

Belper Neighbourhood Development Plan

Regulation 16 Consultation

Submission Version



April 2020

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1 INTRODUCTION

1.1 Context

1.1.1 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure. From this experience, we understand the need for the planning system to deliver the homes, jobs and thriving local places that the country needs.

1.1.2 These representations provide Gladman's response to the current consultation on the submission version of the Belper Neighbourhood Plan (BNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012.

1.1.3 Gladman are promoting land in the neighbourhood area, Land off Sandbed Lane, Belper. Gladman submit that the site represents a suitable and sustainable location for housing, well located to the existing urban area and is seeking the allocation of this site through the neighbourhood plan. A site submission is included within these representations. An outline planning application (AVA/2020/0223) was submitted on the 5th March supported by a full suite of technical documents, demonstrating the site can come forward in the short term through a sympathetic development that takes into consideration the constrained nature of the area.

1.1.4 Through these representations, Gladman provides an analysis of the BNP and the policy decisions promoted within the submission draft Plan. Comments made by Gladman through these representations are provided in consideration of the BNP's suite of policies and its ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the PPG¹.

1.1.5 Gladman currently have concerns about the plan's ability to meet the basic conditions as drafted, which will be detailed below through the following matters:

- Legal compliance; Strategic Environmental Assessment
- National Planning Policy and Guidance;
- Neighbourhood plan policies; and
- Site submission.

¹ Section ID: 41

2 LEGAL REQUIREMENTS, NATIONAL POLICY & GUIDANCE

2.1 Legal Requirements

2.1.1 Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions, set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The Basic Conditions that the BNP must meet are as follows:

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
- b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order;
- c) Having regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order;
- d) The making of the neighbourhood plan contributes to the achievement of sustainable development;
- e) The making of the neighbourhood plan is in general conformity with the strategic policies contained within the development plan for the area of the authority; and
- f) The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.
- g) The making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

2.2 National Planning Policy Framework

2.2.1 On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework (NPPF2018). This publication forms the first revision of the Framework since 2012 and implements changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft NPPF2018 consultation. This version was itself superseded on the 19th February 2019, when MHCLG published a further revision to the NPPF (2019) which implements further changes to national policy, relating to the Government's approach for Appropriate Assessment as set out in Paragraph 177, clarification to footnote 37 and amendments to the definition of 'deliverable' in Annex 2.

2.2.2 The NPPF (2019) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements of the preparation of neighbourhood plans within which locally-prepared plans for housing and other development can be produced. Crucially, the changes to national policy reaffirms the Government's commitment to ensuring up to date plans are in place which provide a positive vision for the areas which they are responsible for to address the

housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, paragraph 13 states that:

“The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.”

2.2.3 Paragraph 14 further states that:

“In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:

a. The neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;

b. The neighbourhood plan contains policies and allocations to meet its identified housing requirement;

c. The local planning authority has at least a three-year supply of deliverable housing sites (against its five-year supply requirement, including the appropriate buffer as set out in paragraph 73); and

d. The local planning authority’s housing delivery was at least 45% of that required over the previous three years.”

2.2.4 The NPPF (2019) also sets out how neighbourhood planning provides local communities with the power to develop a shared vision for their area in order to shape, direct and help deliver sustainable development needed to meet identified housing needs. Neighbourhood plans should not promote less development than set out in Local Plans and should not seek to undermine those strategic policies. Where the strategic policy making authority identifies a housing requirement for a neighbourhood area, the neighbourhood plan should seek to meet this figure in full as a minimum. Where it is not possible for a housing requirement figure to be provided i.e. where a neighbourhood plan has progressed following the adoption of a Local Plan, then the neighbourhood planning body should request an indicative figure to plan taking into account the latest evidence of housing need, population of the neighbourhood area and the most recently available planning strategy of the local planning authority.

2.2.5 In order to proceed to referendum, the neighbourhood plan will need to be tested through independent examination in order to demonstrate that it is compliant with the basic conditions and other legal requirements before it can come into force. If the Examiner identifies that the

neighbourhood plan does not meet the basic conditions as submitted, the plan may not be able to proceed to referendum.

