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Mr N Burrows. (15189441)

St Clements Lodge, Woods Lane, Calverton

Response to Inspector's Questions

Issue 8d - Calverton

1.0 INTRODUCTION

1.1 I have been instructed to respond to the Inspector's questions in respect of issue 8d: Calverton on behalf of the landowners.

1.2 The landowners have an interest in a landholding in Calverton known as St Clements Lodge on Woods Lane on the southern side of the village. The site extends to 0.5 hectares and is located immediately west of the consented housing allocation H14 currently being developed by Langridge Homes.

1.3 The Respondent's site is recorded in the Site Selection Document for Calverton (LPD/GRO/02) as site – 6/649/ - Woods Lane. It is recorded as a previously developed site and is located in a highly accessible location close to all village amenities. The appraisal concluded that:

"The site is sustainably located and would involve the use of brownfield land. There would not be a significant visual or landscape impact from development and the site makes a limited contribution to the purposes of the Green Belt. The loss of employment would not be significant. However, access arrangements are unclear at this stage and the number of homes is small. "

The site is not being considered for allocation.

1.4 The Respondent's submission to the Publication Draft Consultation made it clear that access has been agreed via the adjoining Langridge development (H14). Nevertheless the Council's response at P112/113 of LPD/REG/04 of October 2016 does not take this statement at face value and states that:

"It has been confirmed that the developer of the adjacent Dark Lane site has agreed to provide access through to Woods Lane. However, the required changes to the extant planning permission have not yet been made. As such it is not considered appropriate to make any change to the Green Belt. Given the existing development on site a planning application could be considered under existing Green Belt policy on the redevelopment of previously developed sites through use of NPPF paragraph 89 (5th bullet)."

1.5 We attach communication and plans from Langridge Homes confirming that their site is to be re-planned to accommodate access and drainage connections to St Clements. The revised layout and scheme for St Clements Lodge shows how the site would be developed from the current Langridge scheme. Given that access appears to be the only constraint preventing the logical addition of this brownfield site to the current allocation, the certainty

of an allocation now would be far preferable to an application predicated on paragraph 89 of the NPPF.

1.6 The Woods Lane site is therefore a small, yet logical addition to the housing provision should it be deemed necessary by the Inspector to meet a minimum housing requirement.

2.0 RESPONSE TO INSPECTOR'S QUESTIONS

Issue 8d: Calverton [Policy LPD 66]

Q13 *Does the amount of housing allocated in Calverton accord with the ACS? [Policy LPD 66]*

Response – At 2.4 of the ACS (LPD/REG/01) – Spatial Objectives - the text of the document states at paragraph 2.4.1 on P21 that:

“In other parts of the plan area, the Key Settlements of Awsworth, Bestwood Village, Brinsley, Calverton, Eastwood, Kimberley (including Nuthall and Watnall) and Ravenshead will be developed to make the best of their accessibility to services and infrastructure capacity.”

Calverton is by far the largest of the freestanding settlements in the Borough and has the widest range of facilities. Paragraph 5.2 of the Part 2 Plan acknowledges that:

“Calverton has a good range of facilities compared to other similar sized settlements. These include:

- a combined secondary school and leisure centre;*
- an industrial estate;*
- three primary schools; and*
- a local centre including a library, small supermarket, doctor’s surgery and post office.”*

ACS Policy 2 – The adopted Spatial Strategy sets out at 3c) that up to 1055 homes will be developed in or adjoining the Key Settlement of Calverton. The Part 2 Local Plan Policy LPD 63 proposes only 740 however. In the Respondent’s view, therefore, the provision does not *“make the best of”* its accessibility to services and facilities and does not accord with the Spatial Objectives of the ACS.

Q14 *Is there a need to provide additional homes in Calverton? Are sufficient sites allocated for housing in the settlement?*

Response – Policy LPD 63 proposes a **minimum** of 7250 dwellings for the Borough between 2011 and 2028, of which 740 dwellings are to be allocated to Calverton. The policy specifically states a minimum provision and in the absence of any qualification that certain locations within the four tiers of the hierarchy should be restricted, it should be assumed that the 740 dwelling provision for Calverton should be considered as a minimum provision. Appendix A of the Council’s Housing Background Paper Addendum EX22 sets out the breakdown of the calculated provision for Calverton:

Calverton

| | |
|--|------------|
| Net completions 2011 to 2016 | 149 |
| Extant Planning Permissions (at 31 March 2016) | 143 |
| Sites Below Threshold | 2 |
| Site Allocations | |
| H15 Main Street | 75 |
| H16 Park Road | 390 |
| Total | 759 |
| Calverton Total Proposed | 740 |
| Difference | +19 |

