



Independent Examination of the Gedling Local Planning Document

Matter 5: Housing

Calverton Parish Council (Original Comment ID b/223)

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Issue 5a: Housing Provision and Distribution

Q1. Is the overall level of housing provision and its distribution in the Plan consistent with the ACS? [Policy LPD 63]

Q2. Although the distribution of housing differs in the Plan to that set out in the ACS, would it accord with the Spatial Strategy of the ACS?

Q6. Is the distribution of homes between the Key Settlements appropriate? How has this distribution evolved? Is it clear how and why the housing requirement has been reduced in the Key Settlements? [Policy LPD 63]

1. Calverton Parish Council support the general approach of Policy LPD63 which proposes a lower housing figure for Calverton than had previously been suggested. The Parish Council would not support any increase in the housing figure for Calverton or any redistribution to Calverton from other settlements.
2. Calverton Parish Council is satisfied that the housing level currently proposed for Calverton in the LPD is more sustainable and achievable than the higher quantum proposed in the ACS. However, there is significant concern with respect to the amount of safeguarded land proposed for the village; the level is disproportionate relative to Calverton's position in the borough's identified settlement hierarchy.
3. It is a matter of record that Calverton Parish Council did not accept Calverton's disproportionate share of the ACS Key Settlement housing total following an increase during the final stages of the ACS

process, in response to the LPA position that the Gedling Colliery site was no longer deliverable. Despite assiduous efforts, Calverton Parish Council failed to obtain any evidence from GBC to justify the sudden hike in housing figures for Calverton, relative to the other Key Settlements (from its equal share of 900 houses divided between the key settlements). The decision appeared to be based purely on SHLAA site availability. Since then, it is noted that there has been a significant increase in SHLAA site availability at Ravenshead. Having suffered what was considered to be a disproportionate and unjustified increase in response to the non-deliverability of Gedling Colliery, it has been the consistent view of Calverton Parish Council that any decreases in housing totals in response to the subsequent inclusion of sites like Gedling Colliery should disproportionately favour Calverton.

4. Calverton Parish Council as we have expressed under Matter 4, is of the opinion that a significant adjustment of the distribution of safeguarded land across the borough is required in order to ensure that the LPD is sound. If achieving conformity with the ACS Spatial Strategy requires additional sites to be identified, these should firstly be sought from SHLAA sites within the PUA. If this process fails to identify a sufficient area of alternative land, consideration should be given to identifying alternative sites within the other two key settlements of Ravenshead and Bestwood Village.
5. 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.
6. Underpinning the legal challenge mounted to the ACS by Calverton Parish Council was the concern that the ACS two stage approach with regard to Green Belt release was unable to properly allow the decision maker to adequately consider the impact of the spatial distribution strategy on the acceptability or not of the sites then necessary to be released from the Green Belt to deliver the growth. As such a rigid adherence in the LPD to the ACS distribution figures cannot be expected, GBC as they have undertaken the SA and other assessments such as the Green Belt Assessment can rightly point to a spatial distribution strategy that may differ slightly to the ACS. Notwithstanding our concerns on the detailed findings in the SA and the Green Belt Assessment, we do consider that a reduction in the proportion of growth identified for the Key Settlements for Growth overall is justified and Sound in principle.
7. The total at the three key settlements have been reduced from 1,945 homes as set out in Policy 2: Spatial Strategy of the ACS to 1,515 homes. Paragraph 4.13 of the Housing Background Paper

(LPD/BACK/01) states “It is considered that the most appropriate starting point for decisions on how to divide the remaining over supply between the three key settlements is to pro-rata it between them, based on their share of the housing figure identified in the Aligned Core Strategy”. As such the figures for the Key Settlements are no longer up to figures but are expressed as approximate minimum figures. We support in principle the use of a pro-rata reduction in housing numbers for the three key settlements as they are judged in the ACS and LPD to be equally sustainable settlements. Calverton Parish Council does not support the distribution of sites within Calverton itself, we will however respond to that issue under Matter 8.