2.3 Planning Practice Guidance

2.3.1 Following the publication of the NPPF (2018), the Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018 with further updates being made in the intervening period. The updated PPG provides further clarity on how specific elements of the Framework should be interpreted when preparing neighbourhood plans.

2.3.2 Although a draft neighbourhood plan must be in general conformity with the strategic policies of the adopted development plan, it is important for the neighbourhood plan to provide flexibility and give consideration to the reasoning and evidence informing the emerging Local Plan which will be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested against. For example, the neighbourhood planning body should take into consideration up-to-date housing needs evidence as this will be relevant to the question of whether a housing supply policy in a neighbourhood plan contributes to the achievement of sustainable development. Where a neighbourhood plan is being brought forward before an up-to-date Local Plan is in place, the qualifying body and local planning authority should discuss and aim to agree the relationship between the policies in the emerging Neighbourhood Plan, the emerging Local Plan and the adopted Development Plan². This should be undertaken through a positive and proactive approach working collaboratively and based on shared evidence in order to minimise any potential conflicts which can arise and ensure that policies contained in the neighbourhood plan are not ultimately overridden by a new Local Plan.

2.3.3 It is important that the neighbourhood plan sets out a positive approach to development in the area by working in partnership with local planning authorities, landowners and developers to identify their housing need figure and identifying sufficient land to meet this requirement. Furthermore, it is important that policies contained in the neighbourhood plan do not seek to prevent or stifle the ability of sustainable growth opportunities from coming forward. Indeed, the PPG emphasises that;

“...blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence”³

2.3.4 Accordingly, the BNP will need to ensure that it takes into account the latest guidance issued by the SoS so that it can be found to meet basic conditions (a) and (d).

² PPG Reference ID: 41-009-20160211

³ Paragraph: 001 Reference ID: 50-001-20160519

3 DEVELOPMENT PLAN

3.1 Adopted Development Plan

- 3.1.1 To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.
- 3.1.2 The adopted Development Plan relevant to the preparation of the Belper Neighbourhood Plan, and the Development Plan which the BNP will be tested against, is the saved policies of the Amber Valley Borough Local Plan, adopted in 2006, with policies saved in 2009. Adopted prior to the introduction of the Framework, the degree of weight to be attached to the policies of this plan should be considered against their degree of consistency with the Framework.
- 3.1.3 This plan allocates three of the proposed allocations of the BNP, North and East Mills, West Mill and North Derwent Street for mixed use development. This plan also allocates land at Bullsmoor for industrial uses, the site subject to the appeal decision cited in the BNP. This site however is not allocated in the neighbourhood plan, with policies instead seeking to restrict development in this area. This is a conflict with policies of the adopted development plan.

3.2 Withdrawn Emerging Development Plan

- 3.2.1 The Council were in the process of preparing a new local plan for Amber Valley, with a plan end date of 2028. However, following its Examination in Public the Council withdrew the plan in May 2019. It was resolved at the Annual Council meeting to withdraw the Submission Local Plan and instead 'totally review' the Spatial Vision, Strategic Objectives and Strategic Policies.
- 3.2.2 Whilst this plan did not allocate a specific housing number to Belper, it did recognise its role as one of the main urban areas in Amber Valley Borough, and the role it plays in supporting a catchment beyond the NP boundaries.
- 3.2.3 The plan was proposing to make provision for a minimum of 9,770 dwellings between 2011 and 2028. 7,395 dwellings from needs arising in Amber Valley and a contribution of 2,375 dwellings towards unmet needs arising in Derby. It was proposed most of this growth would take place in and surrounding the four urban areas to which Belper was one. In the highest tier of the proposed settlement hierarchy, Belper is clearly recognised as a sustainable settlement where development within or adjacent to the built framework would have been supported.
- 3.2.4 Through the examination process the Inspector highlighted the need for further land for housing to be identified in the Green Belt. In undertaking this exercise, the Council also proposed to designate areas as new Green Belt, including land under promotion by Gladman at Sandbed Lane. Gladman raised substantial objections to the soundness of this approach and commissioned a report from

Pegasus to assess the approach proposed. This report concluded that the site did not meet the tests of Green Belt designation. Gladman therefore submit that the development potential of this site should be considered through the BNP.

