



Independent Examination of the Gedling Local Planning Document

Comments on Revised Housing Background Paper Addendum, March 2017, and Revised Policy LPD 63 (Housing Distribution)

Calverton Parish Council

Anthony Northcote *HNCert LA(P), Dip TP, PgDip URP, MA, FGS, ICIQB, MInstLM, MCMI, MRTPI*

Introduction

1. Calverton Parish Council have actively participated in the examination hearings for the Gedling LPD, however during those hearings we have drawn attention to a number of inconsistencies and omissions in the evidence base. With regard to the issue of housing the Council has now published EX/98 - Site Selection document - Addendum 2; EX/104 Revised Housing Background Paper Addendum; and EX/105 Proposed revised Policy LPD 63. I note that in the Inspector's note EX/106 comments are only invited on the latter two documents, however as document EX/98 was only added to the examination library on the 27th March there has been no ability for any party to comment on it. We therefore make comments on this document.

EX/98 – Site Selection Document – Addendum 2

2. The purpose of this document was understood to be the explanation of how the LPA pulled all of the evidence together to decide which sites to allocate. The void in evidence was highlighted on a number of occasions and became referred to by parties including the Council themselves as 'the leap of faith'. Calverton Parish Council is disappointed that this document is not comprehensive and is not the robust analysis and explanation of the site allocation process that we believe that the LPA undertook to produce. Gedling have consistently argued that all of the elements of the various strands of evidence undertaken such as landscape; heritage; and green belt were analysed and then assessed and balanced to reach a conclusion whether or not to allocate a site for residential development.

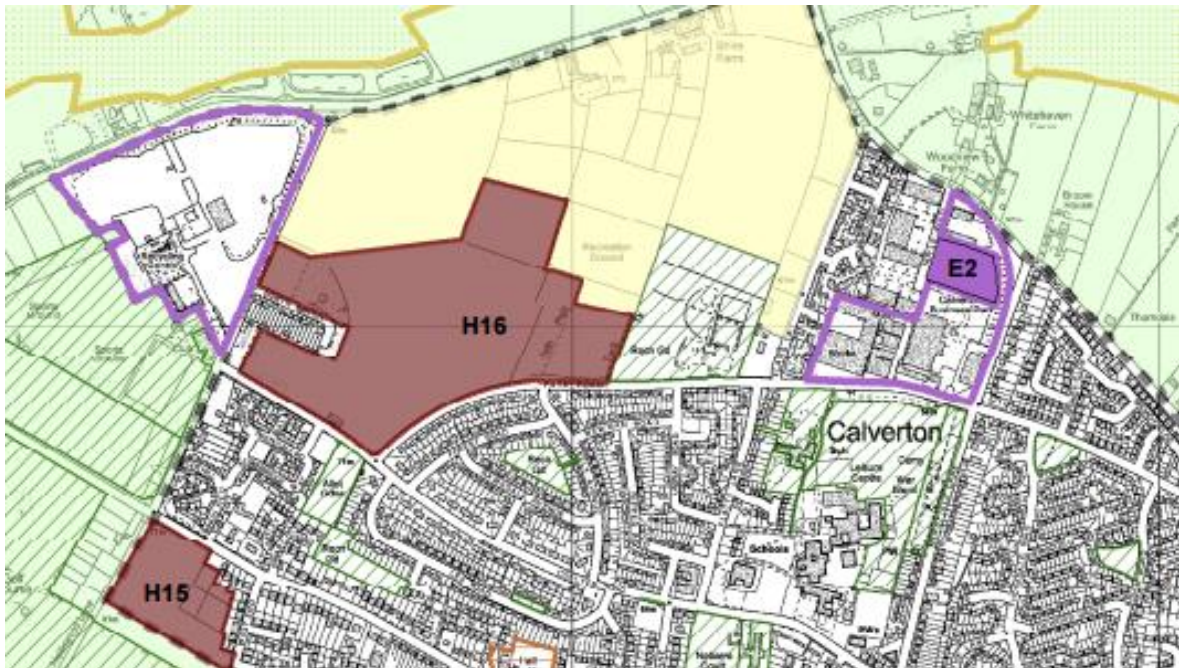
3. As such we were expecting to see a document which clearly summarised all of the evidence, applied appropriate weighting or balance to then provide a clear audit trail as to precisely why a site was or wasn't allocated. This document fundamentally fails to do this and as such it does not respond to the concerns that were consistently expressed throughout the examination hearings. All parties to the examination still have no clarity on how the site selection methodology was undertaken, as such the site allocations in the Plan are still not founded on a credible evidence base. As such we still contend the Plan is fundamentally unsound.
4. Document EX/98 on page 3 confirms that the site selection process was subjective rather than objective, it states: *"In undertaking the comparative assessment, a balanced judgement has been taken by officers as professional planners. Each site has been considered on its own merits, giving appropriate weight to each element of the evidence base as outlined in the Site Selection Document – Main Report (LPD/GRO/05). As such, it was not possible to undertake this exercise using a scoring system or tick box exercise as the weight given to each element may vary for each site. For example, a site may score more highly in green belt terms than an alternative site but it might be considered that this is outweighed by other benefits (such as regeneration) or the opportunity to provide more robust green belt boundaries. Another site may result in a low level of harm on a conservation area but this is outweighed by the scope for mitigation and the sustainable location in relation to other alternative sites."*
5. Calverton Parish Council is deeply concerned that the site selection process lacks any objective evidence which demonstrates a clear and consistent approach. The current approach lacks public confidence which is vital in our view. We consider that this is particularly necessary for the LPA to demonstrate, given that in Calverton the LPA wishes to allocate a site which is at direct odds to the expressed wishes of local residents. The planning process must enjoy public confidence, so the public can understand matters and that their views and all relevant matters have been properly considered even if the public are unhappy with the outcome.
6. Unfortunately the publication of document EX/98 has thrown more confusion on the site allocation process. As with much of the LPD evidence the document is not very clear or easy to understand unless you forensically dissect them! There is now clear conflict between what the Site Selection Addendum appears to suggest; and what the Revised Housing Background Paper Addendum actually states. In particular the Site Selection Addendum now appears to suggest that more land in the North-West of Calverton is being allocated. In the table for Calverton on pages 11 to 16, the document states that the following sites should be allocated:
 - 6/662; 6/921; 6/665 and 6/47



