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Independent Examination of the Gedling Local Planning Document

**Matter 8: Housing Allocations in Key Settlements for Growth**

**Calverton Parish Council (Original Comment ID b/203, b/217, b/223, b/224, c/6)**

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**Issue 8d: Calverton**

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

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

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?

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. We have explained this position in our response to Matter 5.
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.

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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. The 2011 census indicated that Calverton has 7,076 inhabitants in 2,987 households (3,071 dwellings). This had risen only slightly from a population of 6,903 in 2001, a rise of only 2.5% over that 10 year period. Calverton has seen 93 dwelling completions since 2011 (source Gedling AMR 2015), this gives a current baseline number of dwellings of 3,164 as at March 2015. The publication version of the Gedling Local Planning Document in Policy LPD63 indicates that a minimum of 740 homes are to be provided in Calverton. This is to be achieved through allocated sites encompassing 535 dwellings in Calverton. A further 129 dwellings with planning permission are expected to be completed between 2015/16 and 2020/21, this will represent total growth of 24.10% of the village over the plan period to 2028.
7. Calverton Parish Council considers that a growth level of 24.10% over the plan period is already significant. The ACS (LPD/REG/01) envisaged a figure of up to 1,055 dwellings in Calverton under Policy 2: The Spatial Strategy. This would result in a growth level of 34.35% which Calverton Parish Council consider to be untenable and unrealistic. In relation to the other two key settlements of

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Bestwood and Ravenshead, then Calverton is still set for a growth rate in excess of the other two settlements:

	2011 Census No. of Dwellings	ACS Proposed Growth	LPD Proposed Growth	No. of Dwellings to be Allocated
Ravenshead	2,541	330 (12.99%)	250 (9.84%)	61
Bestwood	2,327	560 (24.07%)	525 (22.56%)	211
<b>Calverton</b>	<b>3,071</b>	<b>1,055 (34.35%)</b>	<b>740 (24.10%)</b>	<b>446</b>

8. In addition to having the highest percentage of proposed growth, Calverton also has by far the largest element of the LPD requirement still to be allocated through the LPD. Ravenshead only has 24% of its requirement to be allocated in the LPD; Bestwood has 40% of its requirement to be allocated in the LPD; whereas Calverton still has 60% of its requirement to be allocated in the LPD. In our view Calverton receiving the largest housing reduction from the ACS proposals to those in the LPD is fully justified.

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

9. 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.
10. 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'.
11. 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.
12. 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. As such it is clear that the site assessment process has failed to have regard to these important heritage assets.

**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?**

13. 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).
14. 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.
15. 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. Calverton Parish Council do not consider that site H15 is deliverable during the plan period having regard to national policy or guidance.
16. As we have set out in our detailed evidence to Matters 2 and 4 Calverton Parish Council consider that the site assessment process is flawed as is the sustainability appraisal and the green belt assessment in relation to site H15. Looking at Calverton on a strategic quadrant basis the north-west part of Calverton has been deemed to be the most appropriate location based on many factors.
17. As we set out in Matter 2, 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.

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18. 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 it concluded that a single strategic allocation in the north-west of Calverton should be pursued.
19. The Calverton Neighbourhood Plan has been developed involving the local community, when asked where local residents wanted to see new housing in the village the vast majority of people wanted to see additional housing concentrated in the north-west quadrant (see plan below). No local residents supported new housing in the south-west quadrant, as such Site H15 has no local support.



Neighbourhood Plan Consultation – Preferred Location of New Housing (2016)

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. As we identify under Matter 2, a reason that Gedling have applied to Ravenshead to conclude not to allocate land north of Main Street is that there is no community support for development there. The same lack of community support equally applies to the south of Main Street, site H15 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. If Gedling BC do not accept local community opinion as being a valid reason to remove site H15 then it must revisit the entire plan allocation strategy and reconsider land in Ravenshead in order to be equitable.

