

# Calverton Parish Council

Comments on Application 2017/0207

Development at St. Wilfrid's Square



April 11th 2017

## **1 Introduction**

- 1.1 Calverton Parish Council is extremely concerned about the proposed development at St. Wilfrid's Square. Proper consideration of the scale, design, purpose and impact of the proposals on the immediate and wider area would make it unreasonable for Gedling Borough Council to permit this development within the current planning policy context.
- 1.2 The proposed development is not in conformity with key aspects of either national or local planning policy. The Calverton Neighbourhood Plan process is nearing completion, having commenced its independent examination. Given the advanced stage of the Calverton Neighbourhood Plan, there is a statutory requirement for it to be afforded significant weight in the determination of planning applications (*See Annex 1 NPPF and attached Advice Note*) rather than the "*limited weight*" that is attached to it in the application 'Design & Access Statement'.

## **2 Impact on Calverton's Conservation Area**

- 2.1 As a conservation area is a designated heritage asset, it is covered by the National Planning Policy Framework's stipulation that:

*"...local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting." (NPPF, para 128)*

The application gives absolutely no consideration to the impact that its proposals would have on Calverton's Conservation Area; either in terms of its setting or its appearance and character.

- 2.2 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the 'Act') requires the Local Planning Authority (LPA) to pay special attention to the desirability of preserving or enhancing the character and appearance of the Conservation Area. In addition, Section 66 requires the LPA to pay special regard to the desirability of preserving the setting of listed buildings.

- 2.3 As a designated heritage asset, Calverton's Conservation Area (along with its setting) is afforded a considerable degree of protection:

*"When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification." (NPPF, Para. 132)*

The importance of considering the impact of new development on the significance of designated heritage assets, furthermore, is expressed in Section 12 of the National Planning Policy Framework (NPPF). Paragraph 132 of the NPPF, advises that the significance of designated heritage assets can be harmed or lost through alterations or development within their setting. Such harm or loss to significance requires clear and convincing justification. The NPPF also makes it clear that protecting and enhancing the historic environment is sustainable development (paragraph 7).

It is noteworthy that no justification has been given as part of the application for the harm that this proposal would have to the setting of Calverton's Conservation Area.

The setting of heritage assets is defined in the Glossary of the NPPF which advises that the setting is the surroundings in which an asset is experienced. Paragraph 13 of the Conservation Section within the Planning Practice Guidance (PPG) advises that a thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it. Additional advice on considering development within the historic environment is contained within the Historic England Good Practice Advice Notes (notably GPA2 and GPA3).

- 2.4 That this proposal would harm the setting of Calverton's Conservation Area is made clear in the Calverton Conservation Area Appraisal:

*"The Conservation Area is, however, compromised by surrounding development. Most obvious are the St Wilfrid's Square complex, which has a hugely negative impact in terms of scale, design and materials..." (5.33)*

It is apparent from the details provided that the scale, design and materials of this proposal would be wholly inappropriate with respect to the setting of the Conservation Area and would, therefore, exacerbate what has already been identified as a *"hugely negative impact"*.

- 2.5 Given the already fragile nature of Calverton's historic core, the Conservation Area Appraisal highlights the importance of it not being compromised any further by additional unsympathetic development:

*"There is little capacity for significant change within the Conservation Area. It is possible, however, that further sites bordering the Conservation Area might be redeveloped. Should this prove to be the case, considerable care will need to be taken to ensure that development enhances or respects the setting of the Conservation Area in terms of its plan form, scale, massing, materials and detailing." (5.39)*

- 2.6 The application fails to acknowledge the proximity of the proposed development site to Calverton's Conservation Area. The application site is located approximately 10m from the boundary of Calverton's Conservation Area - there are unrestricted views between the Conservation Area to the west and the proposed development site. There are clear views of historic buildings that make a positive contribution to the character of the Conservation Area.
- 2.7 The application misrepresents *the "local character"* of the area surrounding the proposed development site. It is averred in the application's Design & Access Statement that:

