



Programme Officer
c/o Planning Services
Derby City Council
The Council House
Corporation Street
Derby DE1 2FS

SENT BY E-MAIL ONLY

12th August 2016

Dear Ms Edwards

DERBY CITY PRE SUBMISSION LOCAL PLAN PART 1 EXAMINATION

Thank you for consulting with the Home Builders Federation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders.

In response to the Inspector's invitation to comment on any implications arising from the publication on 12th July 2016 of the 2014-based Sub National Household Projections (SNHP) the HBF submits the following response. As set out in the NPPG (ID 2a-016) a re-assessment of objectively assessed housing needs (OAHN) is only necessary if a meaningful change has been identified by the publication of these projections. On examination of the SNHP it is the HBF's opinion that whilst these demographic projections show a lower figure the change is not so meaningful as to warrant a re-assessment. Moreover as set out in the NPPG the SNHP are just the starting point for the calculation of OAHN (ID 2a-015) after other factors such as worsening market signals (ID 2a-019 & 020), delivering affordable housing needs (ID 2a-029) and supporting economic growth (ID 2a-018) are taken into consideration 33,388 dwellings remains a reasonable assessment of OAHN for the Derby HMA as concluded by the Inspectors examining the South Derbyshire and Amber Valley Local Plans respectively. Therefore it is concluded that the publication of the 2014 based SNHP has no implications for the Derby City Local Plan Part 1. It is hoped that this response is helpful in informing the next stages of the Derby City Local Plan Part 1. In the meantime if any further information or assistance is required please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**

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Susan E Green MRTPI
Planning Manager – Local Plans