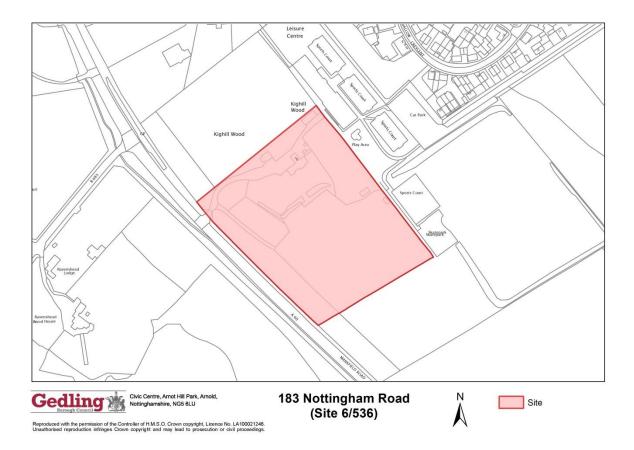
³ <u>https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3158440</u>

The comments could also relate to land at 183 Nottingham Road where separate representations have also been made promoting this site which is SHLAA site 6/536 located west of the leisure centre (considered below).

Land at 183 Nottingham Road (site 6/536)

The landowner objected to the inclusion of sites X5 and X6 as neither are considered to represent a logical extension of the built up area. They would extend the built up area up to Kighill Lane whilst leaving a substantial area of unallocated land in between. The consultee was of the opinion that the resultant Green Belt boundary would not be a logical long term defensible boundary which would require the further release of land between sites X5, X6 and H18 although it is understood this is not needed at this time. However, in the absence of such need this would not warrant exceptional circumstances. The site at 183 Nottingham Road is considered by the promoters to be far more suitable in Green Belt terms being separated from open countryside.

It was also noted that the site was previously discounted by the Council primarily because the access relied on third party land when this was not the case as suitable and safe access could be achieved from Nottingham Road. Reference was made to a supporting Highways Statement in support of this argument. Criticism was also made that the allocations are in the same location coalescing the urban area with dwellings immediately south east of Kighill Lane, putting all eggs in one basket, whereas Cornwater would provide a choice of location.



Response:

The site was considered as a reasonable alternative site in the Site Selection Document (reference 6/536). County Highways has advised that access should not be taken from the A60 Mansfield Road but rather should be from the east which would require third party land.

A Green Belt assessment has been undertaken and informed the Site Selection Document (**LPD/GRO/09**). The Borough Council considers that the proposed amended Green Belt boundaries do form a strong and defensible boundary.

List of Respondents

A & B O'Mara-Winson Anita Jackson David Gorham David Tatham Dr Roberts **Environment Agency Executors of Anne Nightingale** J Guetney John and Carol Devaney John Draper Kevin O'Connell Nicholas Staley Nottinghamshire County Council Nottinghamshire Wildlife Trust Peter Sims Philip and Judy Champ

Addendums to the Sustainability Appraisal, Habitats Regulations Assessment and Equality Impact Assessment

Sustainability Appraisal Addendum 4

Number of Respondents	Number of Comments
8	8

General Comments

Support for the Sustainability Appraisal was received from the following:-

- Natural England noted that the Sustainability Appraisal considered the impact of soils and BMV land at sites X2 and X3 and also the air quality issues affecting the sites within the Arnold area. They had no further comments on these sites.
- Historic England had no concerns in respect of how the historic environment had been considered in relation to the additional sites proposed.

Response: Noted.

A local resident in Calverton spotted an error in Table 1 (on page 8) which should state that site 6/665 Warren Place forms part of site H16 in conjunction with sites 6/47 and 6/662.

Response:

Agreed, the error is noted. This does not affect the conclusions reached by the appraisal.

Site Allocations

Comments have been made with regards to the Sustainability Appraisal on the additional site allocations:-

- Site X3 Land West of A60 B;
- Site X4 Flatts Lane, Calverton; and
- Sites X5 Kighill Lane A and X6 Kighill Lane B, Ravenshead.

Site X3 Land West of A60 B

The residents of the community surrounding site X3 raised the following points:-

SA 2 Health

The development at X3 would increase health inequalities and reduce access to health services.

Funding for the health sector is offered to the primary care budget and is thus in a pool of resource across the CCG remit, rather than specifically for the area.

SA 8 Natural Resources

Concerns about the possibility of 'mitigation' and safeguarding of the greenfield land of X3.

More information requested on the mitigation of air quality issues, which would be exacerbated by the removal of vegetation.

Noted the grade 2 agricultural land on site X3 should be safeguarded and that the land which is grade 3 on the X3 site should be investigated to see if it is versatile.

SA 10 Transport

Site X3 would allow for good access for public transport links given its distance from local bus stops but would like to know how given that the plans outline one single point of access through site X2. The transport assessment also only appears to assess public transport and would like to understand how traffic flow issues are assessed.

Response:

<u>SA 2 Health</u>

Nottingham North & East Clinical Commissioning Group has indicated that additional GP capacity is likely to be required and will require financial contributions.

SA 8 Natural Resources

Detailed plans will be required through the planning application stage. Air quality issues are covered by Policy LPD11: Air Quality. Confirmation as to whether site X3 is on best and most versatile (BMV) agricultural land will be required through the planning application stage.

SA 10 Transport

The Infrastructure Delivery Plan Background Paper Addendum (September 2017) (**EX/133**) notes that a transport assessment will be required through the planning application stage and appropriate contributions to public transport are to be agreed as part of S106 discussions. The comments regarding traffic issues are addressed under Policy LPD 65 Housing Allocations – Urban Area and edge of Hucknall.

No change to the Sustainability Appraisal assessment.

Site X4 Flatts Lane, Calverton

The Flatts Lane Petition Group did not believe that the SA assessment had been fairly appraised based on the potential prospects for prospective new home buyers

(and not existing residents) or people requiring social support in order to locate to the village of Calverton.

The Flatts Lane Petition Group and a local resident made the following points:-

SA 1 Housing

More housing is not a major positive, especially given concerns regarding the impacts of affordable housing.

SA 2 Health

Proximity to a recreational ground benefits children and younger families. Essential amenities would be 25-30 minute walk away, which is too far for people with disabilities or the elderly.

Public transport on Flatts Lane was not as accessible / frequent as it is on Park Road.

People wellbeing is enabled from surrounding nature and open space to calm inner feelings, it disperses stress thus reducing illness (particularly for people with learning difficulties).

