

## **DERBYSHIRE DALES LOCAL PLAN EXAMINATION IN PUBLIC**

### **STATEMENT ON BEHALF OF DERBYSHIRE COUNTY COUNCIL**

#### **MATTER 1: Procedural and Overarching Matters**

##### **Issue 2: Compliance with the Duty to Cooperate, particularly in relation to consideration of housing needs.**

- 1.1 The statement below on behalf of Derbyshire County Council's (DCC) Officers has been prepared to demonstrate that Derbyshire Dales District Council (DDDC) has carried out the requirements of the Duty to Cooperate (DTC) fully and effectively with the County Council in preparation of the Derbyshire Dales Local Plan.
- 1.2 DCC's Officers particularly consider that the requirements of the DTC have been carried out extensively and effectively by DDDC in consideration of the key strategic planning policy and strategic infrastructure considerations of the Local Plan, particularly relating to District's future housing requirements; highways impacts and mitigation, particularly relating to the Joint Transport evidence base; and the school place planning implications of the overall scale and distribution of the housing growth proposed in the Local Plan.
- 1.3 The statement below summarises how the County and District Council's Officers have cooperated since 2015 in the preparation of the Derbyshire Dales Local Plan up to its submission in December 2016, particularly in the consideration of the Local Plan's housing requirements.

#### **Derbyshire Dales Local Plan Key Issues Consultation**

- 1.4 On 30 October 2015, DCC was consulted by DDDC on its Derbyshire Dales Local Plan Key Issues Consultation (KIC). DCC submitted Officer comments on the KIC on 14 December 2015, a summary of which is as follows:
  - Concern was expressed that Strategic Objective 10 of the KIC should be amended and set out a clear objective that DDDC will seek to meet the objectively assessed housing needs (OAHN) of the District, subject to consideration of other strategic objectives in the Local Plan;
  - That new evidence commissioned by the District Council in its Derbyshire Dales Assessment of Housing and Economic Development Needs (AHEDN) was considered to be robust and provided a comprehensive and thorough assessment of the District's future housing and employment land needs. This was also based on a robust consideration of the appropriate housing market area (HMA) for the District; and
  - That of the three Options put forward for the District's future housing requirement, DCC's Officers considered that the Local Plan should plan for a future housing requirement of 6,440 new dwellings, as this would meet the full

OAHN's of the District recommended in the AHEDN and required by paragraph 47 of the National Planning Policy Framework (NPPF).

### **Draft Derbyshire Dales Local Plan**

- 1.5 DDDC consulted DCC on the Draft Derbyshire Dales Local Plan (DLP) on 7 April 2016, on which DCC submitted extensive Member and Officer comments on 19 May 2016. The Officer comments indicated that:
- It was welcomed and supported that Strategic Objective 10 had been amended in accordance with DCC's comments on the KIC, which indicated that the District Council would seek to meet the OAHNs of the District subject to consideration of other strategic Objectives in the Local Plan; and
  - Welcomed the indication in the Local Plan that DDDC would seek to meet as much of the OAHN of 6,440 dwellings within the District and that, under the DTC, the District Council was in discussions with its neighbouring local planning authorities (LPAs) to determine the extent to which these LPAs were able to accommodate some of the identified shortfall of 425 dwellings to meet the OAHN requirement in full (see below).

### **Derbyshire Dales District Council's Duty to Cooperate Letter to Local Planning Authorities in Derbyshire**

- 1.6 On 19 April 2016, DDDC wrote to all the LPAs in Derbyshire, including DCC, setting out the position above in its DLP and inviting each LPA to formally consider whether it was able to accommodate some of the unmet housing need in Derbyshire Dales District within their area.
- 1.7 Councillor Anne Western (Leader of DCC) wrote to Councillor Lewis Rose (Leader of DDDC) on 13 May 2016, indicating that the County Council would undertake to assist the District Council in seeking to meet its unmet housing needs by:
- Identifying land in the County Council's ownership that might be suitable for housing and potential allocation in the Local Plan (4 sites were identified);
  - Through its Officer representation on the Northern HMA Local Plan Liaison Group (LPLG) with Officers from Bolsover District, Chesterfield Borough and North East Derbyshire District Councils; and the Derby HMA Core Strategy Coordination Group (CSCG), with Officers from Amber Valley, Derby City and South Derbyshire District Councils, the County Council's Officers would liaise with Officers on the LPLG and CSCG on DDDC's behalf, to ascertain whether there was scope for their areas to accommodate any of the unmet housing need in Derbyshire Dales.