*"All buildings in the vicinity have been constructed in, approximately, the 1960s / 70s"*

This statement is factually incorrect. As stated above, there is intervisibility between the proposed development site and historic buildings of the Conservation Area. The Nook is a valued part of Calverton's Conservation Area; the Baptist Chapel, located in the Nook is noteworthy:

*"...The Revivalist style Baptist Chapel in The Nook is also of interest for its simple façade, dogtoothed eaves and unusual (in Calverton) round-headed Gothic glazing bar sash windows." (Calverton Conservation Area Appraisal, para. 5.14)*

The Baptist Chapel is identified on the Calverton Conservation Area Appraisal's 'Map 3: Significant Buildings' as a 'Building of Local Interest'.



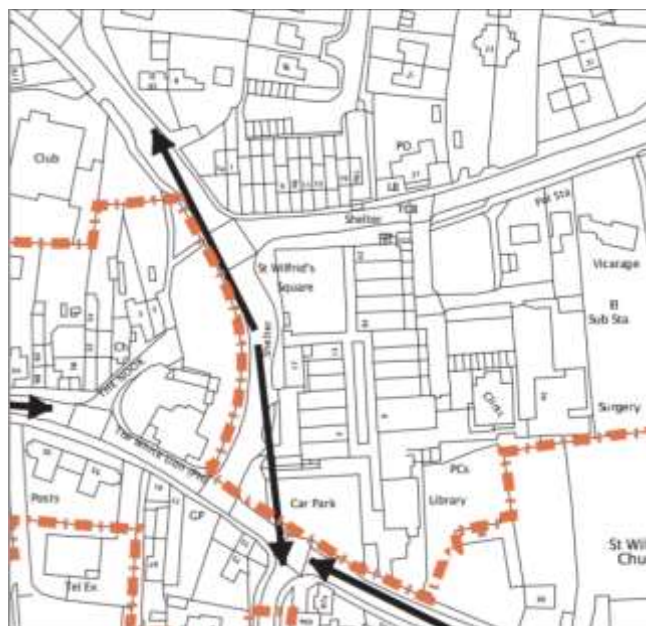
*View of Conservation Area to the west: The Nook.*



*View of Conservation Area to the south.*

The former White Lion Pub (currently named Oscar's) is located within direct view of the proposed site - at a distance of approximately 30m. It is also identified as a significant, prominent Conservation Area building.

- 2.8 The importance of this area of the village centre to the setting of the Conservation Area is highlighted by consideration of the Conservation Area Appraisal 'Map 5: Key Views and Vistas'. Two of the key Conservation Area viewpoints are located next to the proposed development site, as shown in the map extract below:



*Extract from the Calverton Conservation Area Appraisal:  
Map 5 - Key Views and Vistas*



*Key Conservation Area view to the north*

- 2.9 Another significant issue is that the development turns its back on the street scene and the Conservation Area. This will accentuate the problem of existing retail units facing away from the street, which inevitably leads to clutter such as rubbish bins and storage on the roadside - further adversely affecting the setting of the Conservation Area. It is notable, in this respect, that the application makes no provision that would assist either in the storage or collection of waste/recycling for the residential or retail units.

### **3 Non-Conformity with the Calverton Neighbourhood Plan**

- 3.1 As detailed at paragraph 1.2, Calverton's Neighbourhood Plan process is in its final stages and, having already been submitted for examination should, in accordance with the NPPF, be afforded significant weight in the determination of this planning application.

- 3.2 The Design & Access Statement identifies only three of Calverton Neighbourhood Plan's policies as being relevant to the planning application:

- Policy G3 Village Centre
- Policy BE3 Public Realm
- Policy BE4 Parking Provision

The application does not detail how the proposed development would conform to the identified Neighbourhood Plan policies.

