

Amber Valley Borough Council Local Plan Examination



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Representor: UIM Properties Ltd. Reference No: 176

Representor: Wheeldon Brothers Ltd. Reference No: 172

Matter 4 - Housing

4b: Housing Distribution

Does the provision and distribution of housing development in the Local Plan accord with its principal focus of urban concentration and its spatial strategy which promotes growth in and surrounding the four urban areas of Alfreton, Belper, Heanor and Ripley and as part of a comprehensive mixed-use development on land north of Denby Bottles?

The Spatial Strategy for the Borough focuses principally on urban concentration in the main settlements. It directs the provision and distribution of housing development in accordance with the settlement hierarchy; directing development to the most sustainable settlements (Alfreton, Belper, Heanor and Ripley) as well as looking to sustainable lower tier settlements, which are capable of accommodating and delivering proportionate residential development in order to meet additional housing growth requirements. This sequential approach takes support from the NPPF. Whilst the provision and distribution are therefore in general accordance with the spatial strategy, the single housing allocation in Belper for 65 dwellings (policy HGS5) does not reflect the size and suitability of the site itself, or its location in one of the four urban growth areas (see Pre-Submission Local Plan Consultation Form, representor ref. 172).

What account has the Local Plan taken of meeting the unmet housing need arising in Derby in the distribution of housing development in the Borough?

It has been established that the distribution of homes across the Housing Market Area (HMA) represents the best estimate of objectively assessed housing need across the HMA. In Amber Valley, the housing provision reflects the housing need arising in the locality as well as providing a contribution towards unmet housing need in Derby. In doing so, it is appropriate to allocate housing sites in settlements close to and with good connectivity to Derby, such as Belper and Crich.

Would the settlement hierarchy support the principles of sustainable development and the spatial strategy in relation to the scale and distribution of housing?

As above, the settlement hierarchy supports the principle of sustainable development, seeking to direct development to the most sustainable settlements and thereafter allocating proportionate residential development to sustainable lower tier settlements. The settlement hierarchy is grouped appropriately. Additional representations on the Council's settlement hierarchy have been made previously (representor references 172 and 176).

Does the Plan make appropriate provision for housing needs in the Key Villages and Other Villages and Settlements to meet local needs and enable their sustainable growth?

Previously, there has been an over reliance in Amber Valley on the allocation of larger, strategic sites within the four main settlements. Further, it has been recognised that the defined Urban Areas cannot accommodate all of the objectively assessed housing need due to constraints such as Green Belt, flooding and heritage. This was a concern directly highlighted by the Inspector with regard to the previous, withdrawn iteration of the Local Plan. Accordingly, the Council has applied a sequential approach, looking to Key Villages, such as Crich and Langley Mill, in order to meet housing needs in full.

How is 'land adjacent to the built framework' defined? Should this be set out in the Plan for clarity?

For complete clarity, 'land adjacent to the built framework' should be defined. This would at the same time, and more importantly, enable definition of built frameworks.

In our professional experience, the absence of defined settlement frameworks and reliance on continuous or contiguous development does lead to ambiguity.

Such ambiguity can subsequently lead to delays in housing delivery and cast doubt over the soundness of the Plan, in so far as it not being positively prepared.

4c: Housing Supply During the Plan Period

The Local Plan says that the provision of 9,770 homes is the minimum that should be provided in the Plan period. The Plan allocates Housing Growth Sites for a total of 3,536 homes. Have sufficient sites been allocated to meet the housing requirement?

The Council has acknowledged that upon adoption of the Local Plan, on the basis of the currently proposed allocations, the housing land supply figure will be 5.03 years. Whilst therefore notionally providing sufficient site allocations, this is a relatively optimistic assumption. Meeting this housing land supply minimum is dependent on all sites being delivered and maximising their development potential, there being no lapse rate applied and assuming all windfall sites are applied. In view of the relatively short Plan period, the housing land supply risk inherent in the plan, suggests that on adoption, work should start immediately on a Local Plan review, which will necessarily be informed by a comprehensive Green Belt review.

Should a lapse rate be included in the Council's calculations? If so, what would be an appropriate percentage?

Applying a lapse rate to development is not wholly necessary. It is used where the robustness of delivery information is at risk. In the absence of evidence regarding lapse rates specifically, any notional risk could be addressed, for instance, through the modification of the housing allocation at Belper Lane to revert to a quantum of 120 dwellings.

Whilst we do not advocate the inclusion of a lapse rate at this time, we do not agree with the Council's assertion that policies H1 and H2 will enable additional sites to come forward within the built framework of settlements. These policies will not be effective unless the built frameworks are defined, as above.

Does the Local Plan include a housing trajectory, which clearly shows the number of market and affordable dwellings to be completed each year throughout the Plan period? Is the housing trajectory realistic? Will the allocated housing sites come forward for development as set out in the trajectory? What evidence is there to support this?

And

What evidence is there to support the projected rate of delivery on the Housing Growth Sites?

The Council has published housing trajectory tables informed by evidence provided by landowners, developers and promoters. For Housing Growth Sites HGS5, HGS8, HGS10 and HGS14, Officers at Amber Valley Borough Council have regularly asked for identification of projected delivery rates and have provided relevant evidence to support this. Subject to the market at the time of development, the housing trajectory is realistic.

Wheeldon Brothers Limited (representor reference 172) is an active house builder with a successful track record of delivering high quality, sustainable residential developments within Amber Valley. There can be no better evidence of deliverability, than an active local housebuilder, that has repeatedly delivered sites within the Borough and knows the market intimately.

UIM Property Limited (representor reference 176) is committed to the delivery of the site at Asher Lane South and recognises the opportunity for joint working with the landowner of housing growth site HGS9 (north).

Has full consideration been given to opportunities for the redevelopment of brownfield and previously developed land and buildings when allocating sites for housing?

We consider that through the SHLAA, and the preparation of the plan the Council has fully considered suitable and available brownfield sites. As a result, several deliverable brownfield sites are included within the Local Plan, including land at Asher Lane. Whilst there may be other brownfield sites in Amber Valley, as a result of its industrial legacy (manufacturing and coal mining), they are recognised as less deliverable and hence, are rightly not included in the trajectory.

Would the need for 2,228 affordable dwellings in Amber Valley be met during the Plan period? How would this need be met?

Affordable housing is required from all of the Housing Growth Sites and will be delivered from sites HGS5, HGS8, HGS10 and HGS14 unequivocally.

With specific reference to site HGS5, it is the only housing allocation proposed for Belper over the Plan period and is the only realistic mechanism for the delivery of affordable housing in a settlement where the need for affordable housing is high. Without this housing allocation in Belper there is no available planning mechanism to contribute to meeting local needs. The halving of the allocation from 120 dwellings to 65 dwellings, also notably halves the affordable housing delivery from the site and imparts some further risk to the Borough's ability to meet its affordable housing needs.