SA 3 Heritage and Design

Two Roman sites have been named as not benefiting from the extra housing. The planned new homes would be exposed on a ridge, since the land slopes downward and away to the Roman site. Extra social housing would pose considerable risk to undesirable behaviour.

The round house, Oxton woods and the scout woodland area are not mentioned in the SA assessment.

SA 4 Crime

Congested areas bring crime as people fight over car parking space and drugs on the street so it was questioned how the design of a development helps to eliminate crime. Social housing brings noise nuisance, un-kept property, obnoxious and unruly behaviour.

SA 5 Social

Did not want Calverton to lose its village identity and currently do not have enough facilities to cater for the village.

The North West Quadrant of Calverton Village is the furthest away from the main stretches leading into the heart of the village where the main amenities reside. As per objective 2, the main/frequent bus stops are situated on these main stretches of roads around the village and not directly on Flatts Lane itself.

SA 6 Environment, Biodiversity and Green Infrastructure

It was requested that a hedgerow and wildlife survey be conducted under the "Hedgerow Regulations" if not already carried out and the findings should be published. Flatts Lane is also a chosen through route for horse riders.

SA 7 Landscape

It was considered that the proposed development would ruin the landscape.

The effect on a current natural landscape should not be deemed short term and it was questioned what the 'mitigation recommendations' would be.

New development would detract from the current beauty of this restored North Westerly side of the village, blighting the landscape, a currently sympathetic and natural vista.

SA 8 Natural Resources

More cars wold result in several potential health issues. Impact on carbon footprint by using agriculture land.

There is also further damage to the environment caused by additional sound and light as well as added infrastructure (drains etc).

SA 9 Flooding

More houses is a major health concern resulting in more sewage flowing underground but not when it floods.

The assessment has not taken account of previous flooding in the village of Calverton as current drainage infrastructure could not cope. Adding further roads, resulting in more water run- off from an already elevated position, will impact the existing properties as the land slopes off to the east.

SA 10 Waste

The current recycling facility would need to be expanded to adequately manage greater impact prior to any further developments.

SA 11 Energy and Climate Change

The SA assessment should be a negative as human beings use energy and resources.

SA 12 Transport

Since other houses have been built the congestion with traffic has worsened and caused accidents. Flatts Lane is currently being used as a rat run.

Currently very few bus services on Flatts Lane and therefore people will use the car. Increase of bus services on and through Flatts Lane will only cause an already congested lane to be even worse.

SA 13 Employment

More houses equals more people and less jobs and promotion of crime.

The assessment refers to an employment allocation in Calverton. Further details are requested.

SA 14 Innovation

No 'innovation' relevance here, as any positive benefits from a minor amount of dwellings is far outweighed by the unsightly blight on a strip of natural green land.

SA 15 Economic Structure

Seeks clarification on the additional employment site identified in Calverton.

With the lowering of value regards to village life and its assets, peoples house price will be impacted.

Response:

The SA assessment looks at the sites and the cumulative impact it would have on Calverton village as a whole and does not focus on the prospective new home buyers.

SA 1 Housing

The SA assessment met the SA criteria in that it will provide housing. A consistent approach has been taken with the assessment of all housing allocations.

SA 2 Health

Regarding the walk being too far for people with disabilities or the elderly, this is noted. The site scores a minor positive due to the site being within 30 minutes public transport, walking and cycling time and adjacent to an existing recreational open space, taking the consistent approach undertaken for other sites.

The SA assessment refers to bus services on Park Road, not Flatts Lane.

Regarding people wellbeing, the SA assessment states the site is adjacent to an existing recreational open space.

SA 3 Heritage and Design

The SA assessment is based on the conclusions from the Impact of Possible Development Sites on Heritage Assets in Gedling Borough Council (2015) and the Assessment of Impact of LPD Development Sites on Scheduled Monuments (2017).

The round house, Oxton woods and the scout woodland area are not defined as heritage assets or non-heritage assets.

SA 4 Crime

This will be addressed through Policy LPD 32: Amenity.

SA 5 Social

The Infrastructure Delivery Plan Background Paper Addendum (September 2017) (**EX/133**) notes that a transport assessment will be required through the planning application stage and appropriate contributions to public transport are to be agreed as part of S106 discussions.

SA 6 Environment, Biodiversity and Green Infrastructure

The comments regarding hedgerow and wildlife survey are addressed under Policy LPD 67 Housing Allocations – Calverton.

SA 7 Landscape

The mitigation recommendations are outlined in Appendix B of the Sustainability Appraisal Addendum 4.

SA 8 Natural Resources

Pollution and health issues will be addressed through Policy 10 Pollution and Policy 32 Amenity.

SA 9 Flooding

The surface water flood risk map indicates there is no significant surface water flooding issues for the site. The Environment Agency raised no concerns regarding surface water flooding.

SA 10 Waste

It is noted that there may be implications for the current recycling facility issue. A change from a minor negative to a major negative would not affect the overall conclusions of the SA assessment.

SA 11 Energy and Climate Change

The SA assessment is clear that the impact of development upon energy and climate change is dependent upon opportunities for either renewable energy provision or energy efficiency measures, which are unknown at this stage. Thus a neutral effect.

SA 12 Transport

The SA assessment refers to bus services on Park Road, not Flatts Lane. The comments regarding traffic issues are addressed under Policy LPD 67 Housing Allocations – Calverton.

<u>SA 13 Employment</u> The employment allocation referred to is site E2 Hillcrest Park.

SA 14 Innovation Noted.

SA 15 Economic Structure

The employment allocation referred to is site E2 Hillcrest Park.

No change to the Sustainability Appraisal assessment.

Sites X5 Kighill Lane A and X6 Kighill Lane B, Ravenshead

Local residents disagreed with the Sustainability Appraisal assessment and made the following points:-

SA 1 Housing

Additional homes address the ageing population of Ravenshead but the proportion of retirement homes is nowhere near the number needed.

SA 2 Health

Increased housing will place greater strain on the local doctors' surgery which is shared with Blidworth.

SA 3 Heritage and Design

Ignored the fact that the area has WW2 links as the huts around Longdale Heritage Centre are RAF huts in origin and the area was used by the RAF.

SA 5 Social

Kighill Lane is a mile from the village centre, not 800m. Everyone uses cars.

SA 6 Environment, Biodiversity and Green Infrastructure

Although sites H17, H18 & H19 would involve the loss of relatively pleasant open areas, sites X5 & X6 include wooded areas and these would be a much worse loss. New building rarely leaves enough land for new tree planting. The continual ploughing of Site H18 by the owners has apparently been tolerated despite this being described as "Lowland Heathland".

