



Independent Examination of the Gedling Local Planning Document

Matter 6: Housing Allocations

Calverton Parish Council (Original Comment ID b/203, b/217, b/223)

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Issue 6a: General Questions

Q1. Was the site selection process robust? Was an appropriate selection of potential sites assessed? Were appropriate criteria taken into account in deciding which sites to select and was the assessment against these criteria robust?

1. Calverton Parish Council as we set out under Matter 2 do not consider that the Sustainability Appraisal (SA) accompanying the Publication Gedling Local Planning Document represents a sound basis on which to base the decisions taken in the LPD, particularly in relation to decisions regarding site allocations and the review of the Green Belt.
2. In particular the SA does not produce a mechanism for comparing alternatives in a quantifiable manner. It would appear that factors have not been assessed consistently between the sites across an individual settlement.
3. In Calverton 25 sites have been considered as 'reasonable alternatives' in the SA. The choice of the site boundaries for these sites appears to be based on non-planning factors, perhaps land ownership or how they have been suggested over time through the SHLAA process. This represents an illogical process in the view of Calverton Parish Council, as many of those sites in isolation would be remote from the village and could only realistically be considered in collaboration with other sites. As such the SA for sites should have taken a strategic overview, grouping sites where relevant. The identification of Calverton as a Key Settlement for Growth with a housing requirement to match requires in the view of the Parish Council an allocation of a strategic scale.

4. Consequently we consider that the following 16 sites should have been grouped for consideration in the SA:
 - North-West (6/662; 6/47; 6/665; 6/921; 6/35; and 6/37)
 - North East (6/588; 6/587; 6/834; 6/772; and 6/661)
 - South West (6/544; 6/33; 6/780; 6/45; and 6/36)
5. Of the remaining sites, as 2 sites 6/686 (Cherry Tree) and 6/130 (Dark Lane) have planning permission, we consider that these should not have been assessed. In addition we do not agree that the 3 sites 6/664; 6/774; and 6/775 actually comprise 'reasonable alternatives' in the SA.
6. The outstanding 4 sites 6/770; 6/289; 6/540; and 6/649 would then need to be assessed on an individual basis as they are remote from other sites.
7. It is considered that too much emphasis has been placed by the LPA on the process of the SA in order to meet the statutory obligations, rather than the SA having an effective input into the actual development of policies and the choice of sites.
8. We note that whilst the methodology for identifying 'Reasonable Alternative Sites' was clearly defined (although we do disagree that 3 of those sites are actually realistic reasonable alternatives), the subsequent allocations then made from those sites was not. It is stated (LPD/GRO/05, paragraph 3.2) that the SA aided the selection of sites from the 'Reasonable Alternatives'. There was no transparency of process. In the case of Calverton, the process underpinning the shortlisting and final allocation of sites was completely opaque.
9. There does not appear to be assessment in the SA as to the relative merits of providing a single strategic site or multiple allocations to meet the overall housing numbers. In the view of the Parish Council a single strategic allocation provides an opportunity to achieve a comprehensive development which can deliver a more comprehensive range of housing to meet the needs of local residents, and gives a more realistic opportunity to deliver the infrastructure improvements necessary to deliver almost 25% growth in the village over the plan period. In addition the provision of a range of sites is likely to lead to more safeguarded land being retained (due to the natural defensible boundary of Oxton Road) which as a consequence is likely to result in higher levels of future growth in Calverton beyond this plan period.
10. Calverton Parish Council do not consider that the SA appropriately scores certain factors in the required objective, robust and quantified way in relation to the site selection analysis in Calverton.

11. Gedling BC undertook a comprehensive Masterplanning process for key settlements, the work for Calverton was undertaken by URS (now AECOM) and was published in April 2014 (LPD/GRO/02). This document involved engagement with local residents and in paragraph 5.2.1 it clearly identified the outcomes relating to strategic spatial options from the workshops as:

