04 January 2016

To: All Councillors

As a Member of the Local Plan Advisory Committee, please treat this as your summons to attend the meeting on **Tuesday 12 January 2016 at 6.00 pm in the Council Chamber, COUNTY HALL, Matlock.** (PLEASE NOTE VENUE)

Yours sincerely

Sandra Lamb
Head of Democratic Services

---

**AGENDA**

1. **APOLOGIES**

   Please advise the Committee Team on 01629 761300 or e-mail committee@derbyshiredales.gov.uk of any apologies for absence.

2. **PUBLIC PARTICIPATION**

   To enable members of the public to ask questions, express views or present petitions, **IF NOTICE HAS BEEN GIVEN**, (by telephone, in writing or by electronic mail) **BY NO LATER THAN 12 NOON OF THE WORKING DAY PRECEDING THE MEETING. NB: REPRESENTATIONS MUST RELATE SPECIFICALLY TO ITEMS BEING CONSIDERED BY THE COMMITTEE AT THIS MEETING.**

2. **APPROVAL OF THE MINUTES OF THE PREVIOUS MEETING**

   28 September 2015.

3. **INTERESTS**

   Members are required to declare the existence and nature of any interests they may have in subsequent agenda items in accordance with the District Council’s Code of Conduct. Those interests are matters that relate to money or that which can be valued in money, affecting the Member her/his partner, extended family and close friends.

   Interests that become apparent at a later stage in the proceedings may be declared at that time.
4. DERBYSHIRE DALES LOCAL PLAN – KEY ISSUES CONSULTATION

To consider a summary of the responses received during the six week period of public consultation (2\textsuperscript{nd} November 2015 to 14\textsuperscript{th} December 2015) on the Derbyshire Dales Local Plan Key Issues and officer comments in respect of the overall tenet of the responses received.

5. DERBYSHIRE DALES LOCAL PLAN - HOUSING TARGET 2013 - 2033

To consider the Objectively Assessed Need (OAN) for housing in the Derbyshire Dales for the period 2013-2033 and to set the housing provision target.

Members of the Committee: Councillors Martin Burfoot, Albert Catt, Phil Chell, Tony Morley, Tony Millward, BEM, Garry Purdy, Mike Ratcliffe, Lewis Rose, OBE, Andrew Shirley, Andrew Statham, Peter Slack, Jacque Stevens

Substitutes: Councillors Jason Atkin, Richard Bright, Deborah Botham, Sue Burfoot, Ann Elliott, Richard FitzHerbert, Chris Furness, Alyson Hill, Susan Hobson, Neil Horton, Angus Jenkins, Joyce Pawley
DERBYSHIRE DALES LOCAL PLAN – KEY ISSUES CONSULTATION

SUMMARY

The report summarises the responses received during the six week period of public consultation (2nd November 2015 to 14th December 2015) on the Derbyshire Dales Local Plan Key Issues and outlines Officer Comments in respect of the overall tenet of the responses received.

RECOMMENDATION

That the Committee note the responses received to the Derbyshire Dales Local Plan Key Issues Consultation and that the responses received be taken into consideration as part of the ongoing plan preparation process.

WARDS AFFECTED

All Wards outside the Peak District National Park

STRATEGIC LINK

The Derbyshire Dales Local Plan will be a pivotal tool in the delivery of the Council’s Corporate Plan and the Derbyshire Dales and High Peak Sustainable Communities Strategy

1 BACKGROUND

1.1 At a Special Meeting of Council held on 12th October 2015, Members considered a report which summarised the background to the withdrawal of the Derbyshire Dales Local Plan in October 2014. Members were also updated on the extent of the work that had since been undertaken on the evidence base to support the preparation of a revised Derbyshire Dales Local Plan and consideration was given to the outcome of this work.

1.2 At the same meeting, Members endorsed proposals for a six week period of public consultation on the key issues that had emerged from the evidence base as part of the process of preparation of a revised Derbyshire Dales Local Plan. (Minute 169/15)

1.3 The consultation process included the publication of an A5 colour brochure styled upon the Council’s ‘dalesMATTERS’ leaflet. This brochure, entitled ‘Your Local Plan’, was distributed to all 34,100 households in the District – including those within the Peak District National Park. In addition, public meetings were held in Matlock (25th November), Ashbourne (10th November) and Wirksworth (18th November). A seminar for Parish Councillors and Parish Clerks was held on 12th November.
2.1 The consultation leaflet circulated to all homes within the District Council area set out the relevant background information drawn from the refresh of the Derbyshire Dales Local Plan Evidence Base. Specific questions were posed on matters including housing numbers, affordable housing, location of new development, the requirements for Gypsies and Travellers, employment land provision and the approach to development within smaller scale villages. A copy of the consultation leaflet is attached at Appendix 1 to this report.

2.2 The following questions were asked within the consultation leaflet, and respondents were encouraged to submit their answers to these questions through the District Council’s website:

- **Q1** Should the District Council pursue a strategy which reduces from 45% to 30% the proportion of affordable housing required on all new homes developments, enabling more infrastructure across the whole of District?

- **Q2** Should the District Council between 2013-2033 aim to accommodate:
  - 5,300 dwellings
  - 6,440 dwellings or
  - 7,200 dwellings

- **Q3** Do you consider that the towns and villages listed are the most appropriate for development?

- **Q4** In light of the Gypsy and Travellers requirement can you suggest any sites within the Derbyshire Dales where accommodation could be provided?
  
  To meet the future needs of Gypsies and Travellers should the District Council:
  - Identify a single site containing all the required pitches
  - A number of sites or
  - Should the provision be distributed more evenly across the Plan area?

- **Q5** Do you think 15 hectares is an appropriate target for new employment land in the District?

- **Q6** Would small scale infill and consolidation in the smaller villages be beneficial?
  
  Are there any other ways the District Council could maintain the sustainability of smaller villages other than through new development proposals?

2.3 For each question, those responding were asked to explain the reason for their response.

3. ANALYSIS OF RESPONSES

3.1 A total of 405 responses were received to the consultation from individuals, Parish Councils, Agents and Developers. However, not every question was answered by each respondent. The detailed individual responses are available for viewing in full online using the following link [https://www.surveymonkey.net/results/SM-7PRNXKBJ/](https://www.surveymonkey.net/results/SM-7PRNXKBJ/) The following is a summary of the responses received to the above questions along with Officers Comments.
Q1 Should the District Council pursue a strategy which reduces from 45% to 30% the proportion of affordable housing required on all new homes developments, enabling more infrastructure across the whole of District?

<table>
<thead>
<tr>
<th>Answer</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>200 (52.63%)</td>
</tr>
<tr>
<td>No</td>
<td>180 (47.37%)</td>
</tr>
<tr>
<td>Total</td>
<td>380</td>
</tr>
</tbody>
</table>

Issues Raised and Officer Comments

3.2 The explanations provided for the responses to this question indicate a clear divergence of opinion between respondents. Those that responded ‘No’ to this question essentially see the potential reduction in the proportion of affordable housing being sought as part of new housing development as a threat to the future overall provision of much needed affordable housing.

3.3 However, those that responded ‘Yes’ to this question would appear to recognise that this approach provides the opportunity to deliver the infrastructure to support the growth of the District in the future. Those responding on behalf of developers indicated that the requirement to provide only 30% of new development as affordable housing would make the delivery of new housing development more viable.

3.4 The provision of affordable housing is a key issue for the District Council and further consideration will now be given to the percentage of affordable housing provision that is appropriate to our circumstances.

Q2 Should the District Council between 2013-2033 aim to accommodate:-

- 5,300 dwellings
- 6,440 dwellings or
- 7,200 dwellings

<table>
<thead>
<tr>
<th>Answer</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>5,300 dwellings</td>
<td>211 (54.81%)</td>
</tr>
<tr>
<td>6,440 dwellings</td>
<td>111 (28.83%)</td>
</tr>
<tr>
<td>7,200 dwellings</td>
<td>63 (16.36%)</td>
</tr>
<tr>
<td>Total</td>
<td>385</td>
</tr>
</tbody>
</table>

Issues Raised and Officer Comments

3.5 This question was always likely result in the majority of respondents expressing a preference for the lowest housing target possible and the responses received are consistent with previous consultations undertaken during the preparation of the now withdrawn Derbyshire Dales Local Plan. However, it is noticeable that with the benefit of a clear explanation of the issues facing the District in terms of housing pressures, 45% of respondents expressed a preference for a figure that matched OAN or above. This is in sharp contrast to the 2% of respondents who previously indicated that the
then 4400 housing target in the now withdrawn Derbyshire Dales Local Plan was too low.

3.6 Many of the comments made supporting 5,300 dwellings indicated that in fact this level of proposed new housing development was considered to be too high due to the impact it was likely to have upon the environmental quality of the area and the inability of the infrastructure to be able to accommodate any increase in new housing development. Furthermore some comments made in respect of the lower of the three options suggest that there is no evidence to support the view that additional housing has a benefit to the local economy. Other comments indicate a concern that with a population growth forecast of just over 6,000 that the number of homes even at 5,300 is too high, and that a lower figure is in fact required.

3.7 Those supporting the 6,440 option appear to recognise that this meets the needs of the anticipated population changes in the District as well as having benefits to the local economy, and providing the opportunity for the provision of much needed affordable housing. Others comment that this level is consistent with the provision identified by the Local Plan Inspector in 2014, and is a reasonable compromise between the high and lower options, with the least likelihood of delaying the adoption of the Derbyshire Dales Local Plan.

