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Date: 10 December 2014

Mr S Batchelor
Director of Community and Planning
South Derbyshire District Council
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DE11 0AH

Dear Mr Batchelor

Objectively Assessed Housing Need for the Derby Housing Market Area (HMA)

Following the joint session for housing held on the first day of hearings for the examination of South Derbyshire Local Plan Part 1, we have reached the following position. After seeking sensitivity testing of the demographic projections and housing requirement forecasts by GL Hearn in March 2014 Roy Foster concluded that 33,388 new homes represented the best estimate of objectively assessed housing need (OAN) for the Derby HMA, 2011-2028. Jill Kingaby, having reviewed the written evidence and having heard the oral evidence for the South Derbyshire Local Plan examination, concurs with that position. We have taken account of the Review of Objectively Assessed Housing Need in the light of 2012-based Subnational Population Projections (GL Hearn November 2014). We are satisfied that this Review, based on the most recent national population data and taking account of advice on methodology in the national Planning Practice Guidance, demonstrates that the housing requirement figures do not need to be increased.

We also note that appropriate margins of comfort in following the March 2014 estimate are provided by the slightly lower estimates of November 2014 and the feasible outcome of Derby's supply exceeding its currently assessed capacity.

Our outstanding concern relates to the matter of apportioning the HMA's requirement between the three Local Authorities. The Authorities have agreed that Derby City's contribution is capacity-capped. The reasoning behind this is apparent, but the apportionment between Amber Valley and South Derbyshire of the remaining housing is more difficult to understand. Whilst all Authorities have indicated their support for the planned distribution, the justification for the agreed numbers is not clear. No evidence has been provided to show whether any alternative distributions were considered formally, or that sustainability appraisal to justify the selected apportionment between the Authorities was undertaken.

Ideally, this work would have been carried out at an early stage in plan-making to give a credible and robust starting-point for each Authority's housing numbers.

Inspector: Jill Kingaby BSc (Econ) MSc MRTPI

Programme Officer: Carmel Edwards B Lib (Hons) MCLIP

However, in view of the assurance offered by the Authorities that they are prepared to co-operate in meeting the full OAN, we now advise the Councils to re-examine their planned apportionments of OAN and carry out a fresh joint sustainability appraisal of this matter.

Please let us know your thoughts on this proposed course of action, and if the additional work is to be carried out, advise how long you would require to complete it.

While writing, we note the clarity now provided by the decision of the Secretary of State in the case of APP/H1840/A/13/2199085 at Droitwich. The appropriate buffer to the 5-year land supply is to be applied to the sum of the raw 5-year figure and any shortfall accumulated since the base date of the plan.

Yours sincerely

Jill Kingaby and Roy Foster

Inspectors