- 3.3 In the opinion of Calverton Parish Council, a number of Neighbourhood Plan policies need to be taken into account in the consideration of this planning proposal, in addition to those identified by the applicant:

- Policy G2 Developer Contributions
- Policy G5 Housing Mix



- Policy ISF1 Sustainable Transport
- Policy ISF2 Car Parking
- Policy ISF3 Highway Impact
- Policy BE2 Local Distinctiveness and Aesthetics
- Policy BE5 Heritage Assets
- Policy NE3 Flooding

### Policy G2 – Developer Contributions

The Neighbourhood Plan identifies “*Village centre environmental improvements*” as one of the key areas of focus for developer contributions.

Whilst it is recognised that that the application includes the removal and replacement of the existing canopies, the details provided are not sufficient to determine whether this would constitute an enhancement. The application does not include any other proposals that could be regarded as environmental improvements to the village centre.

It is arguable that the scope for improvement within the relatively small geographical area of the village centre would be significantly compromised by the scale of development proposed. The village centre is already in need of major improvement; the development currently proposed would constitute a further degradation. It is impossible to envisage any measures that could be funded by developer contributions that would offset the scale of damage that would be inflicted on the village centre by this development proposal.

### Policy G3 – Village Centre

It is noted that the “*public realm is not of high quality*” (4.1). The Neighbourhood Plan is clear that there is a need to improve the village centre environment and that such investment would bring significant socio-economic benefits:

*“Investment in the public realm can also lead to social benefits by promoting social cohesion and reducing levels of crime. The Parish Council believe that enhancing the public realm of the Village Centre will enhance its vitality and viability and help to create a Village Centre that the community are proud of.”*  
(4.5)

The proposed development would reduce the prospect of St. Wilfrid's Square making a more positive contribution to the public realm of the village centre in the future - contrary to the objectives set out in the Neighbourhood Plan.

In addition, the development would remove an area of open space that performs a significant social role. This area provides an important space for residents both day-to-day and for events like the annual ‘Christmas Lights Switch-On’.

As identified above (paragraph 2.9) the development is turning its back on the street-scene, which will impact negatively on the public realm of the village centre.

The established trees make an important contribution to the village centre environment throughout the year. In addition, they are integral to the Parish Christmas lights display - providing a focal point in the centre of the village. The fact that this application requires the uprooting of these mature trees represents a further degradation of the public realm of the village centre.

#### Policy G5 – Housing Mix

The proposed residential units would make an insignificant contribution to the overall levels of housing to be provided over the current development plan period. A considerable amount of land has already been identified by Gedling Borough Council at more appropriate locations within the village as part of the LPD process.

The main development site to the north-west of the village is large enough to facilitate the provision of a housing mix that can fully meet the housing requirements that have been identified for Calverton, in its capacity as one of Gedling's LPD 'Key Settlements'.

A particular housing need is for dwellings suitable for the elderly and disabled; ground floor provision would obviously be more suitable for this purpose - the proposed 2<sup>nd</sup> and 3<sup>rd</sup> floor residential accommodation would not be capable of making an exceptional contribution to the required housing mix.

Therefore, in terms of both the small quantum of residential units and the type of provision, the proposals cannot be justified in terms of a public benefit that would be sufficient to outweigh the substantial harm that this development would cause.

#### Policy ISF1 - Sustainable Transport

The application indicates that it will require the relocation of the existing bus shelter to a position at some distance from the actual bus stop. This will make the bus stop less operationally effective - far from ideal within a policy context of sustainable development that seeks to encourage the use of public transport.

#### Policy ISF2 – Car Parking

It has been established that there is insufficient parking provision to meet current need in the village centre - this was a principal concern raised throughout the neighbourhood plan process. Relying on pre-existing car parking provision to meet the demands of the proposed development would be a direct contravention of the relevant Neighbourhood Plan policy.



The housing will generate a need for the provision of car parking, this will result in the reduction in availability of parking for the existing retail units and the other facilities in the centre.

