

# Amber Valley Borough Council Local Plan Examination



## Planning and Design Group

**Midlands Office** - Pure Offices Lake View Drive Sherwood Park Nottingham NG15 0DT tel 01623 726256

**London Office** - 5 St John's Lane London EC1M 4BH tel 020 7549 2858

Planning and Design Group is the trading name of Planning and Design Group (UK) Limited, Unit 6, Heritage Business Centre, Derby Road, Belper, Derbyshire, DE56 1SW.  
Registered in England No 8329904. VAT No 155486191.

**Representor: UIM Properties Ltd. Reference No: 176**

**Representor: Wheeldon Brothers Ltd. Reference No: 172**

## Matter 12 – General Site Specific Issues

**Are the allocated sites appropriate and deliverable, having regard to the provision of the necessary infrastructure, including highways and education, affordable housing and other facilities, and taking account of environmental constraints?**

In accordance with earlier representations (responder reference 172 and 176), allocated Housing Growth Sites HGS5, HGS8, HGS10 and HGS14 are appropriate and deliverable and have specific regard to infrastructure, highways, education, affordable housing and all other identified constraints.

**Has sufficient regard been paid to infrastructure and flood risk? Are any of the infrastructure providers or the Environment Agency opposed to the principle of the development of any of the allocated sites? If so, should these be deleted from the Plan?**

A small area of site HGS10 is in Flood Zone 3, but which is outside of the developable area. It is also acknowledged that there is a low residual risk of flooding from the Butterley Reservoir, which sits 'above' the site. Accordingly, sufficient regard has been paid to infrastructure and flood risk in respect of this site and therefore no objections have been received.

**Should the development of brownfield sites be undertaken prior to the use of greenfield sites? If so, how would this be achieved and what would be the implications for housing supply and deliverability?**

Whilst it is respected that planning policies should support and promote the re-use of brownfield land, prioritising the development of brownfield sites, ahead of greenfield sites, cannot be considered exclusive of the need to deliver objectively assessed housing needs, or the policies of the NPPF as a whole.

From a review of the Council's evidence base, all available and deliverable brownfield sites are included within the Council's five-year housing supply. The amount of suitable brownfield sites is plainly insufficient to meet an identified housing need and supply. Based on past under delivery of housing on brownfield sites, there is a real risk that in undertaking development of brownfield sites, prior to greenfield, the Local Plan will be unable to demonstrate a robust five-year supply of housing land and would be found unsound. Greenfield sites are typically less constrained and have a shorter lead in time, which is vital in order to make up the Council's 5.03 years supply without delay.

**Are the detailed requirements for each of the allocations clear and justified? Have site constraints, development mix and viability considerations been adequately addressed? Are the boundaries and extent of the sites correctly defined?**

Detailed requirements have been generally addressed however, in terms of site HGS5, Belper, the capacity and extent of the site is unjustifiably constrained. This housing allocation policy and associated site boundary has been revised from earlier Plan iterations from 120 dwellings to 65 dwellings. There is no sound justification for this as the technical work undertaken to accompany a planning application for 118 dwellings demonstrated that the site could suitably accommodate the development when considering all site constraints (representor reference 172).

In respect of the sites at Belper Lane and The Common, Crich, both sites are the subject of planning applications. The applications have been prepared in liaison with planning officers and supported by a full suite of technical evidence to demonstrate deliverability. The design and layout of the proposals has fully taken on board identified site constraints and have been contextually prepared. Consultation has taken place with the Council's housing officers to ensure that the dwelling mix is appropriate to identified needs.