- 3.2.5 Following the withdrawal of the Amber Valley Local Plan the Council resolved on 25th September 2019 to prepare a new local plan for Amber Valley, with a plan end date of at least 2038. The Council subsequently resolved on 29th January to approve a Local Development Scheme for the preparation of a new Local Plan. It is anticipated a draft of the Local Plan will be published for consultation in April 2021, with a pre-submission plan to follow in early 2022. As such the BNP should not be relying on the new Local Plan to address any shortfall in the short term. This should be addressed as a priority through the neighbourhood plan, either through a flexible policy framework or the allocation of sufficient land for housing.

4 BELPER NEIGHBOURHOOD PLAN POLICIES

4.1 Context

4.1.1 These representations are made in response to the current consultation on the submission version of the BNP, under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. This chapter of the representation highlights the key points that Gladman wish to raise with regard to the content of the BNP as currently proposed.

4.2 Neighbourhood Plan Policies

4.2.1 This section of the representations provides Gladman's comments on the submission draft BNP policies. As currently proposed, Gladman believe that a number of the BNP's policies require modification/amendment, before they can be considered consistent with the Neighbourhood Plan Basic Conditions.

Housing Needs

4.2.2 Gladman have significant concerns around the level of housing that the BNP is planning for. These concerns were raised in response to the previous Regulation 14 consultation however they have not been addressed. As such, many of our concerns are reiterated below.

4.2.3 The original Regulation 14 consultation was supported by a Housing Needs Assessment (HNA), undertaken in 2016, covering the period 2011-2028. The suggestions of the Update Letter, provided by AECOM, and in support of the amended BNP plan period supporting this consultation have not been implemented through either the BNP nor used to support the Strategic Environmental Assessment (SEA). The BNP suggests a need for 667 additional units, whilst the SEA suggests a figure of 957 dwellings. Neither of these figures reflect the Update Letter figure of 1,280 dwellings between 2019 and 2035.

4.2.4 Paragraph 5.12 of the SEA suggests that the combined housing development potential from the proposed allocations is 849 dwellings, including reliance on existing saved allocations which have failed to deliver so far. This is a significant shortfall against the identified housing needs from the HNA Update Letter.

4.2.5 Footnote 40 of the BNP states that:

'The AECOM analysis was based on Borough data available up to 2028. In September 2019 AECOM confirmed that 'that there may be ways in which the HNA could be updated, expanded and improved. However, having carefully reviewed the existing text, we do not consider that any of them would substantially alter its overall conclusions, increase its relevance to the Neighbourhood Plan policies, or be necessary for the Neighbourhood Plan to pass the Basic Conditions.' However, this NP will be reviewed every 5 years and when new data is available

this will be used to assess the continued suitability of the NP4B approach. The Plan will be reviewed if new data indicates the approach is out of date.

- 4.2.6 This is not what the HNA update letter says and is directly contrary to the PPG, to be explored below. What the update letter actually says is that the approach used still stands and should therefore be extended to cover the new period. It is what else the HNA update letter goes on state, which is a cause for particular concern, repeated below:

'Moreover, the Belper Neighbourhood Plan as currently drafted does not in any case rely on the quantity figure as a defined housing target or policy objective, but simply cites it as context. The Neighbourhood Plan also seeks to plan positively for new development through the allocation of a number of housing sites. It does not allocate sites to meet the exact number of dwellings specified in the quantity figure nor does it use that figure as justification to limit future residential development. Rather, it takes a pragmatic and admirable approach of working with the LPA to monitor progress towards meeting outstanding need. In this context, whether the underlying quantity figure is considered too high or too low is broadly less relevant.'

- 4.2.7 This is directly contrary to PPG for numerous reasons. Paragraph 9⁴ states that up to date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan contributes to the achievement of sustainable development. Paragraph 40⁵ states that neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need. Finally, Paragraph 103⁶ states that where neighbourhood planning bodies have decided to make provision for housing in their plan, the housing requirement figure and its origin are expected to be set out in the neighbourhood plan as a basis for their housing policies and any allocation that they wish to make.