8. Calverton Parish council are however concerned that the distribution of safeguarded land under Policy LPD16 does not reflect the same spatial distribution which therefore results in an unbalanced overall approach towards future housing development. Calverton Parish Council is satisfied that the housing level currently proposed for Calverton in the LPD is more sustainable and achievable than the higher quantum proposed in the ACS. However, there is significant concern with respect to the amount of safeguarded land proposed for the village; the level is disproportionate relative to Calverton’s position in the borough’s identified settlement hierarchy.
9. However, over one third of the total amount (by area) of safeguarded land identified in the LPD for the Gedling Borough plan area adjoins Calverton. This is significantly higher than the amount of safeguarded land allocated at the other two key settlements of Bestwood (8.5% of the total by area) and Ravenshead (no safeguarded land). It is important to note that, as supported by the Aligned Core Strategy (main document, sustainability appraisal and evidence base) the Key Settlements have been assessed as being equally sustainable.
10. As has already been noted there is no evidence-based justification for the significantly different levels of development proposed for the 3 Key Settlements - the ACS process having assessed them as being equally sustainable. This disparity in the Key Settlement housing levels is significantly compounded by the proposed distribution of safeguarded land. It is important, therefore, that the LPD does not create a policy context that has the potential to reverse the settlement hierarchy identified in the ACS, should anticipated delivery rates/assessed housing need change during the plan period.

Issue 5b: Housing Supply in the Plan period

Q8. Have sufficient sites been allocated in the Plan to meet the target of 7,250 homes set out in the ACS? [Policies LPD 63 – LPD 68 and Policy LPD 70]

Q10. Should a buffer be included? If so, what level should it be? Specifically, have sufficient sites been allocated to meet the housing target and should more housing be allocated?

11. Calverton Parish Council would not support any overall increase in the housing figure for Calverton than the LDP proposes. We do 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. The developers of site H16, Persimmon Homes have supported a proposed access from Oxton Road.

Q14. What evidence is there to support build out rates for each site, in particular larger sites?

Q16. Are all of the housing sites allocated in Policies LPD 64 to LPD 70 justified and deliverable in terms of national policy and guidance and as indicated in the Housing Trajectory? [Appendix A]

12. 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. However 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.

13. 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.

14. 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.

15. 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 identifies that it expects 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. This already demonstrates that the LPA recognise that Langridge Homes cannot deliver their existing H14 site at Dark Lane as quickly as originally envisaged.
16. In the Housing Background Paper Addendum (EX/22) the LPA identifies that it now considers that all the 75 proposed units on site H15 on Main Street are to be developed in the 5 year period 2016-2021. However the Housing Background Paper (LPD/BACK/01) indicated that the LPA only expected 20 of these units to be developed in the 5 year period 2016-2021. The LPA has not explained specifically in relation to site H15 how the adjusted figure is substantiated by evidence. Therefore we can only assume that it relates to the change in overall delivery assumptions which have been amended as follows:

Housing Background Paper (LPD/BACK/01)

On sites up to 10 homes, the completion rate is 5 per year;

- On sites up to 250 homes, the completion rate is 20 per year;
- On sites up to 1,000 homes, the completion rate is 40 per year; and
- On sites over 1,000 homes, the completion rate is 100 per year.

Housing Background Paper Addendum (EX/22)

On sites up to 10 homes, the completion rate is 5 per year;

- On sites up to 250 homes, the completion rate is 20-40 per year;
- On sites up to 1,000 homes, the completion rate is 40-100 per year; and
- On sites over 1,000 homes, the completion rate is 100 per year.

17. 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.
18. Calverton Parish Council do not consider that the LPA has sufficient evidence to demonstrate that site H15 is deliverable during the period 2016-2021 as they suggest. Having regard to the representations made on the LPD we note that Langridge Homes has stated: *“Langridge Homes Ltd is a significant landowner in Gedling, and will be responsible for ensuring the implementation of many key aspects of the Local Plan by bringing forward land for development.”*
19. From the representations on the LPD (b/174, b/175 & b/176) we can see 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

They are also promoting the following omission sites:

- Extension to Willow Farm (Site Allocation H3) for 180 units
 - Extension to Westhouse Farm (Site Allocation H12 in the Safeguarded Land) for 313 units
 - Extension to Main Street (Site Allocation H15) for 15 units
 - A new allocation at Land off Longue Drive in Calverton for 120 units
20. In representation (b/174) Langridge Homes in relation to Site H3 state: *“The site is...available and deliverable now.”* However they go on in their representation to make it clear that they do not expect any dwellings to be delivered until 2020 and then at a rate of 40 units per annum. In the same representation Langridge Homes in relation to Site H5 state: *“The site is...available and deliverable now.”* However they go on in their representation to make it clear that they do not expect any dwellings to be delivered until 2019 and then at a rate of 40 units per annum. However we note that the LPA in the Housing Background Paper (EX/22) assume development at a rate of 50 units per annum starting a year earlier in 2018.
21. Again in representation (b/175) Langridge Homes in relation to Site H12 state: *“The site is...available and deliverable now.”* However they go on in their representation to make it clear that they do not

expect any dwellings to be delivered until 2019 and then at a rate of 40 units per annum. However we note that the LPA in the Housing Background Paper (EX/22) assume development at a rate of between 9 and 81 units per annum starting a year earlier in 2018.