SA 7 Landscape

Building 170 houses does not have a neutral effect.

SA 8 Natural Resources

No reference to suggest any compulsion on the water companies to improve the provision of drinking water or to address the problem of occasional flooding as the original 1960's pipes were not designed for a village so large.

SA 9 Flooding

Longdale Lane is continually being flooded as a result of the extra surface water from the new development. The addition of housing at sites X5 and X6 would not help this.

SA 10 Waste

The extra demands on landfill and waste management services should be recorded as a major, not a minor negative.

SA 11 Energy and Climate Change

How can there be no effect when the assessment does not know the effect.

SA 12 Transport

The Pronto bus service to Nottingham and Mansfield is not as good as suggested by the timetable as buses are sometimes missing. Also dangerous to cross the A60 with vehicles exceeding the speed limit.

The volume of traffic is currently excessive with large vehicles, lorries and buses constantly using the road as a cut through. Additional housing will cause further volume problems.

Increase in road use and effect upon locals.

Response:

SA 1 Housing

The SA assessment notes the range and affordability of homes is not certain at this stage for sites H17 and H18 so a range of retirement homes could be provided at these sites. Sites X5 and X6 will include self build plots which meet the SA objective to provide a range of housing. The adjacent site allocation H18 currently has a planning application (2014/0273) which includes retirement homes.

SA 2 Health

Nottingham North & East Clinical Commissioning Group has indicated that additional GP capacity is likely to be required and will require financial contributions.

SA 3 Heritage and Design

The RAF huts identified are not defined as heritage assets or non-heritage assets.

SA 5 Social

The precise distance does not affect the overall conclusions of the SA assessment.

SA 6 Environment, Biodiversity and Green Infrastructure

The SA assessment notes that further ecological appraisal will be required for sites X5 and X6 at the planning application stage. Trees protected by Tree Preservation Orders would be retained within the scheme and protected during construction to avoid/minimise any adverse effects. Any effects on the adjoining Local Wildlife Site would need to be fully mitigated.

The comments regarding to wildlife issues are addressed under Policy LPD 68 Housing Allocations – Ravenshead.

SA 7 Landscape

The scoring is based on the conclusions of the Landscape and Visual Analysis of Potential Development Sites (December 2014) (LPD/NAT/01).

SA 8 Natural Resources

The comments regarding drainage issues are addressed under Policy LPD 68 Housing Allocations – Ravenshead.

SA 9 Flooding

The surface water flood risk map indicates surface water flooding route runs along Longdale Lane although the Environment Agency confirms there is no issue with surface water flood risk. The Environment Agency stated that a site specific flood risk assessment focusing on sustainable surface water management is required and the need to refer to Nottinghamshire County Council for advice on surface water disposal.

SA 10 Waste

A change from a minor negative to a major negative would not affect the overall conclusions of the SA assessment.

SA 11 Energy and Climate Change

The SA assessment is clear that the impact of development upon energy and climate change is dependent upon opportunities for either renewable energy provision or energy efficiency measures, which are unknown at this stage. Thus a neutral effect.

SA 12 Transport

The SA assessment uses the bus timetables taken from the information available from the online bus service websites. The comments regarding traffic issues are addressed under Policy LPD 68 Housing Allocations – Ravenshead.

No change to the Sustainability Appraisal assessment.

List of Respondents

Dexter Cooper Flatts Lane Petition Group Historic England Ian Spencer Jan Deebank Joyce Morley Natural England Residents of the community surrounding Site X3

Sustainability Appraisal Addendum 3

Number of Respondents	Number of Comments
3	3

General Comments

Calverton Parish Council provided comments on the Addendum through the examination hearings.

Historic England had no concerns in respect of how the historic environment had been considered in relation to the additional sites proposed.

Noted	Response:	
	Noted.	

Northern Trust believed the change of the SA score from minor negative to major negative for reasonable alternative site 6/35 was not a reasonable reflection of the potential impact of development on the significance of the Scheduled Monument Two Roman camps 350m north east of Lodge Farm. A detailed Heritage Appraisal of land to the west of Flatts Lane (site ref. 6/35 and 6/37) had been undertaken by Turley Heritage, appended to the submitted Vision Document for that site (i.e. sites 6/35 and 6/37).

Response:

The Sustainability Appraisal is based on the conclusions of the two studies commissioned by the Borough Council. The detailed Heritage Appraisal undertaken by Turley Heritage follows on from the Sustainability Appraisal and provides the detailed assessment for the proposed site allocation on Flatts Lane. Thus there is no need for a change to the Sustainability Appraisal.

The change of the SA score from a minor negative to a major negative would not have an impact on the conclusions of the site selection process.

List of Respondents

Calverton Parish Council Historic England Northern Trust

Sustainability Appraisal Addendum 2

Number of Respondents	Number of Comments
2	2

General Comments

Calverton Parish Council provided comments on the Addendum through the examination hearings.

Historic England had no comments.

Response:	
Noted.	

List of Respondents

Calverton Parish Council Historic England

Sustainability Appraisal Addendum

Number of Respondents	Number of Comments
2	2

General Comments

Calverton Parish Council provided comments on the Addendum through the examination hearings.

Response:	
Noted.	

Site X3 – Land West of A60 B

The residents of the community surrounding site X3 stated that the Sustainability Appraisal Addendum noted the need for a 'landscape buffer' in the Arnold. This does not appear to be carried through to what the plans refer to as 'edge of urban area'.

Response:

The Sustainability Appraisal Addendum looked at the three sites proposed through the Publication Draft consultation exercise which took place in 2016. These sites had not been assessed previously and required further consideration and included:-

- North of Bestwood Lodge Drive, Arnold;
- 22 Kighill Lane, Ravenshead; and
- Steeles Way/Orchard Rise, Lambley.

The Sustainability Appraisal Addendum sets out the mitigation suggestions for the specific site in Arnold being assessed, including the provision of a landscape buffer.

List of Respondents

Calverton Parish Council Residents of the community surrounding Site X3

Addendum to the Habitats Regulations Assessment

Number of Respondents	Number of Comments
4	4

General Comments

Calverton Parish Council had no comments to make on the Habitats Regulations Assessment.

Natural England agreed with the Habitats Regulations Assessment for additional housing allocation X4 (Flatts Lane) and have no further comments to make.

Response: Noted.