Extract from Site Selection Document Appendix C – Calverton (May 2016) (LPD/GRO/08)

Note - We have underlined the relevant site numbers for ease of identification

7. However this evidence directly contradicts the actual site H16 which was then allocated. Site H16 includes all of 6/662 but then only includes part of sites 6/665 and 6/47. There is no clear explanation as to why the LPA state that sites 6/665 and 6/47 should be allocated but then only part is so allocated with the remainder being safeguarded land. Even more confusingly the table in EX/98 states that site 6/921 should be allocated but in fact it has not been allocated but is identified as safeguarded land.



Extract from Policies Map (LPD/REG/03)

8. As the LPA have produced this evidence subsequent to the examination hearings, this must cast significant doubt on the concerns they expressed regarding allocation of the safeguarded land in lieu of site H15 at earlier hearing sessions. This latter evidence now suggests that the LPA has changed their mind and now agree in principle that all of sites 6/662; 6/921; 6/665 and 6/47 should be allocated. Consequently this is a fundamental issue, as such site H16 should be extended as suggested by both Calverton Parish Council and Persimmon Homes. This will increase the housing numbers on this site thereby rendering all of the arguments in relation to the allocation of site H15 put forward by others irrelevant. As we identified previously if the North-West of Calverton as the sequentially preferable location for green belt release can accommodate all of the strategic development requirement for the village then there can be no exceptional circumstances present to justify the release of site H15.
9. **Calverton Parish Council consider that it is imperative that the Inspector should hold a further examination hearing session to explore the fundamental inconsistency between this new evidence and the position adopted to date by the LPA.**

EX/104 – Revised Housing Background Paper Addendum

10. Section 4 of the Housing Background Paper (May 2016) (LPD/BACK/01) provides information on how the housing distribution proposed in the Local Planning Document accords with the spatial strategy of the Aligned Core Strategy. As identified by the LPA in its response to the Inspector's Initial Questions (EX/08) the LPD has redistributed some housing proportion from the key settlements to the Urban Area. Calverton Parish Council considers that this principle is sustainable and accords with the urban-centric focus of the ACS and the NPPF in general. We note that whilst the proposed housing figure for Calverton has increased from 740 to 765 dwellings, although we do not support any increase it is acknowledged that 20 out of the 25 dwellings is based on a factual adjustment relating to the number of units with planning permission. However we do not agree that the remaining additional 5 units as an 'Allowance for Sites Below Threshold' is realistic.
11. Calverton Parish Council still consider; particularly having regard to the conclusions now set out in EX/98; that the redistribution of housing from site H15 to site H16 is appropriate. Site H15 should be deleted completely and the numbers added to site H16 at Park Road, of course in fact Site H16 can not only deliver the replacement housing numbers, but potentially an increased overall housing figure.
12. The Parish Council has previously highlighted the need for some flexibility within site H16 regarding the extension of the site north to Oxton Road to facilitate a new access from Oxton Road which is a