### **Derbyshire Dales Local Plan - Pre-Submission Draft Plan**

1.8 On 10 August 2016, DDDC consulted DCC on its Derbyshire Dales Local Plan - Pre-Submission Draft Plan (PSDP). DCC submitted extensive Member and Officer comments on the PSDP on 22 September 2016. In summary, DCC's Officer comments:

- Reaffirmed support for the OAHN requirement of 6,440 dwellings set out in the PSDP and as recommended by the AHEDN as this piece of evidence was considered to be fully compliant with the requirements of the NPPF and National Planning Practice Guidance (NPPG) and was a comprehensive and robust piece of evidence;
- Fully supported DDDC's proposals to meet the full OAHN requirement within the District as set out in the Policy S6 of PSDP and the identification of sufficient land to meet the requirement in full (6,571 dwellings). It was noted that following DDDC's letter to all its adjoining LPAs on 19 April 2016, none of the LPAs was in a position to accommodate any of the OAHNs arising in Derbyshire Dales District; and
- Recommended that the District Council should carry out / commission further 'sensitivity testing' work to consider the implications of the 2014-based Sub-National Household Projections on the District's OAHN, as the AHEDN was based on the previous set of projections in the 2012-based Sub-National Household Projections (see further comments below).

#### **Objectively Assessed Housing Need – District Only Figure**

1.9 In its consultation responses on the KIC, DLP and PSDP, DCC's Officers consistently considered that the AHEDN was a comprehensive and robust piece of evidence. The AHEDN provided a comprehensive assessment of the housing market area that was appropriate for the District, concluding that the northern part of the District should be defined as falling within a Sheffield focussed HMA with some inter-relationships between the north of the District and High Peak Borough, particularly Buxton. The Southern part of the District falls within a wider Derby-focussed HMA, while the central part falls within an area of overlap between the northern and southern HMAs.

1.10 The AHEDN recommended an OAHN requirement for the District as a whole of 6,440 dwellings over the Plan period, having taken account of the three HMAs above. The recommendation of District only OAHN figure is fully consistent with the approach taken in all of the Strategic Housing Market Assessments (SHMAs) and OAHN studies that the County Council's Officers are familiar with and which have been commissioned elsewhere in Derbyshire and Nottinghamshire, particularly:

- Review of Objectively Assessed Housing Needs in Light of 2012-Based Sub-National Population Projections for the Derby Housing Market Area – Final Report (G L Hearne November 2014);

- North Derbyshire and Bassetlaw Strategic Housing Market Assessment Final Report (G L Hearne November 2013);
- High Peak Housing Needs Study 2012-based Sub National Household Projections Update May 2015 (Nathaniel Lichfield & Partners); and
- Nottingham Outer Strategic Housing Market Assessment (October 2015) (G L Hearne).

- 1.11 Each of these studies has recommended an OAHN requirement for the respective HMAs as a whole and then disaggregated this requirement for their constituent city/district/borough administrative areas as a whole. This has been the case, not least because key statistical evidence, particularly ONS Sub-National Population Projections and CLG's Sub-National Household Projections are only published at a whole district level geography and not disaggregated below this geographical level. This makes any meaningful assessment of housing needs below this geographical level very difficult and largely based on assumption and guesswork.
- 1.12 The Inspector may wish to be aware that the housing needs studies for the High Peak HMA and Derby HMA referred to in paragraph 1.10 above, have not been challenged as being unsound or fundamentally flawed by the respective Inspectors who have recently carried out examinations into the High Peak Local Plan (2015), South Derbyshire Local Plan Part 1 (November 2015) and Derby City Local Plan Part 1 Core Strategy (April 2016).
- 1.13 For the reasons above, the approach taken in the AHEDN for Derbyshire Dales is considered to be a robust approach for assessing the District's future housing needs.

### **The Implications of Housing Needs in Adjoining Housing Market Areas to Derbyshire Dales**

- 1.14 Derbyshire Dales District is adjoined to the south and south-east by the Derby HMA comprising the local authority areas of Amber Valley Borough, Derby City and South Derbyshire District; to the north-east and east, by the North Derbyshire and Bassetlaw HMA comprising the local authority areas of Bolsover District, Chesterfield Borough and North East Derbyshire District Councils in Derbyshire and Bassetlaw District Council in Nottinghamshire; and to the north-west by the High Peak HMA comprising the local authority area of High Peak Borough Council.
- 1.15 OAHN studies or SHMAs have been carried out in the last few years for all the HMAs referred to above. A more detailed assessment is provided in the appendix to this statement but a summary is provided below of the OAHN recommendations of these studies and details of how each of the local authorities is meeting its needs in their adopted or emerging Local Plans.

