

Nigel Mills M.P.



HOUSE OF COMMONS

LONDON SW1A 0AA

Cllr S Bradford
Leader - Amber Valley Borough Council
Town Hall
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Ripley
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21 December 2012

Dear Stuart

Preferred Growth Strategy

I am writing to set out my comments on the Council's proposed preferred growth strategy for Amber Valley.

While it is pleasing that the proposed strategy is not based on the higher options contained in the original "Options for Housing Growth" document, and that many of the Greenbelt sites previously proposed for consideration have been ruled out, I still consider that there are a significant number of issues with the latest strategy, namely:

- The overall number of houses proposed for the Derby Housing Market Area ("HMA") is excessive compared to expected levels of growth, past performance and proposals for neighbouring areas;
- The number of houses proposed for Amber Valley especially appears to be excessive compared to expected growth levels and at 27% of the proposed total for the Housing Market Area higher than indicated in 3 of the 4 options considered in the previous document;
- The preferred strategic sites exclude several brownfield sites in Amber Valley where significant numbers of houses could be constructed – and indeed where developers have proposals to do so;
- The preferred sites still include the loss of greenbelt which should be a last resort;
- The preferred strategic sites seem to be disproportionately in the East of the Borough despite other areas of the Borough having easier access to Derby.

A reconsideration of these issues would result in a lower overall housing growth target, a lower target for Amber Valley and the potential to remove one or more of the preferred sites from further consideration.

Proposed housing growth for Derby HMA

The proposed housing growth of 33,700 for the period to 2028 falls between the 2nd and 3rd options set out in the Options for Growth paper. While I note that this is a little less than the old regional plan target, I still have concerns that this number is excessive. The Preferred Growth Strategy document sets out various comments which indicate that this is the case including:

- "this exceeds the increase in the housing stock being proposed in the Greater Nottingham aligned Core Strategies"
- "This proposed level of growth is at the upper limits of what is likely to be deliverable, having regard to past build rates and current very difficult market conditions as assessed in the Housing Requirement Study."
- "Development on this scale would imply an increased workforce of just below 10% which would easily outstrip the projections for employment growth"

Member of Parliament for Amber Valley

I would urge the Council to reconsider whether this level of housing growth is necessary, desirable or achievable.

Proposed Allocation to Amber Valley

The proposal is that 27% of the housing growth should be constructed in Amber Valley – a higher proportion than options 1, 2 and 4 of the original consultation (15%, 23%, 24% respectively). Given that there has been far greater demand in South Derbyshire in recent years and that the City represents the preferred area for growth given the availability of infrastructure and work opportunities, it is surprising that so high a proportion has been agreed for Amber Valley.

Particular comments in the strategy that cause concerns are:

- *“The amount of development proposed in South Derbyshire away from the Derby Urban Area is therefore somewhat below the adjusted trend projection for the district.”*
- *On the strength of demographically projected growth alone, Amber Valley would effectively have to be planning for virtually no economic growth at all (0.2% p.a.)*

It would seem that an excessive proportion has been allocated to Amber Valley. Reducing this even to the proportion in option 2 of the original consultation (the one with the total closest to 33,700) would reduce the housing proposed in Amber Valley to approximately 7,600 – this would mean that one or more of the preferred sites could be removed.

Use of Brownfield sites

While it is welcome that many of the greenbelt sites have been omitted, the proposed strategy does still involve the further loss of greenbelt land and Greenfield land. None of the preferred sites except Taylor Lane in Heanor represents brownfield land, despite the fact that brownfield sites with significant potential for housing are available. These sites, where I fear development may not be viable without a housing element, include the old Stevensons dye-works at Bullbridge, the old Butterley site in Ripley (on which some housing has already been constructed) and the old American Adventure site.

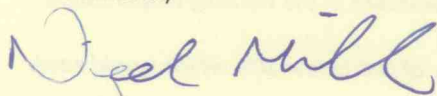
While the Council may prefer alternative uses for these sites, I would urge that further consideration be given to the potential for housing on these sites in order to make regeneration and clean-up of them viable and to take the pressure off greenbelt and Greenfield sites elsewhere. Plans shown to me suggest that around 1,000 houses could be constructed across these 3 sites alone, reducing the demand for other sites considerably.

Site allocation across Amber Valley

While I can appreciate the issues with the World Heritage Site and the very rural nature of some of the Western part of the Borough, the preferred sites do seem to be disproportionately allocated to the east of the Borough. Given the ease of access to Derby for the more southern and western parts of the Borough, it would seem sensible to reconsider whether any suitable options for housing development are available in that area.

Overall therefore while I welcome that the Council have eliminated some greenbelt sites from further consideration, and the total proposed new development is lower than first feared, I do consider there to be scope to reduce the total still further and therefore protect more greenbelt from development and remove one or more of the preferred sites from being developed.

Yours sincerely



Nigel Mills MP