requirement of the Submission Calverton Neighbourhood Plan. The developers of site H16, Persimmon Homes have supported a proposed access from Oxtan Road.

13. The proposed revised housing figure of 765 dwellings for Calverton (up from 740) is now made up as follows:

- Completed 2011-2017 – 159 dwellings
- Sites with Planning Permission at 28th Feb 2017 – 135 dwellings (NB this includes H14 Dark Lane for 72 dwellings)
- Site H15 (Main Street) – 75 dwellings
- Site H16 (Park Road) – 390 dwellings
- Allowance for Sites Below Threshold – 5 dwellings

14. If you add these up they actually total 764 not 765, whilst the Council are not proposing at this stage to add any additional sites the Council is seeking to increase the housing figure through use of an allowance for sites below threshold. In making this assumption of an allowance for 5 dwellings on sites below threshold this includes 2 single plots on the corners of Collyer Road and Seely Avenue which are owned by Gedling but have only been promoted in 2017. These would appear to be purely promoted to artificially boost the housing figures. As the 2017 SHLAA call for sites only closed on the 31st March 2017 we have no details published relating to these sites, therefore we are not even able to see precisely where they are located.

15. In our view it is inappropriate for the LPA to seek to try and include new SHLAA sites from the 2017 call for sites at this late stage. They have published no evidence to underpin the inclusion of any new sites which is a further fundamental failing of the plan preparation process. This tactic can perhaps best be described as Gedling having gone on a trawl of desperation to find almost anything they can to throw into the pot to boost the figures; to try and demonstrate that they are planning for sufficient housing. The Parish Council does not consider that these two plots are realistically viable or deliverable, if they were then Gedling as the landowner would have promoted these much earlier in the process.

16. In addition the plots are indicated to be on corners, as such we do not consider that they would likely to be a form and layout of development that would respect the character and appearance of the streetscene. Therefore we would contend that they would be unlikely to get planning permission.

17. In addition the other element of the allowance for sites below threshold is 3 plots at Spring Farm Kennels which previously had planning permission but have now lapsed. I'm not persuaded that these are realistic possibilities to include in any housing figure. Reliance on plots which have previously had planning permission but which have lapsed is a flawed strategy. Given that the

permission has lapsed then there is likely to be problems associated with deliverability or viability. As such we do not consider that the housing figure for Calverton should include the 'Allowance for Sites Below Threshold'.

18. The LPA are seeking to introduce a larger windfall allowance, they state: *"The windfall allowance has been revisited and is now assumed to come forward from Year 4 onwards."* Calverton Parish Council considers that the LPA is seeking to double count housing numbers through its revised approach. Taking Calverton as an example the type of sites they are seeking to count under the 'Allowance for Sites Below Threshold' is precisely the type of supply that would traditionally be considered to be windfall. Given that the revised five year land supply figure includes both 80 units of 'Windfall' and 263 units of other 'Allowance for Sites Below Threshold' it is vital to examine the issue of double counting. As document EX/104 makes clear there is only an oversupply of 94 dwellings in the 5 year supply, if there is any double counting of 'Windfall' and 263 units of other 'Allowance for Sites Below Threshold' then the supply becomes marginal or perhaps less than 5 years.