The Gedling Parking Standards SPG would require a total of 7 unallocated parking spaces available to serve the flats.

The new retail units, using the 6Cs parking standards, would require 1 space per 14sqm, giving a requirement of 18 additional parking spaces.

In total, the new development generates a parking requirement of 25 additional car parking spaces.

The proposal includes no additional parking over that already provided. The application is in error in indicating ownership of 16 car parking spaces; Calverton Parish Council owns 8 of those identified spaces.

Address data suggests that there are 10 existing flats which require a further 8 unallocated car parking spaces. The existing retail floorspace is around 1,400sqm, generating a parking requirement of 100 spaces. The existing retail and residential units alone require up to 108 parking spaces - far in excess of the approximate 61 spaces in the two car parks. The library, health centre and GP practice generate further existing parking requirement.

There is no capacity within the existing car parks to facilitate additional development.

#### Policy ISF3 – Highway Impact

The proposals raise significant highways concerns with respect to: the relocation of the bus shelter (with visibility splay implications at a key junction); altered pedestrian access arrangements; conflict between existing pedestrian/vehicle use with respect to the traffic/servicing logistics associated with the new development.

The lack of off-street car parking capacity will lead to further displacement of on-street car parking onto the neighbouring roads and streets; this not only raises the potential for highway conflict and road safety issues for pedestrians, but also leads to adverse impacts on residential amenity.

The lack of clarity provided by the sparse application information has resulted in a lack of transparency - this has limited the ability of the Parish Council to comment on this matter in detail, in the context of its Neighbourhood Plan.

#### Policy BE2 – Local Distinctiveness and Aesthetics

The Neighbourhood Plan prioritises the need for good design, emphasising that new development “*should be designed to a high quality that reinforces local distinctiveness.*”

The design proposals are not specific in many of the details. However, sufficient information is given to enable the Parish Council to be clear that the proposed design is both generic and of extremely low quality. As outlined by the accompanying drawings and the Design & Access Statement, this proposal does not incorporate a single element that could be interpreted as representing the locally distinctive. The proposed roofing material - "grey single ply membrane" is a case in point - it couldn't be further removed from the characteristic local clay pantiles.

Both the Calverton Neighbourhood Plan and the Calverton Conservation Area Appraisal detail local characteristics of the built environment. These documents could have provided a useful starting point for development proposals, but currently only serve to highlight the huge level of divergence between this proposal and the type of development that might have been acceptable.

#### Policy BE3 – Public Realm

It is stated that:

*"Development proposals which have the potential to impact on the public realm will be expected to demonstrate how they will contribute to high quality streets, pavements and other publicly accessible areas (the public realm) within Calverton, subject to complying with all other Neighbourhood Plan policies."*

As has already been detailed above (see Policy G3 - Village Centre) this development would have a major negative impact on the village centre and the public realm therein.

The design will diminish the ability of the remaining open space to fulfil a positive social function. Indeed, there are key elements of the design that are raising significant concerns amongst residents who regularly use St. Wilfrid's Square.

The design includes a narrow, enclosed access between the existing precinct building and the proposed new building. This area would be transformed from a positive social space to one that, given the lack of natural light and natural surveillance, could present a risk to public safety. A high potential for anti-social behaviour is built into this design, due to a lack of natural surveillance; both because of its enclosure and the fact that residential properties would be at first floor level. This represents a major concern not only to residents, but also to the Core Centre and the dental surgery - which fulfil valuable roles within the community.

#### Policy BE4 – Parking Provision

*"All development proposals which include an element of residential development, including change of use to residential, must provide adequate space for vehicle parking to meet the expected needs of residents and visitors. A design-led approach should be taken to ensure parking is properly*

*integrated into the layout of the scheme, minimises adverse impacts on surrounding uses, and facilitates traffic flow and accessibility for service and emergency vehicles.”*

Contrary to the requirements of the Calverton Neighbourhood Plan, the proposals fail to adequately consider parking provision - this is addressed in detail above (Policy ISF2 Car Parking). No proper account is taken of the increased requirements that would result from new residents and their visitors combined with the commercial element of additional retail employees and shoppers. Within the context of a village centre that is already beyond capacity with respect to parking provision, this is completely unacceptable.