3.8 Those advocating a higher housing requirement for the District indicate that this would have a significant beneficial effect in providing housing to meet the needs of young people who are increasingly being forced to move away from the area, as well as associated benefits to the local economy.

3.9 Although the question sought views on the overall level of housing provision over the plan period, many comments raised concerns about the location of new development. A suggestion made by a number of respondents including Darley Dale Town Council is that the majority of new housing development should be located in a New Settlement, such that it does not have an adverse impact upon the character and appearance of existing towns and villages. Whilst this is a laudable suggestion and is a concept which is being actively considered by Government as part of a current consultation on changes to the NPPF, there are significant implications for a rural area such as Derbyshire Dales. The District Council has in the last 5 years, undertaken numerous ‘call for sites’ exercises as part of its SHLAA preparations. At no time has any landowner or developer submitted a clear proposal which would demonstrate that the creation of a new settlement in the Derbyshire Dales is feasible or indeed achievable. Notwithstanding any landscape and environmental impacts that would inevitably arise, the overall scale of outstanding housing development is such that it would be unlikely to be a commercially viable proposition to enable the housing and necessary infrastructure (schools, shops, medical facilities and employment opportunities) to be provided in a sustainable new settlement. Whilst it has been suggested that the District Council should compulsory purchase land to create a new settlement, this is not considered to be a viable option and is not conducive to securing the adoption of a Local Plan within the timescales required by Government.
Q3 Do you consider that the towns and villages listed are the most appropriate for development?

<table>
<thead>
<tr>
<th>Answer</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>187 (50.95%)</td>
</tr>
<tr>
<td>No</td>
<td>180 (49.05%)</td>
</tr>
<tr>
<td>Total</td>
<td>367</td>
</tr>
</tbody>
</table>

Issues Raised and Officer Comments

3.10 The lack of an overall consensus in respect of this question is surprising given that the assessment undertaken in respect of the Settlement Hierarchy clearly indicates which of the towns and villages in the plan area are the most appropriate to accommodate sustainable development.

3.11 However, the comments made in respect of this question appear to suggest those responding ‘No’ have concerns about the impact new development would have on individual settlements. Other comments supporting a ‘No’ response indicate support for development being distributed more widely across a greater number of settlements throughout the plan area, and for more development to take place within the Peak District National Park.

3.12 Those responding ‘Yes’ would appear to recognise that the settlements listed are the most sustainable locations, and are the most appropriate locations for new development to take place.

Q4 In light of the Gypsy and Travellers requirement can you suggest any sites within the Derbyshire Dales where accommodation could be provided?

Issues Raised and Officer Comments

3.13 This question allowed respondents to enter their suggestions for potential sites to meet the needs of the Gypsy and Traveller Community. The majority of responses received to this question did not make any site suggestions.

3.14 A number commented upon general locations for sites including former quarries and sites away from built areas. In terms of specific sites, a few sites were identified including Cawdor Quarry, Ashbourne Airfield, Homesford Woodyard, Ashbourne, Doveridge, Darley Dale and Darley Moor Airfield.

To meet the future needs of Gypsies and Travellers should the District Council:-

- Identify a single site containing all the required pitches
- A number of sites or
- Should the provision be distributed more evenly across the Plan area?
<table>
<thead>
<tr>
<th>Answer</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identify a single site containing all the required pitches,</td>
<td>135 (40.30%)</td>
</tr>
<tr>
<td>A number of sites, or</td>
<td>98 (29.25%)</td>
</tr>
<tr>
<td>Should the provision be distributed more evenly across the Plan area?</td>
<td>102 (30.45%)</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>335</strong></td>
</tr>
</tbody>
</table>

**Issues Raised and Officer Comments**

3.15 Whilst 40% of respondents indicated a preference for all provision to be made on a single site, 59% favoured a more dispersed approach.

3.16 Those suggesting a single location would appear to prefer this option as the most effective means of ensuring effective site management, whereas those suggesting a more disbursed approach considered that this would minimise the overall impact of development on the environment.

3.17 A number of comments were made that the location of facilities for Gypsies and Travellers should be dictated to by the needs of the Gypsy and Traveller community.

**Q5 Do you think 15 hectares is an appropriate target for new employment land in the District?**

<table>
<thead>
<tr>
<th>Answer</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>207 (65.30%)</td>
</tr>
<tr>
<td>No</td>
<td>110 (34.70%)</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>317</strong></td>
</tr>
</tbody>
</table>

**Issues Raised and Officer Comments**

3.18 There is a clear majority that considers 15 hectares of new employment to be adequate to meet the future economic needs of the District.

3.19 A number of the respondents who answered ‘No’ to this question indicated that they were not in a position to be able to provide a positive response as they did not have sufficient information upon which to make a judgement. Similarly, some that have answered ‘Yes’ to the question also commented that they felt they did not have sufficient knowledge to counter the evidence presented in the evidence base report.

3.20 Other respondents considered that this level of provision was in fact too high, and is not required given the pattern of out-commuting to employment outside of the District Council area.

3.21 Other positive comments supported the level of employment land provision and the benefits that this would have on the local economy and to providing potential employment opportunities for young people.
Q6 Would small scale infill and consolidation in the smaller villages be beneficial?

Are there any other ways the District Council could maintain the sustainability of smaller villages other than through new development proposals?

<table>
<thead>
<tr>
<th>Answer</th>
<th>Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>315 (83.11%)</td>
</tr>
<tr>
<td>No</td>
<td>64 (16.89%)</td>
</tr>
<tr>
<td>Total</td>
<td>379</td>
</tr>
</tbody>
</table>

Issues Raised and Officer Comments

3.22 The overwhelming support for this proposition would appear to be as a result of those respondents who consider that more of the required housing development should be spread across a wider number of settlements across the plan area than those listed in the Settlement Hierarchy, and those that see small scale development, particularly affordable housing to meet local needs, as having a benefit to these smaller settlements.

3.23 In terms of other measures to improve the sustainability of the smaller villages a number of suggestions were made including improved public transport to existing services and facilities, improved broadband, grants to support community shops and post offices, better car parking provision, improved public toilets and seek to discourage second homes.

4 RISK ASSESSMENT

4.1 Legal

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Not having an up to date Local Plan in place which provides adequate land for housing places the District Council at risk to residential development being brought forward on appeal rather than on a plan-led basis.

4.2 Financial

The cost of preparing the Derbyshire Dales Local Plan, including any consultation is contained within the District Council’s budget. The financial risk is, therefore, assessed as low.
4.3 Corporate Risk

The Derbyshire Dales Local Plan will be a pivotal tool in the delivery of the Council’s Corporate plan and the Derbyshire Dales and High Peak Sustainable Communities Strategy. In order to fulfil this role it is necessary to ensure that robust evidence-based and “sound” documents are prepared. Failure to do so will undermine the ability of the District Council to achieve its key aims and objectives. In light of the Inspector’s Report the Corporate Risk associated with the preparation of the Local Plan has been reviewed and identified as Medium Risk.

5 OTHER CONSIDERATIONS

In preparing this report, the relevance of the following factors has also been considered: prevention of crime and disorder, equalities, environmental, climate change, health, human rights, personnel and property.

6 CONTACT INFORMATION

Mike Hase, Policy Manager
Tel: 01629 761251
E-mail: mike.hase@derbyshiredales.gov.uk

7 BACKGROUND PAPERS

<table>
<thead>
<tr>
<th>Description</th>
<th>Date</th>
<th>File</th>
</tr>
</thead>
<tbody>
<tr>
<td>Individual Responses to Key Issues Consultation</td>
<td>November/December 2015</td>
<td>G/5/P1</td>
</tr>
<tr>
<td>Reports to Local Plan Advisory Committee</td>
<td>July &amp; September 2015</td>
<td>G/5/P1</td>
</tr>
<tr>
<td>Report to Council</td>
<td>October 2015</td>
<td>G/5/P1</td>
</tr>
<tr>
<td>National Planning Policy Framework</td>
<td></td>
<td>G/5/P1</td>
</tr>
</tbody>
</table>

ATTACHMENTS

Appendix 1: Derbyshire Dales Local Plan Key Issues Consultation Leaflet
Your Local Plan

Inside:

Your questions answered about the Local Plan

Have your say
YOUR views welcome on future housing numbers

Complete our Local Plan survey online at www.derbyshiredales.gov.uk/LocalPlan
This special publication has been put together to encourage YOU to have your say as we set about preparing a Local Plan to guide new developments here in the Derbyshire Dales over the next 20 years.

After digesting all the information we really do hope you will complete the online questionnaire to help us in our deliberations.

Most of you now have access to the internet either at home or via family, friends or even the local library. If you have an issue in this respect, please feel free to put your thoughts in writing to our Planning Policy Team.

Taking into account the latest population and economic growth forecasts and our affordable housing needs, we probably need to build around 322 new homes a year up to 2033.

While we will of course protect wherever possible our green fields, in some instances this won’t be possible. Sadly, future housing needs cannot be accommodated by developing brownfield sites alone.

Because we don’t control development within the National Park, the housing need for the whole of the Derbyshire Dales has to be met by only half of our area (see bottom of p4).

Planning inside the Park is the Peak District National Park Authority’s responsibility and they are working with us to explain why their conservation purpose means they cannot set housing targets.

Last year we had no choice but to withdraw an earlier version of the Local Plan because it didn’t meet the national government’s policy to build more houses. We were told our estimate of 4,400 new homes was 2,000 short of what is needed.

So now it is back to the drawing board, but we continue to welcome your involvement in every part of the preparation of this vital Plan for the future.