19. We note that sites marked as 'New' in document EX/104 in the 'Allowance for Sites Below Threshold' now includes a total of 62 dwellings as follows:

Urban Area

- Derwent Crescent – 9 units
- Chase Farm – 35 units
- Plains Road – 14 units
- Queens Avenue – 1 unit

Calverton

- Collyer Road – 1 unit
- Seely Avenue – 1 unit

Other Villages

- Cromwell Crescent Lambley – 1 unit

20. As 'New' sites they are not included in any of the SHLAA evidence base published to date, they were not considered to be sites which were available, deliverable or viable at the time of submission. As the 2017 SHLAA has not been published there is no evidence before the examination to demonstrate that these sites can be considered for inclusion in the housing supply. If our contention that these sites should be ignored completely is accepted then the 5 year housing supply reduces from 3,830 down to 3,768 dwellings. If the 3 plots at Spring Farm Kennels, which previously had planning permission but have now lapsed, which we consider cannot realistically be included in the 'Allowance

for Sites Below Threshold' are discounted then the supply reduces even further to 3,765 dwellings which is only 5.040 years supply. Any double counting in the 'Windfall' and 'Allowance for Sites Below Threshold' then the supply will inevitably reduce to less than 5 years.

21. The LPA also continue to contend that it is not necessary to introduce a lapse rate in the housing figures, this is only appropriate if the reliance upon those sites with planning permission is realistic. As can be seen from the 3 plots at Spring Farm Kennels which previously had planning permission but have now lapsed; the local housing market has weaknesses which mean that sites stall or are not delivered.
22. This is demonstrated fundamentally by those sites within the ownership or control of Langridge Homes where for example the Longue Drive development has had consent for the remaining 36 plots since 2008 but where 21 plots have still not been completed. Over a 9 year period only 15 plots have been completed which is the equivalent delivery of only 1.67 units per annum. Therefore on the same delivery rate the remaining 21 plots plus the 3 other plots still remaining from an even older (2006) consent would take over 14 years, although we note the position on construction which indicates that most of these plots are effectively built but not deemed complete by Building Control.
23. However within the scope of sites with planning permission for Calverton it includes the following sites totalling 24 units:
 - 6/489 at Little Tithe Farm – 3 Dwellings
 - 6/390 at Renals Way – 5 Dwellings
 - 6/947 at Spring Farm Kennels (A) – 1 Dwelling
 - 6/948 at Spring Farm Kennels (B) – 1 Dwelling
 - 6/686 at The Cherry Tree – 14 Dwellings
24. Calverton Parish Council does not consider that these sites are realistically going to be delivered within the suggested 5 year period. The planning permission at Little Tithe Farm includes a replacement dwelling which is not a net addition so cannot be considered so should be viewed as two dwellings at the most. Inclusion of a replacement dwelling in the figures casts serious doubt on the robustness of the process, the supply figure can only include net additions and the figures need to be double checked to ensure that no other replacement dwellings have been included. We note that site 6/633 at Ravenshead is also described as a replacement dwelling and not a net addition. Removing these incorrectly counted replacement dwellings means the supply reduces even further to 3,763 dwellings which is only 5.037 years supply.
25. The table in document EX/104 also appears to suggest that the two prior approval dwellings at 6/489 are not intended to be delivered until the year 2018/19 which is beyond the three year

commencement period specified in the GPDO. Consequently we consider these two dwellings should not be counted in the 5 year supply. Site 6/390 at Renals Way relates to the remaining 5 plots from a 1972 planning permission obtained by Langridge Homes. The last planning activity on this site was in 2008 when plot 76 obtained consent for a different house type but has not been implemented. Given the passage of time and the fact that the site is substantially treed we do not consider that the site can realistically be delivered. The site is also well utilised by local people, this can be seen on the paths which are well defined. In addition it is identified as a Local Green Space in the submission Calverton Neighbourhood Plan. As such the Parish Council do not agree that the site should form part of the 5 year land supply.

26. As other land at Spring Farm Kennels has lapsed without the planning permissions being implemented we do not consider that it is reasonable to include sites 6/947 or 6/948 in the 5 year land supply either. The site 6/686 at The Cherry Tree has been stalled for over 4 years since the latest scheme was approved in 2012. The pub has been demolished and foundations were started but the developer then stopped. Whilst the LPA indicate that the site has been sold to another developer the Council has made assumptions regarding delivery rather than any firm indication set out by the new developer. Given the fact that there is no sign of any works re-commencing and no information from the developer has been obtained; we do not consider that this site should be included within the 5 year housing supply either. Taking all this into account then the supply therefore reduces even further to 3,740 dwellings which is only 5.007 years supply.
27. As we identified earlier if there is any double counting of 'Windfall' and 'Allowance for Sites Below Threshold' anywhere in Gedling or any sites outside of Calverton that shouldn't be included, then the supply will become less than 5 years. As our interest is in Calverton we have not analysed in detail the sites in the rest of Gedling. However taking just the elements in Calverton which appear to be incorrectly included in the 5 year supply, we consider that there is a prima facie case that Gedling cannot demonstrate a 5 year land supply of housing.
28. As such we consider it to be imperative that a further hearing session must be held to consider the latest documents EX/98; EX/104 and EX/105. Calverton Parish Council have written under separate cover formally requesting suspension of the examination, we consider that the concerns we have identified regarding the latest position on housing supply further supports our request.
29. As we have highlighted previously Calverton Parish Council do not consider that site H15 is deliverable during the plan period having regard to national policy or guidance. Our full case on this was set out in our previous evidence. This site is within the ownership of Langridge Homes, the Inspector has previously explored the issue of deliverability in response to our concerns. We note

