

**Gladman Developments Ltd**

**Matter 4 Hearing Statement**

**Amber Valley Local Plan**

**Housing**



**May 2018**



## **Matter 4a – Housing Requirement**

### **1.1. Q. a(iv) – The housing requirement is for a minimum of 9,770 additional dwellings between 2011 and 2028 – this is made up of the housing need arising in Amber Valley (7,395) and a contribution towards unmet housing need arising in Derby (2,375). Does this, along with the provision of a minimum of 12,618 dwellings in South Derbyshire and 11,000 dwellings in Derby, reflect the full objectively assessed needs for market and affordable housing in the housing market area?**

- 1.1.1. It is recognised that the housing need assessment that has been carried out by GL Hearn has been examined in other authorities within the HMA and has been found to be appropriate. It is also recognised that the Amber Valley Plan is seeking to ensure that there is full Local Plan coverage across the HMA to 2028 and is therefore working off the same evidence base as South Derbyshire and Derby City. Gladman had concerns with the assessment of Housing Need which underpinned both of the Plans which were examined, particularly with the approach to market signals. However, we are aware that our concerns were not accepted by the Inspectors in those cases.
- 1.1.2. However, the situation has moved on since the examination of both the South Derbyshire and Derby City Local Plans and there is a need to ensure that all local plans which cover the HMA are based on up-to-date evidence.
- 1.1.3. The Government are proposing, through the changes to the Framework, to introduce a standard methodology for assessing housing need. The 2016 Population and Household Projections will be released later this year, along with new affordability data which will allow Local Planning Authorities the ability to calculate their new housing need figures. Given the lifespan of the Amber Valley Local Plan will only have, at best, 9 years to run once it is adopted, coupled with the fact that the Government want to see a step change in housing delivery across the Country and that the data for calculating housing need in the HMA will soon be out of date, it is considered essential that an immediate review of the Amber Valley Local Plan is undertaken alongside reviews of the other Local Plans which make up the HMA.
- 1.1.4. It is only through a rapid review of all the Local Plans within the HMA, that the delivery of housing across an appropriate time period (i.e. at least 15 years) which meets the identified housing needs of the area, can be assured.

## **Matter 4b – Housing Distribution**

### **1.2. Q. a(i) – 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?**

- 1.2.1. It is supported that the Amber Valley Local Plan directs significant growth to the four urban settlements of Alfreton, Belper, Heanor and Ripley. However, as Belper is the closest of the four settlements to Derby City, where housing need cannot be met entirely within the City's boundaries, it is considered that a greater level of growth should be accommodated in Belper.
- 1.2.2. At present, only 65 units are proposed to be delivered in Belper at Belper Lane (Policy HGS5) which is only 2% of the allocations made within the Amber Valley Local Plan. Given that the settlement is recognised in the Plan as a focus for growth and given its proximity to Derby, it is considered that greater effort should have been made to identify suitable, available and deliverable sites in the settlement to deliver new housing growth across the Plan period.
- 1.2.3. It is recognised that Belper is constrained to some extent by the World Heritage Site designation. However, impact on the heritage asset should not be treated as a blanket restriction on development. If a proposal is deemed to have less than substantial harm on the heritage asset then this must be weighed in the planning balance, as set out in Paragraph 134 of the Framework, against its benefits.
- 1.2.4. What is required is a detailed assessment of all sites which are potentially available within the settlement in terms of their impact on the heritage assets and for this to be weighed against the sustainability and other benefits of locating new development in one of the main settlements within the Borough.
- 1.2.5. If Belper is to be a focus for growth, as set out in the Strategic Objectives of the Plan (Objective 3) and Policy SS2, and in order to continue to support the regeneration of the town and support its improving and expanding services and facilities, then the town needs to deliver new housing and employment growth across the Plan period.
- 1.2.6. Sites are available in Belper which are available, achievable and deliverable which may or may not have an impact on the World Heritage Site. These sites should have been assessed, in detail, through the evidence base of the Local Plan to determine if any harm is established and if so, to what degree. This information could then have been used to identify additional, suitable, available and

- deliverable sites whose benefits outweigh any harm (if indeed any harm is deemed to be caused through the heritage assessment).
- 1.2.7. One such site is Land off Sandbed Lane, Belper (AVBC/2008/0230) which has been promoted as an omission site during the preparation of the Local Plan.
- 1.2.8. The SHLAA 2013 identifies the site as potentially suitable for residential development. Gladman believe that the site has the potential to deliver following benefits:
- a. a mix of housing types and sizes to meet the strategic needs of the local housing market, including market and affordable housing;
  - b. significant areas of planting to provide green infrastructure, ecological and wildlife benefits. Future habitat creation measures to ensure net biodiversity is retained and enhanced within existing biodiversity assets;
  - c. a feasible access solution can be achieved with new highways improvements;
  - d. structural landscape planting and the retention of positive management of key landscape features;
  - e. provision of new public open space facilities to serve existing and future residents;
  - f. improved connectivity with informal footpath links to the surrounding area; and
  - g. improvements to the local economy and increased footfall to the existing businesses of Belper.
- 1.2.9. If it is deemed that additional sites are necessary to make the Amber Valley Local Plan sound, then Land off Sandbed Lane, Belper should be allocated.

## **Matter 4c – Housing Supply During the Plan Period**

### **1.3. Q. c(i) - 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?**

1.3.1. It is difficult to assess whether or not sufficient sites have been allocated in the Amber Valley Local Plan until the sites and assumptions have been assessed as part of the Local Plan Examination. If issues are found to exist with any of the allocated sites, lead-in times, delivery trajectories, windfall allowance etc. then additional sites will have to be found and allocated to ensure that the Local Plan housing requirement is met or surpassed.

### **1.4. Q. c(iii) – Is it anticipated that all the dwellings with existing planning permissions or resolutions to grant permission for housing development will be built? If so, what evidence is there to support this?**

1.4.1. It is considered that this is an unrealistic assumption and there is no evidence before the Examination which gives confidence that this can be achieved. Sites with planning permission may not come forward for a whole host of reasons including legal issues, changes of ownership, unforeseen on-site issues etc. and research has suggested that between 10% and 20% of sites with Planning Permission lapse.

1.4.2. A lapse rate should therefore be applied to sites with Planning Permission and this should be based on historical lapse rates in the Borough. This will ensure that the housing land supply in the Borough is robust and flexible enough to deal with changing circumstances as required by the Framework.

### **1.5. Q. c(iv) – Should a lapse rate be included in the Council's calculations? If so, what would be an appropriate percentage?**

1.5.1. See the response set out above.

### **1.6. Q. c(x) – If sites are deleted from the Plan it seems likely that other sites will have to be found?**

1.6.1. Yes. If, for any reason, it is deemed necessary to delete sites from the Local Plan then additional allocations will need to be found to ensure that the Plan can be found sound and will deliver a five-year supply of housing land across the Plan period.

**1.7. Q. c(xxii) – Overall, does the Plan deal adequately with uncertainty?  
Is sufficient consideration given to monitoring and triggers for  
review?**

- 1.7.1. No. The Local Plan does not deal adequately with uncertainty for the reasons set out in this Hearing Statement. Sufficient consideration is not given to the Local Plan Review which, as set out in our response to Matter 1, should be immediate.