

BY EMAIL ONLY

Mr Mike Moore
c/o Carmel Edwards
Programme Officer
Derby City Council
The Council House
Corporation Street
Derby
DE1 2FS

Our Ref: 13.020 SNHP 12-08-2016

12th August 2016

Dear Mr Moore,

**Examination of Derby Local Plan Part 1: Core Strategy
Publication of 2014-based Sub-National Household Projections**

Thank you for the opportunity to comment on any implications for the Derby City Local Plan Part 1 following the publication of the 2014-based Sub-National Household Projections (SNHP). In response to your invitation, I set out our representations below, making specific reference to land at Lime Lane, Oakwood, Derby.

Having comprehensively reviewed the 2014-based SNHP, which was published on 12th July 2016, there is a clear expectation for household and population increases, nationally. There is an overriding need therefore, for additional housing provision in all Housing Market Areas (HMA).

In terms of the Derby Unitary Authority specifically, the household projections and population projections maintain their increase during the whole period of 2014–2039. During the same time, it is anticipated that the average household size will decrease. Albeit this fall is not significant (approx. 0.2 persons every five years), it follows a rise in 1-person households. The SNHP anticipates that this ‘type’ of

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occupation will increase the most when compared with households occupied by couples, couples with other adults, with dependants and other.

It is relevant to compare the 2012 based projections with the newly published 2014 based projections to establish the accuracy of the Council's Objectively Assessed Housing Need (OAHN) figure as justified in the Local Plan Part 1. From this analysis there is a slight reduction in forecast households beyond 2029. Until this time, the 2014 based projections demonstrate an increase in housing growth need. The comparative figures are replicated in the table below:

Table 1: Total Change and Percentage Change Household Projections Derby UA

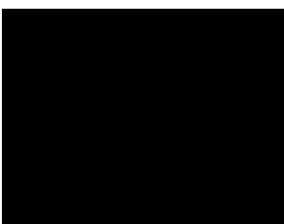
Year (2014 Base)	2014	2019	2024	2029	2034	2039	Total Change	Percentage Change
Change (000's)	104	109	113	117	121	125	21,000	21%
Change (000's)	103	108	112	117	122	126	23,000	23%
Year (2012 Base)	2012	2017	2022	2027	2032	2037	Total Change	Percentage Change

The above changes, beyond 2029, come as a result of falling population growth figures between the 2012 and 2014 bases. In total, the population growth figures fall by 2,276. Whilst the National Planning Policy Framework (NPPF) is unequivocal that Local Plans should be kept up-to-date and informed by the latest available information, this reduction is not considered to be a 'meaningful change', in accordance with National Planning Practice Guidance (NPPG). It follows, therefore, that a re-assessment of the Council's OAHN figure is not required.

Notwithstanding the above, there is an increased requirement for housing prior to 2029 when using the 2014-based projections. In addition, there has been a persistent under delivery of housing post-recession, to date, which in terms of the NPPF requires an increased 'buffer' of demonstrably deliverable sites. With continued and significant housing delivery requirements in the Housing Market Area, we suggest exploring the full potential of sites in Derby City and the identification of additional sites to ensure a continual healthy supply of specific and deliverable sites, as per the requirements of Paragraph 47 of the NPPF.

This reaffirms our position that development would be a credible way of resolving ever emerging local housing land supply issues, as we have asserted in the Oakwood ward, which has high demand for market housing and a severe shortage of new affordable homes. Ultimately, the household and population projections in Derby reflect the national trend of growth and subsequent need for more housing, particularly in the short to medium term.

Yours Sincerely



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Senior Town Planner