Site X3 – Land West of A60 B

The residents of the community surrounding site X3 group (113 signatories) noted diverse fauna of site X3 including: nightjars; woodpeckers; deer; bats; voles; field mice and badgers. The group raised concern that development of the site would destroy local wildlife populations and queried how future ecological assessments would be carried out. The group noted that the Natural England Advice Note (March 2014)⁴ made specific reference to the sites importance as a breeding area for nightjars.

Response:

Existing fauna on the site noted. Where development proposals are likely to affect biodiversity, Policy LPD18 of the Local Planning Document requires an up to date ecological assessment and requires advice from Natural England. The HRA takes into account the location of the Sherwood pSPA.

Site X4 – Flatts Lane

A local resident raised concern that the Habitats Regulations Assessment does not give consideration to the habitats of species that are not endangered or protected. They requested that the Wildlife Trust provide a report on the impact of hedge habitats under the Hedgerow Regulations, and that the Woodland Trust provide a report on the impact of trees and habitats within the trees.

Response:

The Borough Council has fulfilled its legal requirement to undertake a Habitats Regulation Assessment. Policy LPD18 of the Local Planning Document seeks to

⁴ <u>http://www.mansfield.gov.uk/CHttpHandler.ashx?id=7529&p=0</u>

protect and enhance areas of biodiversity interest, including giving specific protection to 'priority habitats and species' set out in the relevant national legislation and in the Nottinghamshire Local Biodiversity Action Plan. Where development proposals are likely to affect biodiversity, Policy LPD18 of the plan requires an up to date ecological assessment and requires advice from Natural England. These aspects will be undertaken and considered at the planning application stage.

List of Respondents

Calverton Parish Council Jan Deebank Natural England Residents of the community surrounding Site X3

<u>Addendum to the Equality Impact</u> <u>Assessment</u>

Number of Respondents	Number of Comments
2	2

General Comments

Calverton Parish Council had no comments to make on the Equality Impact Assessment.

Response:

Noted. No further action required.

A local resident noted that Calverton had a large retirement-aged population and some working professionals and that disruption caused by development would have a negative impact upon views, peaceful lifestyle, and their personal health.

Response:

Demographic of local population and concerns regarding potential impact on health noted. The impact of proposed development, including the construction stage, is managed through the inclusion of conditions attached to planning permissions. Policy LPD32 of the plan seeks to protect the amenity of local residents as a result of development.

List of Respondents

Calverton Parish Council Jan Deebank

Evidence Documents

Housing Background Paper Addendum 2

Number of Respondents	Number of Comments
5	7

General Comments

One resident was concerned that Appendix B: Deliverability Notes did not provide a full assessment of the identified sites as it was viewed that the assessment was incomplete or missing. Concern was expressed over the sites in Ravenshead which will have a significant impact on surface water drainage as Longdale Lane currently floods after heavy rainfall. Increased traffic flow on Kighill Lane will increase degradation particularly as there is only one curb.

Response:

Issues of the need to upgrade surface water drainage and impact of traffic flow on Kighill Lane are considered in the Infrastructure Delivery Plan Background Paper Addendum (September 2017) (**EX/133**) and are addressed under the response to LPD 68 Housing Allocations – Ravenshead.

One resident considered that there was an excess and unfair amount of housing in Calverton and that village should remain a village. Infrastructure is at capacity and there were concerns that there would be more social problems

Response:

Policy 2 of the Aligned Core Strategy sets out the broad spatial distribution of new homes around the Borough, adopting a strategy of urban concentration and regeneration by firstly directing development to locations within or adjacent to the main urban areas. The three key settlements for growth which includes Bestwood Village, Calverton Ravenshead are then considered before other local settlements for local needs only.

The principle of housing growth in Calverton was set in the Aligned Core Strategy with Policy 2 setting an 'up to' figure of 1,055 homes for Calverton. The current provision will set the level of new homes at 824 homes. In preparing the Local Planning Document, there is a need for sufficient land to be allocated for housing in order to meet the overall housing requirement as set in the Aligned Core Strategy but also the need to demonstrate that the plan will deliver a five year supply for housing. The site has been allocated following a site selection process and it was considered that there were exceptional circumstances required to amend the boundary of the Green Belt. The site currently lies within the proposed Safeguarded Land and will contribute to the Council's Five Year Housing supply.

Contributions will be expected through a s106 agreement for education, health and open space. Emerging policies LPD 32: Amenity and LPD 35 Safe, Accessible and Inclusive Development of the Local Planning Document will seek to protect the amenity of local residents as a result of the development and to ensure that potential impacts are acceptable.

Calverton Parish Council considered that there was a mismatch between the housing trajectory as set out in Policy 2 of the Aligned Core Strategy and the availability and deliverability of housing sites. NPPF advises that LPA's should produce a single Local Plan for its area. The delivery of the strategic sites is threatened by the supply of easier and smaller housing sites. The proposed revisions have increased the total housing supply to 10,085 dwellings against a policy requirement of 7,250 taking the emerging Local Planning Document further out of conformity with the Aligned Core Strategy.

Langridge Homes and a local landowner considered that the housing delivery from strategic sites was over optimistic and had been inflated. Teal Close delivery within the five years supply had increased from 260 (May 2017) to 331 (September 2017) an increase of 71. No valid justification was given for this increase and planning permission for the reserved matters phase 1 is still pending. At Gedling Colliery/Chase Farm later phases depend on the delivery of the Gedling Access Road and there it was understood that there was still much preparatory work to be done. Also noted that the rate of delivery had increased from 323 homes being completed in the five year supply period to 510 but considers there was little justification. Northern Trust considered the scale of development now anticipated to be delivered on site H9 seems overstated and not sufficiently justified. No explanation had been given for the projected increase in delivery rates assumed in the housing trajectory for the Gedling Colliery/Chase Farm site from 72 homes to 96 homes per annum.

Northern Trust and a landowner promoting Glebe Farm, Burton Joyce stated that no lapse rate has been applied to sites with planning permission. Reference was made to the research undertaken by the government⁵ that indicates that between 10-20% of planning permission are not implemented whilst a further 15-20% are subject to a revised application process which delays delivery. It was argued that there should be an explanation that not all of the sites with planning permission will be delivered and that a minimum of 10% discount should be applied.

Langridge Homes and a local landowner considered that it was unlikely that any homes will be delivered on the Top Wighay Farm site as the County Council has not appointed a development partner and had not submitted an outline planning application and considered that even if a development partner was appointed in 2018/19 it would take at least three years for development to start.

