



Independent Examination of the Gedling Local Planning Document

Matter 2: Sustainability Appraisal Issue

Calverton Parish Council (Original Comment ID a/118)

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

Issue 2a: Soundness of the Sustainability Appraisal

Q1. Is the Plan based on a sound process of Sustainability Appraisal?

Q4. Does it test reasonable alternatives? Has the Sustainability Appraisal been robustly prepared with a comparative and equal assessment undertaken of each reasonable alternative?

1. Calverton Parish Council 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. The colour-coded matrix method of assessment has the potential to produce total scores for comparative purposes (with the simple addition and subtraction of positive and negatives awarded for each criterion), but this step is not taken. However 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:
 5. North-West (6/662; 6/47; 6/665; 6/921; 6/35; and 6/37)
 6. North East (6/588; 6/587; 6/834; 6/772; and 6/661)
 7. South West (6/544; 6/33; 6/780; 6/45; and 6/36)
8. Of the remaining sites, as 2 sites 6/886 and 6/130 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.
9. The outstanding 4 sites 6/686; 6/289; 6/540; and 6/649 would then need to be assessed on an individual basis as they are remote from other sites.
10. 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.
11. 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.
12. 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.

13. If the sites had been grouped for consideration in the SA as we suggest then the site H15 as part of the South-West Quadrant would have been assessed as in our view using the methodology in LPD/REG/11 as:

Housing	++	
Health	-	(Not within 400m of the GP Surgery)
Heritage and Design	--	(Impact on Heritage Assets)
Crime	0	
Social	0	(Not within 400 m of existing community facilities)
Environment, Biodiversity and GI	--	(TPOs and Loss of Open Space)
Landscape	--	(Landscape impact)
Natural Resources	-	(Loss of Agricultural Land)
Flooding	--	(Relationship to Main Street surface water flooding)
Waste	-	
Energy and Climate Change	0	
Transport	-	(Not within 400m of bus stop)
Employment	0	
Innovation	0	
Economic Structure	0	

14. The Green Belt Assessment (LPD/GRE/02) in its Stage 1 analysis used strategic quadrants and groups of sites, this is inconsistent with the SA approach and in our view the methodology used in the Green Belt Assessment should have also been undertaken in the SA. Our detailed comments on the Green Belt Assessment is set out in our evidence to Matter 4 on the Green Belt. The Green Belt Assessment Stage 1 analysis clearly concluded that the North-West of Calverton is by some way the most appropriate quadrant in which to consider Green Belt release. Calverton Parish Council agree with the fact that the North-West of Calverton is the most appropriate location for Green Belt release, if such release is justified by exceptional circumstances. If the SA had pursued a similar quadrant or group of sites approach then we consider that the SA conclusions would have been materially different such that as we set out above Site H15 would have failed in the SA process.

15. Safeguarded land is not assessed per se for that actual role by the SA, it may have been assessed on a site by site basis for housing but this is not strictly the same as identifying it as safeguarded land.

16. Whilst the plan makes an assumption that the safeguarded land will not be needed within the plan period - this lack of appraisal for this purpose is in our view a fundamental flaw in the LPD process. Safeguarding occurs to ensure continuity of housing supply both within and beyond the plan period. The SA cannot in our view reasonably adopt a position that assumes that one of the principal reasons for requiring safeguarding will not apply over the course of the plan period. In this context, it should be noted that GBC granted planning permission on safeguarded land because of a housing land supply shortage during the last plan period, despite a large supply of allocated, undeveloped sites. We also do not consider that the SA has considered sufficient reasonable alternatives for safeguarded land across the whole plan area, in particular in the other key settlements for growth.

Q5. Is the Sustainability Appraisal decision making and scoring robust, justified and transparent?

17. 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. To underpin our response made to Questions 1 and 4 we make the following detailed interpretation of incorrect SA scoring:

SA Objective 3: Heritage & Design

18. 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.
19. 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'.
20. 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.
21. 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.

22. The Sustainability Appraisal Publication Draft Appendix D: Reasonable Alternative Sites for Housing in the Key Settlements (LPD/REG/15) also makes absolutely no reference to Calverton's Scheduled Ancient Monuments.
23. Appendix H of the Sustainability Appraisal (LPD/REG/19) makes brief reference to the Fox Wood Scheduled Ancient Monument with respect to H14 (Dark Lane) - a site with extant planning permission that was allocated during the previous local plan.
24. Historic England has submitted comments regarding site H14 (Dark Lane) to GBC in which consideration was given to the harm that development would have on the designated heritage assets of the conservation area and the scheduled ancient monument at Fox Wood. Calverton Parish Council shares the position of Historic England that the hillside constitutes the setting of the Iron Age hillfort at Fox Wood and that this setting will be harmed by the Dark Lane development.
25. Calverton Parish Council accepts that, as a site with an extant planning permission on which development has now commenced, there is no scope to avoid the development of site H14, even though it is not in conformity with the policy context of the ACS Policy 11: Historic Environment, which seeks to conserve and enhance *"elements of the historic environment which contribute towards the unique identity of areas and help create a sense of place"*. The SA site assessment process also draws attention to the shortcomings of site H14 which further supports the consensus view of the local community that site H14 should never have been allocated previously and that GBC were fundamentally wrong in granting it planning permission.
26. Calverton Parish Council is concerned that Historic England's views, with reference to site H14, have been misrepresented in the LPD's Sustainability Appraisal (LPD/REG/19, page 42, 3. *Heritage & Design*) and that this could have had implications for the protection of Calverton's historic ridgeline during the LPD site selection process. Not addressing the site assessment process on a grouped basis has then perpetuated this misrepresentation.
27. Consideration of Historic England's comments in full would help to provide an informed context for assessing the potential impact of future development to the south of Main Street, not only on the scheduled ancient monument hillfort of Fox Wood, but also, through extrapolation, to the similar type of designated heritage asset at Cockpit Hill (Ramsdale).