### **Issue 8e: Main Street (H15) [Policy LPD 66]**

Q18. Is the proposed allocation justified and appropriate in terms of the likely impacts of development?

Q19. Is the proposed allocation deliverable? In particular, is it:

a. confirmed by the landowner involved as being available for the use proposed?

- b. supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?
- c. deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?

- 21. 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. We have set these out in our evidence on Matter 6 (Q2).
- 22. Calverton Parish Council do not consider that site H15 is deliverable during the plan period having regard to national policy or guidance. Our case on this was set out in our evidence under Matter 6 (Q4). 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. As we identified in our previous evidence in Matters 5 and 6, Langridge Homes have a poor record of housing delivery.

**Q20. Should this site be extended to include the strip of land between the edge of the allocation site and Ramsdale Golf Course, with the capacity increased from 75 to 90 homes?**

- 23. No, given that we consider that the site H15 as GBC propose fails to meet the required justification for Green Belt release or for allocation when assessed against the sustainability appraisal and other factors, then Calverton Parish Council could in no way support an extension to site H15. The problems that we have identified with regard to impact and deliverability would be exacerbated.

**Q21. Does the allocation of this site accord with the objectives of the emerging Neighbourhood Plan for Calverton?**

- 24. No, the Calverton Neighbourhood Plan is at an advanced stage. The statutory Regulation 14 consultation was carried out over the summer 2016, it was formally submitted to Gedling BC on the 14<sup>th</sup> November 2016 under Regulation 15 of the Neighbourhood Planning Regulations 2012. Gedling BC commenced the consultation required under Regulation 16 on the 20<sup>th</sup> January 2017 that consultation will end on the 3<sup>rd</sup> March 2017 which is before the end of the examination hearing sessions for the Gedling LPD.
- 25. Calverton Parish Council as the qualifying body responsible for the production of the Calverton Neighbourhood Plan consider that Site H15 is incompatible with the objectives of the NDP. In particular we consider the site to be in conflict with objective (C) as set out below:

(C) Protect and enhance Calverton’s natural and historic environment, countryside and Green Belt setting

- Enhance the green infrastructure network through the creation of new open spaces and the protection and improvement of existing open spaces
- Protect the Green Belt from inappropriate development and ensure that the southern ridgeline is protected
- Improve attractive and accessible spaces for residents to live, work and play
- Ensure that new development does not increase the risk of flooding and every opportunity available to minimise the risk of pluvial (surface) water flooding is taken
- Create attractive approaches to the village from every direction
- Ensure that both new and existing communities are fully integrated

26. In addition the principles underlying neighbourhood planning is to allow the local community to influence and direct the future planning of their area. The last Gedling Local Plan imposed Site H14 at Dark Lane on the local community. That site is almost without exception not supported by the local community. As part of the NDP consultation process the Parish Council through the Neighbourhood Plan Steering Group sought public opinion on the locations for future housing growth in the village.

27. There was no support from the local community for any form of housing development to the south of the village in the area of Site H15. The residents of Calverton did not support the ACS proposals for such extensive levels of growth in the village. As their local representatives Calverton Parish Council undertook a legal challenge to the ACS, focussed on the issue of green belt release. The local community have now largely accepted that Calverton is to get significant growth, however they feel very strongly that they should be allowed to direct where the growth in Calverton will go. Through the Gedling Masterplanning process in 2014 and more recently through the Calverton NDP, local residents have expressed a clear desire for growth to be sited in the north-west quadrant of the village.

**Q22. What are the exceptional circumstances which justify the removal of this site from the Green Belt?**

28. 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. As we set out in detail in our evidence under Matter 4 we do not consider that exceptional circumstances have been demonstrated to justify the removal of this site from the Green

Belt. Neither does the Parish Council consider that the amendment of the Green Belt relating to Site H15 meets the requirements of Policy 3 of the ACS.

