



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

SENT BY E-MAIL AND POST

13th April 2016

Dear Sir / Madam

SOUTH DERBYSHIRE LOCAL PLAN PART 1 – MAIN MODIFICATIONS 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.

MM14 modifies Table 1 : Housing Target Across Derby Housing Market Area (HMA) 2011 – 2028 whereby the total housing requirement of 33,388 dwellings for the Derby HMA is distributed as 12,618 dwellings in South Derbyshire, 11,000 dwellings in Derby city and 9,770 dwellings in Amber Valley. However it is noted that under Reasons for Modification the Council states "Table 1 lists the current position but will need updating once information is available to reflect the most up to date housing strategy". From this statement the Council's future intentions are unclear. It is known that the Amber Valley Local Plan was withdrawn from Examination in December 2015 and the Derby Local Plan Examination will commence on 26th April 2016 perhaps the Council is anticipating further changes as a consequence of these two events. Therefore this statement is concerning because it introduces uncertainty about whether or not objectively assessed housing needs (OAHN) for the HMA will be met in full by the Local Plans prepared by the Derby HMA authorities. For the South Derbyshire Local Plan Part 1 to satisfy 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. Any further modification to **MM14** resulting in not meeting full OAHN in the Derby HMA would be unsound.

It is hoped that these representations are of assistance to the Council and the Inspector in concluding the final stage of the South Derbyshire Local Plan Part 1 Examination. 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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