

DERBY CITY LOCAL PLAN PART 1: CORE STRATEGY EXAMINATION
Further comments on Housing Land Supply

It is agreed that as set out by the Council the most appropriate approach to the calculation of the 5 YHLS is the Sedgefield method to recouping shortfalls as soon as possible and a 20% buffer for persistent under-delivery applied to both the shortfall and annualised housing requirement.

The HBF does not comment on the merits or otherwise of individual sites. Therefore the following comments are based on the figures provided by the Council and as such our representation is submitted without prejudice to any further comments made by other parties on the delivery rates and availability of specific sites.

If the Derby Local Plan Part 1 proceeds to adoption at the end of 2016 / beginning of 2017 it is reasonable to assume that at that time the 5 YHLS calculation will lie somewhere between the 2016 base date and 2017 base date calculations. So on the Council's original calculation the 5 YHLS figure will be between 4.78 years (2016 base date set out in Appendix A) and 5.22 years (as set out in Document EX016). Or alternatively on the Council's revised calculations taking into account other parties representations on lead in times and delivery rates of individual sites the 5 YHLS figure will be between 5.02 years (2016 base date set out in Appendix F) and 5.39 years (2017 base date also set out in Appendix F). Therefore on the latest evidence it is most likely that on adoption the 5 YHLS figure will be circa 5.18 years providing a contingency of only circa 200 dwellings above 5 years supply or circa 40 dwellings per year over the 5 year period which could be considered precarious by providing insufficient headroom. However as suggested by the Council two omission sites on which planning permission is recommended for approval by Planning Officers are currently awaiting determination and therefore may come forward in the foreseeable future to contribute to the 5 YHLS and provide additional headroom.

The HBF submits two further suggestions in order to provide greater headroom to the Council's 5 YHLS position. Firstly a commitment to an early review is inserted into the Local Plan Part 1. An early review policy was previously proposed by the HBF because of the short plan period expiring in 2028 only eleven years after the proposed adoption date of the Plan which is below the preferred timeframe of fifteen years set out in the NPPF. However an early review policy may also assist in remedying any further erosion of the Council's 5 YHLS position. The second suggestion is that more housing sites are released in the Local Plan Part 2. As previously stated by the HBF additional sites may be found following a full and comprehensive re-assessment of the city's Green Wedges. Obviously the release of more housing sites would provide greater headroom to the Council's 5 YHLS position rolling forward in the future.

The submitted evidence does not support using the Liverpool method or a stepped trajectory in the 5 YHLS calculation for Derby. The legitimate argument for using the Liverpool method or stepped trajectory relates to the characteristics of the sites contained within the HLS rather than the extent of the scale of the shortfall. The recently published Local Plans Expert Group Report to Government confirms the recommendation that the current preference for Sedgefield as set out in the NPPG is maintained whilst only adopting Liverpool where justified by specific circumstances, for example, a strategic vision to build large strategic sites (para 7 in Appendix 13). Indeed within the Derby HMA in the neighbouring authority of South Derbyshire where a large proportion of Derby's unmet housing needs will be met in such large sustainable urban extensions the 5 YHLS is calculated on the basis of Sedgefield and a 20% buffer applied to shortfalls and the annualised housing requirement (see South Derbyshire Local Plan Part 1 Inspector's Final Report paras 36 – 38) which re-enforces the argument that there is no justification not to do so in Derby itself. The site allocations in the Derby Local Plan are not of sufficient size to justify such an approach. Therefore the 5 YHLS should be calculated using the Sedgefield method as preferred by the Council.

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