#### Policy BE5 – Heritage Assets

As detailed above in Section 2: *Impact on Calverton's Conservation Area*, the development proposals would have a substantial negative impact on the character of Calverton. The Neighbourhood Plan seeks to preserve and enhance the locally distinctive aspects of Calverton's heritage, as outlined in the Calverton Conservation Area Appraisal and supported by the policy context at both LPA and national level.

There is a statutory requirement that designated heritage assets should only be harmed by development when it can be demonstrated that there is no alternative and the harm is outweighed by the public benefit that would be derived from the new development.

As has already been noted, future residential requirements within Calverton have already been allocated within Gedling's Local Planning Document - therefore, it cannot be argued that the proposed residential units would constitute a public benefit that would outweigh the harm to heritage.

There is no demonstrable need for retail units beyond the existing provision; indeed it is questionable whether businesses of this type, at this location, would be viable and they could certainly affect the viability of other businesses in the precinct.

Even if additional retail provision for this location could be justified, a far higher standard of design would be necessary in order for the application to comply with the heritage requirements set out in the Neighbourhood Plan and established planning policies at both LPA and national level.

#### Policy NE3 – Flooding

The application gives no consideration to the issue of flooding. It wrongly identifies the proposed site as being in an area that has no risk of flooding. It is a matter of record that the village centre has suffered significant flooding in response to high rainfall events, accompanied by a rapid increase in surface water runoff.

The Calverton Neighbourhood Plan seeks to minimise the possibility of future development exacerbating the existing flood risk:

*“Development proposals will be expected to include sustainable drainage systems (SUDS). In addition to their principal role of flood risk management SUDS should offer additional benefits such as amenity value and biodiversity enhancement.*

*Development proposals will not be permitted where it will result in any additional surface water flows into the areas of surface water flood risk identified by the Environment Agency in Calverton, including the Main Street Corridor and Village Centre area.”*

The development proposals offer no integrated flood management measures. An increased development footprint would reduce the area remaining for surface runoff at a sensitive, high-risk central location; this would necessarily serve to increase the depth of floodwater.

#### **4 Conclusion**

- 4.1 Calverton Parish Council strongly objects to every aspect of application 2017/0207. The proposals would constitute a major negative impact on Calverton village as a whole.
- 4.2 Calverton residents are already significantly disadvantaged by having a village centre that is dominated by a poorly designed and built shopping precinct, accompanied by extreme car parking constraints. St. Wilfrid's Square, in its current form, represents a visual intrusion that compromises the setting of Calverton's Conservation Area.
- 4.3 The development proposals would do nothing to alleviate existing problems in this sensitive central location, but would rather exacerbate identified issues and limit future potential solutions.
- 4.4 The prevailing policy context is for sustainable development that, to quote from the Ministerial Forward of the NPPF, *“is about change for the better... a creative exercise in finding ways to enhance and improve the places in which we live our lives... This should be a collective enterprise. Yet, in recent years, planning has tended to exclude, rather than to include, people and communities. In part, this has been a result of targets being imposed, and decisions taken, by bodies remote from them. Dismantling the unaccountable regional apparatus and introducing neighbourhood planning addresses this.”*

The community of Calverton has responded to the new policy context that promotes localism and has progressed its neighbourhood plan to the final stages; it is vital that Gedling Borough Council now works in partnership with residents to shape future development in a sustainable manner.

- 4.5 Application 2017/0207, for the reasons outlined in this document, does not accord with the principles of sustainable development. The proposals do not conform with key requirements of the National Planning Policy Framework, Calverton's Submission Neighbourhood Plan or Gedling Borough Council's own Local Planning Document - permission must, therefore, necessarily be refused.