that following the housing sessions, Langridge have provided document EX/90 which again is not a document on which we have had opportunity to comment.

30. In that document EX/90 it is clear that Savills state that no arrangement to sell site H15 is in place and it has not yet been put to the market. No indication of any purchase option is indicated therefore we still consider that there is no evidence to demonstrate that the site can be delivered within the plan period and certainly not within the 5 year period. The fact that Langridge still propose to pursue their own planning application on the site must further cast doubt on the contention that they intend to sell the site. As such we consider that the document EX/90 conflicts with the statements made by Geoffrey Prince Associates during the examination hearings.
31. Langridge Homes have a poor record of housing delivery, particularly in Calverton, they commenced the Woodview development on Longue Drive in Calverton in 1975 and it is still not completed. The development at Renals Way started in 1972 has also not been completed.
32. In addition in Calverton, Langridge Homes are developing the site H14 on Dark Lane. This site was allocated in 2005, an application for outline planning permission was first applied for in 2005, with the reserved matters granted in August 2013. Work was not commenced on the site access as the initial stage however until mid-2016 some 12 years since the site was allocated in the last Local Plan.
33. The Dark Lane site H14 is for some 72 units, we consider that this site will represent a significant challenge to Langridge Homes to deliver through the plan period. In the Housing Background Paper Addendum (EX/22) the LPA identified that it expected 54 of these units to be developed in the 5 year period 2016-2021. The Housing Background Paper (LPD/BACK/01) however indicated that the LPA expected 60 of these units to be developed in the 5 year period 2016-2021. In document EX/104 the LPA now contend that all 72 units can be developed during the first five year period which we consider unrealistic, particularly given the lack of certainty regarding its prospective sale
34. Calverton Parish Council understand from the representations on the LPD (b/174, b/175 & b/176) that Langridge Homes are the promoters and developers of the following sites:
 - Willow Farm (Site Allocation H3) – 110 units
 - Land at Lodge Farm Lane (Site Allocation H5) – 150 units
 - Westhouse Farm (Site Allocation H12) – 210 units
 - Dark Lane Calverton (Site Allocation H14) – 72 units
 - Main Street Calverton (Site Allocation H15) – 75 units
35. In the examination hearings, Langridge have suggested that they would sell sites H5 and H15, leaving 392 out of the 617 allocated dwellings under their control. In addition Gedling also contend that

Langridge will complete a further 28 dwellings on Longue Drive and Renals Way during the first 5 year period.

36. Taking into account the trajectory set out in document EX/104 the Council housing supply relies upon Langridge delivering the following numbers of units per annum:

Year 1 (2017/18) – 23 dwellings

Year 2 (2018/19) – 43 dwellings

Year 3 (2019/20) – 68 dwellings

Year 4 (2020/21) – 108 dwellings

Year 5 (2021/22) – 113 dwellings

Year 6 (2022/23) – 35 dwellings

37. As Langridge identified during the examination hearing sessions as a local builder it can develop around 100 units per annum across all of its portfolio of sites across the region. Gedling are relying upon Langridge in delivering more than this amount in years 4 and 5 just in Gedling Borough. As we have identified previously Langridge do not only operate in Gedling, they also have sites to finish at Church Farm, Ripley and The Willows, Leabrooks.

38. In relation to Church Farm, Ripley – The latest Amber Valley SHLAA was published in 2013, it does not clearly identify phasing proposals but appears to suggest that plots 183 to 305 were outstanding, this being 122 dwellings. Looking at recently determined applications there would appear to be at least 159 dwellings still to be built, although the phasing and delivery rates is unclear. (Evidence: AVA/2016/1317 – granted 24th January 2017; AVA/2016/0328 – granted 30th November 2016; AVA/2016/0075 – granted 30th November 2016; AVA/2016/0930 – granted 27th September 2016; and AVA/2016/0463 – pending decision due by 30th April 2017).