28. Modifications are sought to ensure that the LPD and its SA are in conformity with Calverton's Submission Neighbourhood Plan which represents the values held by the local community on key environmental and social issues. There are significant differences between the areas of greatest landscape value identified through the LPD and that considered to be of the most value to the local community through the Neighbourhood Plan processes.
29. The methodology adopted in the Landscape & Visual Analysis (LPD/NAT/01) was not sensitive enough to produce accurate conclusions. This resulted in the LPD identifying the highest value landscape as an area that slopes down to the B6386 Oxton Road in the current safeguarded land.
30. Development *"only forms part of the southern part of reasonable alternative site 6/47 to avoid areas of higher landscape value to the north"* and measures seek to *"mitigate against long range views into the site from the north and east"* (LPD/REG/19).
31. This landscape is not visible from the built-up area of Calverton and the principal visual receptors are located on a busy road - mostly screened from the landscape by substantial hedges - and the former colliery spoil heap. Only limited glimpses of this area are therefore generally seen, the landscape setting which is of the highest value to residents in Calverton is that to the south of the village rising up to the ridgeline. Community value and use of a landscape should be built into the assessment process which the SA has not taken into account.
32. The SA uses overall numerical values assigned to each site in the Landscape & Visual Analysis of Potential Development Sites (LPD/NAT/01) to determine the potential landscape impact in its assessment of Reasonable Alternative Sites (LPD/REG/15).
33. The Landscape & Visual Analysis of Potential Development Site study was conducted by an outside consultancy. Its conclusions inform the Sustainability Appraisal in an unmodified form. No consideration is given to representing the views of the local community directly in the landscape appraisal. It is the view of Calverton Parish Council that the Landscape & Visual Analysis of Potential Development Sites (LPD/NAT/01) was flawed in its approach and as such the SA is flawed as a consequence of slavishly following its conclusions.
34. The Landscape & Visual Analysis uses proxy indicators to form subjective judgements on key elements of landscape assessment such as recreation value, visual value and perceptual aspects (Appendix B, LVIA, page 230). The LVA Methodology details that the visual receptors should be considered from the perspective of *"the potential users of the study area who will be affected by*

changes in view brought about by the development of the site". (Appendix B, 13.2, page 231). The conclusions reached in the study indicate a failure to adequately identify and reflect the views of those *"potential users"*.

35. In contrast, the Submission Calverton Neighbourhood Plan is based directly on evidence provided by actual users of the area and, therefore, provides a more accurate representation of landscape value to the user. Taking this user view of the actual local community rather than a perceived view of a non-local expert into the methodology would have resulted in different conclusions in the Landscape & Visual Analysis and then subsequently in the SA assessment of the reasonable alternative sites in Calverton.
36. As detailed in the Calverton Neighbourhood Plan supporting document 'Evidence: Southern Ridge Area', 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.
37. 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.
38. The Landscape & Visual Analysis does not reflect the way in which the landscape is accessed and valued. For example, 'Reasonable Alternative Site' 6/36 is assessed as being of lower visual value because it is "visually contained", even though the value of landscape views both within and through the site contribute significantly to the amenity of a well-used footpath that runs across it. Similarly, the network of well-used paths in and around Ramsdale Golf Course and the community woodland of Hollinwood (Millennium Wood) proximate to sites H15 and 'Reasonable Alternative Sites' 6/780, 6/33 and 6/45 are given insufficient weight as visual receptors. In addition, the contribution that potential development sites make to the overall landscape, as viewed from higher elevations within the Southern Ridge Area, is inadequately assessed.

39. As detailed in the Submission Neighbourhood Plan's Southern Ridge Area Evidence document, except for one site, all key views of 'Reasonable Alternative Sites' to the south of Main Street are from elevations no greater than 6m above the highest point within the respective sites.

Q7. Does it represent the most appropriate strategy in the circumstances?

40. Calverton Parish Council do not consider that the SA accompanying the Publication Gedling Local Planning Document represents the most appropriate strategy for the reasons set out above.

Conclusion and Modifications Sought

41. Calverton Parish Council does not consider that the SA accompanying the Publication Gedling Local Planning Document is Sound and as such renders the LPD unsound.

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

- Undertake the SA Appraisal of proposed housing sites in Calverton on a grouped quadrant basis;
- Build community value into the landscape analysis in the SA for all proposed allocations;
- Undertake consideration of 'Reasonable Alternatives' for Safeguarded Land and undertake an SA Appraisal of those sites specifically for that purpose; and
- Delete site H15 on Main Street in Calverton

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

NEIGHBOURHOOD-PLAN.CO.UK

Planning Advisors to Calverton Parish Council and the Calverton Neighbourhood Plan

17th January 2017