- 4.2.8 As drafted, the BNP does not attempt to meet the housing requirement identified in the updated HNA letter and is therefore contrary to basic conditions (a) and (d). There will be significant shortfall in the neighbourhood area in following the current strategy of prioritising brownfield sites. Whilst accepting that the neighbourhood area is constrained, containing Footnote 6 constraints that provide a reason for restricting the overall scale of and distribution of development in the plan area there are opportunities outside the Green Belt but within the World Heritage Site Buffer Zone that could come forward under Paragraphs 201 and 196 of the NPPF (2019). These opportunities need to be explored prior to a reduction of the BNP's contribution to neighbourhood areas housing needs.

⁴PPG Paragraph: 009 Reference ID: 41-009-20190509

⁵ PPG Paragraph: 040 Reference ID: 41-040-20160211

⁶ PPG Paragraph: 103 Reference ID: 41-103-20190509

- 4.2.9 In this regard, [REDACTED], Land off Sandbed Lane, Belper would be a suitable candidate and should be allocated in the neighbourhood plan, this proposal will be addressed in detail through the site submission in Section 6 of this representation.

Policy NPP1 Sustainable Development and the Built Framework

- 4.2.10 Whilst welcoming that this policy would support development that adjoins the Built Framework Boundary, we are concerned with the choice of wording of criterion (b) and the seeking of the safeguarding of the World Heritage Site and its buffer zone. This approach does not accord with national policy as it goes further than guidance contained within the NPPF (2019) regarding the consideration of development proposals that potentially affect a World Heritage Site.
- 4.2.11 Paragraph 184 of the NPPF (2019) defines World Heritage Sites as heritage assets of the highest significance that should be conserved in a manner appropriate to their significance. However, Paragraph 201 sets out that not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Where harm to a World Heritage Site is less than substantial, when taking into account the relative significance of the element it affects and its contribution to the significance as a whole, development proposals should be considered in line with Paragraph 196. This requires a balancing of the harm against the public benefits of the proposal.
- 4.2.12 As such, and as the term 'safeguards', could be applied subjectively this term should be removed from the policy. The newly inserted criteria (c) will instead ensure development proposals do not have an unacceptable adverse impact on the World Heritage Site.

NPP3 Protecting the Landscape Character of Belper Parish

- 4.2.13 This policy... Part A of this policy does not represent a positively worded policy necessary to comply with national policy, specifically Paragraph 16. Gladman also consider this policy to be contrary to the tests of Paragraphs 184 and 201 of the Framework, which would allow for the consideration of a development proposal that impacts upon the DVMWHS and its buffer zone, this adds a further test in this regard and could be argued to be repetition of such a test. A development proposal that could be said to meet the tests of Paragraph 201, where impact on the 'buffer zone' would already be considered, could then be restricted due to the wording of this policy. Gladman consider criterion to add an unnecessary further layer for consideration and criterion (a) should therefore be removed.

Policy NPP9: Protecting the Landscape Character of Bullsmoor and Belper Rural Fringe East, Belper Cemetery and Rural Fringe North (LCA 06)

- 4.2.14 This policy seeks for development proposals in Landscape Character Area 6 to demonstrate how they maintain the historic field pattern and valued landscape that makes a positive contribution to the Outstanding Universal Value of the DVMWHS. A development proposal may have a positive impact on this area without maintaining the historic field pattern, effectively precluding such development

under this policy. This policy, therefore is not positively worded and contrary to Paragraph 16 of the Framework.