39. In relation to The Willows, Leabrooks – The latest Amber Valley SHLAA does not identify this site. Looking at the latest application granted there appears to be 19 units still to be built, although the phasing and delivery rate is unclear. (Evidence: AVA/2015/0078 – date of grant not recorded)

40. As these two sites are already under construction it can be assumed that Langridge Homes will wish to complete these sites before commencing new sites in Gedling. As such those 178 units, together with the 23 units already approved at Longue Drive in Calverton (total 201 units) will take at least the two full years 2017/2018 and 2018/2019 to deliver at the 100 per annum overall delivery quantum indicated by Mr Prince as being that Langridge can manage. As such we do not consider that sites H12 and H14 can commence in year 2 (2018/19) as Gedling suggests in EX/104. This would have a knock on impact to the overall delivery, that in our view at least some 78 units suggested for years 1

to 5 will then need to take place later outside of the first 5 year period. We would suggest that a trajectory as follows would be more realistic:

Site	Total No. of Dwellings	Potential Revised Trajectory of Langridge Homes Sites With Delivery Rates Set At Maximum 100 Units Per Annum										
		2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028
Urban Area – Document EX/56												
H3 Willow Farm	110				40 23	40 27	40	20				
Bestwood – Document EX/58												
H12 Westhouse Farm	210		25	50 32	50	50	50	3				
Calverton – Document EX/59												
6/452 Longue Drive	3	3										
6/490 Longue Drive	19	19										
6/491 Longue Drive	1	1										
6/390 Renals Way	5					5						
H14 Dark Lane	72		18	18	18	18						
Amber Valley												
Church Farm	159	50	50	50	9							
The Willows	19	19										
Sub Total	598	92	93	100	100	100	90	23	0	0	0	0

41. The loss of a further 78 units from the first 5 years supply therefore reduces this even further to 3,662 dwellings which is then only 4.902 years supply. Whilst not within Gedling it should also be borne in mind that In addition to the sites above, before the Amber Valley Core Strategy was withdrawn in December 2015, Langridge was promoting two sites to be developed in years 1-5, these were:

- AVBC_2008_0058 Chestnut Avenue – 66 dwellings
- AVBC_2008_0083 Bradshaw Avenue – 60 dwellings

In addition to these sites, through the Rushcliffe Local Plan Part 2, Langridge are promoting site COT3 (Land rear of and to the west of Main Road) for 125 homes. As Langridge Homes operate beyond Gedling it cannot be reasonably assumed that they will target all of their deliverability capability only

in Gedling during the first 5 years of the plan period. Langridge may have other sites in addition that we are not aware of elsewhere in the region.

42. The LPD is also based on assumptions of delivery rates which historically Langridge have been unable to meet. Longue Drive at Calverton (212 units) was granted full planning permission in 1975, to date in 32 years only 188 units have been delivered, this equates to just under 6 units per annum. On site H14 at Dark Lane, allocated in 2005, to date after 12 years no units have been delivered. The site at Renals Way was granted planning permission in 1972 (believed to be for 92 units), but some 35 years later this site is not complete as both Gedling and Langridge identify. At The Willows at Leabrooks in Amber Valley (69 units), the planning application was submitted in 2004, approved in September 2007, to date in 9.5 years only 50 units have been delivered, this equates to just over 5 units per annum.
43. Therefore expecting Langridge to be able to deliver up to 50 units per annum on an individual site does not appear to be justified by the evidence of their historical ability to deliver. This is particularly relevant to the Calverton housing market where Langridge has been unable to build sites out to completion. Whereas the sites built by the national housebuilders allocated in the 2005 Local Plan have been fully built out. This must further call into question the delivery of even the 4.902 years supply that we have demonstrated to be the maximum actual position.
44. Taking account of the historical delivery rates of Langridge Homes it would seem reasonable and justified to assume that Langridge can actually only deliver around 10 units per annum on any individual site. If we apply this assumption to sites H3; H12; and H14 then out of the 279 units in the revised trajectory we have suggested in the table above to be delivered in the first 5 years. Then in fact only 100 of those (at a rate of 10 units per site per annum) will come forward, thereby reducing the 5 year housing supply further to 3,483 dwellings which is only 4.663 years supply
45. We also identify that serious doubts must be cast on the delivery of sites H5 and H15 as Langridge have not provided any evidence to demonstrate that these are either sold or on option to other developers. Then this reduces the deliverable 5 year land supply figure even further by 225 units, thereby bringing the 5 year supply down to 3,258 dwellings which is actually only 4.361 years supply. If any other parties can identify any issues relating to any other sites then this would of course compound this serious housing supply shortfall even further.
46. **Calverton Parish Council consider that it is imperative that the Inspector should hold a further examination hearing session to explore the fundamental flaws in this new evidence which in no way demonstrate a deliverable 5 year housing supply, thereby rendering the LPD unsound.**