What IS the Local Plan?

The Derbyshire Dales Local Plan is a very important document, setting out the overall vision, objectives, and policies for the future development of those parts of the Derbyshire Dales that lie outside the Peak District National Park.

Please see the map on the facing page to get an idea of the area involved. The regions shaded mid-green are the parts of the Dales that lie inside the National Park, and the darker green areas are outside the Park. The Local Plan applies only to future development in the darker green areas.

The Plan seeks to address local needs, especially for housing and economic development, while ensuring that the very special environmental qualities of the district – both natural and built – are conserved and, where possible, enhanced.

It will set out the District Council’s policies and proposals for the use and development of land for the period up to 2033.

Complete the questionnaire

After reading through this publication, please complete our questionnaire online at: www.derbyshiredales.gov.uk/LocalPlan

It is far quicker and cheaper for us to collate your feedback via the online form. If this is an issue for you, please write to: Planning Policy Team (Local Plan), Town Hall, Matlock DE4 3NN.
What is the Local Plan?

**DID YOU KNOW?**
The population of the Derbyshire Dales is expected to grow by around 6,000 from 2013 to 2033.

**DID YOU KNOW?**
The estimated population of the Dales in 2033 is 77,278 (71,266 in 2013).

**DID YOU KNOW?**
Average house prices in the Derbyshire Dales are much higher than comparative areas.

---

To back up the information in this publication, the following Public Consultation Meetings will take place in November: Tuesday 10<sup>th</sup> Ashbourne Elim Church; Wednesday 18<sup>th</sup> Wirksworth Leisure Centre; Wednesday 25<sup>th</sup> Matlock Town Hall. All start at 7pm.

[www.derbyshiredales.gov.uk/LocalPlan](http://www.derbyshiredales.gov.uk/LocalPlan)
Why do we need a Plan?

Your District Council has a legal requirement to prepare a Local Plan and to use it when determining planning applications. An adopted Local Plan provides certainty both for local residents and developers about what type and scale of development is needed.

What has happened recently?

In May 2014 the District Council submitted a draft Derbyshire Dales Local Plan to the Secretary of State for independent examination.

This Plan responded positively to the overwhelming views of Dales residents to provide for 4,400 new houses against an Objectively Assessed Need for 6,000 houses.

However, in July 2014 the Government Inspector appointed to conduct the Examination in Public concluded that the District Council were not providing sufficient new houses to meet the needs of the area. The Plan was therefore withdrawn in October last year and we have been forced to revisit this issue again.

What happens next?

We now need to revise our original Plan and want your views on the key issues that have emerged since October last year. There will be further opportunities to have your say as the Plan develops in the coming months. Here’s the timetable:

<table>
<thead>
<tr>
<th>Milestone</th>
<th>Month</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initial consultation</td>
<td>November 2015</td>
</tr>
<tr>
<td>Draft Derbyshire Dales Local Plan consultation</td>
<td>February/March 2016</td>
</tr>
<tr>
<td>Submission Plan consultation</td>
<td>June/July 2016</td>
</tr>
<tr>
<td>Derbyshire Dales Local Plan submitted</td>
<td>September 2016</td>
</tr>
<tr>
<td>Examination in Public</td>
<td>November/December 2016</td>
</tr>
</tbody>
</table>

Impact of... on homes target

The National Park covers about half of the Derbyshire Dales, but there is only limited opportunity for new development here because of the likely impact on the environmental quality of the Park. Another complication is the potential conflict with the Park’s Statutory Purposes of conservation.

The Government does not require the National Park to set a target for new housing development. This puts added pressure on the District Council to meet almost 100% of the local housing needs in only 50% of the area.
Why do we need so many new houses?

To meet the country’s needs, the Government estimates 240,000 new homes need to be built each year, yet only 125,000 were built in 2014.

So the Government’s planning policy is to significantly increase the supply of housing across the country.

The Derbyshire Dales cannot fight national policy. Developers can appeal against any refusal of planning permission and that appeal is heard by the Government. What we need is a Local Plan that identifies appropriate sites with development potential, but one that also protects the much-loved Dales landscape.

There are however some tough decisions to be made, because national planning guidance no longer protects our green spaces in the way it did previously.

Population projections...

The Government’s National Planning Policy Framework (NPPF) requires the District Council to identify the scale and mix of housing and the range of tenures that the local population is likely to need in the coming years.

The most recent population projections predict:

- A population growth of about 6,000 people (8.4%) here in the Dales between 2013-33.
- A 43% increase in people aged 60 or more, but the biggest change will come in the 75+ age group, where an 88% increase is forecast
- A fall in the population of all age groups 15-59

<table>
<thead>
<tr>
<th>Age group</th>
<th>Population 2013</th>
<th>Population 2033</th>
<th>Change in population</th>
<th>% change from 2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under 15</td>
<td>10,554</td>
<td>11,204</td>
<td>650</td>
<td>6.2%</td>
</tr>
<tr>
<td>15-29</td>
<td>10,084</td>
<td>8,938</td>
<td>-1,146</td>
<td>-11.4%</td>
</tr>
<tr>
<td>30-44</td>
<td>11,041</td>
<td>10,991</td>
<td>-50</td>
<td>-0.5%</td>
</tr>
<tr>
<td>45-59</td>
<td>16,760</td>
<td>13,485</td>
<td>-3,275</td>
<td>-19.5%</td>
</tr>
<tr>
<td>60-74</td>
<td>15,068</td>
<td>18,045</td>
<td>2,977</td>
<td>19.8%</td>
</tr>
<tr>
<td>75+</td>
<td>7,759</td>
<td>14,616</td>
<td>6,857</td>
<td>88.4%</td>
</tr>
<tr>
<td>TOTAL</td>
<td>71,266</td>
<td>77,278</td>
<td>6,012</td>
<td>8.4%</td>
</tr>
</tbody>
</table>
Assessing housing need

What is needed?

Across the District Council area the average house price in 2014 was £255,500 - much higher than surrounding areas.

Although house prices in Derbyshire Dales grew by over 200% over the period 1998-2006 they have settled down since 2008. They are however still higher than neighbouring areas and higher than the average price in the East Midlands.

The evidence suggests a household income of just over £44,000 a year is needed to own a property in the Derbyshire Dales. The minimum required for a social rent is just under £15,000.

Just over a third (34%) of households have an income below £20,000. A further third are in the £20,000 to £40,000 range. The overall mid-range income of all households in the district is around £28,100, with a mean income of £36,900.

Priority

This suggests many local people are not actually able to afford to buy a house and live in the Dales.

Affordable housing has been the District Council’s highest priority for a number of years, and more than 1,000 new affordable homes have been provided across the whole of Derbyshire Dales in recent times.

The most recent evidence suggests around 100 affordable homes have to be built each year to meet local needs in the period up to 2033. The possible introduction of a Community Infrastructure Levy means the District Council could seek to reduce its affordable housing target from 45% to 30% of all new housing.

Different scenarios...

As a District Council, we have to objectively assess housing need, taking into account the area’s population and economic growth prospects and affordable housing needs.

Independent consultants tell us the District Council should be planning to deliver 322 houses a year over the period 2013-2033 – that’s a total of 6,440 new houses.

This is one of three scenarios below. As you can see, we have also considered what happens when the focus of the Local Plan is changed.

SCENARIO 1: Meeting Affordable Housing Needs – 265 houses a year (Total 5,300)

This would be the minimum amount of development to meet our future affordable housing needs (101 new homes a year) based on 35% of new houses being “affordable”. This is slightly above the minimum population growth requirement but would not result in any employment growth. No provision is made for new jobs.

Less greenfield land would be needed than the 6,440 new homes option. While this scenario factors in more social facilities to meet residents’ needs, there would be no uplift in the local economy as no provision is made for growth created by new jobs.

SCENARIO 2: Meeting the Objective Assessment of Housing Need – 322 houses a year (Total 6,440)

This scenario predicts an uplift in the number of new Derbyshire Dales jobs taking account of current forecasts. It provides the opportunity for some affordable housing to be provided to meet future needs. Improvements in social facilities would also result, though the environmental impact is greater than in Scenario 1.

SCENARIO 3: Boosting the Derbyshire Dales Economy – 360 houses a year (Total 7,200)

This level of development predicts enhanced economic growth for the area above that in Scenario 1 and 2, and factors in even more affordable houses as a result. Improvements in social facilities would also result from this scenario. However the environmental impact would be greater than either Scenario 1 or 2.

In all three scenarios the number of new homes across the District Council area would be higher than previous development rates, which have been no more than on average 200 a year.
Some villages may not have any sites allocated to meet the District Council's overall housing need. However, we want to support these rural villages by allowing small scale infill and consolidation, proportionate to local needs.

Development distribution

Development should happen where the need to travel can be reduced through good access to facilities and services and without significant adverse impacts.

All settlements across the Plan area have been assessed on the basis of their range of facilities and services, employment opportunities and landscape sensitivity.

The following settlements are considered to be best suited to accommodating new development across the Plan area: Ashbourne, Matlock, Wirksworth, Darley Dale, Balacliff, Cromford, Doveridge, Matlock Bath, Middleton, Northwood, Rowsley, Sudbury, Tansley, Bonsall, Brassington, Clifton, Darley Bridge, Hulland Ward, Kniveton, Carsington, Kirk Ireton, Longford, Marston Montgomery, Roston, Osmaston, Bradley.

SEE QUESTION 3, back page

Gypsies & Travellers

The District Council is required to assess the future accommodation needs for Gypsy and Traveller sites, developing fair and effective strategies by identifying land for sites over a reasonable timescale. Fair and realistic policies have to be included in the Local Plan.