- 4.2.15 Further, this policy is seeking to protect the areas of this Landscape Area that aren't designated as Green Belt through the identification of the area as a 'valued landscape', not supported by the evidence in the Belper Heritage and Character Assessment but from an appeal decision determined by the Secretary of State. This was a judgement taken at a single point of time based on the development proposal in front of the Secretary of State based on the planning situation at the time. This does not constitute the evidence necessary to designate this area as a 'valued landscape' which instead should be supported by a robust evidence base highlighting with the key characteristics and attributes detailed. This is essential to conform with NPPF (2019), PPG and case law regarding key views and valued landscapes. When considering the evidence base, which identifies these areas in this Character Area outside the Green Belt as having 'medium sensitivity' it is clear, that whilst these views may be valued locally they do not constitute the necessary requirements of the Framework.
- 4.2.16 When considering the evidence base, it is clear that this is not a positive policy to be used to guide any future development proposal but instead a policy designed to restrict development. The statement on Page 67 of the Belper Heritage and Character Assessment 2016 states there should be no future development in LCA6 to protect the clear distinction between town and countryside and the rural setting of the WHS. This proposed blanket protection does not accord with the positive approach to development of the NPPF (2019) and the needs to balance the impacts of development in this area against the benefits that development would deliver.
- 4.2.17 It is important to note that the adopted development plan that the BNP is to be tested against allocates a site within the Character Area for industrial development, despite the Secretary of State dismissal of a development proposal on this site. At the time of preparing of the Local Plan it was clearly felt that development could be accommodated in this area where appropriate mitigation was provided as part of a scheme. This conflict with the adopted development plan should be resolved through the removal of this policy from the neighbourhood plan.

Site Allocations

- 4.2.18 Gladman has significant concerns with the strategy that the BNP is following regarding site allocations and the prioritisation of brownfield sites. Several of the sites are saved allocations from the Amber Valley Local Plan 2006 which are yet to come forward. In continuing to allocate these sites the Steering Group need to be certain that the reasons these sites have yet to be developed can be overcome in the neighbourhood plan period.
- 4.2.19 Further, in line with the NPPF (2019), and to meet basic condition (a) the Steering Group need to ensure that the proposed sites are deliverable. In Annex 2 of the NPPF (2019) states that '*to be considered deliverable, sites for housing should be available now, offer a suitable location for*

development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.

- 4.2.20 This is taken further with Paragraph 16 stating that plans should be prepared positively in a way that is aspirational but deliverable. Gladman currently have significant concerns regarding the deliverability of the BNP's proposals.
- 4.2.21 This is important because as has already been addressed earlier in this representation, the strategy currently proposed by the BNP will fail to deliver the full housing needs of the neighbourhood area in the plan period and should any of the proposed site allocations also fail to come forward for development this will compound this issue with an even greater shortfall against the housing needs of the neighbourhood area in the plan period.
- 4.2.22 Gladman submit that the positives of addressing the proposed housing shortfall of the neighbourhood plan period should be considered in the planning balance with further consideration of the greenfield sites adjacent to the development boundary. Without undertaking this exercise again, considering the updated housing needs, it is likely that the BNP will fail to meet basic condition (d).

5 STRATEGIC ENVIRONMENTAL ASSESSMENT

5.1 Context

- 5.1.1 In accordance with PPG ID: 11-027, the preparation of Neighbourhood Plans may fall under the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) that require a Strategic Environmental Assessment (SEA) to be undertaken where a Plan's proposals would be likely to have significant environmental effects.
- 5.1.2 The SEA is a systematic process that should be undertaken at each stage of a Plan's preparation. It should assess the effects of a Neighborhood Plan's proposals and whether they would be likely to have significant environmental effects and whether the Plan is capable of achieving the delivery of sustainable development when judged against all reasonable alternatives.
- 5.1.3 The decision making and scoring of the SEA should be robust, justified and transparent and should be undertaken through a comparative and equal assessment of each reasonable alternative. Too often SEA flags up the negative aspects of development whilst not fully considering the positive aspects which can be brought about through new opportunities for housing development and how these can influence landscape issues, social concerns and the economy.
- 5.1.4 In assessing the reasonable alternatives conclusions need to be provided on the reasons for the rejected options not being taken forward with reasons provided for selecting the preferred approach in light of the alternatives.

5.2 Belper Neighbourhood Plan -Strategic Environmental Assessment

- 5.2.1 Gladman have multiple concerns with the SEA currently supporting the BNP. As confirmed in the HNA update letter the amended housing needs for the extended plan period exceed the levels that have been assessed in the SEA. This could affect the current findings of the SEA as the shortfall against the preferred strategy has increased and likely to affect the scoring against the sustainability objectives. For example, failing to meet housing needs to this extent is unlikely to provide long term significant positive effects.
- 5.2.2 Further to this, we are concerned with the current identification of reasonable alternatives or rather lack of. It is accepted through the SEA that the housing needs of the neighbourhood area cannot be delivered through the preferred brownfield led approach, yet the SEA has not sought to test greenfield alternatives based on an understanding of availability. The SEA has instead sought to rely on the now withdrawn SA that was in support of the emerging Local Plan and now no longer publicly available.
- 5.2.3 There are available sites around Belper that would be a reasonable alternative that will need to be tested for the SEA to meet the EU regulations. One such site is land being promoted by Gladman, Land

off Sandbed Lane, Belper. We contend that a strategy that also included this site would be a more sustainable strategy than that that is currently being progressed.