EX/105 – Proposed revised Policy LPD 63

47. We have cast doubt above on the delivery of sites within the first 5 year period, however some of these elements also impact upon the overall housing numbers in Policy LPD63. We consider that 62 of the units identified in the Allowance for Sites below Threshold need to be removed (see paras 13 to 18) and that at least 24 units on Sites with Planning Permission also need to be removed (see paras 20 to 23). This together with our contention that sites H3 and H12 need to be viewed with an annual delivery rate of only 10 units per annum per site (see para 40) then as these sites will take beyond the plan period to be completed, this is a further reduction of 30 units on H3 and 110 units on H12 in the overall policy total.
48. This reduces the Policy LPD63 total from 7,855 dwellings by a total of 226 dwellings to 7,628 dwellings also taking into account the arithmetic error of 1 unit in the Calverton figure already. This does not however reduce the overall supply below the 7,250 minimum in the revised Policy. The actual impact on the settlements would then become:
- ~~4,535~~ 4,446 homes in or adjoining the main built up area of Arnold and Carlton;
Up to 1,265 homes around Hucknall;
~~1,555~~ 1,418 homes at the Key Settlements for Growth made up of:
- i. Bestwood Village – ~~540~~ 430 homes;
 - ii. Calverton – ~~765~~ 738 homes; and
 - iii. Ravenshead - 250 homes.
- ~~180~~ 179 homes at the other villages including:
- i. Burton Joyce – 80 homes; and
 - ii. Woodborough - 55 homes.
- Windfall allowance - 320 homes.
49. The adjusted figures would see a modest redistribution in the urban area percentage from 57.7% to 58.3% and a modest reduction in the key settlement percentage from 19.8% to 18.6%. Calverton Parish Council remain of the view that the wishes of the local community of Calverton should prevail and site H15 should be deleted. This can be easily replaced by an increase in an extension to site H16. If that site were extended to include all of sites 6/665 and 6/47 together with site 6/921; then a site of some 30.71 Ha would allow for the capacity of site H16 to increase from 390 dwellings to around 600 dwellings.
50. This estimated capacity is based on a low density of just under 20 dwellings per hectare to allow for substantial buffers to be introduced on the Oxton Road frontage and for the elements identified in the Calverton Neighbourhood Plan to be included. An increase of 210 units here would more than

offset the loss of site H15. Given that we do not consider that site H15 can realistically be delivered during the first 5 years, then the fact that the additional parts of site H16 would be delivered later in the plan period would have no material impact on the 5 year land supply. At the prescribed annual delivery rates for site H16 in EX/104 an extended site H16 would still be expected to be completed in the plan period.

51. Whilst Calverton Parish Council would wish to see more sites allocated in the urban area to meet the lack of demonstrable 5 year land supply, we accept that substitution for site H15 if deleted should result in an extended site H16. The Parish Council as suggested previously would be willing to see a further increase in the extent and capacity of site H16 to allow delivery of key objectives of the Calverton Neighbourhood Plan. For example access from Oxton Road which is a fundamental pre-requisite of the local community in being prepared to accept any development in the north-west quadrant.
52. **Calverton Parish Council consider that it is imperative that the Inspector should hold a further examination hearing session to explore the revisions to Policy LPD63.**

Anthony Northcote *HNCert LA(P), Dip TP, PgDip URP, MA, FGS, ICIQB, MInstLM, MCMI, MRTPI*

NEIGHBOURHOOD-PLAN.CO.UK

Planning Advisors to Calverton Parish Council and the Calverton Neighbourhood Plan

11th April 2017