The projected provision exceeds the minimum requirement by just 19 dwellings. This represents a provision of just 2.5% above the Part 2 Local Plan minimum threshold and some 40% below the ACS Policy 2 provision of up to 1055 dwellings. Moreover there is very little leeway in this provision to account for slippage and/or sites not coming forward at the densities anticipated in Policy LPD 66. Table A1 of Appendix B to EX22 assumes that sites of up to 1000 homes in moderate market locations such as Calverton will commence development in Year 6 – 2022/23. If this assumption is to be considered as a reasonable guide, there is the real prospect that the 390 dwelling allocation at Park Road will not build out in the plan period. Table A1 is not, however, consistent with the Detailed Housing Trajectory at Appendix D which suggests that the Park Road site will start to deliver from April 2017-2018. The nature and uncertainties of the housing market may suggest a start date somewhere in between but what is evident is that there is very little flexibility within the figures to meet the minimum provision for this settlement proposed by the Part 2 Plan. In short there is a need to provide additional homes and sites in and around Calverton.

The Borough Council have acknowledged that they have a recent record of persistent under delivery of housing, and prior to the examination of the Part 2 Plan had a supply estimated at 3.14 years against the requirements of the ACS (EX/23, p9) excluding sites proposed for allocation within the Plan. The Council’s Housing Background Paper Addendum (EX 22)

undertakes at paragraphs 3.27-3.31 a further assessment of the housing supply including sites allocated in the Part 2 Local Plan that are deliverable in the five year period 2016-2021 and state that the supply totals 5.01 years, an oversupply acknowledged as just 6 dwellings. This extent of 'alleged' oversupply offers no significant flexibility whatsoever and any slight delay or overoptimistic assumption on delivery on any allocated site across the Borough will bring supply down below five years. Indeed some attendees at the Examination are likely to be challenging the Council's starting figure of 5.01 years' supply.

This buffer is clearly inadequate and the Council should be looking across the Borough to increase supply to a more robust level. Any adjustment for Calverton should be proportionate and consistent with the ACS position of up to 1055 dwellings. Therefore allocation of further dwellings here would not undermine the objectives of the Aligned Core Strategy or the Part 2 Local Plan in any material context.

There are clearly a number of additional site options available around the settlement to boost the housing supply, including the Respondent's landholding referenced in the introduction to this submission, which will be accessed from the adjacent and consented allocation on Dark Lane which is already underway and delivering completions.

Q15 *Why has Calverton received the largest reduction from the figures in the ACS despite it being identified as the most sustainable of the Key Settlements?*

Response - This is primarily a matter for the Council to respond to as plan maker, yet the alleged ability to deliver more homes in and adjacent to the urban area coupled with local opposition to the level of provision ultimately confirmed in the ACS may be influencing factors.

The matter for this Inspector to consider is whether this level of reduction is justified having regard to the robustness of delivery of the housing supply – to be addressed in earlier sessions of the examination, - and having regard the relative sustainability of the other Key Settlements and Other Villages and the level of housing allocated to them in this Part 2 Local Plan.

Calverton has by far and away the greatest level of services, facilities and employment opportunities of any of the key settlements as well as a very good, regular bus service into Nottingham City Centre. Bestwood Village has some limited employment and one general store whilst Ravenshead has no dedicated employment area and a small local shopping centre. Neither Bestwood Village nor Ravenshead has a secondary school nor the frequency of bus services into Nottingham City.

As the largest settlement, Calverton also has the greatest capacity to accommodate additional development and this is evident from the ACS provision and the number of sites identified around the settlement as possible locations for additional housing. Indeed, the Site Selection Document for Calverton (LPD/GRO/08) sets out 25 'reasonable alternatives' which would readily accommodate additional housing numbers up to the ACS maximum provision. Beyond Green Belt considerations (which are equally applicable to the other key settlements and other villages), there do not appear to be any other 'significant' environmental or technical factors that would prevent the most sustainable of the key settlements from accommodating the level of housing proposed in the ACS.

Q16 *Has sufficient assessment of the impact of the proposed development sites on the three Scheduled Ancient Monuments in Calverton been carried out?*

Response - The two Scheduled Ancient Monuments (SAMs) east of Lodge Farm and Fox Wood to the north and south of Calverton are described on the Historic England website as being earthworks or not visible above ground. The third SAM to the south east known as Cockpit Hill is somewhat distant and sits significantly above the settlement. Development contained within and around the current settlement as proposed in the Part 2 Local Plan and amongst the reasonable alternatives is not considered likely to have any material impact upon the setting of any of the Scheduled Ancient Monuments.

Q17 *Having regard to the emerging Neighbourhood Plan for Calverton, should allocations to the south of the settlement be removed and a single strategic site allocated in the north west of Calverton?*

Response – The Calverton Neighbourhood Plan (EX/36) specifically states at paragraph 2.4 that the Neighbourhood Plan does not allocate any housing or employment sites for growth. The Neighbourhood Plan references the North-West Quadrant Urban Extension which corresponds with the Part 2 Local Plan allocation of site H16 for 390 homes and adjoining land bounded by Park Road, Flatts Lane, Oxtan Road, Hollinwood Lane and Collyer Road which is identified as Safeguarded Land.