- 5.2.4 To meet basic condition (f) it is likely that the BNP will likely need to be subject to further SEA work or it will face the risk of not being able to proceed to referendum.

6 SITE SUBMISSION

6.1 Land off Sandbed Lane, Belper

6.1.1 The Councils are aware of [REDACTED] Land off Sandbed Lane, Belper for residential development and associated community infrastructure. A location plan is available at Appendix A of this submission. An outline planning application (AVA/2020/0223) was submitted on the 5th March supported by a full suite of technical documents, demonstrating the site can come forward in the short term through a sympathetic development that takes into consideration the constrained nature of the area.

6.1.2 The site represents a suitable and sustainable location for housing, well located to the existing urban area. Gladman consider that the site has the potential to deliver the following benefits:

- Much needed market and affordable housing of a suitable mix of housing types and sizes to meet the strategic needs of the local housing market. This will demonstrably support and secure the current and future vitality of the area enabling local people to access the housing market locally rather than being forced to move away due to a lack of available housing due to the proposed housing shortfall following the proposed brownfield only strategy;
- Significant areas of planting to provide green infrastructure, ecological and wildlife benefits. Future habitat creation measures will ensure net biodiversity gain through the retention and enhancement of existing biodiversity assets.
- A feasible access solution can be achieved via new highways improvements through new access arrangements;
- Structural landscape planting and retention of positive management of key landscape features;
- Provision of new public open space facilities to serve existing and future residents;
- Improved connectivity with informal footpath links to the surrounding area; and
- Improvements to the local economy and increased footfall to the existing business of Belper.

