

**From:** [Steve Simms](#)  
**To:** [Programme Officer](#)  
**Subject:** Re: Derby City Local Plan Part 1: Core strategy examination - further work on 5 year land supply.  
**Date:** 10 June 2016 11:57:11  
**Importance:** High

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Dear Ms Edwards

We remain concerned about the number of sites without planning permission that are included in the projected five year supply, particularly those projected to deliver towards the very end of the period. This weighting inevitably increases the risk that housing will not be delivered in the short term in accordance with government policy in NPPF paragraph 47.

With regard to the first section of Appendix B, we observe that a significant portion of the windfall completions in the last five years comprised sites of 10 or more dwellings, which, had there been a plan in place, would have been allocated and therefore not identified as windfalls. This has the effect of artificially inflating the apparent rate of windfall completions. The fact of there being no plan in place and no five-year housing land supply will itself also have driven up the rate at which all unallocated sites, including smaller ones, obtained permission.

We are also concerned that in the second section of Appendix B, which identifies small sites with permission, there is no indication of whether the permissions are full or outline, and that a high proportion appear to be three or nearly three years old and are annotated "NYS", which we take to mean that they are not yet started. This inevitably leads one to question whether indeed they will be started in the short term. Given that interest rates are historically low and house prices high, a change in either would compromise delivery of such sites.

On a point of information, we also advise that our planning application in respect of Rough Heanor Farm has now been amended and is projected to deliver up to 80 dwellings with a minimum of 60 on land within the applicant's control.

Kind regards

**Steve Simms** MA MRTPI  
**Director**

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**From:** Programme Officer <[Programme.Officer@derby.gov.uk](mailto:Programme.Officer@derby.gov.uk)>  
**Date:** Friday, 20 May 2016 09:34  
**To:** Programme Officer <[Programme.Officer@derby.gov.uk](mailto:Programme.Officer@derby.gov.uk)>  
**Subject:** Derby City Local Plan Part 1: Core strategy examination - further work on 5 year land supply.

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Dear Participant

At the recent examination hearings the Inspector requested a block of work from the Council regarding 5 year housing land supply. He gave a deadline of Friday 20 May. This information has

now been received.

Mr Moore is inviting further comments on this work from interested parties. Any further comments should be sent to me by **noon on Friday 10<sup>th</sup> June**. Once he has received these Mr Moore will take a view on whether a further hearing session is necessary.

Please do not hesitate to get in touch if you have any queries.

Kind regards

Carmel

*Carmel Edwards*

*Programme Officer*

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