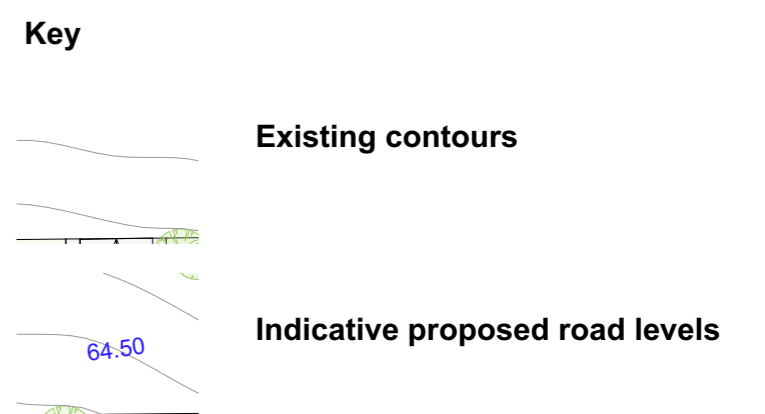
The current Part 2 Local Plan approach of allocating sites to the south of the settlement does not conflict with the Neighbourhood Plan and the NP does not question or criticise these allocations. Moreover, Site H14 has planning permission and is under construction. Any move to reduce the allocations from three to two by the deletion of the H15 allocation could pose delivery concerns by limiting range and choice to one landholding which may well be in the control of one developer.

It is the Respondent's view, as set out in response to question Q14, that the number of sites in Calverton should actually be increased. By taking an opposite approach and reducing housing site options and focussing on one urban extension, there is a higher likelihood of difficulty in maintaining delivery housing levels across the settlement with possible knock on implications for the wider housing trajectory and 5 year supply.

