

Planning Policy Team
Amber Valley Borough Council
Town Hall Market Place
Ripley
Derbyshire
DE5 3BT

SENT BY E-MAIL ONLY TO
ldf@ambervalley.gov.uk

2nd May 2019

Dear Sir / Madam

AMBER VALLEY LOCAL PLAN EXAMINATION – GREEN BELT AMENDMENTS & ADDITIONAL SITE ALLOCATIONS CONSULTATION

Introduction

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following representations to the above mentioned consultation and to participate in any resumed Examination Hearing Sessions.

Green Belt Amendments & Site Allocations

In June 2018 after receiving the Local Plan Examination Inspector's Notes the Council resolved to undertake a comprehensive Green Belt boundary review in order to inform the process of identifying and proposing additional housing growth sites in the Local Plan so that the minimum housing requirement of 9,770 dwellings between 2011 – 2028 is met and on adoption of the Local Plan a 5 year housing land supply (YHLS) exists.

The HBF agrees with the Council that exceptional circumstances exist to justify the amendment of Green Belt boundaries as set out in the proposed amendments to **Policy SS10**. The proposed addition of fifteen housing growth sites to the Council's overall housing land supply (HLS) as set out in **Policy HGS1** is also welcomed although the HBF make no specific comment on the individual sites selected for allocation.

The overall HLS is 13,252 dwellings between 2011 – 2028 against a minimum housing requirement of 9,770 dwellings (see Table 3 of Appendix 1). It is noted that the proposed housing growth sites as set out in detail in **Policies HGS15 – HSG30** provide a total additionality of 2,010 dwellings of which 1,220 dwellings are in the Council's 5 YHLS (see Tables 4 & 4A of Appendix 1).



These housing allocations provide a variety of site sizes (4 of less than 50 dwellings, 5 of 51 – 150 dwellings, 3 of 151 – 250 dwellings, 2 of 251 – 550 dwellings & 1 of more than 551 dwellings) and locations across the Borough in Denby, Ripley, Codnor, Hease, Belper, Heanor, Duffield and The Riddings.

As well as releasing sites from the Green Belt for development the status of two villages of Mapperley and Marehay is also changed to be inset into rather than washed over by the Green Belt.

Housing Trajectory & 5 YHLS

The Local Plan Examination Inspector's Note also required the Council to prepare a revised housing trajectory and an updated 5 YHLS calculation which should clearly set out the basis of assumptions used.

As of October 2018 the Council's 5 YHLS using 20% buffer and Sedgefield is 6.13 years or using 20% buffer and Liverpool is 7.21 years for the period 2018/19 – 2023/24 (see Tables 4 & 4A of Appendix 1). However if the Local Plan is not adopted until the end of 2019 the relevant 5 year period is 2019/20 – 2024/25. Before any resumed Examination Hearing Session the Council should provide a revised calculation for further discussion.

It is noted that the Council's 5 YHLS and housing trajectory assume that allocations currently without planning consent are delivering completed dwellings by the end of March 2021. This provides a lead in time for pre on-site commencement and start on-site to first completion / occupation of only 23 months from now. There is limited information available on the speed at which the Council can process planning permission applications, discharge planning conditions and complete Section 106 agreements before on-site construction commences and if the residual period provides enough time for developers to build and sell dwellings to meet the expected delivery of housing.

Conclusion

It is hoped that these representations are of assistance to the Council and Inspector during the next stages of Amber Valley Local Plan Examination. If any further assistance or information is needed please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**



Susan E Green MRTPI
Planning Manager – Local Plans