### Derby HMA

- 1.16 The OAHN study carried out by G L Hearne for the Derby HMA recommended an OAHN of 33,388 dwellings over the period 2011 to 2028. Through their emerging and adopted Local Plans the three local authorities are planning to meet the OAHN for the Derby HMA in full as follows:
- Amber Valley Draft Local Plan (March 2017) proposes a housing requirement of 9,770 dwellings over the period 2011 – 2028;
  - Adopted Derby City Local Plan Part 1 Core Strategy (January 2017) proposes a housing requirement of 11,000 dwellings over the period 2011 – 2028;
  - Adopted South Derbyshire Local Plan Part 1 (June 2016) proposes a housing requirement of 12,618 dwellings over the period 2011 – 2028.

### North Derbyshire and Bassetlaw HMA

- 1.17 The North Derbyshire and Bassetlaw SHMA carried out by G L Hearne recommended an OAHN for the North Derbyshire and Bassetlaw HMA of 23,600 – 27,000 (1,180 – 1,350 dwellings pa) between 2011 and 2031. Through their emerging and adopted local plans the three local authorities in Derbyshire are planning to meet the OAHN in full as follows:
- Bolsover District Consultation Draft Local Plan (November 2016) proposes to make provision for 3,600 (240 pa) from 2018 – 2033;
  - Chesterfield Borough Local Plan Consultation Draft (January 2017) proposes to make provision for 4,629 dwellings (272 per annum) over the period 2016 to 2033;
  - North East Derbyshire Local Plan Consultation Draft (March 2017) proposes to make provision for 6,600 dwellings (300 pa) over the period 2013 – 2033;

### High Peak HMA

- 1.18 The High Peak Housing Needs Study by Nathaniel Lichfield & Partners recommended an OAHN for High Peak Borough of between 310 and 350 dwellings pa (6,200 and 7,000 dwellings) from 2011 to 2031 based on a range of growth scenarios. The Adopted High Peak Local Plan (April 2016) makes provision for 7,000 (350 pa) dwellings between 2011 and 2031.

### Overall Implications

- 1.19 On the basis of the above, the Inspector can be satisfied that all of the neighbouring local planning authorities to Derbyshire Dales District are proposing to meet their OAHNs in full in either their adopted or emerging Local Plans. There is no requirement, therefore, for Derbyshire Dales District to accommodate any potential unmet housing need arising in any adjoining local authority in Derbyshire. Conversely, as the Derbyshire Dales Local Plan

Submission is proposing to meet the OAHN of 6,440 dwellings in full, there is no requirement for any potential unmet housing need arising in Derbyshire Dales to be met in any adjoining local authority area in Derbyshire.

### **Implications of 2014 - Based Sub-National Household Projections**

- 1.20 In its comments on the PSDP, DCC's Officers recommended that the District Council should carry out / commission further 'sensitivity testing' work to consider the implications of the 2014-based Sub-National Household Projections on the District's OAHN, as the AHEDN was based on the previous set of projections in the 2012-based Sub-National Household Projections.
- 1.21 This view was largely based on a preliminary analysis that DCC's Officers had undertaken of the 2014-based Sub National Household Projections which indicated that they were likely to have significant impact on the District's OAHN and particularly be likely to imply a future housing requirement significantly below that of 6,440 set out in the PSDP.
- 1.22 A broad comparison of the 2012-based Sub-National Household Projections with the 2014-based Sub National Household Projections for Derbyshire (including Derby City) and Derbyshire Dales District is set out below.

<b>Derbyshire</b>	Households 2013	Households 2033	Difference
2012 SNHP	441,000	508,000	+ 67,000
2014 SNHP	441,000	502,000	+ 61,000

<b>Derbyshire Dales</b>	Households 2013	Households 2033	Difference
2012 SNHP	31,000	36,000	+ 5,000
2014 SNHP	31,000	34,000	+ 3,000

- 1.23 It is clear from the above, that the position in Derbyshire Dales is that the latest 2014-based Sub National Household Projections indicate a level of household growth over the period 2013 to 2033 of approximately 2,000 households lower than was previously indicated by the 2012-based projections. This is similar to the broad pattern for Derbyshire as a whole. The implications of the above assessment are that the OAHN for Derbyshire Dales over the Local Plan period is likely to be significantly less than the 6,440 dwellings set out in the PSDP.
- 1.24 In this respect, DCC's Officers are aware that DDDC has commissioned G L Hearne to undertake further sensitivity testing of the AHEDN in the light of the 2014-based Sub-National Household Projections (Examination Document

EX/03). Based on a consistent approach in the AHEDN, it is noted that the final report by GL Hearne recommends a revised OAHN for Derbyshire Dales of 5,680 dwellings over the Plan period. The Derbyshire Dales Local Plan is therefore proposing a housing target significantly in excess of its OAHNs based on the most up-to-date evidence.