- *“Development to south of village is not suitable for reasons including impact on natural and historic landscape, ecology, flooding and access;*
- *Development north-west of village is preferred as it uses lower-quality land, flood risk is lower, access is easier and there is space for new facilities;*
- *Majority preference for lorry park at Calverton Colliery to be redeveloped for housing;*
- *Majority preference for all new development to be in single strategic location;*
- *Competing opinions on whether development of the cemetery site is desirable;*
- *Small majority in favour of relocating employment elsewhere in the village if colliery site redeveloped for housing;*
- *Little support for development to east, west of north-east of village, including development of Flatts Lane timber yard;*
- *Development in location less likely to increase traffic on Main Street preferable; and*
- *George’s Land to south of village narrow and winding, cut off in winter and generally unsuitable for higher levels of traffic.”*

12. The Masterplan conclusion in paragraph 5.2.4 was therefore: *“The three sources of evidence used are relatively consistent in suggesting that the south of the village would be the least suitable direction for growth. The three sources are also relatively consistent in suggesting that the north-west is the most suitable direction for growth on a range of criteria, including environmental quality of land, flood risk, access to the transport network and the space to provide the range of supporting facilities a development of this scale would require. Based on the evidence we have seen, we agree with these conclusions, and also note that concentrating the growth in a single place would also result in reduced construction and visual impact, as well as a critical mass of population to support new facilities and services nearby. Concentrating the growth in a single place is also the preferred option of local residents.”*

13. Calverton Parish Council do not consider that the selection of Site H15 to the south of Main Street has taken into account the evidence from the LPA’s own Masterplanning process for Calverton (LPD/GRO/02). The site selection process has not been undertaken in a sufficiently robust manner and the allocation of site H15 is unjust and unsound.

Q2. Are there any significant factors that indicate that any sites should not have been allocated?

14. Calverton has one third of Gedling Borough's total number of SAMs (noted in the 2013 Scoping Report: LPD/REG/10). Two Iron Age hillforts are located on Calverton's southern ridgeline.
15. It is made clear in Calverton's Submission Neighbourhood Plan that the settings of the Scheduled Ancient Monuments, as well as the Conservation Area, are of great importance to the integrity of the historic landscape of the landscape to the south of Calverton, referred to in the emerging Neighbourhood Plan as the 'Southern Ridge Area'.
16. Many non-designated heritage assets of local interest are also detailed in the additional 'Southern Ridge Area Evidence' document, submitted alongside the Calverton Neighbourhood Plan. It is of significant concern to Calverton Parish Council that there has been almost no consideration of the hillside settings of the Iron Age hillforts as part of the LPD process and the underpinning SA.
17. Two key studies that help inform the Sustainability Appraisal and should have identified the importance of the settings of the Iron Age hillforts are the Green Belt Assessment (LPD/GRE/02) and the Heritage Assets study (LPD/HIS/01). Neither of these studies reference Calverton's Scheduled Ancient Monuments in their assessments of individual sites.
18. As detailed in the Calverton Neighbourhood Plan supporting document 'Evidence: Southern Ridge Area' (EX/38), the landscape to the south of Main Street is a highly valued local visual amenity that is regarded as a cohesive whole. The LPD is underpinned by an analysis of individual sites considered in isolation, priority appears to have been given to the impact that development would have when viewed from the wider landscape, rather than from the perspective of residents within the village. This has resulted in a significant disparity between the conclusions reached in the LPD SA and Calverton's Submission Neighbourhood Plan (EX/36).
19. The Landscape & Visual Analysis (LPD/NAT/01) has not identified/given adequate weight to locally important visual receptors in conducting the assessment. Permissive paths and rights of way on the lower lying slopes of the land to the south of Main Street provide not only a means of accessing the higher areas of the Southern Ridge, but also a valuable amenity for residents to enjoy easy access to countryside that is contiguous with the built-up area.
20. Calverton Parish Council consider that there are significant factors which mean that Site H15 should not be allocated and should be removed from the LPD.

Q3. Is there any risk that site conditions and constraints might prevent development or adversely affect viability and delivery?

Q4. Are the allocated sites viable and deliverable, having regard to the provision of the necessary infrastructure, affordable housing and other facilities, and taking account of environmental constraints?