22. It is also noted that Langridge indicate that they had pre-application discussions with the LPA on both sites H3, H5 and H12 in 2013, this demonstrates an intervening time period in Langridge's own representation of needing 6 or 7 years from pre-application discussions to delivering any units on site.
23. This must further call into question the thought that Langridge can start delivering units on site H15 Calverton in 2018 as the LPA suggests in the Housing Background Paper (EX/22). Particularly given the strong public opposition to this site and the fact that in the view of the Parish Council it is not supported by the Submission Calverton Neighbourhood Plan.
24. On a more positive note, 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.

Q17. Should the housing sites allocated in Policies LPD 64, LPD 65, LPD 66, LPD 67, LPD 68 and LPD 70 which benefit from planning permission or a resolution to grant planning permission, or are under construction, be formally allocated in the Plan? Have these sites been assessed using the same site selection process? Have any been found to be unacceptable and allocated only because they benefit from planning permission? [H6, H9, H11, H13, H14, H19, H20 and H23]

25. Calverton Parish Council consider it inappropriate to allocate site H14 at Dark Lane in Calverton in the LPD purely because it has an extant planning permission. This approach generates a lack of public confidence in the LPD process as the community consider they are being consulted on matters upon which no changes can actually be made. This site is an existing commitment and should only be identified as such.

26. Site H14 has only been allocated because it benefits from planning permission. If the SA site selection analysis is considered (LPD/REG/19), the Parish Council consider that this site would fail the SA due to the heritage impacts indicated by the LPA. As we have identified in our evidence on the SA in Matter 2, we consider that the LPA has misinterpreted the SA with regard to site H15. Some of those same aspects of misinterpretation and downplaying also apply in relation to site H14, particularly in relation to heritage, flooding and landscape impact.

Q24. Is the type and size of housing provided/planned meeting/likely to meet the needs of the area?

27. Calverton Parish Council consider that given the ageing population of the rural parishes within Gedling there is a need within areas such as Calverton for the provision of a housing mix to include bungalows. The Calverton Neighbourhood Plan is addressing this issue and positive pre-application discussions with Persimmon Homes have indicated a willingness to provide suitable elderly housing.

Issue 5c: 5 Year Housing Land Supply

Q33. What evidence is there to support the projected completions on the sites expected to deliver homes within the 5 year period 2016 – 2021, in particular on allocated sites which do not currently have planning permission?

Q34. What evidence is there to support build out rates for each site, in particular larger sites?

28. Calverton Parish Council do not consider that site H15 is deliverable during the plan period having regard to national policy or guidance. We do not consider that the proposed build rate for site H15 is justified by evidence. Our full case on this has been set out above under Questions 14 and 16 in Issue 5b, we do not repeat it here for brevity although it is equally valid for Questions 33 and 34.

Conclusion and Modifications Sought

29. Calverton Parish Council support the general approach of Policy LPD63 which proposes a lower housing figure for Calverton than had previously been suggested. The Parish Council would not support any increase in the housing figure for Calverton or any redistribution to Calverton from other settlements.

30. The Parish Council is of the view that the Gedling Local Planning Document could only be made Sound by substantial additional work involving an adjournment of the Examination to allow the LPA to propose Main Modifications as follows:

- Delete site H15 on Main Street in Calverton;
- The Safeguarded Land (March 2016) document (LPD/GRE/04) needs to be reconsidered to include evidential analysis of the Policy LPD16 sites at Bestwood Village and Calverton;
- Undertake a full detailed re-consideration of 'Reasonable Alternatives' for Safeguarded Land across the Urban Area and the Key Settlements for Growth including identification of Safeguarded Land in Ravenshead and Bestwood Village to ensure that the current Green Belt boundary review can endure for the long term and that Calverton is not unduly penalised in the next Local Plan Review by having a disproportionately high percentage of the total safeguarded land; and
- Review the evidence on housing deliverability taking into account realistic lead in times for the different sizes and types of developers and taking into account the total quantum of sites within any developers control and their ability or not to deliver multiple sites.

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