Northern Trust and a landowner promoting Glebe Farm, Burton Joyce argued that the level of flexibility (or 'buffer') was not sufficient as it was likely that sites that form

⁵ DCLG presentation "Planning Update" to the HBF Planning Conference 2015 (see Ruth Stanier, Director of Planning presentation slides <u>https://www.house-builder.co.uk/events/hbf-planning-conference-2015</u>)

part of the housing supply would not come forward as anticipated. Reference was made to paragraph 11.2 of the Local Plans Expert Group report (**EX/118**) which stated "…there is little that Local Plans can do to address any shortages that appear in the five year supply…". With the additional housing allocations, the overall supply is 8,305 dwellings which represents a buffer over the minimum requirement of 14.5% below the 20% recommended by the Local Plans Expert Group report. Discounts should be applied to the sites H8 (from 230 to 80 dwellings), site H9 (from 1,050 to 792 dwellings) alongside with the reduction from windfalls (from 320 to 240 dwellings) and an allowance for a lapse rate (57 dwellings). This resulted in a supply of 7,760 dwellings (instead 8,305) which represented a 7% buffer.

Langridge Homes and a local landowner also considered that a risk allowance or discount rate of 10% should be applied to the other smaller and medium sized sites. In conclusion it was argued that further sites were needed to be allocated to demonstrate a robust five year supply of new homes. Reference was made to the government 'Planning for the right homes in the right places' consultation paper (**EX/136**) and proposed housing formula that indicates an increase for Gedling from 426 to 468 homes per annum which would increase the five year requirement by 160 dwellings increasing the shortfall on the basis of Langridge's assessment to 512.

Calverton Parish Council also referred to the government consultation paper (**EX/136**) and the standard method for calculating local authority housing need. Across the 17 year plan period it would mean an additional 714 homes would be required across Gedling Borough. It was recognised that the new figures are not required under transitional arrangements to be used now but it will result in an immediate pressure post March 2018 for the strategic housing figure for Gedling Borough to be reconsidered through a local plan review. It was considered that the imperative for the six new housing sites that are necessary to demonstrate a five year housing supply is undermined. Currently unclear whether there would be a requirement to take into account past shortfall or have a 5% or 20% buffer.

Calverton Parish Council considered the Local Planning Document examination needs to take a pragmatic approach and either abandon the current Local Planning Document and commence production of a single new Local Plan or look to adopt the submission plan, with sites deleted as necessary if they are found to be unsound, with a commitment to undertake an immediate review based on a new single local plan.

Response:

The housing trajectory for the Aligned Core Strategy was established through an examination process and confirmed that sustainable development would be achieved through a strategy of urban concentration and regeneration. The policies of the Aligned Core Strategy have been written in such a way as to address strategic common issues and provide a sufficiently flexible framework for Part 2 Local Plans. The Local Planning Document has been scoped for legal compliance against the NPPF.

The Housing Background Paper Addendum 2 (EX/130) confirms that the total housing supply has increased by approximately 1000 dwellings over the minimum figure set by the Aligned Core Strategy and explains that this is a result of the need

to demonstrate a five year land supply.

The housing trajectory for the strategic sites is based on information provided by the developers. Gedling Colliery/Chase Farm is now under construction and the GAR is on track for completion in spring 2020. The developer has confirmed that output will be 120 per annum from 2019 and is working with the HCA and other housing providers to increase delivery through additional tenures.

Construction has also commenced at North of Papplewick Lane, Hucknall. Persimmon the prospective developers of Teal Close provided information on the housing delivery and have submitted the reserved matters application which is to be determined at the November 22nd Planning Committee.

The delivery rates for sites H8 and H9 were recently revised and provided by developers during the SHLAA 2017 consultation.

The County Council as landowners of Top Wighay Farm are working in partnership with the HCA and Gedling Borough to secure funding including from the Accelerated Construction Fund with the aim of starting on site by 2020. Gedling Borough are also looking to secure funding for a project manager to progress the site.

Paragraph 3.37 of the Housing Background Paper Addendum 2 (**EX/130**) is clear that a lapse rate has not been included in the five year land supply calculation as each site with planning permission has been considered individually and on its merits. For sites below the threshold, if no information has been provided by the agent, developer or landowner through the SHLAA process to indicate that the site is likely to come forward for development in the future, then it has been assumed that the site is not deliverable and has therefore been excluded from the assessment.

It is clear that the government 'Planning for the right homes in the right places' is a consultation paper and until the final details of the new Regulations are known it is not considered appropriate or necessary to make any further changes or delay the examination of the Local Planning Document.

One resident considered the delivery of site H24 Broad Close with 10 dwellings in 2018-19 and a further five dwellings in 2019-20 unrealistic as the site is in multiple ownership with no realistic prospect of gaining access into the site in the short term.

Response:

H24 Broad Close has already been considered through the Local Planning Document examination and it has been confirmed that the joint owners of the site support the allocation of the site and that they will continue to work to deliver new housing at the earliest opportunity. Information from the SHLAA 2017 consultation provides the delivery rates for the site.

Northern Trust, promoting two sites Orchard Close, Burton Joyce and Flatts Lane, Calverton, believed that the Borough Council did not allocate sufficient housing to meet the housing need and there was no five year housing land supply.

Northern Trust considered the windfall allowance of 80 dwellings was no robustly justified and there was a sufficient risk of double-counting. It was noted that the Council was making allowance for windfall development to 2020/21 and 2021/22 onwards (i.e. Years 4 and 5 onwards) in order not to generate double-counting issue with the existing supply of sites with permission. Using the housing trajectory in the Housing Background Paper Addendum 2, 55 dwellings are expected to be delivered from extant planning permissions in years 2020/21 and 2021/22. This failed to acknowledge that only commencement of development is required within three year period, not completion. The windfall figure should discount the two years (i.e. Years 4 and 5) and be limited to the last six years of the plan.

Responses:

Paragraph 3.36 of the Housing Background Paper Addendum 2 (**EX/130**) is clear that the Council has an oversupply of 206 homes with a 5.28 year supply.

Appendix E of the Housing Background Paper Addendum 2 (**EX/130**) explains the windfall allowance and paragraphs E.19 to E.23 (supported by Table E3 and Appendix E2) explained further work has been undertaken and shows that an average of 39 dwellings have been granted planning permission on sites (excluding garden land) that were not previously included in the SHLAA database (i.e. the housing supply) since 2011.