A Gypsy and Traveller Accommodation Assessment undertaken with the other local planning authorities has indicated that over the next five years six pitches should be provided in the Derbyshire Dales, and in the future one additional pitch every five years for the next 15 years. So a total of nine pitches are needed in the Dales over the period to 2033.

SEE QUESTION 4, back page

How much land is needed?

Whatever eventual new homes target is decided on, the good news is that around 2,000 new houses have already been built or have the benefit of planning permission across the whole of the District Council area. This means we need to find land for only the remaining 3,300 to 5,200 new homes up to 2033.

It is anticipated a further 400 new homes will be built in the National Park over the Plan period to 2033, further reducing the overall number of new homes not yet identified to between 2,900 and 4,800.

The District Council is currently assessing potential new sites sent for consideration as part of our Call for Sites invitation. No decisions have yet been made on the scale or location of development.

You can still suggest sites you think would be suitable to develop for housing at w:derbyshiredales.gov.uk/callforsites

Employment land

The Local Plan needs to support the local economy. This involves safeguarding existing jobs and providing new job-generating development.

Opportunities to meet the needs of businesses across the Plan area are limited, so the District Council will try wherever possible to resist the loss of employment land to housing.

Here are the results of a recent future employment land assessment, taking account of economic trends, projected employment growth and commercial property conditions. It estimates we need to accommodate an additional 15 hectares of employment land up to 2033:

<table>
<thead>
<tr>
<th>Need for Employment Land</th>
<th>Hectares</th>
</tr>
</thead>
<tbody>
<tr>
<td>Net Demand</td>
<td>11.3</td>
</tr>
<tr>
<td>Allowance for vacant floorspace</td>
<td>1.1</td>
</tr>
<tr>
<td>Margin to provide choice &amp; flexibility</td>
<td>2.3</td>
</tr>
<tr>
<td>TOTAL GROSS NEED</td>
<td>14.7</td>
</tr>
</tbody>
</table>

SEE QUESTION 5, back page

Small scale infill & consolidation

Some villages may not have any sites allocated to meet the District Council’s overall housing need. However, we want to support these rural villages by allowing small scale infill and consolidation, proportionate to local needs.

SEE QUESTION 6, back page
Identifying and assessing existing and future infrastructure needs to support housing and jobs growth has to be addressed by the Derbyshire Dales Local Plan.

Our review of infrastructure needs concludes there are few serious immediate concerns for the district. Traffic and transportation are however issues that need to be looked at in Matlock, Ashbourne and Wirksworth. The District Council and Derbyshire County Council have instructed consultants to assess the extent of the traffic and transport issues and what may be required.

Questions...

Q1
Should the District Council pursue a strategy which reduces from 45% to 30% the proportion of affordable housing required on all new homes developments, enabling more infrastructure across the whole of the district? Y/N

Q2
Should the District Council between 2013-2033 aim to accommodate:
   a. 5,300 dwellings
   b. 6,440 dwellings, or
   c. 7,200 dwellings

Q3
Do you consider that the towns & villages listed are the most appropriate for new development? Y/N

Q4
In light of the Gypsy & Traveller requirement can you suggest any sites within the Derbyshire Dales where accommodation could be provided?
To meet the future needs of Gypsies and Travellers, should the District Council:
   a. identify a single site containing all the required pitches,
   b. a number of sites, or
   c. should the provision be distributed more evenly across the Plan area?

Q5
Do you think 15 hectares is an appropriate target for new employment land in the district? Y/N

Q6
Would small-scale infill and consolidation in the smaller villages be beneficial? Y/N
Are there any other ways the District Council could maintain the sustainability of smaller villages other than through new development proposals?

Please complete our questionnaire online at: w: derbyshiredales.gov.uk/LocalPlan
Closing date for responses is 14 December 2015

This publication is available free of charge in electronic, audio, Braille and large print versions, and in other languages on request.

For assistance in understanding or reading this document, please call 01629 761195.
DERBYSHIRE DALES LOCAL PLAN – HOUSING TARGET 2013-2033

SUMMARY

The report seeks to establish the Objectively Assessed Need (OAN) for housing in the Derbyshire Dales for the period 2013-2033 and also seeks to set the housing provision target.

RECOMMENDATION

1. That the Objectively Assessed Need for Housing in the Derbyshire Dales for the period 2013-2033 be set at 6,440

2. That the provisional housing target for inclusion in the draft Derbyshire Dales Local Plan be set at 5,850

3. That the Committee nominate a Member representative to engage in Duty to Co-operate discussions with Members from neighbouring local planning authorities in respect of the unmet Derbyshire Dales housing requirements.

WARDS AFFECTED

All Wards outside the Peak District National Park

STRATEGIC LINK

The Derbyshire Dales Local Plan will be a pivotal tool in the delivery of the Council’s Corporate Plan and the Derbyshire Dales and High Peak Sustainable Communities Strategy

1 BACKGROUND

1.1 At the meeting of this Committee held on 21st September 2015, Members were informed of the outcome of work that had been undertaken to support the preparation of a revised Derbyshire Dales Local Plan in respect of the Assessment of Housing & Economic Needs, Strategic Landscape Sensitivity Assessment and the Gypsy & Traveller Accommodation Assessment. At that meeting it was resolved that the outcomes of these studies are used in the preparation of the revised Derbyshire Dales Local Plan.

1.2 At that meeting it was resolved (Minute 144/15):

• That the Committee endorse the findings of the evidence base reports.
• That the Corporate Director progress discussions with relevant neighbouring local authorities and other public bodies in respect of the issues arising from the reports in accordance with the Duty to Cooperate.
• That progress reports on the Duty to Co-operate be presented to future meetings of this Committee.
• That the findings of the reports be incorporated into a revised Derbyshire Dales Local Plan.

2 OBJECTIVELY ASSESSED NEED FOR HOUSING

2.1 The Objectively Assessed Need (OAN) for housing is derived from an objective analysis of the evidence, to the exclusion of any policy objectives and value judgements; and that evidence should be entirely about need and demand, to the exclusion of any supply-side factors such as physical constraints, policy designations and adverse impacts of development. The excluded factors have no bearing on the OAN, however they may be taken into account at a later stage when translating the OAN into a provision target.

2.2 At the meeting of this Committee held on 21st September 2015, Members considered the findings of the Assessment of Housing and Economic Development Needs report (September 2015) produced by GL Hearn. This report adopted the approach outlined in the National Planning Policy Framework (NPPF) and Planning Practice Guidance to defining the Objectively Assessed Need for Housing in the Derbyshire Dales. The report concluded that the Objectively Assessed Need for Housing should be set at 322 per annum or 6,440 dwellings in the period 2013-2033.

2.3 It is considered that this represents a robust assessment of housing need across the Derbyshire Dales up to 2033 and factors in demographic changes, economic growth aspirations and improving affordability. Officers therefore recommend that the OAN should be fixed at 6,440 dwellings.

2.4 A copy of the 21st September 2015 report is attached at Appendix 1.

3. DERBYSHIRE DALES HOUSING PROVISION TARGET 2013-2033

3.1 Paragraph 14 of the National Planning Policy Framework (NPPF) states that at the heart of the National Planning Policy Framework, there is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For plan-making this means that:

• Local Planning Authorities should positively seek opportunities to meet the development needs of their area;
• Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:-
  ➢ any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
  ➢ specific policies in this Framework indicate development should be restricted.

3.2 The NPPF further emphasises in Paragraph 47 that:

To boost significantly the supply of housing, local planning authorities should:-
• use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.

3.3 The Local Plan will be examined by an Inspector appointed by the Secretary of State whose role is to assess whether the plan has been prepared in accordance with the Duty to cooperate, legal and procedural requirements and whether it is sound. One of the tests of ‘soundness’ is that the Local Plan should be:

“Positively prepared – …. based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development”

3.4 Both the NPPF and the Planning Practice Guidance make it clear that an authority’s housing provision target or requirement, does not necessarily equal its objectively assessed need. Two factors come between the OAN and the target. The first is the area’s deliverable and sustainable housing capacity, defined with reference to constraints recognised in the Framework. The second factor is cross-boundary unmet need, which the authority should accommodate ‘when it is reasonable to do so and consistent with achieving sustainable development’ (NPPF Para 182). Additionally, in setting the housing target the authority should also have regard to the impact of housing development on its wider policy objectives and priorities.

3.5 Taking the above into account, the starting point for setting a housing target for inclusion in the Derbyshire Dales Local Plan is the identification of the extent of the Objectively Assessed Need for Housing.

3.6 Case Law in Hunston Properties Limited v (1) Secretary of State for Communities and Local Government and (2) St Albans City and District Council [2013] EWHC 2678 (Admin), clarified that the identification of the OAN is essentially a technical exercise undertaken on a policy off basis, and should be undertaken without taking account of any constraints or policy aspirations that a local planning authority may wish to take in preparing a Local Plan. It clarifies that the process of setting a housing target for inclusion within a Local Plan is one that is determined through the preparation of a Local Plan and tested through an Examination in Public, taking all relevant factors into account including constraints to supply, policy aspirations and the outcome of Duty to Co-operate discussions.

