### **Why Build Here**

#### No Proven Need for Housing on This Site

The proposed development does not demonstrate a clear, site-specific housing need within Littleover. Derby City Council's wider housing targets do not automatically justify building on every available green space, especially when this location lacks supporting infrastructure and already faces pressure on schools, roads, and healthcare. The council's planning documents acknowledge that housing need is unevenly distributed across the city, with greater demand closer to employment hubs and transport corridors. Prioritising development here risks undermining community wellbeing without solving Derby's housing challenges.

#### **Housing Pressure Lies Elsewhere in Derby**

Strategic housing assessments show the most acute housing need in Derby lies in areas such as Normanton, Sinfin, and parts of the city centre, where regeneration, affordable housing, and brownfield development better serve local populations. These areas offer better access to public transport, jobs, and services, unlike the Littleover site, which is poorly connected and environmentally sensitive. Building here ignores more sustainable options and risks creating isolated, car-dependent housing that does not meet the needs of Derby's most vulnerable residents.

### South Derbyshire Development Already Strains Blagreaves

The proposed 150-home development off Grovebury Drive — part of a wider 500-home scheme in South Derbyshire — will already place significant pressure on Blagreaves ward's infrastructure. Although outside Derby City's boundary, the development relies on Derby-owned land for access and will funnel new residents into city services, schools, and roads. Approving additional housing in Littleover compounds this strain, creating overlapping demand without coordinated investment in public services or transport. The Grovebury Drive scheme alone should trigger a reassessment of capacity in Blagreaves before any further development is considered.

#### Smarter Alternatives to Meet Housing Demand

Derby City Council has alternatives to meet housing demand without sacrificing green wedges or overburdening suburban infrastructure. These include unlocking brownfield sites, supporting city centre regeneration, and collaborating with neighbouring authorities through the Derby Housing Market Area (HMA) strategy. The council's Growth Options Study identifies sustainable expansion zones outside sensitive areas like Littleover, including Infinity Garden Village and land south of Mickleover, which are better suited to large-scale development and offer opportunities for integrated planning, transport links, and service provision.

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# Objection to Housing Need Justification for Planning Application in Littleover, Derby

The justification of housing need is a central pillar of any large-scale residential planning application in the UK. Proposals must align with national and local policies and demonstrate a robust link to genuine need, particularly at the site level. In Derby, and Littleover specifically, delivering new homes must be weighed against environmental, infrastructural, and community factors, considering statutory guidance, policy changes, and cross-boundary developments that impact local resources. This objection draws on critical analysis of the latest published evidence, including Derby City Council's Five Year Housing Supply Statement (April 2025), Local Housing Needs Assessments, strategic infrastructure and green wedge reviews, news coverage, and live issues relating to Section 106 obligations and developer contributions.

The main objection arises from the absence of compelling, site-specific evidence that this location is essential to Derby's overall housing trajectory, given current oversubscription of allocated strategic sites and underutilised alternative land supplies. The Five Year Housing Supply Statement (April 2025) shows Derby's housing delivery is below the required five-year supply, but national policy is clear that housing need identification is a baseline calculation and site selection must consider constraints, sustainability, and mitigation of adverse effects. The 2023 Local Housing Needs Assessment (LHNA) and Strategic Housing Market Assessment (SHMA) reaffirm that much of Derby's need should be met through brownfield land, strategic regeneration areas, or cross-boundary supply mechanisms. South Derbyshire's accelerated housing delivery since 2017/18 was intended to absorb "unmet need" from Derby, reflected in the supply distribution within the wider HMA.

The Derby Local Plan outlines that urgent need does not override the protection of green wedges, heritage assets, or community resources unless it is shown that less harmful, appropriate sites have been exhausted. Derby's 2025 Housing Supply identifies over 420 dwellings with permission on small sites (mostly urban and brownfield), and brownfield-focused policies aim to unlock thousands more homes. The city's empty homes strategy continues to deliver hundreds of units per year through proactive engagement and acquisitions.

Given this, the claim of "site-specific" housing need at Littleover fails a sequential test. There is insufficient justification that the loss of sensitive landscape and public amenity is essential to meeting supply, or that less harmful options have been appropriately discounted. Derby's preferred strategy and evidence base indicate directed growth should favour urban regeneration, brownfield densification, or urban extensions already earmarked as sustainable, particularly those with infrastructure capacity and strong transport links. The Littleover application constitutes unnecessary additional supply at

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a location not optimised for current or future need and conflicts with national policy and local spatial priorities.

### Misrepresentation of Housing Need Distribution and Acuteness across Derby's Wards

Another objection is the mischaracterisation of where acute housing need is most intense across the city and HMA. Although Derby struggles to maintain annual supply, spatial analysis reveals acute housing need varies greatly between wards. Derby's LHNA (2023) shows the greatest shortfalls in affordable and market housing are in innercity wards such as Arboretum, Abbey, Normanton, and Darley, typified by high rates of private renting, overcrowding, and below-average owner occupation. These areas have higher concentrations of house-sharing, households in temporary accommodation, and people on the Housing Register. Littleover and Blagreaves are not identified as priority zones for acute need, deprivation, or affordable housing delivery. Littleover is largely owner-occupied and low-density, with census data indicating lower deprivation and a higher rate of under-occupied households compared to the Derby average.

