
FREETHS

**AMBER VALLEY BOROUGH LOCAL PLAN
MATTER 16 HEARING STATEMENT: POLICIES MAP**

**PREPARED ON BEHALF OF
HALLAM LAND MANAGEMENT LIMITED**

MAY 2018

**FREETHS LLP
PLANNING AND ENVIRONMENTAL GROUP**

**Cumberland Court
80 Mount Street
Nottingham
NG1 6HH**

**DX: 10039 Nottingham
Tel: 0115 9369 369
Fax: 0115 8599 641**

1. INTRODUCTION

- 1.1. This Statement is prepared by Freeths LLP on behalf of our client Hallam Land Management Ltd and is submitted as evidence as part of the Amber Valley Borough Local Plan examination. Hallam Land Management Ltd is currently promoting land at Coppice Farm, Ripley within the administrative area of Amber Valley, this being a site that benefits from an extant planning permission for circa 350 dwellings with a further application being considered by the Council (at the time of writing) for up to 400 dwellings as a result of amended site boundaries and revised site capacity assessment.
- 1.2. The issues covered by this Statement relate to Matter 16: Policies Map of the 'Inspector's draft matters, issues and questions for examination (Revised)' dated 16/05/18 prepared by the Inspector and forming the basis of the Examination Hearings. This Statement responds specifically to question 16(iii) identified by the Inspector.

2. COMMENTS

Housing Supply during the Plan period

Q16(iii). The 'Proposals Map' in the Local Plan is made up of an A4 Key Diagram, which sets out the broad location of the proposed housing sites, the extent of the urban areas and Green Belt, the proposed amendment to the Green Belt, Special Landscape Area, World Heritage Site (along with its buffer zone), railway routes and main roads; and a series of A4 OS based plans, showing more detailed boundaries of allocated sites and areas referred to within policies in the Plan. Would it be more helpful to have a single plan, or series of plans, possibly on a settlement by settlement basis, covering the entire Borough which illustrates more clearly the geographic application of the policies in the Local Plan and the interrelationship between them?

- 2.1. It is submitted that large scale sites (>150 units) with planning permission should be detailed as allocations or commitments on the policies map. These sites, considered and assessed as sustainable locations for development, are accounted for and contribute towards the District's housing supply, relied upon in the Plan as a result to

deliver the identified housing need. Noting that the Plan's housing requirement figure is not intended as a ceiling or maximum, this approach would provide a greater degree of confidence concerning the Plan's ability to do this and ultimately, its soundness.

- 2.2. Such an approach would also provide greater certainty and flexibility to developers, particularly on sites where development has been delayed due to unforeseen circumstances including viability or economic variations for example. We have raised previously in an earlier Hearing Statement (Matter 4 – Housing) that proposals in Derbyshire are sensitive to even small impediments that often result in sites becoming undeliverable (such as elevated build, abnormal or infrastructure costs for example). This approach would therefore provide greater confidence to developers as a fall-back position should such circumstances arise.