21. 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 will be set out in our evidence under Matter 8. We also addressed this issue of deliverability under Matter 5. This site is within the ownership or control of Langridge Homes, a small local family run business who presently have three sites being marketed at Church Farm, Ripley; The Willows, Leabrooks; and Woodview, Calverton.
22. Langridge Homes have a poor record of housing delivery, they commenced the Woodview development on Longue Drive in Calverton many decades ago, believed to be in the 1980s. This development is still not completed and according to Housing Background Paper Addendum (EX/22) the LPA identifies that there are still some 32 units to be developed over the 5 year period 2016-2021. At Church Farm Ripley according to the Langridge Homes website (as at 12th January 2017) some 12 units are still to be developed out a scheme illustrated on the Langridge site plan to be 44 units. At Church Farm Ripley according to the Langridge Homes website (as at 12th January 2017) some 11 units are still to be developed out a scheme illustrated on the Langridge site plan to be 29 units. This leaves a total of 55 units to be developed out of some 111 units, thereby some 49.5% of the schemes which Langridge have underway is still to be developed.
23. In addition in Calverton, Langridge Homes are developing the site H14 on Dark Lane. This site was allocated in the previous Local Plan adopted in 2005, and an application for outline planning permission was first applied for in 2005. The reserved matters application was applied for in 2012 but was 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. The LDP plan period is only for an 11 year period post-examination, i.e. up to 2028. Based on the inability of Langridge Homes to commence the Dark Lane development until 12 years post adoption, Calverton Parish Council considers that there is no evidence to demonstrate that site H15 could actually be delivered within the plan period.
24. Calverton Parish Council note that there is a disparity between the LPA position in the Housing Background Paper Addendum (EX/22) and the representation from Langridge Homes (b/176). Langridge Homes indicate that development will not commence until 2019 with a development rate

of 40 units per annum, whereas the LPA indicate development commencing a year earlier in 2018 at a rate of 25 units per annum. However the LPA is obviously unclear in their view as to when Site H15 may come forward as in the Housing Implementation Strategy (LPD/HOU/01) they do not anticipate Site H15 coming forward until the year 2020/21. In our view this lack of clarity completely undermines any suggestion that Site H15 has any realistic prospect of making any contribution to a deliverable 5 year land supply.

25. On a more positive note, as we identified under Matter 4, the Parish Council strongly consider that site H16 on Park Road is deliverable, this site is proposed to be developed by Persimmon Homes. They have held local community pre-application consultation which identified overwhelming public support. They have also undertaken effective pre-application consultation with the LPA, other consultees and the Parish Council/Neighbourhood Plan Working Group. As such the Parish Council has the confidence that Persimmon Homes are in a position today to submit the necessary planning application and that the scheme they are likely to submit would accord with the LPD and the Submission Neighbourhood Plan. We are aware that Persimmon Homes has made a strategic investment in opening a new office in Mansfield to allow a focus on delivering this site and as such, being a large developer will have the ability to deliver the housing numbers on site H16 to contribute as required to a deliverable 5 year land supply.

Q5. Are the detailed requirements for each of the allocations clear and justified? Have site constraints, development mix and viability considerations been adequately addressed? Are the boundaries and extent of the sites correctly defined?

26. Calverton Parish Council would not support any overall increase in the housing figure for Calverton than the LDP proposes. We do however support the redistribution of housing from site H15 which we consider should be deleted and added to site H16 at Park Road. The Parish Council also recognises the potential 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 (EX/36). The developers of site H16, Persimmon Homes have supported a proposed access from Oxton Road.
27. The Submission Calverton Neighbourhood Plan (EX/36) also sets out a number of requirements regarding the inter-relationship between Site H16 and existing development on North Green and Park Road. This also means that some potential need for some flexibility within site H16 regarding the extension of the site north to Oxton Road can be justified. The Submission Calverton Neighbourhood Plan also identifies a need for Site H16 to deliver a housing mix including bungalows,

this will have a minor impact on density assumptions which has been discussed with Persimmon Homes in pre-application discussions involving Calverton Parish Council.

Q6. For those sites that have been removed from the Green Belt, have exceptional circumstances been demonstrated to enable the alteration of existing Green Belt boundaries? Have all potential sites in the Green Belt been considered for inclusion based on clear criteria?

