



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

SENT BY E-MAIL ONLY

12th July 2016

Dear Ms Edwards

DERBY CITY PRE SUBMISSION LOCAL PLAN PART 1 EXAMINATION

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. 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 any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

Further to the Inspector's letter of 14th June 2016 the HBF would submit the following comments on the three matters referred to therein :-

2014-based Sub National Population Projections (SNPP)

The HBF have reviewed the Council's latest evidence as set out in the G L Hearn Report on the Implications of 2014-based SNPP dated June 2014 and the Council's accompanying letter dated 13th June 2016. As set out in the NPPG (ID 2a-016-20140306) 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. Therefore the HBF concurs that no re-assessment is necessary.

South Derbyshire Local Plan Inspector's Final Report

The Council's position that the OAHN for the HMA is unchanged is further endorsed by the publication of the Inspector's Final Report on the South Derbyshire Local Plan Examination and the subsequent adoption of the South Derbyshire Local Plan on 13th June 2016.

The Court of Appeal judgement Secretary of State for Communities and Local Government v West Berkshire District Council and Reading Borough Council [2016] EWCA Civ 44.

As the Council's affordable housing policy has a site threshold of 15+ dwellings it is not considered that the Court of Appeal judgement will impact on the Derby Local Plan as proposed. However it is noted that in the Council's letter dated 20th May 2016 a modification is proposed on the vacant building credit, which the HBF understands will be subject to further comments as part of a main modifications public consultation.

In summary it is concluded that the three matters above have no discernible impacts on the Derby City Local Plan Part 1. However as discussed during the Examination Hearing Sessions whether or not full OAHN for the Derby HMA in particular unmet housing needs from the city are delivered is dependent upon the yet to be prepared Amber Valley Local Plan therefore it is essential that the Derby City Local Plan includes an appropriate policy commitment to an early review.

It is hoped that these representations are of assistance in informing the next stages of the Derby City Local Plan Part 1. If any further information or assistance is required please contact the undersigned.

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



Susan E Green MRTPI
Planning Manager – Local Plans