List of Respondents

Calverton Parish Council Jan Deebank Kighill Farm Mr David Mark Northern Trust

Site Selection Document Addendum 2

Number of Respondents	Number of Comments
2	2

General Comments

Calverton Parish Council commented that they had previously made representations on this document and refers the evidence already submitted in any new hearing session on housing and other topics.

Historic England confirmed it has no concerns in relation to the site selection for the additional sites X1-X6 inclusive.

Response:	
Noted.	

List of Respondents

Calverton Parish Council Historic England

Site Selection Document Addendum 3

Number of Respondents	Number of Comments
16	17

General Comments

The Nottingham North and East Clinical Commissioning Group commented that the additional sites would increase demand for primary and community care and a need to develop health infrastructure. The Clinical Commissioning Group in conjunction with NHS England will be anticipating S106 contributions from these developments estimated at £551 per dwelling.

Historic England stated it had no concerns over the selection of the additional sites X1 - 6 inclusive.

Ashfield District Council welcomed the fact that there were no proposals for additional sites adjacent to Hucknall.

Response:

Noted.

Site 6/778 (Site X3 - Land West of A60 B)

A local resident considered that the plans may be incorrect as they include part of an adjoining garden and that also there is an active badger sett on the northern part of the site.

Another local resident queried why new housing was proposed in the area when previously it was rejected due to high levels of pollution from vehicles and the A60 being unable to cope with the increased volume of traffic.

Response:

In response to the comment by the local resident about the accuracy of the plans, the red line allocation aligns with the indicative layout plan provided by the planning agent for the site. In relation to badgers which are protected species, an ecological assessment will be undertaken as part of any detailed planning application in order to identify any protected species on site and necessary mitigation.

In respect of the local resident querying why development is acceptable now as opposed to previously it is assumed this comment relates to earlier proposals to develop the New Farm site for between 850 and 1,000 homes. This was considered by the Inspector who examined the Gedling Borough Replacement Local Plan which was adopted in 2005. The Inspector did not recommend allocation of this far larger development largely because of unresolved transport and access problems. The Site Selection Document Addendum 3 (September 2017) (**EX/131**) sets out the justification for the current smaller allocation for 150 homes and states that the key

reason why this site was not allocated at earlier stages of the plan preparation process was due to uncertainties around access which has now been resolved. County Highways has no objections in principle and considers that satisfactory access can be achieved.

Sites 6/669, 6/841, 6/166 (Site X5 Kighill Lane A) and 6/845, 6/843, 6/1046 (X6 Kighill Lane B)

The landowner fully supported the proposed extra sites in Ravenshead.

Response:

Noted.

Site 6/37 (Long Acre Lodge, Calverton)

Northern Trust commented that the impact of the site on the Scheduled Monument had been significantly over stated. An appraisal of the Scheduled Monument and potential impacts of development had been submitted by the landowner. This concluded that the setting of the Roman camp had changed fundamentally and is now more limited. The setting overall makes a low contribution to the significance of the asset; and the site is largely screened by intervening topography and trees. Northern Trust also criticised the Landscape and Visual Analysis of Potential Development Sites (December 2014) (LPD/NAT/01) and considered the methodology flawed and concluded that there were few long range views of the site.

Calverton Parish Council considered that the Site Selection Document did not undertake a balanced approach to the assessment of choosing the best land for housing as its overriding parameter was only to consider land that could come forward in the five year period. It did not consider the fact that the landowner of site H16 is pursuing a planning application involving a larger area of site 6/47 and creating an access to the Oxton Road as the Calverton Neighbourhood Plan Policy G1 requires. The approach was considered also inconsistent with Policy G1 of the Neighbourhood Plan which requires a comprehensive masterplan approach. It was viewed that the intention was for the site to be developed in isolation, it will require significant archaeological assessments and because it is contrary to the Neighbourhood Plan may be refused planning permission. The Parish Council considered that it will not be delivered early in the plan period. Concerns also raised about the size, shape and capacity of the site which are dealt with in the comments on Policy LPD 67.

Local residents commented:-

- No assessment for Flatts Lane on the impact of traffic;
- Current parking problems effectively narrows Flatts Lane hampering traffic movements on the road which is also used by commercial vehicles;
- Highway safety issues which won't be solved by widening as more traffic will be introduced;
- Parking in the village is inadequate insufficient infrastructure including GPs and schools;

- Provision of a footpath and the widening of Flatts Lane are essential in ensuring the safety of people affected by the development;
- Considered Calverton is already at saturation point with people and cars and argue that development to be directed elsewhere to Oxton and Woodborough which need regeneration;
- The Flatts Lane site is an important wildlife corridor which should be protected and requested a wildlife survey to be carried out ahead of any detailed plans;
- The site would blight the landscape coming in from the rural Whinbush Lane which is in close proximity to Flatts Lane as well as along the Oxton Road;
- Queries whether the owner has come to a financial arrangement with the Council;
- Background to proposing the 60 dwellings is not robust enough as the village does not have the infrastructure, roads, schools, health services, parking;
- Impact on heritage two Roman Sites;
- Impact on scout camp; and
- Concerns about the impact on wildlife including bats roosting in existing trees.

Response:

The site has been assessed to see whether satisfactory access could be achieved as part of the plan preparation process, with input from County Highways. This assessment indicates that it may be necessary to provide a pavement along the western side of Flatts Lane and potentially widen the road. A transport statement addressing detailed transport issues will be required as part of any planning application.

The adopted Aligned Core Strategy directs development firstly to locations within and adjoining the Nottingham urban area and secondly to the Key Settlements of Bestwood, Calverton and Ravenshead. Provision for local needs is also to be met within the villages. Calverton is a key settlement with a reasonable range of services and is considered a sustainable location for new housing. The Aligned Core Strategy proposed up to 1,055 homes at Calverton. The distribution of homes between the urban area and Key Settlements has been revised as more homes have been accommodated within the urban area and the Local Planning Document now proposes 820 homes at Calverton (which is lower than the figure provided for in the Aligned Core Strategy).

The impact of development on services such as GPs and schools is acknowledged. The relevant service providers have been consulted and mechanisms are in place for developers to make contributions towards the additional demand created by the development. The Calverton Neighbourhood Plan, if it passes the referendum, indicates that the local GP surgery may be interested in expansion and potential relocation. Land at Collyer Road is safeguarded for community use and any proposals for a new Health Campus on this site are supported. Land is also safeguarded for educational use and proposals for the expansion of existing schools will be supported subject to criteria.

