Proposed Spatial Strategy Policy.
A) Housing Growth

We support the fact that the Housing Land Supply is such that we don't need to build on Green Belt.

However, we wish to protect not only the Green Belt but also greenfield land in general as far as possible.

We are very concerned that the high number of additional homes and the low housing densities proposed will inevitably lead to more urban sprawl and use of greenfield sites.

Our view is, therefore, that Amber Valley's new homes should be well-designed, high-density housing benefiting from, and contributing to, the viability of transport, green and social infrastructure.

Additional homes

We consider that making provision for a minimum of 7,885 additional homes between 2022-2039 is too high a figure.

In the 2021 public consultation on spatial strategy options for housing and economic growth, the majority of respondents indicated that Amber Valley should meet **its own housing requirement**, as set out in the standard methodology for calculating the minimum level of housing need, i.e. 6392 homes. However, this proposed policy ignores the results of this public consultation. The proposed figure for housing provision (7885 homes) is over 23% above Amber Valley's assessed need, with the explanation:

This scale of housing growth would… more closely reflect the rate of housing completions within the Borough over the period 2011-2022, as well as recognising the need to give further consideration to any unmet housing need arising within adjoining authorities.

We consider it incorrect that future need should be based on the rate of housing completions in the past, and incorrect that the increase on the assessed need should be as large as 23%. However, we recognise the need to give further consideration to any unmet housing need arising within adjoining authorities, but we would expect that adjoining authorities give the same consideration to Amber Valley. Furthermore, Derby City is an ideal place for well-designed, high-density housing, like all cities.

Housing densities

In addition, we do not accept the figures assigned to the potential sites identified as part of the SHELAA process. These are based on 'past densities of development achieved in the borough', whereas we consider that the total figure for the 14 sites identified as suitable, available and achievable for new housing development should be based on the following evidence:

- the mixes of housing proposed as appropriate by the Local Housing Needs Assessment. This would still allow the policy to state that the most appropriate mix on a site-by-site basis would depend on local circumstances;
- a requirement that National Space Standards apply (to ensure rooms are an adequate size);
- a requirement relating to **housing densities (dwellings/hectare and/or bedspaces/hectare)** and site coverage ratios which would use land responsibly, sustain vibrant communities, provide green spaces, and reduce car dependency. (as per NPPF para 125, cited below)

NPPF 2018
*Para.125. Area-based character assessments, design guides and codes and masterplans can be used to help ensure that **land is used efficiently** while also creating beautiful and sustainable places. **Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site**.*
In these circumstances:
*a) **plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards** for city and town centres and **other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate**;*
*b) **the use of minimum density standards should also be considered for other parts of the plan area**. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and*
*c) **local planning authorities should refuse applications which they consider fail to make efficient use of land**, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).*

Conclusion

AVBC's housing provision should not be increased by 23% to accommodate the housing needs of other local authorities. This would create commuting and increase car dependency. The reason the government has put an additional housing requirement on cities, such as Derby, is because it is recognised that it is more sustainable to build denser housing in cities, reducing journeys and sustaining local amenities.

Building Derby's homes on Amber Valley's greenfield sites in low density developments is poor use of land, and Amber Valley Green Party opposes this.

B) Economic Growth

In the 2021 public consultation on spatial strategy options for housing and economic growth, the majority of respondents indicated that Amber Valley should meet the employment land requirement as set out in the updated ELR i.e. 42.33 hectares. However, the proposed figure for employment development is over 23% more than the identified need, with many of the sites on greenfield and one on the Green Belt.

We believe that this uplift in land supply is unnecessary, and can see no justification for it.