



Acres Land & Planning Ltd

'Acres of space'

Client: The Goodall Family
Matter 3 Objectively Assessed Need & Housing Requirements

FURTHER SUBMISSION ON HOUSING RERQUIREMENTS.

DERBYSHIRE DALES LOCAL PLAN: EXAMINATION IN PUBLIC

Introduction.

Acres Land & Planning Ltd (ALPS) have submitted representations on behalf of the Goodall Family in support of their land at Brailsford which is proposed for future housing development. This further submission summarises the key points raised by ALPS in our cases and addresses the points raised by the inspector in his Question & Answer paper.

Issues.

Issues 1. The Housing Market Area

This issue is covered under Matter 1.

I have already made a further submission in respect of Matter 1 and therefore won't repeat the points.

Issue 2. The OAN and 2014-based household projections.

Is the Council's analysis of the implications of the 2014-based household projections contained within EX/03 robust? Does the analysis have any implications for the housing requirement?

Issue 3: Adjustments in the OAN to take into account economic growth, affordable housing needs and market signals.

Have sufficient upward adjustments been made in the OAN to take into account economic growth, affordable housing needs and market signals? In particular is the OAN adjustment of 21 homes per annum to improve affordability sufficient?

I have studied the Council's document EX/03 published in February 2017 and reviewed the comparison between the 2012 and 2014 Household Projections. In the absence of technical support on the demographic implications of the changes to the Government Projections I cannot provide conclusive advice on whether the Document is robust or not, however I do have a number of concerns and queries which arise out of the report which I feel require explanation.

1. The GL Hearn update report EX/03 acknowledges in paragraph 1.3 that it has undertaken the analysis using District wide figures rather than basing the calculations on Housing Market Area information due to the difficulty of obtaining comparable sub-District data. Has GL Hearn been able to build-up any picture of the pattern for sub-market areas – such as Ashbourne and Matlock?
2. The commentary in paragraph 1.6 indicates that Derbyshire Dales had a larger proportion of employment sectors which are likely to perform less well. Is this simply a value judgement, or is there further evidence to support this assumption?
3. Paragraph 2.2 indicates that the Government assumption built into the 2014 based household projections is that a national level ONS expect net international migration to the UK to fall from 329,000 in 2014/15 to 185,000 in 2020/21, which is then maintained thereafter. This is a dramatic decrease. Whilst this forms only a token part of the Derbyshire Dales picture, there must be doubt that such a significant fall will occur in view of the continuing net migration flows even after Brexit – with fewer migrants arriving but also fewer UK residents likely to be leaving the country.
4. It is clear from Table 3 that it is internal migration which tends to drive the Derbyshire Dales Housing Market, rather than international migration. Natural change is negative and hence Derbyshire Dales needs an inward flow of households in order to maintain its economy. Table 6 in particular demonstrates that internal migration dipped from 2012 onwards which explains why the population change built into the 2014 population projections signals a downturn. This will have been affected by the reduced availability of housing during the last Local Plan when there were no allocations at all, the downturn is therefore to a degree self-inflicted.
5. Table 4 highlights the change in age structure whereby the number of people 85+ will increase by 117% whereas the teenage year groups will actually fall. This has serious implications for the Derbyshire Dales economy which needs to be addressed through the Local Plan. Paragraph 2.14 indicates that It is also notable that the 2014-based Projections will see a greater reduction in the workforce. This means that stronger upward adjustments will be necessary to balance growth in housing and employment in the District.
6. There is a wide disparity in the employment predictions from Cambridge Econometrics (anticipating 3000 jobs) and Oxford Economics (predicting 900 jobs) which really needs to be explained. The choice of a midpoint of 1700 is logical but arbitrary and could be seen as a pessimistic assumption in the light of the Cambridge figures. The top-up forecasts are critically dependent upon these assumptions.
7. It is particularly surprising that despite the Derbyshire Dales having an anecdotal reputation as being the source of commuters to the surrounding major towns and cities, Table 12 shows that in 2011 there was actually a net outflow of commuting from the Derbyshire Dales amounting to some 1300 extra people flowing inwards to take up jobs. As Table 6 shows, internal migration has actually decreased since then. Ideally, this is a balance which ought to be redressed in order to achieve a more

sustainable homes/jobs ratio by allocating more housing in Derbyshire Dales. Yet paragraph 3.9 suggests that this assumption will remain unchanged.

8. The reference within paragraphs 3.10 – 3.12 to double jobbing suggests that 6.1% of the population may have more than one job and hence this reduces the future need for a growth in the workforce. In practice however, by definition these must be part time jobs and are likely to be self-employed roles which may not be available to other elements of the workforce. It would seem dangerous to build this element of restraint into the figures. Similarly, the assumption that because people live longer they will continue to work for longer may be misplaced. The essential reason why so many people settle in the Dales is not to work but to retire.
9. In terms of affordable housing, the Derbyshire Dales are well known as being an expensive location relative to income levels, by virtue of the attractive environment and shortage of housing. The private rent levels quoted in Table 16 (including for example a 3 bedroomed property for £600 per month) seem surprisingly low compared with other parts of the country.
10. The update in affordable housing need from the HEDNA report is helpful but there is no information to explain the derivation of the new figures. Paragraph 4.11 states *'reducing the overall housing target would inevitably reduce the level of affordable housing'*. Furthermore, paragraph 5.6 indicates that the price/income ratio within the DDDC area remains at 8.87 which is higher than both the region and the HMA figure. Paragraph 6.1 seems to suggest that upward adjustments for other reasons will help to address affordability and therefore that a 'bonus' of 21 dwellings will do. We are doubtful that this figure would do any more than scratch the surface.

Issue 4: The needs of older people.

Have the needs of older people been taken into account in the OAN having regard to growth in population of this age group? Should those older people who require care home bed spaces be included in the OAN?

Yes they should.

Issue 5: The PDNPA contribution

Is the PDNPA contribution of 400 dwellings for the LP period justified?

Yes it is. This is covered under Matter 1.

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