3.7 Whilst the NPPF is clear that Local Plans should seek to plan to meet the full OAN, supply constraints are a relevant factor to take into consideration. In cases where the supply is proven to be inadequate to meet the OAN, it does not necessarily follow that a Local Plan will be found unsound if a Local Plan includes a housing target which is below the OAN. However, the assessment of supply must be robust and every effort should be made to identify a sufficient quantum of suitable sites unless, in the context of the NPPF, the adverse impacts of would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole.
3.8 In order to assess the overall quantum of sites that may be considered for inclusion within the Local Plan, a revised Strategic Housing Land Availability Assessment (SHLAA) has been undertaken. The purpose of the SHLAA is not to identify sites for development – that is the role of the Local Plan, but to establish realistic assumptions about the availability, suitability and economic viability of land to meet an identified housing need over the plan period.

3.9 Following the withdrawal of the Local Plan in October 2014, over 200 sites have been assessed as part of a revised SHLAA process. The methodology that has been adopted for the preparation of the SHLAA follows that set out in the NPPG, and has involved a detailed assessment of each site in regard to factors such as its location in relation to services and facilities, flood risk, landscape sensitivity, impact on the historic environment and the ability of a site to provide a safe and secure access onto the highways network.

3.10 The assessment of sites has involved extensive consultations with key consultees such the District Council’s Landscape Officer, Design and Conservation Officer and Environmental Health Officers. It has also involved external consultation with Derbyshire County Council’s Highways/Archaeology, Environment Agency, and Derbyshire Wildlife Trust.

3.11 An objective assessment of the SHLAA, existing commitments and anticipated supply from other sources, indicates that at the present time, the deliverable supply of housing in the Derbyshire Dales in the period 2013-2033 is as follows:

<table>
<thead>
<tr>
<th>OAN 2013-2033</th>
<th>6440</th>
</tr>
</thead>
<tbody>
<tr>
<td>Completions 2013-2015 DDDC</td>
<td>218</td>
</tr>
<tr>
<td>Completions 2013-2015 PDNPA</td>
<td>22</td>
</tr>
<tr>
<td><strong>Total Completions 2013 - 2015</strong></td>
<td><strong>240</strong></td>
</tr>
</tbody>
</table>

**Commitments (at 1st December 2015)**

| Net Sites Sizes 0-9 Not Started | 61 |
| Net Sites Sizes 0-9 Under Construction | 194 |
| Net Site Sizes 10 + Not Started | 186 |
| Net Site Sizes 10 + Under Construction | 1282 |
| **Total Commitments** | **1723** |

Total commitments less 10% discount for non-implementation of sites not commenced (61 + 186 = 247 x 10%) | 25 |

**Total Net Commitments** | **1698** |

**Supply (at 1st December 2015)**

| PDNPA Estimates 2015-2033 | 378 |
### Windfall Allowance 2013-2033 Site Sizes 0-9

<table>
<thead>
<tr>
<th>Description</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minus Windfalls 0-9 Dwellings Completed 2013-2015</td>
<td>-75</td>
</tr>
<tr>
<td>Minus Commitments on Sites Net Size 0-9 Dwellings</td>
<td>-255</td>
</tr>
<tr>
<td><strong>Total Net Supply</strong></td>
<td><strong>668</strong></td>
</tr>
</tbody>
</table>

#### PLUS

<table>
<thead>
<tr>
<th>Description</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing Sites with Resolution to Grant Planning Permission</td>
<td>585</td>
</tr>
<tr>
<td>SHLAA Sites 10+ (Potential Allocations)</td>
<td>2656</td>
</tr>
<tr>
<td><strong>Total Housing Supply (2013 – 2033)</strong></td>
<td><strong>5847</strong></td>
</tr>
</tbody>
</table>

3.12 On the basis of the above calculation it is recommended that the provisional housing target for inclusion in the Derbyshire Dales Local Plan for the period 2013-2033 be set at 5850.

3.13 A number of new sites were submitted to the District Council during the Key Issues consultation and due to the lateness of these submissions, it has not been possible to complete a full detailed assessment of these sites in time for inclusion in the above calculation. The assessment work on these sites will continue and the outcome reported to a further meeting of this Committee, and if necessary the provisional housing target be adjusted accordingly.

3.14 As the provisional housing target is below the OAN figure of 6,440 the requirements of the Duty to Co-operate are engaged. As such, it is necessary to enter into dialogue with our neighbouring local planning authorities to determine the extent to which they may be able to assist in identifying suitable sites within their areas to meet our currently anticipated net shortfall of circa. 590 dwellings.

3.15 The requirements of the Duty to Co-operate are such that in order to be meaningful, they should involve discussions at both Officer and Member level. Therefore, in order to take these discussions forward, it is recommended that the Committee nominate a lead member to participate in these discussions.

### 4 RISK ASSESSMENT

#### 4.1 Legal

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Not having an up to date Local Plan in place which provides adequate land for housing places the District Council at risk to residential development being brought forward on appeal rather than on a plan-led basis.
4.2 Financial

The cost of preparing the Derbyshire Dales Local Plan, including any consultation is contained within the District Council’s budget. The financial risk is, therefore, assessed as low.

4.3 Corporate Risk

The Derbyshire Dales Local Plan will be a pivotal tool in the delivery of the Council’s Corporate plan and the Derbyshire Dales and High Peak Sustainable Communities Strategy. In order to fulfil this role it is necessary to ensure that robust evidence-based and “sound” documents are prepared. Failure to do so will undermine the ability of the District Council to achieve its key aims and objectives. In light of the Inspector’s Report the Corporate Risk associated with the preparation of the Local Plan has been reviewed and identified as Medium Risk.

5 OTHER CONSIDERATIONS

In preparing this report, the relevance of the following factors has also been considered: prevention of crime and disorder, equalities, environmental, climate change, health, human rights, personnel and property.

6 CONTACT INFORMATION

Mike Hase, Policy Manager
Tel: 01629 761251 E-mail: mike.hase@derbyshiredales.gov.uk

7 BACKGROUND PAPERS

<table>
<thead>
<tr>
<th>Description</th>
<th>Date</th>
<th>File</th>
</tr>
</thead>
<tbody>
<tr>
<td>Individual Responses to Key Issues Consultation</td>
<td>November/December 2015</td>
<td>G/5/P1</td>
</tr>
<tr>
<td>Reports to Local Plan Advisory Committee</td>
<td>July &amp; September 2015</td>
<td>G/5/P1</td>
</tr>
<tr>
<td>Report to Council</td>
<td>October 2015</td>
<td>G/5/P1</td>
</tr>
<tr>
<td>National Planning Policy Framework</td>
<td></td>
<td>G/5/P1</td>
</tr>
</tbody>
</table>

ATTACHMENTS

Appendix 1 - Local Plan Advisory Committee Report 21st September 2015.
DERBYSHIRE DALES LOCAL PLAN EVIDENCE BASE UPDATE

SUMMARY

This report sets out for Members the outcomes of work that has been undertaken to support the preparation of a revised Derbyshire Dales Local Plan in respect of the Assessment of Housing & Economic Needs, the Strategic Landscape Sensitivity Assessment and the Gypsy & Traveller Accommodation Assessment. It recommends that the outcomes of these studies are used in the preparation of the revised Derbyshire Dales Local Plan.

RECOMMENDATIONS

1. That the Committee endorse the findings of the evidence base reports as set out in Section 2.
2. That the Corporate Director progress discussions with relevant neighbouring local authorities and other public bodies in respect of the issues arising from the reports in accordance with the Duty to Cooperate.
3. That progress reports on the Duty to Co-operate be presented to future meetings of this Committee.
4. That the findings of the reports be incorporated into a revised Derbyshire Dales Local Plan.

WARDS AFFECTED
All Wards outside the Peak District National Park

STRATEGIC LINK

The Derbyshire Dales District Council Local Plan will be a pivotal tool in the delivery of the Council’s Corporate Plan and the Peak District Partnership Statement of Priorities.

1 BACKGROUND

1.1 At the meeting of this Committee held on 8th July 2015, Members considered a Progress Report on work that has been undertaken to further develop the Local Plan evidence base to support the preparation of a revised Derbyshire Dales Local Plan. At that meeting, it was resolved that a series of reports would be presented to future meetings of this Committee in respect of the evidence base, Local Development Scheme and Statement of Community Involvement.
1.2 This report sets out the outcomes of the Assessment of Housing & Economic Needs, Gypsy & Traveller Accommodation Assessment and the Strategic Landscape Sensitivity Assessment.