Steve Buffery  
Principal Planner  
Derbyshire County Council  
11 April 2017

## **APPENDIX 1:**

### **Objectively Assessed Housing Needs Studies and Local Plan Housing Targets in Housing Market Areas Adjoining Derbyshire Dales District**

#### **Derby Housing Market Area**

##### Study

Review of Objectively Assessed Housing Needs in Light of 2012-Based Sub-National Population Projections for the Derby Housing Market Area – Final Report (G L Hearne November 2014)

Recommended OAHN for Derby HMA: 33,388 dwellings 2011 - 2028

Derby HMA OAHN of 33,388 dwellings was agreed by Amber Valley and South Derbyshire Local Plan Inspectors following Joint EIP Hearing Session November 2014.

Derby City's OAHN was also agreed by the Inspectors as being 16,000 dwellings. Inspectors accepted that due to capacity constraints, Derby City could only accommodate 11,000 of its OAHN. The residual of 5,000 dwellings would therefore need to be provided in Amber Valley Borough and South Derbyshire District.

(Note: Amber Valley Local Plan Part 1 Core Strategy was subsequently withdrawn in December 2015)

##### Local Plan Proposed Housing Targets

- Amber Valley: 9,770 dwellings 2011 – 2028 – Amber Valley Draft Local Plan (March 2017) – includes 2,375 dwellings contributing to Derby City's OAHN.
- Derby City: 11,000 dwellings 2011 – 2028 – Adopted Derby City Local Plan - Part 1 Core Strategy (January 2017).
- South Derbyshire: 12,618 dwellings 2011 – 2028 – Adopted South Derbyshire Local Plan Part 1 (June 2016) – includes around 2,600 dwellings to meet Derby City's OAHN.

#### **Northern Housing Market Area**

##### Study

North Derbyshire and Bassetlaw Strategic Housing Market Assessment Final Report (G L Hearne November 2013)

Recommended OAHN for North Derbyshire and Bassetlaw HMA: 1,180 – 1,350 dwellings pa (23,600 – 27,000 total) between 2011 and 2031

Recommended OAHN for Districts:

- Bassetlaw: 435 – 500 dwellings (8,700 – 10,000 total)
- Bolsover: 235 – 240 dwellings (4,700 – 4,800 total)
- Chesterfield: 240 – 300 dwellings (4,800 – 6,000 total)
- North East Derbyshire: 270 - 310 dwellings (5,400 – 6,200 total)

#### Local Plan Proposed Housing Targets

- Bassetlaw: 6,000 dwellings (350 pa) 2010 – 2028 – Bassetlaw Adopted Core Strategy 2011
- Bolsover: 3,600 (240 pa) 2018 – 2033 – Bolsover District Consultation Draft Local Plan (November 2016)
- Chesterfield: 4,629 dwellings (272 per annum) over the period 2016 to 2033 - Chesterfield Borough Local Plan Consultation Draft (January 2017).
- North East Derbyshire: 6,600 dwellings (300 pa) - North East Derbyshire Local Plan Consultation Draft (March 2017)

### **High Peak HMA**

#### Study

High Peak Housing Needs Study 2012-based Sub National Household Projections Update May 2015 (Nathaniel Lichfield & Partners)

Recommended OAHN for High Peak Borough: Range between 310 and 350 dwellings pa (6,200 and 7,000 dwellings in total) 2011 to 2031, based on a range of growth scenarios.

#### Local Plan Proposed Housing Target

- High Peak: 7,000 (350 pa) dwellings 2011 to 2031 – Adopted High Peak Local Plan (April 2016)

### **Nottingham Core Housing Market Area**

#### Study

Broxtowe, Erewash, Gedling and Nottingham City Housing Background Paper (June 2012); Greater Nottingham Household Projections Background Paper (June 2012);

and Broxtowe, Erewash. Gedling and Nottingham City Housing Background Paper Addendum (2014).

Recommended OAHN for Nottingham Core HMA: 49,950 dwellings 2011 to 2028.

### Local Plan Housing Targets

- Broxtowe: 6,150 dwellings (361 pa) 2011 – 2028 – Broxtowe Adopted Aligned Core Strategy 2014
- Erewash: 6,250 dwellings (368 pa) 2011 – 2028 – Adopted Erewash Core Strategy 2014
- Gedling: 7,250 dwellings (427 pa) 2011 – 2028 – Gedling Aligned Core Strategy 2014
- Nottingham City: 17,150 dwellings (1,009 pa) 2011 – 2028 – Nottingham City Aligned Core Strategy (2014)
- Rushcliffe Borough Council: 13,150 dwellings (774 pa) – Rushcliffe Part 1 Local Plan Core Strategy (2014)