

**DERBYSHIRE DALES LOCAL PLAN EXAMINATION**  
**MATTER 4 – HOW WILL THE HOUSING REQUIREMENT BE MET & A 5**  
**YEAR HOUSING LAND SUPPLY MAINTAINED?**

**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 1. The extent of flexibility built into the housing supply**

**Is there sufficient flexibility built into the housing supply such that the housing requirement is likely to be met?**

There is insufficient flexibility (130 dwellings equivalent to only 2%) in the Council's housing land supply (HLS) especially given that the housing requirement is a minimum and therefore not a ceiling to sustainable development. As the Council is underperforming on housing delivery a 20% buffer has been applied to its 5 YHLS calculation. The Council is also likely to fail the proposed Housing Delivery Test as set out in the recently published Housing White Paper. Therefore it is the HBF's opinion that the same percentage contingency should be applied to the overall HLS.

Whilst the HBF is supportive of the Council's proposed modification to Policy S5 for additional flexibility for sustainable development beyond settlement boundaries in the event of an inadequate 5 YHLS (Document EX/06). The Council's suggestion that the number of dwellings on allocated sites is increased to improve flexibility should be approached with caution (Document EX/06). The opportunity to increase the density of residential development is restricted by the Council's prescriptive housing mix requirements and proposals to introduce the nationally described space standard in Policy HC11 (see HBF answer to Matter 5 Issues 4 & 5). It is also noted that participants at the stakeholder viability workshop event queried the Council's densities tested in the viability assessment as unrealistic given the topography of many sites in the District (Document CD19).

The HBF object to the Council's proposal to add flexibility to the HLS by reducing its proposed housing requirement (answer to Question 11 in EX/02). The reasons for our objections are set out in response to Issue 2 in HBF Matter 3 Statement. Even if the housing requirement is reduced flexibility in overall HLS would only increase from 2% to 13% which remains insufficient.

**Issue 2. The housing trajectory**

**Is the housing trajectory set out in the strategic housing & economic land Availability Assessment (SHELAA) and at Appendix 3 of the LP realistic taking into account past completion rates?**

**Are build out rates of 30 dwellings per annum from larger sites realistic and supported by evidence?**

All assumptions on completion rates in the housing trajectory should be realistic and justified by the Council's evidence. A more detailed commentary was included in the HBF pre submission representation.

**Is there any updated information on commitments and completions to inform the examination?**

The HBF await the Council's updated evidence on its HLS and trajectory before making any further comments.

### **Issue 3. Delivery form commitments and allocations**

**Is the delivery of some 74% of commitments and 36% of allocations within the first 5 years of the LP realistic?**

It is critical that assumptions on lead in times and start dates for existing consented sites and Local Plan allocations included in the Council's 5 YHLS are realistic and justified by evidence. A more detailed commentary was included in the HBF pre submission representation.

### **Issue 4. Constraints to delivery**

**What are the implications for meeting the housing requirement if one or more of the strategic housing allocations do not come forward?**

The implication of one or more strategic housing sites not coming forward or progressing more slowly than anticipated because of infrastructure constraints means the housing requirement is not met. For this reason it is necessary for the Council to allocate sufficient land including a contingency in its HLS. It is also important that a mix of sites is provided so that strategic housing sites are complimented by non-strategic sites. From November 2017 the Council may also fail the Housing Delivery Test as proposed in the recently published Housing White Paper. The Housing White Paper emphasises the importance of a wide range of sites because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.

### **Issue 5. Housing Implementation strategy**

**Are the provisions of Chapter 9 of the LP (implementation and Monitoring) sufficient to meet the requirements for a Housing Implementation Strategy?**

The provisions of Chapter 9 are insufficient to meet the requirements for a Housing Implementation Strategy. The Council's implementation & monitoring

should set out triggers and actions to be taken. Indeed if the Council fails the proposed Housing Delivery Test then an Action Plan will be required.

**Issue 6. The wording of housing supply policies**

**How is policy HC1 (and any other relevant policies) to be modified to respond to a shortfall in the 5 YHLS?**

It is understood Policy HC1 will be modified. When the proposed modification is published the HBF may make further comments.

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