1.3 A copy of each report of the above reports is published on the Members Portal and on the Council website.

2 ASSESSMENT OF HOUSING AND ECONOMIC DEVELOPMENT NEEDS

2.1 The NPPF indicates that robust evidence is required to support Local Plans and the policies within them. It sets out that Local Authorities should:

Prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

- meets household and population projections, taking account of migration and demographic change;
- addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
- caters for housing demand and the scale of housing supply necessary to meet this demand;

2.2 The National Planning Practice Guidance advocates a wider approach to objectively assessed needs. It sets out that the assessment of housing and economic development needs includes the Strategic Housing Market Assessment requirement as set out in the National Planning Policy Framework. It also advises that the primary objective of identifying need is to:

- identify the future quantity of housing needed, including a breakdown by type, tenure and size;
- identify the future quantity of land or floorspace required for economic development uses including both the quantitative and qualitative needs for new development; and
- provide a breakdown of that analysis in terms of quality and location, and to provide an indication of gaps in current land supply

2.3 As Members will be aware, following the Examination in Public in July 2014, Inspector Holland in his report concluded that the approach taken by the District Council to setting its Objectively Assessed Need for Housing did not adequately take account of the need to provide for affordable housing needs, and the economic aspirations for growth set out within the Derbyshire Dales Local Plan. Given the significant emphasis within the plan to adequately addressing the housing and economic needs of the area, it was considered appropriate to undertake a further review of the Housing and Economic Development Needs.
2.4 Following a comprehensive tendering process consultants were appointed to provide advice on the following specific issues:

a) The extent and nature of the housing market area within which Derbyshire Dales sits, and the extent to which the housing market extends into neighbouring local planning authority areas. In considering this requirement account must be taken of the advice in the NPPG about self-containment and the work undertaken by CURDS\(^1\) and should take account of the 2011 Census Data on Travel-to-work.

b) The extent to which the functional economic area in relation to economic uses for Derbyshire Dales covers the District Council area or otherwise.

c) In accordance with the Advice in the NPPG, the overall (objectively assessed) housing requirement for the housing market area and the District Council area for the period 2012-2031 and 2012-2033. In undertaking this element of the commission the appointed consultants were required to liaise with the consultants appointed by Sheffield City Region (David Simmonds and AECOM) to undertake an assessment of the potential spatial distribution impacts of the Strategic Economic Plan (SEP) ambition for 70,000 new jobs over the period 2015-2025 and to ensure that the impact of these ambitions is taken into account appropriately. Similarly the appointed consultants were advised to engage with D2N2 to seek views on the extent to which their SEP ambitions will influence the housing requirements for Derbyshire Dales.

d) A breakdown of the overall housing figure by tenure, household type and household size for the period 2012-2031 and 2012-2033

e) An estimate of the future requirements for affordable housing for the period 2012-2031 and 2012-2033

f) Taking account of the Oxford Economics employment forecasts for Derbyshire, Experian retail expenditure data, the EKOSGEN report, the ambitions set out in the D2N2 SEP, Sheffield City Region SEP, the District Council’s Economic Plan and future population forecasts, an assessment of the overall amount of land and floorspace required for economic development uses (including town centre uses) for the whole of the economic functional area, and the District Council area. The amount of land and floorspace required should be identified for the National Park area of Derbyshire Dales and the area for which the District Council is the local planning authority for the period 2012 - 2031 and 2012-2033.\(^2\)

g) A breakdown of the overall figure for land and floorspace required for economic development uses (including town centre uses) by quality, type, size and location, based on a detailed assessment of current supply, vacancy rates, need and demand, making clear the amount of employment land required for new development, for the period 2012-2031 and 2012-2033

\(^1\) http://www.ncl.ac.uk/curds/research/defining/NHPAU.htm

\(^2\) Any assessment of requirement for the National Park area must be assessed in the light of the statutory purposes of national parks, the adopted development plan for the National Park and the specific policy references to National Park contained within the NPPF, as well as the anticipated different population change trajectories for Derbyshire Dales inside and outside the National Park.
2.5 The appointed consultants were also asked to ensure that the advice took account of evidence from the 2012-based population and household projections and the economic ambitions set out in the D2N2 Strategic Economic Plan, the Sheffield City Region Strategic Economic Plan, and the District Council’s Economic Plan.

2.6 A copy of the final report forms a background paper and is available on the Members Portal and the Council website.

2.7 The key findings of the report are as follows:

**Housing Market Area and Functional Economic Area**

2.8 A review of a wide range of indicators was undertaken to determine the extent to which the Housing Market Area (HMA) and Functional Economic Areas (FEMA) in Derbyshire Dales operate. The indicators included house prices, migration patterns, commuting patterns as well as retail and leisure provision, and transport infrastructure.

2.9 The report concludes that there are economic and housing market relationships between the north of the District and Sheffield; and the south of the District and Derby. The central part of the District is slightly more complex, with relationships between this area and a number of surrounding cities/larger towns – including Chesterfield.

2.10 The consultants consider that it is appropriate to define the southern part of the District as falling within a Wider Derby-focused HMA / FEMA. This area includes Ashbourne and Wirksworth.

2.11 It is further recommended that the northern part of the District should be defined as falling within a Sheffield-focused HMA / FEMA. This includes Bakewell and Hathersage. There are localised inter-relationships between the north of the District and High Peak (particularly Buxton).

2.12 The central part of the District, including Matlock, is considered to fall within an “area of overlap” between Housing and Functional Economic Market Areas; with influences from Sheffield; from Chesterfield; and from Derby.
APPENDIX 1

Objectively Assessed Need for Housing

2.13 The consultants make it clear in their report that by taking account of the guidance in the NPPF and the NPPG, and relevant case law precedents, the identification of the Objectively Assessed Need (OAN) for housing is a policy-off position. The OAN does not take account of any constraints to development within a particular area, which might influence what a local plan target may ultimately be.

2.14 The approach taken in the report seeks to follow the guidance in the NNPF and NPPG, both of which set out that the starting point for determining the OAN is the most recent population and household projections. In this case the 2012-Based Population and Household Projections.

2.15 The projections are however trend-based and the NPPG advises that in setting the OAN, consideration needs to be given to whether it is sustainable to plan on the basis of past trends, or whether wider evidence suggests that level of housing provision (in the absence of development constraints) should be adjusted to take account of:

- Employment trends
- Market signals
- Need for affordable housing

2.16 The NPPG sets out that employment trends should be considered to assess whether an alternative level or distribution of housing provision is necessary to support
APPENDIX 1

economic growth; or whether housing provision should be adjusted upwards to improve the affordability of market housing or enhance the delivery of affordable housing.

2.17 Throughout the report the consultants have sought to sensitivity test the data to ensure that the inputs into the OAN calculation for Derbyshire Dales are wholly appropriate for the area, including the 2012-Based Sub-National Population Projections.

2.18 The 2012-based Sub-National Population Projections (SNPP) indicates population growth of 8.4% in the District between 2013-33. This is modestly below that projected for Derbyshire as a whole (9.5%), but above recent rates of population growth.

2.19 The report indicates that when sensitivity checked, the 2012-based SNPP appear to be a sound demographic projection for Derbyshire Dales. Population growth sits above recent trends, but higher migration is projected moving forwards taking account of the likelihood that net migration to the District will increase as a result of age structure changes in the District; and growing populations in areas from which people typically move to the Derbyshire Dales. The wider evidence suggests that recent population growth has been constrained to some degree.

2.20 The 2012-based Household Projections, based on the SNPP, project a need for an average of 244 dwellings per annum over the 2013-33 period. This is based on past trends in births, deaths, age-specific trends in migration and household formation.

2.21 In order to consider the economic growth prospects for Derbyshire Dales a range of economic forecasts and other economic data was taken into account. The report concludes that on the basis of all of the available data, a reasonable evidence-based assessment of economic growth potential would be for employment growth of 1,700 jobs over the period 2013-2033. On the basis of this level of jobs growth it is considered that there would be a need for approximately 301 dwellings over the plan period to 2033 (244 demographic + 57 economic growth).

2.22 The final element in the OAN equation is the amount of housing required to meet future affordable housing needs. The assessment indicates that there is a need for 93 affordable houses per annum, and at this level it represents approx 38% of the overall demographic need, and 31% of the need derived from the economic-led projections. Following the approach in the PPG, the affordable housing needs evidence supports the case for a marginally higher level of housing provision than shown in the demographic-led projections. The higher housing provision in the economic-led projections will contribute to enhancing affordable housing delivery. Overall, there is case to be made for an uplift on the overall housing requirement to address the affordable housing needs of the District.

2.23 The report also considers the extent to which house prices across the District influence the need to deliver more housing to meet housing needs. Comparatively high house prices contribute to affordability pressures. In this regard, affordability ratios in the Derbyshire Dales are high and are above national and county averages. Median house prices in the Derbyshire Dales are 8.6 times the median earnings in the District, compared to a national rate of 6.5 and a county rate of 5.5. The demographic date shows fewer younger people (in their 20s and 30s) living in the district suggesting that those priced out of the market are leaving or remain living outside of the district.
for longer. The evidence further suggests that housing costs would make it more difficult for younger people to live in the District.

2.24 Overall, the analysis clearly points to higher affordability pressures on housing in Derbyshire Dales than in other parts of the country, and higher prices and more acute affordability pressures than seen in neighbouring area. Taking account of the evidence, the report concludes that in order to improve affordability, an additional 21 homes per annum are required. Drawing this together, the report identifies an Objectively-Assessed Need (OAN) for housing for 322 homes per year (2013-33) across then whole of Derbyshire Dales (244 demographic + 57 economic growth + 21 affordable = 322) as illustrated below:

2.25 It is important to note that the OAN does not represent a policy target for housing provision. It needs to be brought together with other evidence regarding the capacity of the District to accommodate development. However it is an important starting point for considering how much housing provision to plan for.

Peak District National Park

2.26 Half of the District of Derbyshire Dales is included within the Peak District National Park Authority (PDNPA), as such the District Council is only Local Planning Authority for those parts of the district which lie outside the PDNPA.

2.27 Paragraph 14 of the NPPF sets out a presumption in favour of sustainable development whereby local plans should meet objectively assessed needs unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, or policies within the Framework indicate that development should be restricted. The footnote to Paragraph 14 clearly outlines that the Framework expects the designation of a National Park to restrict development and thus there is not an expectation that a National Park will seek to meet its objectively assessed housing needs in full. Instead, the policy focus is on meeting local needs with a specific focus on providing affordable housing within the Park; and working with local authorities to plan to meet housing needs across the wider Housing Marker Area.
2.28 It is estimates that based upon the 2011 Census (population at output area level) that 35.9% of the District’s population live within the National Park with 64.1% living outside the National Park. Using these proportions, the consultants have sought to calculate the need arising from within and outside the National Park. This is set out below:

<table>
<thead>
<tr>
<th>Homes per Annum</th>
<th>Within PDNP</th>
<th>Plan Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Demographic Need</td>
<td>244</td>
<td>88</td>
</tr>
<tr>
<td>Supporting Employment Growth</td>
<td>57</td>
<td></td>
</tr>
<tr>
<td>Improving Affordability</td>
<td>21</td>
<td>8</td>
</tr>
<tr>
<td>Total</td>
<td>322</td>
<td>95</td>
</tr>
</tbody>
</table>

2.29 Furthermore the consultants advise that these conclusions should be discussed with the PDNPA, as part of the Duty to Co-operate and that the District Council should consider the likely supply in the National Park.