M.J. Downes

BA, B.PI, MRTPI

January 2017



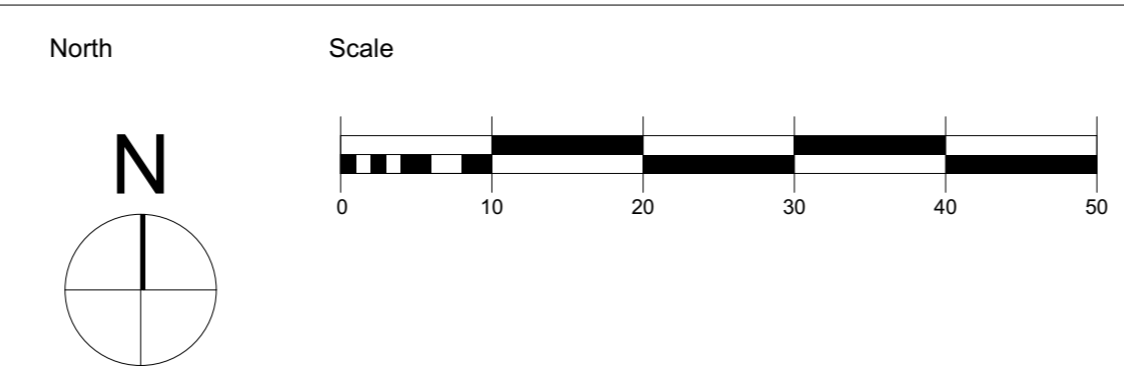
Schedule of accommodation

Main site
 28 x 4 bed houses
 19 x 5 bed houses
 Total 47

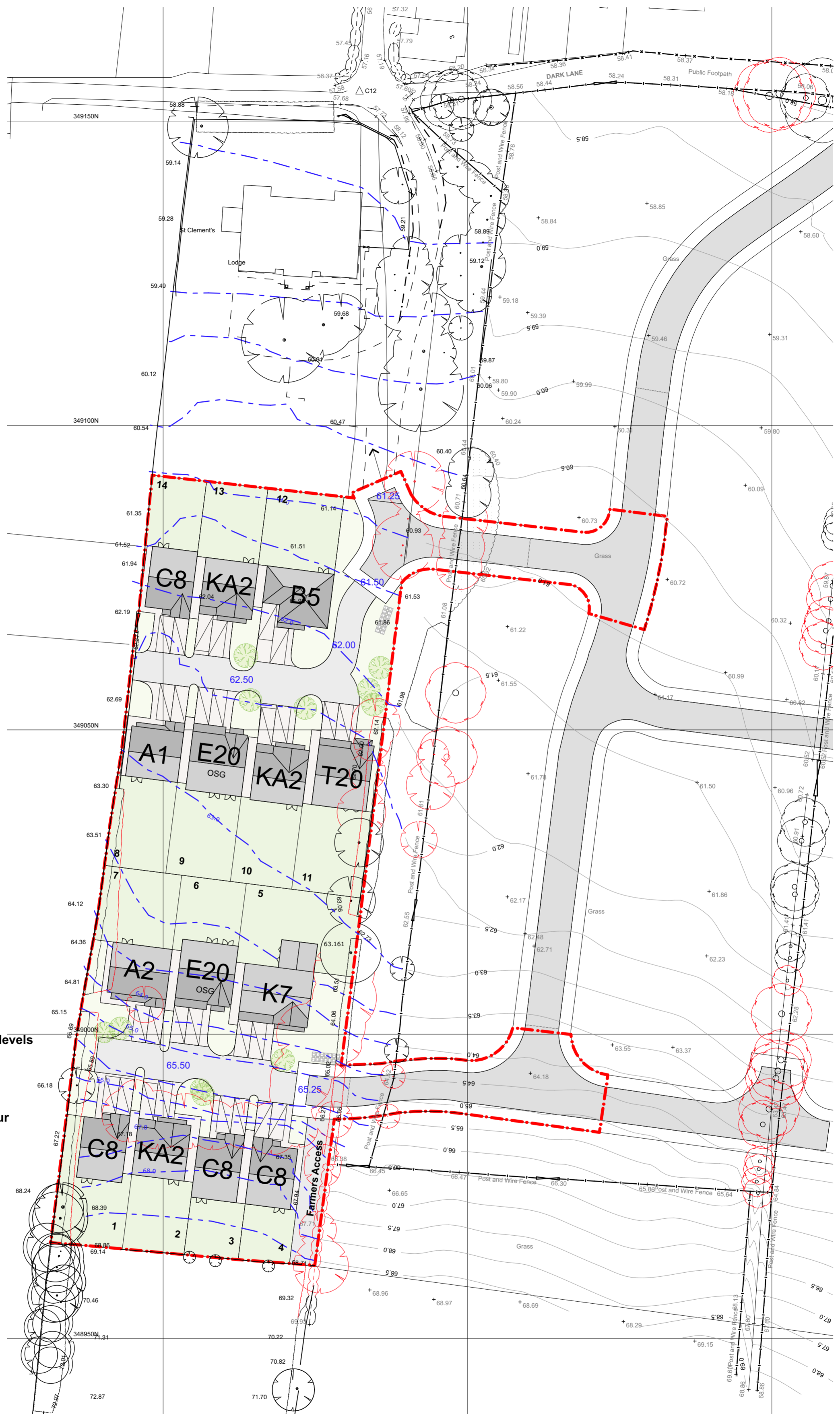


| Rev. | Date | Description | Drawn | Check |
|------|----------|-----------------------------------|-------|-------|
| B | 22/08/17 | Updated following client feedback | JB | |
| A | 22/08/16 | Farmers access added | JB | |
| Rev. | Date | Description | Drawn | Check |




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| Office: Liverpool Nottingham Newcastle Preston Nottingham Address: 53 Forest Road East Post Code: NG1 4HW Tel: 0115 989 7969 Website: www.hlpdesign.com | Drawing Title: Proposed site layout option B Project: Dark Lane, Calverton Client: Langridge Homes Scales @ A1: 1:200, 1:500 Date: August 16 Drawn: SL Check: JB Status: Preliminary Job Number: N1076/3 Drawing: 102_B | Halsall Lloyd Partnership ARCHITECTS & DESIGNERS |
|---|--|--|



Key

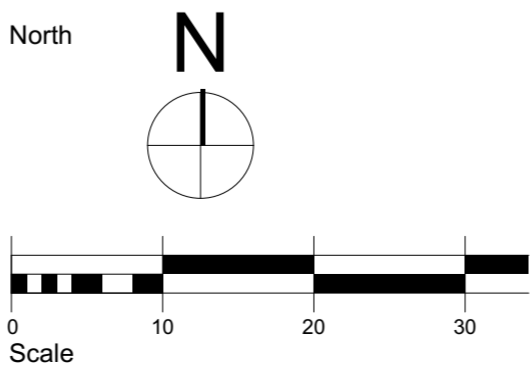
-  Existing contours
-  Indicative proposed road levels
-  Proposed levelling contour

Schedule of accommodation

- Riding School site
- 10 x 4 bed houses
- 4 x 5 bed houses
- Total 14**

| Rev. | Date | Description | Drwn. |
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Drawing Title
 #Project Name
 Project
 Dark Lane, Calverton
 Client
 Langridge Homes
 Scales @ A2
 Date
 January 17
 Drawn
 JR
 Check
 JB
 Job Number
 Drg. No - Revision
 Status
 N1076/3 103 Preliminary