28. Calverton Parish Council have had fundamental concerns regarding the two stage approach to the removal of land from the Green Belt, firstly through the ACS and then through the LPD. As a consequence the Parish Council undertook a legal challenge to the ACS **[2015] EWHC 1078 (Admin)**, although this challenge was unsuccessful. However the obiter given by Mr Justice Jay in that case regarding the interpretation of the NPPF is highly relevant to this Examination. We set out our full case on the Green Belt release under Matter 4 and do not repeat it all here for brevity.
29. The ACS Policy 3 has established in our view only the principle that there is a need to review the Green Belt boundary it has not, with one exception at Field Farm, made any decisions regarding the quantum of land to be removed from the Green Belt or which areas of land should be removed. The ACS does however set out a framework for making the decisions in the LPD regarding the review of the Green Belt boundaries.
30. ACS Policy 3 clearly defines the release of Green Belt land being the third and final choice in a sequential approach to deciding what land should be allocated for development in the LPD. The ACS also sets out clear criteria which must be met in order for any site to be removed from the Green Belt. These criteria are:
- a) the statutory purposes of the Green Belt, in particular the need to maintain the openness and prevent coalescence between Nottingham, Derby and the other surrounding settlements;
 - b) establishing a permanent boundary which allows for development in line with the settlement hierarchy and / or to meet local needs;
 - c) the appropriateness of defining safeguarded land to allow for longer term development needs; and
 - d) retaining or creating defensible boundaries.
31. Calverton is encircled by the Greater Nottingham Green Belt, as such any extension of the existing built footprint brings into play the need to consider the appropriateness of releasing that land from the Green Belt.

32. We do not agree that the Green Belt Stage 2 assessment considered in paragraph 4.13 (LPD/GRE/02) has been based on the 'Reasonable Alternative' sites. In our evidence to the SA in Matter 2 we identified a deficiency in relation to the SA by 'salami slicing' sites which plainly need to be considered in the form of holistic groupings of sites. As such this SA shortcoming has been perpetuated as a further deficiency in the Green Belt Assessment. Although it is noted that the Green Belt Assessment does group some of the sites looked at individually in the SA, this further undermines the principles of the SA assessments.
33. The Green Belt Assessment in Stage 2 concluded that Site 1 is the most appropriate for release, followed by Sites 2 and 9. Site 9 at Dark Lane should not have been assessed given that this site represents a committed site with extant planning permission on which development has commenced. Sites 1 & 2 are within the North-West Quadrant of Calverton, Site 1 includes the new cemetery, the Miners Welfare Sports Facilities and an established employment area. As such the Parish Council consider that Site 1 could not be delivered or developed even if released. This leaves Site 2, which includes the Park Road site H16 and the safeguarded land as the sequentially preferable site to be released.
34. Site 13 which is the Main Street site H15 scores worse than Site 2 in the LPA's own assessment. It is our view that in the Stage 1 and Stage 2 assessment process, having reached the conclusion that the North-West Quadrant was the most appropriate strategic direction for Green Belt release. Then the Stage 2 assessment should only have looked at the constituent parts of that strategic quadrant. Given that Site 2 (including Park Road site H16) in this quadrant allows more than sufficient quantum to deliver the housing requirement then no exceptional circumstances can be demonstrated to release Site 13 (Main Street site H15). Consequently Calverton Parish Council consider that the Green Belt Assessment (LPD/GRE/02) has erred in law in relation to proposing to release site H15 without demonstrating the required exceptional circumstances.
35. In the case of site H15, a simple hawthorn hedgerow is regarded as a strong green belt boundary which is considered not to represent a long-term defensible boundary in any manner, particularly given the aim of the developer is clearly identified through objections to the LPD to extend this site significantly to the south. Gedling BC have concluded not to allocate land north of Main Street in Ravenshead due to lack of community support. This same reason would equally apply to site H15 in Calverton. GBC has always been aware that there is no community support for development to the south of Main Street in Calverton, if this is a justifiable reason not to allocate land in Ravenshead then it must also be a reason not to allocate site H15 in Calverton.

Conclusion and Modifications Sought

36. The Parish Council is of the view that the Gedling Local Planning Document could only be made Sound by the LPA proposing Main Modifications as follows:

- Delete site H15 on Main Street in Calverton and reinstate the Green Belt boundary to that currently in place; and
- Incorporate the redistribution of housing from site H15 which we consider should be deleted and added to site H16 at Park Road. The Parish Council also recognises the potential 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.

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1st February 2017