**Future Housing Types & Sizes**

2.30 Paragraph 159 of the NPPF requires local planning authorities to identify the range of types and sizes of accommodation likely to be needed by the population in future, including that required by those groups with specific housing needs.

2.31 There are a range of factors which will influence demand for different sizes of homes, including demographic changes, future growth in real earnings and households’ ability to save; economic performance and housing affordability. Taking account of the forecast changes in the size and structure of the population during the plan period, the report considers that the majority of demand for market housing will be for mid-market homes with 2 and 3 bedrooms. The evidence also points to a strong demand for bungalows from older households.

2.32 In terms of the mix of affordable and market homes, the report recommends the following provision over the plan period to 2033:

<table>
<thead>
<tr>
<th></th>
<th>1-bed</th>
<th>2-bed</th>
<th>3-bed</th>
<th>4+ bed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Market</td>
<td>5%</td>
<td>40%</td>
<td>50%</td>
<td>5%</td>
</tr>
<tr>
<td>Affordable</td>
<td>40%</td>
<td>35%</td>
<td>20%</td>
<td>5%</td>
</tr>
<tr>
<td>All dwellings</td>
<td>15%</td>
<td>40%</td>
<td>40%</td>
<td>5%</td>
</tr>
</tbody>
</table>

2.33 In terms of the different types of affordable homes the report identifies that 80% of the net need for affordable housing is for social and affordable rented homes, with 20% for equity-based intermediate housing options such as shared ownership homes. Intermediate housing includes:

- Help-to-Buy Shared Ownership
- Affordable Rent
- Rent-to-Homebuy
- Low Cost Sale
APPENDIX 1

2.34 The population projections indicate that over the plan period the number of residents aged over 65 is expected to increase significantly, and as such is likely to require additional specialist housing provision. Based principally on the expected growth in population of older persons, the report estimates a need for an additional 1,182 specialist dwellings for older persons over the 2013-33 period (59 per annum). This need is principally for market housing, and forms part of the OAN identified above for 342b dwellings (being 17% of this).

2.35 The District Council will, in conjunction with other agencies need to give consideration as to how best to deliver this specialist need housing.

Employment Land and Floorspace Requirements

2.36 The report has also considered the need for employment land and floorspace in Derbyshire Dales taking account of economic trends and projected growth in employment, commercial property conditions and a survey of businesses across the District.

2.37 The evidence confirms that the economic appeal of the District is primarily from SME’s and micro-businesses, and that there is generally a positive outlook with as significant number of businesses surveyed expecting business activity, turnover and staffing numbers to increase over the next five years.

2.38 Taking account of all the evidence the report provides forecasts for future employment space needs as follows:

<table>
<thead>
<tr>
<th>Gross Need</th>
<th>Ha: Derbyshire Dales District</th>
</tr>
</thead>
<tbody>
<tr>
<td>Net Demand</td>
<td>11.3</td>
</tr>
<tr>
<td>Allowance for Vacant Floorspace</td>
<td>1.1</td>
</tr>
<tr>
<td>Margin to Provide Choice and Flexibility</td>
<td>2.3</td>
</tr>
<tr>
<td>Total Gross Need</td>
<td>14.7</td>
</tr>
</tbody>
</table>

2.39 The consultants consider that it would be appropriate to plan to provide 15 hectares (gross) of employment land provision with development potential across the District. This takes account of the preferred economic scenario, but includes an allowance to provide a choice of sites and flexibility of supply.

Future Retail Capacity

2.40 As part of the assessment of economic development needs the consultants have prepared an updated assessment of the quantitative capacity for retail floorspace within the District, and assessed the performance of town centres within the District.

2.41 The report is split into two sections, the first setting out a health check for the each of the main retail areas across the District:

- Ashbourne;
- Bakewell;
- Darley Dale;
- Hathersage;
APPENDIX 1

- Matlock;
- Tideswell; and
- Wirksworth.

2.42 In general terms the report concludes that each of the main retail areas are generally healthy, well maintained, with low vacancy rates, and each retail centre fulfils its role as either a primary or secondary location well.

2.43 The second part of the report provides an updated quantitative assessment of retail floorspace capacity. It assesses the need for new retail floorspace by examining current shopping patterns and projecting potential turnover of these destinations in the future – taking account of expected trends in spending, as well as population growth.

2.44 To inform the retail assessment the consultants undertook a telephone household survey from 700 respondents who as a result provided up-to-date information on the patterns of expenditure and market share across the area.

2.45 The combination of the predicted growth in population levels and personal expenditure produces a growth in the pool of available expenditure in the survey area. It is estimated that available convenience expenditure will grow by 16.4% from £337.6 million in 2015 to £392.8 in 2033. This amounts to a total increase in available convenience expenditure of £55.2 million over the plan.

2.46 Estimated comparison growth rates are higher than convenience rates and it is anticipated that the total pool of available comparison expenditure will grow by 87% between 2015 and 2033. There is currently £525.5 million of spend available in the survey area. This is expected to grow to £982.6 million by 2033 which is an increase of £457.1 million. Some of this additional spend will be absorbed by existing floorspace through efficiency gain, some will be absorbed by commitments and pipeline development projects, and the remainder will be available to support additional floorspace.

2.47 Combining the results of the household survey, and the expenditure data enables the calculation of turnover levels within each retail area to be derived, and from that the extent to which expenditure is retained within the District. The report indicates that only 33% of convenience expenditure is being retained within the Derbyshire Dales, with significant alternative draws from outside the area in Buxton, Chesterfield and Belper. In terms of comparison expenditure the report suggests that only 16% of comparison expenditure is actually retained within the Derbyshire Dales.

2.48 Whilst the result of the survey indicates low retention rates across the District Council area, the assessment of capacity for additional convenience floorspace across each of the settlements set out above does not show any potential scope for additional retail floorspace. In contrast the report suggests that by the end of the plan period there may be potential for up to 1,332 sqm of additional floorspace for comparison goods. However the report caveats this conclusion by indicating that it will be not be until approximately 2030 that there is any anticipated headroom for growth in retail capacity. In the interim, caution should be given to using these figures as a basis for future planning.
2.49 As Members will be aware, the strategy adopted in the withdrawn Derbyshire Dales Local Plan sought to continue previous strategies for the area of balancing the housing and economic needs of the area whilst also seeking to safeguard the high environmental quality of the District. However, the Inspector in his report concluded that on the basis of the evidence presented, he was not satisfied that the District Council had effectively demonstrated that the level of development proposed secured an appropriate balance between meeting development needs and safeguarding environmental quality.

2.50 Given the view taken by the Inspector, it was considered appropriate to undertake a strategic landscape sensitivity analysis to assess the extent to which the landscape of the plan area is capable of accommodating new development.

2.51 In order to take this forward, landscape consultants were commissioned to undertake the following:

- A strategic landscape sensitivity analysis of areas in and around selected settlements across the local planning area.
- Landscape and visual impact assessments (LVIA) of sites that have been identified as being available for development.

2.52 The scope of the commission for the landscape sensitivity assessment was to identify different levels of sensitivity of the landscape to new development within and surrounding the following settlements:

- Matlock; Ashbourne; and Wirksworth;
- Darley Dale; Tansley; Hulland Ward; Brailsford; Doveridge Cromford; Matlock Bath; Middleton-by-Wirksworth;
- Northwood; Bonsall; Brassington; Clifton; Darley Bridge; Hognaston; Kirk Ireton; Kniveton; Marston Montgomery; Rowsley; Sudbury and
- Other locations at Two Dales; Upper Hackney; Bolehill; Carsington; Hopton; Bradbourne; Atlow; Mappleton; Hulland; Bradley; Yeldersley; Osmaston; Snelston; Wyaston; Norbury; Shirley; Ednaston; Rodsley; Yeaveley; Roston; Hollington; Alkmonton; Cubley; Longford; Boylestone; Somersal Herbert; Longcliffe

2.53 The scope of the commission for the LVIA was to assess the capacity of sites nominated through the ‘Call for Sites’ process taking account of the potential impact on landscape and visual amenity as well as identifying, where appropriate, the type of mitigation measures which may be required in order that development can be successfully accommodated in and around the following settlements:

---

3. Landscape sensitivity relates to the value attached to the landscape in terms of a wide range of factors including: its character; whether or not it is designated (as National Park or a Site of Special Scientific Interest or Local Wildlife Site for instance); whether it contains important features such as protected trees; its visual prominence; the nature of the local settlement pattern etc and its susceptibility to change brought about by development. In these terms landscape sensitivity can be assessed as being high, medium or low.

