



South Derbyshire District Council  
Planning Services  
Civic Offices  
Civic Way  
Swadlincote  
Derbyshire  
DE11 0AH

SENT BY E-MAIL AND POST

12<sup>th</sup> February 2016

Dear Sir / Madam

## **SOUTH DERBYSHIRE LOCAL PLAN PART 2 – ISSUES & OPTIONS CONSULTATION**

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. We would like to submit the following representations and appear at future Examination Hearing Sessions to discuss these matters in greater detail.

This Issues & Options consultation is concerned with the allocation of non-strategic housing sites (defined as sites in urban areas and villages of up to 100 houses), settlement boundaries, Local Green Space designations and proposed development management policies.

The Duty to Co-operate requires the Council to engage constructively, actively and on an on-going basis with other prescribed bodies to maximise the effectiveness of plan making in satisfying the Duty it is important to consider the outcomes arising from the process of co-operation and the influence of these outcomes on the Local Plan. One of the required outcomes is the delivery of full objectively assessed housing needs (OAHN) for market and affordable housing in a housing market area (HMA) as set out by paragraph 47 of the National Planning Policy Framework (NPPF) including the unmet needs of neighbouring authorities where it is reasonable to do so and consistent with sustainable development (NPPF paragraph 182). South Derbyshire is part of the Derby HMA together with Derby City and Amber Valley Councils. In December 2015 the Amber Valley Core Strategy was withdrawn from examination creating an uncertainty over whether or not full

OAHN will be met in the HMA. It is known that the Inspector recently appointed to examine the Derby City Local Plan has raised the question of unmet needs across the HMA in his initial letter to the City Council. At this time the Inspector's Final Report on the South Derbyshire Local Plan Part 1 is also awaited. In these circumstances should the Council be considering a higher housing figure?

It is agreed that the Council should be meeting housing needs across all communities preferably in locations where that housing need arises. There is a residual requirement for 600 dwellings to be allocated in the Local Plan Part 2. The Council has identified between 500 – 850 dwellings distributed as 150 – 300 dwellings in urban areas on non-strategic allocations, 150 – 400 dwellings in Key Service Villages and 150 dwellings in Local Service Villages to meet this remaining requirement. However if it is concluded that as a consequence of the withdrawal of the Amber Valley Core Strategy from examination South Derbyshire should be accommodating a higher housing figure in its Local Plan further allocations may be necessary. When allocating sites the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets.

Similarly the currently proposed settlement boundaries are based on the Part 1 Local Plan which may change as a consequence of unmet needs in the HMA. If these boundaries are too tightly drawn the Plan will lack flexibility and inhibit sustainable development from coming forward. Moreover the relationship between the settlement boundaries identified in the maps in Appendix B and the proposed site allocations is unclear. It is suggested that settlement boundaries should include any contiguous development sites allocated in the South Derbyshire Local Plan Part 1 & 2.

The Council should confirm that the circa 82 Local Green Spaces set out in Appendix D are consistent with the definitions set out in paragraphs 76 and 77 of the NPPF. It is interesting to note that Cheltenham Borough Council is carrying out a similar consultation on Designated Local Green Spaces as part of its Cheltenham Plan Issues and Options consultation however the number of proposed designations amounts to only 29 areas which questions if there is a disproportionate number of proposed allocations in South Derbyshire. As stated in the NPPF Local Green Space designation will not be appropriate for most green areas or open spaces because any areas designated as Local Green Spaces must be demonstrably special to a local community and be of particular local significance because of its beauty, historic significance and recreational value. The NPPG (ID 37-009-20140306) emphasises that this demonstrably special nature must be evidenced. The NPPG also advises that where land is already protected by designations such as Area of Outstanding Natural Beauty, Site of Special Scientific Interest, Scheduled Monument or conservation area, consideration should be given to whether any additional local benefit would be gained (ID 37-011-20140306). Designated Local Green Space should be local in character as opposed to an extensive tract of land (NPPG ID: 37-015-20140306) so the blanket designation of extensive tracts of

land and open countryside adjacent to settlements is not appropriate. Paragraph 78 of the NPPF confirms that managing development within a Designated Local Green Space should be consistent with national policy for Green Belts. Therefore Designated Local Green Spaces should not be proposed to achieve by stealth what could be seen as the designation of a new localised Green Belt around smaller settlements.

For the South Derbyshire Local Plan Part 2 to be found sound under the four tests of soundness as defined by paragraph 182 of the NPPF, the Plan should be positively prepared, justified, effective and consistent with national policy. The Council should re-consider its proposals as set out in this Issues & Options consultation in order to avoid preparing a Plan which is unsound by failing to be consistent with national policy, positively prepared, properly justified and so ultimately ineffective. It is hoped that these representations are of assistance to the Council in preparing the next stages of the South Derbyshire Local Plan Part 2. In the meantime if any further information or assistance is required please contact the undersigned.

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



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