There are no protected wildlife sites within the allocation. If it is allocated in the final plan it would require an ecological assessment as part of any planning application process to assess whether protected species are present and also appropriate

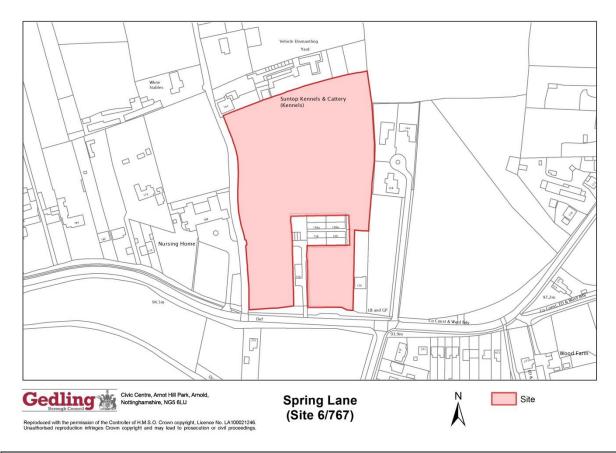
mitigation. As a general principle trees and hedgerows would be retained unless this is not practical. The Neighbourhood Plan also includes a policy to protect the frontage of Park Road.

In terms of the impact on the landscape the Landscape and Visual Analysis of Potential Development Sites (December 2014) (LPD/NAT/01) acknowledges there would be greater views of the development from Whinbush Lane, Flatts Lane and William Lee memorial park but these views are already affected by the existing settlement edge. The study recommends that the northern part of the site is kept open to minimise landscape and visual impact.

The site selection process has considered over 100 reasonable alternative sites which in the main have been submitted by landowners/developers, although some were identified by the Council through site searches. The site selection has treated all sites consistently and taken into account a range of evidence and selection criteria in the decision process. The landowner and developer are actively promoting the Flatts Lane site and the Borough Council as local planning authority has no financial interest in this site.

Site 6/767 (Spring Lane, 156)

A landowner promoted site 6/767 identified in the SHLAA review 2017 which they considered was discounted for consideration in Sustainability Appraisal Addendum 3: Review of SA Assessment of Reasonable Alternative Sites and Allocation Sites based on the second heritage assessment (**EX/62**). The landowner considers the site provides a deliverable alternative to meet housing need and should be reconsidered for allocation.



Response:

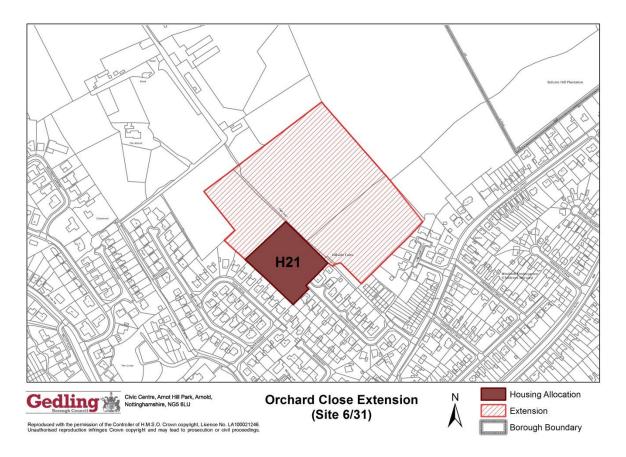
The respondent refers to the Sustainability Appraisal Addendum 3 (**EX/62**) which was undertaken to take account of the conclusions of the Council commissioned second independent heritage assessment. The Addendum 3 makes it clear that site 6/767 has been discounted for the purposes of the heritage assessment in that the site would not have an impact on a Scheduled Monument. The SA is just one of the pieces of evidence feeding into site selection and the relevant document summarising the site selection process is the Site Selection Document and its addendums.

The Site Selection Document Appendix A – Urban Area and Adjacent to Hucknall (LPD/GRO/06) assessed this site as not being suitable for consideration for allocation. As set out on page 31, the site does not adjoin the urban area and is part of the gap between Lambley and the urban area where ribbon development is prevalent. The site is incorrectly referred to in Site Selection Document Addendum 2 (EX/98) and Addendum 3 (EX/131) giving the wrong impression that it had been considered for allocation (6/767 appears in the table on page 8 of the Site Selection Document Addendum 3). However, this is an error as it was not previously considered suitable for allocation for the reasons set out above and as originally stated on page 31 of the Site Selection Document Appendix A. The Borough Council remains of the view that the site is not suitable for development.

Land at Orchard Close (sites 6/31 and 9/923)

The landowner promoting two sites at Orchard Close (sites 6/31 and 6/923) raised concerns over the content of the document as follows:-

- Access to the wider site can be achieved, including for large refuse vehicles;
- The existing topography of the site can be used to inform road structure and development parcels;
- Development is likely to require cut and fill in order to achieve required access but this need not affect the site's integration with the adjoining area;
- Potential impacts on residential amenity on Orchard Close/Langham Drive can be mitigated; and
- Surface water is currently un-attenuated and potential solutions are available to reduce the risk of flooding elsewhere.



Response:

The Borough Council remains of the opinion that the site is unsuitable for allocation for the reasons set out in the Site Selection Document Addendum 3 (September 2017) (**EX/131**).

List of Respondents

Andrew Carter Ashfield District Council Calverton Parish Council Helen Kendall Historic England Ian Copestake Jan Deebank John Suggett Karen Summerfield Natalie Chapman Northern Trust Nottingham North and East Clinical Commissioning Group Paul Westwick RC Tuxford Exports Limited Susan Arnold Tracey Cousins

<u>Housing Implementation Strategy (updated</u> <u>September 2017)</u>

Number of Respondents	Number of Comments
1	1

Site H24 – Broad Close

A local resident questioned whether the Council's own criteria has been applied correctly as the document states that a site is high risk if the site is in multiple ownership with no evidence of the owners working together. The resident contended that as the site is in multiple ownership and it is understood that the owners are not working together therefore it is at a higher risk level and should not be considered suitable for development.

Response:

This site has already been considered through the Local Planning Document examination and it has been confirmed that the joint owners of the site support the allocation of the site and that they will continue to work to deliver new housing at the earliest opportunity. Information from the SHLAA 2017 consultation provides the delivery rates for the site.

List of Respondents

David Mark

<u>Infrastructure Delivery Plan Background</u> <u>Paper Addendum</u>

Number of Respondents	Number of Comments
4	4

General Comments

Historic England stated it had no concerns in relation to the Addendum and site selection of the additional sites X1-6 inclusive.

Response:	
Noted.	