4. LVIA is used to assess the impact that development is likely to have on a site in respect of the character and sensitivity of the landscape and the key features of it contained within the site and its surroundings and the impact on the visual amenity of those who live or work near the site or who travel through or past it. In these respects it can be used to assess the capacity of the site to successfully accommodate development.
In undertaking the assessment, the consultants emphasise the advice in the NPPF which sets out in Paragraph 109 that the “planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes”

The report also takes into consideration comments made by the Minister of State for Housing and Planning outlined in a letter dated 27th March 2015 which stressed that the impact of development on landscape character, particularly outside National Parks, can be an important material consideration in the determination of planning applications.

The methodology employed by the consultants to undertake the assessment draws upon the guidance set out within the Landscape Institute and the Institute of Environmental Management & Assessment “Guidelines for Landscape and Visual Impact Assessment” Third Edition (LVIA). In practical terms it also took into account work undertaken by the former Countryside Commission, and Derbyshire County Council on identifying the different landscape character types across Derbyshire Dales.

The assessment process involved a combination of both desktop and field survey work, which categorised and assessed areas as either High, Medium or Low Sensitivity:

**High sensitivity:**
Land with a high susceptibility to change and/or which is of high value, e.g. land adjacent to or visually prominent from the PDNP or WHS, land outside of the settlement pattern, land which has high visual prominence, land which contributes to heritage or ecological assets.

**Medium sensitivity**
Land with a medium susceptibility to change and/or which is of medium value, e.g. land which has medium visual prominence, land which partially contributes to heritage or ecological assets.

**Low sensitivity**
Land with a low susceptibility to change and/or which is of low value, e.g. land within the settlement pattern, land with low visual prominence, land which has no or very limited contribution to heritage or ecological assets.

The distribution of the high, medium and low sensitivity areas are shown on the Maps set out in the Appendix to the report. The conclusions of the report are as follows:

“The northern half of the District is generally characterised by valley bottom settlements, both nucleated and linear in pattern. Settlements are larger in the north, with the Market Towns of Matlock and Wirksworth located here. Ashbourne is located near the centre of the District.
The density of settlements increases towards the north, with the collection of settlements located on the A6 around Matlock comprising the most densely developed area. In this area physical coalescence has occurred between many of the settlements, such as Matlock and Upper Hackney, and Darley Dale and Two Dales, and it is difficult to identify the delineation of settlements on a map. However visual coalescence is prevented due to the presence of extensive screening vegetation, and open space alongside the A6. Land which prevents visual coalescence is therefore of high sensitivity, and it is important that this land remains undeveloped in order to maintain the perceived breaks between settlements.

Land of high sensitivity in this area also relates to the proximity to the PDNP. Many of the settlements, such as Rowsley and Northwood, are located on the opposite side of the Derwent Valley to the PDNP. Therefore land surrounding them is visually prominent in views from the Park, and development could potentially adversely impact upon the setting of the Park.

The southern part of the District (south of Ashbourne) is generally characterised by nucleated settlements located on plateaus and ridges, which are generally more rural in character than in the north of the district. Settlements within the south are smaller and more dispersed, with the majority of the Small Villages and Other Locations concentrated in the south.

Areas of high sensitivity within the south predominantly related to visually prominent land which slopes down from the hilltop settlements, and land which contributes to the rural character of settlements. Sensitivity was also generally high in villages with heritage constraints, where the majority of the surrounding landscape was located within a Conservation Area, or was important for the setting of listed buildings.

Areas of low and medium sensitivity throughout the district were generally identified on land at a similar elevation to the adjacent settlement edge, which was enclosed or semi-enclosed with low visual prominence, and did not contribute to the character or setting of the settlement.

**Gypsy and Traveller Accommodation Assessment**

2.59 The National Planning Policy Framework (NPPF) and Planning Policy for Traveller Sites (PPTS) require local planning authorities (LPAs) to carry out assessments of the future accommodation needs of Gypsies and Travellers. These are called Gypsy and Traveller Accommodation Assessments (GTAA’s), which can be used to inform the preparation of policy and site allocations for Gypsies and Travellers at Housing Market Area (HMA) or Local Plan level, as appropriate.

2.60 In accordance with the NPPF and the Duty to Co-operate set out in the Localism Act 2011, a GTAA covering Derbyshire and East Staffordshire was jointly commissioned in August 2013 by the following partners to update the previous study published in 2008 for Derbyshire and 2013 for East Staffordshire:

- D10 - including the Derbyshire County Council, Derby City Council and the eight District and Borough Councils in Derbyshire;
- The Peak District National Park Authority;
• East Staffordshire Borough Council; and
• The Derbyshire Gypsy Liaison Group.

2.61 A copy of the GTAA 2014 has now been published by Derbyshire County Council on their website along with a Position Statement which sets out the status of the study. A copy of the final report is also available on the Members Portal.

2.62 The GTAA represents a piece of evidence which provides a starting point for considering pitch and plot requirements for Gypsies and Travellers and Travelling Showpeople in the study area for the period 2014/15 to 2033/34.

2.63 The data for the study was obtained from three main sources:

• **Primary data**: face-to-face surveys of Gypsies and Travellers
• **Secondary information**: including a literature review and secondary data analysis
• **Stakeholder consultation**: with local organisations involved with Gypsies and Travellers and Travelling Showpeople

2.64 The accommodation need was assessed using a Department for Communities and Local Government model in accordance with the advice set out in the NPPG. The model contains seven basic components; five assessing need and two assessing supply, which are applied to each sub-group of Gypsies and Travellers, based on primary data.

2.65 Overall the total requirement for new accommodation across the whole of the study area over the next 20 years is as follows:

• 134 residential pitches
• 4 transit sites/emergency stopping places consisting of at least four or five pitches
• 13 Travelling Showpeople plots.

2.66 In respect of the requirement for accommodation within the Derbyshire Dales, the study indicates that over the next five years provision should be made for 6 pitches and in the future 1 additional pitch every five years for the next fifteen years, equating to a total requirement of 9 pitches to be found over the next 20 years.

2.67 The report sets out that need does not have to be met where it arises i.e. it could be met throughout the study area local authorities. This is particularly in relation to meeting needs arising from families residing on unauthorised encampments requiring permanent accommodation.

2.68 As such, the GTAA recommends that the study area local authorities adopt HMA-type collaborative structures to help determine how to jointly meet the accommodation needs of Gypsies and Travellers. The report in its conclusions makes the following points:

---

• According to the survey undertaken with Gypsies and Travellers in the study area the preferred size for permanent/residential sites is for small, family sized sites. The stakeholder meetings undertaken as part of the GTAA confirmed that smaller sites are preferred.

• Following CLG (2008) guidance it is recommended that new sites contain a maximum of 15 pitches whilst smaller sites for individual extended families should be considered.

• Survey results suggest that a mix of public and private sites will be required dependent on need. Specific sites available should be outlined in future DPDs and guidance offered on the type of land that is likely to obtain planning permission as well as land that is unlikely to. Specific advice on the planning process should also be offered.

• Local authorities should consider how they can facilitate the provision of new sites including applying for funding as part of the HCA’s 2015-18 Affordable Homes Programme (AHP); sites developed on a cooperative basis; shared ownership; small sites owned by a local authority, but rented to an extended Gypsy or Traveller family for their own use; and Community Land Trust options.

• Local authorities should jointly (within the HMA-type groupings) examine their Strategic Housing Land Availability Assessments (SHLAAs) as well as other land availability documents to identify suitable locations.

• Gypsies and Travellers living in bricks and mortar accommodation sometimes face discrimination and hostility from the settled community. Local authorities should consider the provision of alternative accommodation which directly meet the needs Gypsies and Travellers such as group housing schemes.

3 RISK ASSESSMENT

3.1 Legal

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Not having an up to date Local Plan in place which provides adequate land for housing places the District Council at risk to residential development being brought forward on appeal rather than on a plan-led basis. The legal risk is therefore high.

3.2 Financial

The cost of preparing the Derbyshire Dales Local Plan is contained within the District Council’s budget. The financial risk is, therefore, assessed as low.

3.3 Corporate Risk

The Regeneration and Policy Risk Register identifies that preparation of the Local Plan carries a high risk rating score of 20 – this being the highest risk in the Regeneration & Policy Risk Register, and one of the highest corporately.

This indicates that lack of progress on the preparation of the Local Plan could have a significant impact on a number of areas. The timetable set out in Section 3 is considered to
be realistic however any significant delay in the preparation of the Local Plan is likely to result in some of the consequential effects continuing to occur e.g. reputation and political.

4 OTHER CONSIDERATIONS

In preparing this report, the relevance of the following factors has also been considered: prevention of crime and disorder, equalities, environmental, climate change, health, human rights, personnel and property.

5 CONTACT INFORMATION

Mike Hase, Planning Policy Manager
Tel: 01629 761251 E-mail: mike.hase@derbyshiredales.gov.uk

7 BACKGROUND PAPERS

<table>
<thead>
<tr>
<th>Description</th>
<th>Date</th>
<th>File</th>
</tr>
</thead>
<tbody>
<tr>
<td>Report to Council</td>
<td>2nd October 2014</td>
<td></td>
</tr>
<tr>
<td>Report to Local Plan Advisory Committee</td>
<td>8th July 2015</td>
<td></td>
</tr>
<tr>
<td>Derbyshire Dales Housing &amp; Economic Development Needs Assessment</td>
<td>September 2015</td>
<td></td>
</tr>
<tr>
<td>Derbyshire Dales Landscape Sensitivity Study</td>
<td>August 2015</td>
<td></td>
</tr>
<tr>
<td>Derby, Derbyshire, Peak District National Park &amp; East Staffordshire Gypsy and Traveller Accommodation Assessment</td>
<td>July 2015</td>
<td></td>
</tr>
</tbody>
</table>