**Q23. Will this site deliver the allocated number of homes during the Plan period?**

29. 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 detailed under Matters 5 and 6. 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. As we highlight under Matter 5, Langridge Homes have a poor record of housing delivery and through the Gedling LPD they have control over a number of allocations and they are seeking allocation of a number of omission sites.

**Q24. Has full consideration been given to the lack of support for development to the south of the settlement when allocating this site for housing development?**

30. There was no support from the local community for any form of housing development to the south of the village in the area of Site H15. 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.

**Issue 8f: Park Road (H16) [Policy LPD 66]**

**Q25. Is the proposed allocation justified and appropriate in terms of the likely impacts of development?**

31. 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.

32. This site has local community support in principle, the LPD in paragraph 5.7 states: *“An additional access may be possible via North Green although the amenity of the existing homes here would need to be protected.”* This statement is not justified and should be removed from the LPD as North Green

is a privately owned road and as we set out in the Calverton NDP, North Green is an atypical area of Calverton's built environment and its significance as a potential heritage asset of unique relevance to Calverton's colliery history. North Green constitutes the only completed element of a discontinued part of the original housing scheme that was to have accompanied the construction of Calverton Colliery. This original scheme was architect-designed by a partnership that had included the renowned landscape architect Sir Geoffrey Jellicoe. It is documented that the intention had been to provide an extremely high quality residential environment for colliery workers, in an estate that was to have been isolated from the old village of Calverton through a combination of natural topography and landscaping.

**Q26. Is the proposed allocation deliverable? In particular, is it:**

- a. confirmed by the landowner involved as being available for the use proposed?
- b. supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?
- c. deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?

33. As we identified under Matters 4 and 6, 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

**Q27. Has full consideration been given to potential mining subsidence when allocating this site for housing development?**

34. The site does not fall within the defined Coal Authority Development High Risk Area and contains no recorded mining legacy features according to the Coal Authority Interactive Map Viewer.

**Q28. Would the scale of development be appropriate?**

35. The Parish Council has set out its case on housing distribution under Matters 5 and 6.

**Q29. Would this site deliver the allocated number of homes during the Plan period, particularly given the multiple landowners involved?**

36. As we identified under Matters 4 and 6, the Parish Council strongly consider that site H16 on Park Road is deliverable, this site is proposed to be developed by Persimmon Homes, it is our understanding that Persimmon Homes have control over the entire site allocation. 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.

**Q30. Should this site be extended to the north to include around 650 homes, in preference to the development to the south of Main Street (H15)?**

37. Calverton Parish Council does 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.

38. 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.

**Q31. Are there any constraints to the development of this site?**

39. Calverton Parish Council has engaged with Persimmon Homes, the LPA and other consultees in pre-application discussions relating to this site. Based on these discussions we do not consider that there

are any constraints which will prevent delivery of this site. As we set out above the Submission Calverton Neighbourhood Plan (EX/36) sets out a number of requirements for this site, however our discussions with Persimmon Homes indicates that these can be incorporated.

**Q32. The Housing Implementation Strategy [LPD/HOU/01] indicates that the Council will invite the developer/owner of this site to participate in a partnership approach to facilitate partnership working to help deliver this site. Why is this necessary? What is the timetable for this work?**

40. Calverton Parish Council through the Submission Calverton Neighbourhood Plan (EX/36) is seeking any planning application coming forward in the north-west quadrant which includes Site H16 to be accompanied by a masterplan indicating how the entire area including the safeguarded land could be developed comprehensively in the long term. Our pre-application engagement with Persimmon Homes has clearly demonstrated that they are developing their detailed proposals within the framework of an overall masterplan.

41. The Parish Council does not however support the proposals being put forward by Northern Trust for the Flatts Lane end of the safeguarded land. Northern Trust have put forward proposals that clearly demonstrate that they would seek to develop their land in isolation without regard to the provisions of the Submission Calverton Neighbourhood Plan (EX/36).

## **Conclusion and Modifications Sought**

42. 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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1<sup>st</sup> February 2017