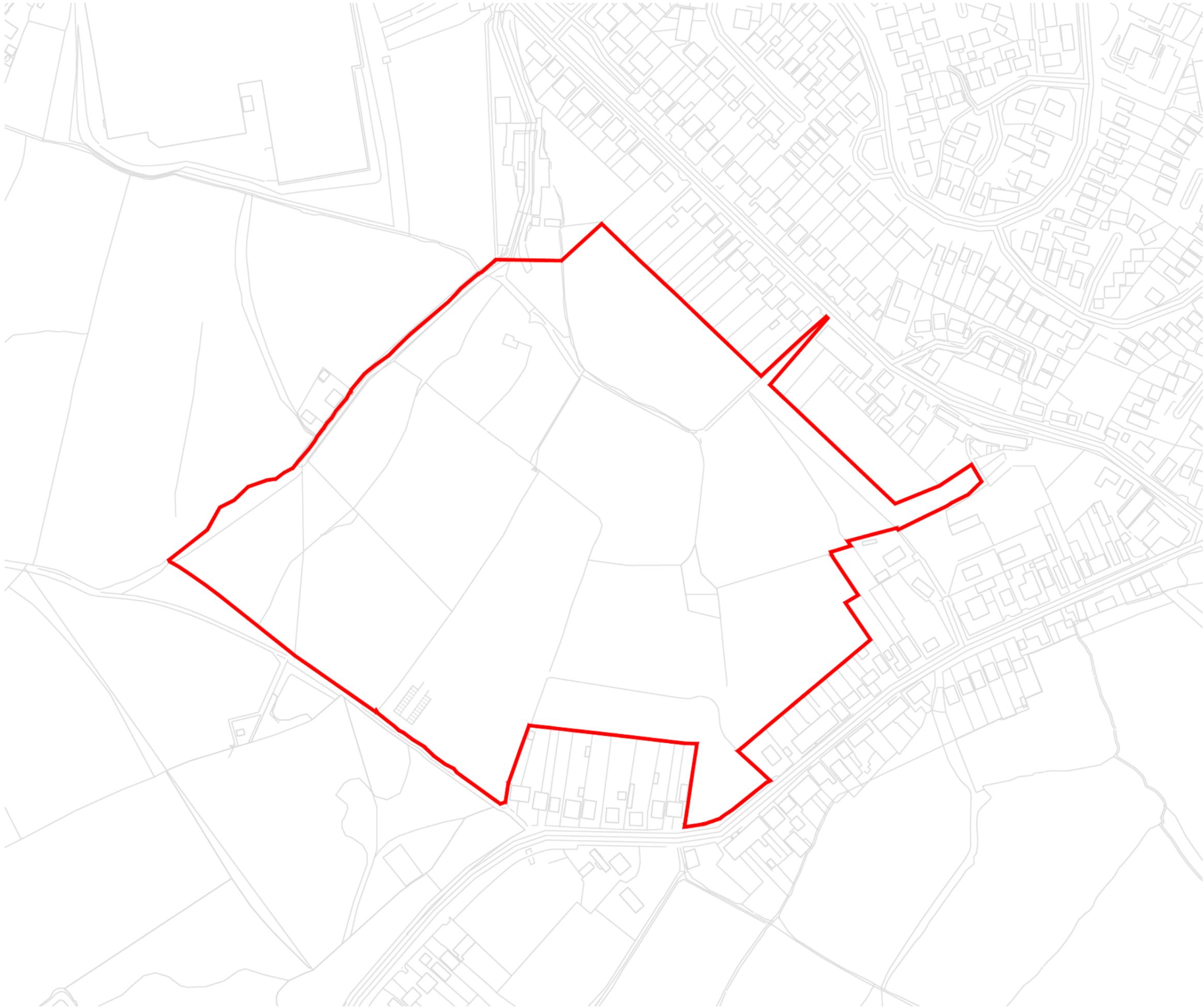
7 CONCLUSIONS

7.1 Assessment against Basic Conditions

- 7.1.1 Gladman recognises the Government’s ongoing commitment to neighbourhood planning and the role that such Plans have as a tool for local people to shape the development of their local community. However, it is clear from national guidance that the BNP must be consistent with national planning policy and the need to take account of up-to-date evidence. If the plan is found not to meet the Basic Conditions at Examination, then the plan will be unable to progress to referendum.
- 7.1.2 As drafted the neighbourhood plan does not propose to meet the identified housing needs of the neighbourhood area following a prioritised brownfield approach. Gladman submit that there are greenfield sites available that can be allocated to deliver much need market and affordable housing such as Land off Sandbed Lane, Belper.
- 7.1.3 Gladman suggest that further work will be required in assessing reasonable alternatives through the SEA. It is not sufficient to rely on the Council’s withdrawn SA that is no longer publicly available. Further work is also required to consider the sustainability of the strategy against the increased housing shortfall and how an alternative strategy that delivered further housing needs may be more appropriate.
- 7.1.4 The current policy approach to the protection of the World Heritage Site and its Buffer Zone does not accord with national policies and guidance. Gladman have suggested alternative wording for these policies.
- 7.1.5 However, without the changes suggested we submit that the BNP does not meet basic conditions (a), (d) and (f), amendments will need to be made for the plan to meet the basic conditions.
- 7.1.6 If the Examiner finds it necessary to consider the concerns raised through a public hearing, Gladman would wish to be invited to such a session.

Appendices

Appendix A– Site Location Plan



NOTES
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 Ordnance Survey base mapping - supplied by client.



Key
 Application Site Boundary

rev	date	description	dm	chkd
-	18.02.2020	First issue.	ETM	OFD



masterplanning ■
 environmental assessment ■
 landscape design ■
 urban design ■
 ecology ■
 architecture ■
 arboriculture ■

FPCR Environment and Design Ltd
 Lockington Hall
 Lockington
 Derby DE74 2RH

t: 01509 072772
 f: 01509 074505
 e: mail@fpcr.co.uk
 w: www.fpcr.co.uk

client
Gladman Developments Ltd

project
**Sandbed Lane
 Belper**

drawing title
SITE LOCATION PLAN

scale: 1:2,500 @ A3 drawn / checked: ETM / OFD revision date: 18 February 2020

drawing number
9150-L-03 rev: -