

**DERBYSHIRE DALES LOCAL PLAN EXAMINATION**  
**MATTER 1 – PROCEDURAL & OVERARCHING MATTERS**

**Inspector's issues and questions in bold type.**

This Hearing Statement is made for and on behalf of the HBF which should be read in conjunction with our previously submitted representation to the pre submission consultation dated 22<sup>nd</sup> September 2016. This representation only answers specific questions included in the Inspector's Stage 1 Matters, Issues & Questions document.

**Issue 2. Compliance with the DTC, particularly in relationship to consideration of housing needs.**

**Is the approach within the Housing & Economic Development Needs Assessment (HEDNA) to district-only objectively assessed housing need (OAHN) reasonable taking into account overlapping Housing Market Areas (HMAs) which affect the District?**

The Council has prepared a local District only HMA Assessment as opposed to a Strategic HMA Assessment even though it is acknowledged that the District is not a self-contained HMA and the functional linkages between places where people live and work which define a geographical area as a HMA cross the administrative boundaries between Derbyshire Dales and its neighbouring authorities. It is acknowledged that there are inter-relationships between :-

- Northern Derbyshire Dales (Bakewell & Hathersage) & the Sheffield City Region ;
- Southern Derbyshire Dales (Ashbourne & Wirksworth) & the Derby HMA ;
- Central Derbyshire Dales & Sheffield, Chesterfield and Derby.

The Council's approach is unsound because it is inconsistent with national policy in particular paras 47 and 159 of the NPPF. Under the NPPF the Council should have a clear understanding of housing needs. The Council should prepare a Strategic HMA Assessment to assess their full housing needs working with neighbouring authorities where the HMA crosses administrative boundaries to ensure that the Local Plan meets the full OAHN in the HMA. The Council's argument for a local District only HMA Assessment is that this approach is pragmatic and reasonable because :-

- SNPP & SNHP data is unavailable below District level ;
- there is no reasonable alternative because neighbouring authorities have formed themselves into Strategic HMAs which exclude Derbyshire Dales ;

- no unmet housing needs arise if Derbyshire Dales meets its own OAHN in full and neighbouring HMAs also meet their own OAHN in full.

The Duty to Co-operate Statement (Document SD07) illustrates the liaisons which have occurred between the Council and its neighbouring authorities concerning OAHN and the meeting of housing needs in full. The Statement confirms that the OAHN for the Sheffield City Region is not yet concluded. The Statement also states that communications between the Council and its neighbouring authorities will continue in the future. However the missing component in proposed future co-operative working is the incorporation of Derbyshire Dales District into a wider Strategic HMA. At this time the Council's approach may be pragmatic but it is inconsistent with national policy and as such its continuation should not be perpetuated indefinitely into the future. It is noted that there is no reference to local or Strategic HMAs in the Local Plan. It is suggested that a reference should be included together with a commitment to become an integral part of a wider Strategic HMA by the time of the next review of the Local Plan. Under proposals set out in the recently published Housing White Paper the Local Plan should be reviewed at least once every five years. At the time of review the re-calculation of OAHN using a standardised methodology as also proposed in the Housing White Paper may result in higher housing requirement figures which if to be met in full may only be achievable across a wider Strategic HMA.

**Have the housing needs of neighbouring planning authorities including PDNPA been taken into account particularly having regard to the overlapping HMAs?**

By liaison with neighbouring authorities the housing needs of these authorities have been taken into account. To date the Council has not received any formal request to assist in meeting any unmet needs from elsewhere. However currently Sheffield City Council has not concluded its own assessment of OAHN. The authorities will have to continue working together until this matter is concluded.

Furthermore as the Council received no offers of assistance in meeting any unmet needs arising from Derbyshire Dales it is fundamental to the Local Plan's soundness that the Council meets its own housing needs in full.

With regard to the housing needs of the PDNPA these are included in the HEDNA. However the quantum of housing needs to be met within the administrative boundary of the National Park itself is not satisfactorily evidenced (please also see HBF response to Matter 3, Issue 5).

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