Site X3 – Land West of A60 B

Residents of the community surrounding site X3 raised concerns about public service infrastructure:-

- Has the local oversubscribed and outstanding secondary school been approached for their opinion?;
- Catchment primary school is one mile away is rated inadequate and this adds pressure to nearer local primary school provision which is overstretched and oversubscribed;
- There are currently problems getting appointments at health surgeries, so would funding be spent locally?; and
- Site X3 will increase health inequalities and reduce access to health services (the three local surgeries are up to capacity).

Response:

The Infrastructure Delivery Plan Background Paper Addendum (September 2017) (**EX/133**) identifies the broad requirements for infrastructure needed to support the additional site allocations. Appropriate financial contributions for the additional school places generated by the development will be required. Details of how contributions will be spent and the additional school places required delivered will be agreed as part of planning agreements at the detailed planning stage.

The Nottingham North and East Clinical Commissioning Group has identified there is likely to be a need for additional capacity at Arnold GPs and is seeking financial contributions of approximately £550 per dwelling. Details of how contributions will be spent and the additional school places required to be delivered will be agreed as part of planning agreements at the detailed planning stage.

Site X4 – Flatts Lane

A local resident raised the following issues:-

- Traffic issues and safety;
- More children will result in unmanageable numbers in classes; and
- Doctor's surgery is already overloaded.

Response:

The general impact of site X4 upon highways has been considered through the Site Selection Document (May 2016) in consultation with County Highways. This states that access to site X4 can be achieved subject to the provision of a footway along the western side of Flatts Lane and, potentially, the widening of Flatts Lane. A more detailed assessment of impact upon highway safety and capacity and parking will be considered in consultation with County Highways through the planning application process.

Financial contributions to mitigate the impact of site X4 upon education and health infrastructure will be sought through the planning application process.

Sites X5 and X6 – Kighill Lane A and Kighill Lane B

A local resident had the following concerns:-

- Kighill Lane is a prime route especially between 7.30 and 8.30 and access to existing houses is hazardous;
- No assessments of traffic volumes or projections have been done;
- The surface of Kighill lane is subject to noticeable erosion particularly as one side is uncurbed and will be exacerbated by increased traffic;
- Community facilities, medical services and the school are oversubscribed; and
- Frequent flooding on Longdale Lane.

Response:

The site has been assessed to consider whether satisfactory access can be gained from local highways and whether any access constraints could be overcome through mitigation work including in particular for any off site highway works that would add significantly to development costs. This initial assessment indicates that access from Kighill Lane is likely to be acceptable and acknowledges that the existing grass verge should be incorporated as a pavement.

This assessment is for the purposes of plan making only; detailed proposals submitted as part of future planning applications will be determined when a transport statement will be required which will look at trip generation and other aspects such as safety.

The relevant service providers have been consulted. The Police have made no comments about the need for extra resources due to the additional housing

development. Nottinghamshire County Council as the Local Education Authority has indicated that developer contributions are required towards primary and secondary school places and that the existing schools estate can be adapted. Contributions are also likely to be needed for primary health care.

In terms of surface water the development sites are required to sustainably manage surface water runoff through, for example, using infiltration techniques and attenuation ponds designed to the standards required by the Environment Agency.

List of Respondents

David Owen Historic England Jan Deebank Residents of the community surrounding X3

<u>Appendix 1 – Summary of the Key Issues from</u> <u>the Workshops</u>

Summary of the key issues from the three workshops are as follows:-

Redhill Workshop

<u>Housing</u>

• Questions relating to the affordable housing requirement, in particular querying what constitutes affordable housing?

Infrastructure

- Concerns about existing traffic (volume of traffic and air pollution) on the A60 which will be exacerbated by additional development.
- Concerns for the ability of residents to turn onto the A60 from the new development and from existing junctions in the surrounding area. There was strong support for a signalised junction at the Metallifacture entrance, which for many would address their concerns.
- Provision of bus/tram services required along A60.
- Questions relating to the relationship between the Lodge Farm (H5) junction and the Metallifacture (X2 and X3) junction.
- The impact on local school capacity, in particular given that local ability to gain a good school place is limited. Concern that the S.106 funding for education will not be used in the local area. Requirement for a new school in the area.
- Concern about the impact on local amenity of Lodge Close, Larkspur Avenue and Henry Street.

Green Belt

 Concern that the Council is removing multiple Green Belt sites. Concern that Green Belt sites are coloured brown instead of green on the map which is misleading.

Footpaths

- Concern that potential use of public footpath to the west of Henry Street (currently publicly open) will be used more and therefore impact on the security of local residents on Henry Street.
- Need to retain public footpaths as much as possible as part of all developments in the borough.

<u>Other</u>

• Comments relating to the SA addendum in relation to the transport objective, querying whether the 400 m to bus stops was calculated using actual routes or as the "crow flies".

Ravenshead Workshop

<u>Housing</u>

- Proposed density of allocations is high and does not reflect the character of the area. Particular concern that the proposals will be similar to the Cornwater Fields development to the north. Also concern that the development will be 3-storey dwellings.
- Concern that developers will not deliver retirement dwellings on Ravenshead sites.
- Impact upon local amenity of existing properties on Kighill Lane

Infrastructure

- Development will add to existing traffic along Kighill Lane. The street is narrow and cannot accommodate additional dwellings.
- Existing education and health facilities are at capacity.
- Surface water flooding along Longdale Lane.

Natural Environment

• Concern that trees will not be retained.

Calverton Workshop

Impact upon infrastructure

- Impact on doctors surgeries.
- General view that the existing infrastructure won't cope with the new houses.
- Concern that additional education requirements will result in the small local school becoming large.
- Impact on additional traffic along Flatts Lane, including concern with the highway is currently narrow and has significant parking.
- Impact on traffic in Calverton in general in particular parking facilities in the local centre, and access point into the village.
- Road safety.

- Existing surface water flooding on Flatts Lane.
- STW have confirmed that sewerage can't cope.

Natural Environment

- Impact on the pSPA.
- Need full ecological survey concerns re bats.
- Wanting to retain existing trees/hedgerows on Flatts Lane.

<u>Other</u>

- Reference to neighbourhood plan want extension of Park Road site instead.
- Too much new development is being focussed on Calverton.
- Concern that public consultation in Calverton has not been taken into account.
- Leisure centre requires sustaining particularly in terms of investment in health.

Support

 Support for the X4 site to reflect the design of the recent Brambles residential development.

<u> Appendix 2 – 1835 Sanderson's Map</u>

Extract of the 1835 Sanderson's Map.