Recent empty homes mapping places Littleover and Blagreaves at or below the city's mean for empty properties. The LHNA, SHMA, and Allocations Policy emphasise newly arising and backlog need is skewed towards smaller, more affordable dwellings and supported housing for vulnerable groups, reflecting the prevalence of younger, lower-income, or ethnically diverse households in the city's core. The Littleover proposal is for standard family housing, with an anticipated 30% affordable contribution and an undefined mix, which does not align with evidence of acute need for genuinely affordable, supported, or specialist homes in high-pressure urban areas.

The application does not address local variations in population growth or demography. South Derbyshire has recorded stronger recent growth, driven by new-build supply for Derby's "unmet need," while city household formation is now sluggish. This means less pressure in Littleover and adjacent wards and reinforces the importance of distributing housing resources to the areas of greatest need.

Building on the Littleover site misallocates scarce land and investment, doing little to alleviate the highest-need locations and risking increased spatial inequality. City-wide housing need alone does not justify site loss without evidence of causality, scale, and effectiveness relative to demonstrable local need.

# Inadequate Scrutiny of Alternatives and Failure to Prioritise Urban, Brownfield, and Underused Land Over Green Infrastructure Loss

This objection focuses on policy compliance and the site's selection within Derby's commitment to green infrastructure protection and sequential assessment. Local and national policies require sites with the least environmental and community harm are exhausted before sensitive or protected green spaces are considered. The Littleover site

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sits within or adjacent to designated green wedge land under Policy CP18 and the Derby Green Wedge Review, which rates most wedges as making a "strong contribution" to urban structure, neighbourhood identity, biodiversity, and access to countryside. The Littleover/Mickleover wedge is highlighted as critically vulnerable to "obstruction or enclosure" from external development, especially without compensatory improvements or alternative open space provision.

The Local Plan requires all new major development to demonstrate brownfield and urban infill options have been reasonably considered, biodiversity and recreational net gain outweighs any loss, and development is essential to meeting unmet need. These provisions are reinforced by appeal successes and Inspector decisions, where failure to exhaust less sensitive alternatives weighs against permission for greenfield incursion.

Derby's Empty Homes Strategy (2021–26) and Cabinet initiatives have returned hundreds of properties per year to the market, reducing long-term empties. The strategy highlights that re-occupying empty homes is not the whole answer, but their potential cannot be ignored. Statutory funding and policy focus on brownfield-first priorities, as seen in the East Midlands Brownfield Housing Fund and regeneration projects in the Local Plan. Derby's Strategic Housing Land Availability Assessment and Five Year Statement have identified sufficient brownfield and small-site supply to accommodate much future need without further green infrastructure loss.

The applicant has not provided a sufficiently robust "alternatives assessment," failing to demonstrate the proposed units could not be delivered on less sensitive land or through brownfield regeneration, empty homes, or re-use schemes. Displacement of valued green infrastructure without robust alternatives assessment and policy compliance would set a dangerous precedent, exposing other assets to erosion and harming climate adaptation, health, and sustainability.

## Failure to Address the Cumulative Impact of Adjacent South Derbyshire Developments on Blagreaves Ward and City Resources

A final objection concerns the impact of major adjacent developments, especially the South Derbyshire Grovebury Drive scheme, on infrastructure and sustainability for Littleover and Blagreaves. The Grovebury Drive project, outside Derby City's boundary but dependent on Derby's infrastructure, will deliver up to 500 dwellings (150 initially) with access from Grovebury Drive in Blagreaves. Cabinet documentation confirms a sale of council-owned land to facilitate access and junction improvements, allowing the scheme to contribute to Derby's growth and absorb "unmet need." Cross-boundary solutions are seen as less environmentally damaging, provided existing infrastructure and community capacity are adequately mitigated via Section 106 or other contributions.

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Despite this, the cumulative impact analysis for the Littleover scheme is inadequate. The 500 new dwellings will place direct pressure on Blagreaves' GP practices, schools, and facilities, and combined with further allocations, will overload transport infrastructure, increase congestion and air pollution, and add demand for school places. Section 106 contributions from South Derbyshire are unlikely to fully offset these impacts, with a lack of clarity about funding streams and a pattern of delays or underspending.

City infrastructure is being incrementally overloaded by external development, while the Littleover applicant provides no serious assessment of impacts or mitigation. The effects of Grovebury Drive are being ignored, despite their significance for schools, health, open space, and transport. Local councillors warn that providing access for South Derbyshire's planned development will cause traffic increases, loss of amenity, and diminished accessibility for existing communities. The result is serious risks of overstretch, community dissatisfaction, and avoidable harm.

Major allocations in Littleover or Blagreaves should be paused and rigorously reassessed in light of these cross-boundary pressures.

The housing need justification for the Littleover application is unsound on four grounds: lack of specific evidence the site is necessary; misalignment with the spatial distribution of need; failure to exhaust or robustly evaluate alternative land supply; and absence of cumulative impact assessment regarding Grovebury Drive and other developments. Rather than supporting the city's policy focus on urban core, regeneration sites, and brownfield/empty dwellings, the application proposes the loss of a crucial community asset and undermines Derby's green wedge strategy.

The proposal should be refused unless the applicant can robustly evidence that: (1) no preferable alternatives exist; (2) there is a compelling local need for the proposed units; (3) credible infrastructure mitigation addresses cross-boundary impacts; and (4) any loss of green infrastructure is offset by substantial local gains. Failing these tests, the housing need justification for Littleover warrants strong objection and refusal.

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