

E.V.A.D.E.

Ecclesbourne Valley Against Development Excesses

NEWS LETTER NO. 7

6th September 2021

Committee's Response to AVBC Consultation.

To keep all our members fully informed on this very important issue, we are circulating the complete text of our response letter to AVBC, consequently the newsletter is longer than usual. The response is aligned to the agreed Aims and Purposes of EVADE (<https://www.ecclesbournevalley.co.uk/evade-aims-and-purpose.html>).

Your voice

We, again, encourage everyone to consider AVBC's short consultation document titled "Alternative spatial strategy options for housing and economic growth" found on link:

<https://storymaps.arcgis.com/stories/c4d6ff58e5dc40b69d6a0f241bc9c014>

It is important that AVBC gets a clear understanding of opinions in the Ecclesbourne Valley so that their Local Plan can be based upon and reflect those opinions, so please make your voice heard. This is your only opportunity to influence the content of the Local Plan which will have direct impact on developments in Ecclesbourne Valley through AVBC's strategic planning decisions.

Make your voice heard by using the AVBC's on-line response form to [express your opinions and/or support the EVADE submission before the 30 September closing date.](#) Link to the form:

[https://www.ambervalley.gov.uk/planning/planning-policy/local-plan/alternative-spatial-strategy-options-for-housing-and-economic-growth/consultation-response-form/.](https://www.ambervalley.gov.uk/planning/planning-policy/local-plan/alternative-spatial-strategy-options-for-housing-and-economic-growth/consultation-response-form/)

E.V.A.D.E. Letter to AVBC

Dear Sirs,

Response to the Consultation on Amber Valley Borough Plan, Alternative Spatial Options for Housing and Economic Growth

I write as chairman of E.V.A.D.E. (Ecclesbourne Valley Against Development Excesses). The Committee have considered the consultation document alongside the Aims and Purposes of EVADE's members (some 150 households) and with reference to the Sustainability Appraisal Spatial Strategy Options Assessment (by clearlead) including its detailed analysis in the Appendix A: Spatial Options Assessment- June 2021 analysis; and your SHELAA Interactive Map.

Overview:

Our recommended options are Option A for Scale of Housing & Economic Growth and a combination of Options 1 and 4 for Distribution of Housing and Economic Growth. Please see below for detailed recommendations and reasons.

The current proposals are very high-level, and we look forward to having an opportunity to comment on more detailed proposals when these are available, before the draft local plan is finalised

Options for Scale of Housing & Economic Growth

Option A: Housing Growth - meeting the minimum requirement using the standard method in national planning guidance (6,395 dwellings). Economic Growth – meeting the requirement set out in the Employment Land Review (42.33 ha).

Reasons:

- The plan is based on the period 2021 to 2038 and local housing development over the next 17 years can only be speculated upon at this stage. There is no reason to believe that housing need will grow in excess of the national guidance and Option B would be inappropriate - particularly as it would require diverting scarce resources (infrastructure improvements etc) when AVBC resources are already under extreme pressure.
- Option C whilst desirable should only be pursued only if there is a realistic prospect of adjoining authorities taking up the shortfall. This is unlikely and hence we feel that Option C is unrealistic.
- The minimum housing need in accordance with the government guidelines is for 6395 dwellings between 2021 and 2038. Industrial and/or office development, climate change affecting transport needs, pandemics resulting in shifts in employment patterns and other factors could radically affect the required number and location of housing over the Local Plan period. In the light of such significant uncertainties, Option A should be adopted as the most pragmatic approach.

Distribution of Housing and Economic Growth

Combination of Options 1 and 4 with the priorities and key focus as follows:

- 1. Main development growth on the edge of and around the Derby Urban Area to make best use of the services and infrastructure already there (SO8) – enhancing it would be more cost effective in these areas as the development proceeded and with the user catchment being more compact. Less impact on the overall nature and character of the wider AVBC area – important for SO8, SO9, (referring to the “clearlead” report SA objectives)**
- 2. Development around the four main urban areas of Amber Valley (Alfreton, Belper, Heanor and Ripley) centred on brownfield land as a first priority.**
- 3. Minimum development in villages and rural areas where public transport, road infrastructure for private travel, leisure facilities, schooling, major medical facilities, etc. are limited. Adequate provision of these facilities in village and rural areas would be much more costly (financially and in land use terms as measured against the SO categories). Development needs to be located near to employment and recreation centres. Climate change will become an increasingly important issue between 2021 and 2038 so no development should be allowed on floodplains and other natural assets which are important to protect against climate change SO11/SO12. Any developments which encourage or demand commuting, particularly by private transport, should be avoided to minimise overall carbon emissions. Significant development in villages and rural areas would negatively impact all of these factors.**

Reasons – Further Detail:

- Concentration of developments around the urban areas would also encourage the use of brown field sites – and AVBC should proactively secure and use such land, especially to use surplus industrial sites and to protect heritage assets from decay, becoming unsafe and an eyesore for local residents (e.g. East Mill in Belper) SO13/SO14/SO15. Green field and productive agricultural land should not be used until all such brownfield land/assets have been used and returned to be a viable part of the communities. This policy must avoid greenfield land being developed just ‘because it is easier for developers to do so’ SO11/SO12/SO15.
- The combination above would have the advantage of making best use of the facilities and infrastructure associated with the existing urban areas allowing new populations easy access without the need for more distant travel.
- Use of current Green Belt land for development should be undertaken only after proper consideration of all the implications. Such assessment should require appropriate compensatory extensions of the Green Belt to ensure that the AVBC area does not become a mass of urban sprawl. It is recognised that different areas of Green Belt fulfil their purpose to a greater or lesser extent and their effectiveness should be reviewed. (See link below *)
- The vibrancy of urban areas is dependent on larger facilities, cinemas, supermarkets, outdoor venues, sports facilities etc, all of which benefit from larger concentrations of housing of the Derby and AVBC urban areas.
- Many of the outlying villages have pre-existing flood risks, these would most likely be negatively impacted by large scale housing development in and around the villages. Whilst the urban areas are not without their flood risk, many of them already have some level of flood defences in place to enable them to cope with such events. Investment in such defences would be better spent in urban areas where they would benefit a greater number of households/ businesses – rural areas should be protected by not allowing development on their natural floodplain defences SO11/SO12. These areas are also critical for safeguarding and enhancing biodiversity, water quality in watercourses and groundwater, and natural habitats SO12.

In summary, we are of the opinion that the scale of development should be set in line with Option A, not exceeding or falling short of the national planning guidance, and that the distribution of the development should be based on a combination of options 1 and 4, concentrating development on areas which provide best access to existing infrastructure, facilities and employment. Development of brown field sites should be a priority with greenfield sites and particularly flood plains being protected. Green Belt boundaries should be reviewed in relation to their effectiveness and benefits, and any encroachment on Green Belt should be accompanied by compensatory designation of new areas.

We trust that these proposals will be considered and incorporated into the development of the Local Plan and look forward to hearing more in due course.

Please do not hesitate to contact us (via the address, telephone number or e-mail address above) if you wish to discuss these matters further. Acknowledgement of the receipt of this letter would be appreciated.

Yours faithfully.

R. S. Skinner (Chairman) on behalf of the committee of E.V.A.D.E.

*Current debate around how well Green Belt fulfils its purpose and the ability to compensate with areas that better fulfil the Green Belt purposes [Green Belt - House of Commons Library \(parliament.uk\)](https://www.parliament.uk/libraries/commons/libraries/committees/green-belt)

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Check Our Website www.ecclesbournevalley.co.uk
Tell your friends.