

SENT BY EMAIL ONLY to localplan@derbyshiredales.gov.uk



20/06/2024

Dear Planning Policy Team,

Derbyshire Dales, A New Approach to Housing - Consultation May 2024

1. Thank you for consulting the HBF Home Builders Federation (HBF) as part of your A New Approach to Housing - Consultation May 2024. Our survey response is attached to this letter.
2. 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.
3. HBF is very concerned about the premise of this consultation and the undermining of the plan-making process that will result. The purpose of plan-making is to provide certainty for developers and communities on where new development will occur and the allocation of sites de-risks schemes. The allocation of sites in a Local Plan is the result of a significant amount of work site including evidence gathering, site assessment, choices and justification, public consultation and the Examination in Public. This work is undertaken to provide a long-term plan for the future of the area, preparing a local plan and allocating sites that HBF would expect to remain in plan over the plan period. If monitoring showed that sites were not delivering, we would expect the Council to engage with developers to understand why and what actions could be taken to help bring the allocations forward. The simple act of talking about de-allocating them introduced uncertainty and could further undermine their delivery.
4. The Derbyshire Dales Local Plan adopted in 2017 and covers the period 2013-2033. A New Approach to Housing - Consultation May 2024 states that Council wants to "hear your views about our new approach to meeting our housing needs over the next 16 years, and the leaflet says "over the next 17 years"" HBF is unclear whether the Council is proposing to review its plan and replace it with a whole new Plan, or is proposing a partial review that simply removes existing rural allocations from the adopted Plan. The NPPF requires the Plan period to run for at least 15 years from adoption, and if the plan period is to be extended, irrespective of the annual housing requirement level, additional housing will be needed.

5. The appropriate place to review any housing requirement is through a full Local Plan review. The PPG sets out that the housing requirement should be established using the standard method as a starting point. HBF would argue that in light of the housing crisis and the need for economic growth, and unmet needs of neighbouring authorities, will necessitate a higher housing figure and additional allocations in the Derbyshire Dales Local Plan. We recognise that consultation on the housing requirement figure will be an important part of the plan-making process.
6. It is simply not appropriate to start a consultation on a new Local Plan/Plan review with a decision having already been taken on the housing requirement, and then inferring that this definitely means that current housing allocation sites are no longer needed and should be deallocated. This is improper and disingenuous. Plan-making for housing policies should start with establishing the housing requirement, and only then consider issues of housing land supply.
7. HBF would request that in reaching its conclusions on the proposed housing requirement the Council should fully consider all of the issues that may result in a need for a higher housing requirement than required by the standard method, including the need to provide a range and choice of sites, the need for flexibility, viability considerations and whether higher levels of open-market housing are required in order to secure increased delivery of affordable housing. In a predominantly rural area like the Derbyshire Dales, the role of new housing is helping to support the viability and sustainability of current and future rural services should also be recognised.
8. HBF have responded to the individual questions in the Derbyshire Dales, A New Approach to Housing consultation but our primary concerns relate to the need for a wider consideration and consultation on what the housing requirement should be. This consultation on how the requirement for less housing should be delivered seems both inappropriate and premature.
9. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
10. Please let me know if you have any further questions.

Yours faithfully

R. H. Danemann

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Derbyshire Dales Local Plan Review – A New Approach to Housing Consultation

The Derbyshire Dales Local Plan sets out the overall vision, along with policies and proposals for the future development of those parts of the District that lie outside the Peak District National Park for the period up to 2040.

As part of the review of the Local Plan we are considering how the District's population will change in the future and what that might mean for the number of new homes we need, and to fulfil our ambitions to ensure that our towns and villages are sustainable and flourishing.

In order to take the Local Plan forward the District Council would now like to hear your views about our new approach to meeting our housing needs over the next 17 years.

A six week period of public consultation will run 9th May to 20th June 2024. To make your views known please fill out the online survey.

Following this consultation we will continue to work on the review of the Local Plan.

Should you have any questions please contact the Planning Policy Team at localplan@derbyshire.gov.uk or 01629 761101.

Derbyshire Dales District Council takes your privacy seriously. We will treat all personal information provided in confidence and store it securely in accordance with the Data Protection Act 2018 and UK General Data Protection Regulations.

The information provided will be used for the purpose or purposes for which it was intended but may be shared with other departments in the Council and third-party processors operating on their behalf to provide the service. Data will also be shared with other enforcing authorities for the purpose of preventing fraud, misuse of public funds and any legal or statutory requirements.

For more information on how we process your personal data and your rights as a data subject, visit: www.derbyshiredales.gov.uk/privacy

1. Do you think the housing needs we have identified allow us to deliver flourishing and thriving communities, are they:

Too few X
Just right
Too many

1a. Please explain your reasoning

2. Do you consider our aspirations for supporting all of our communities are ambitious enough?

Yes
No X

Although HBF welcomes the Council's efforts to ensure that they have an up to Local Plan. Plan-making is a fundamental part of a Local Authority's role and is essential to support the delivery new homes and jobs, it is disappointing that the Council has launched its local plan review in a with this consultation which seems to begin from the premise that new development, particularly new housing in rural areas, is a bad thing for communities.

The purpose of plan-making is to provide certainty, both for the development industry and local communities. In the midst of a housing crisis seems completely perverse to be looking to deallocate currently allocated housing sites.

2a. Please explain your reasoning

The Council's preferred approach section of the leaflet says "These have the potential to deliver more than 3,000 new homes, which is more than we need up to 2040. We will, therefore, need to make decisions about which of these sites we should keep in the Local Plan". HBF fundamentally disagree with this conclusion and proposed way forward.

The information presented within the consultation document itself illustrates a worsening affordability problem and growing need for affordable housing in Derbyshire Dales. The solution to this issue should be more, not less, new housing.

Any full or partial review of the Derbyshire Dales Local Plan in relation to housing should start with a calculation of the housing need using the standard method. This should be clearly sets out and explained including the affordability ratio impacts and what allowance is being made to make a contribution to the unmet need of neighbouring areas. Derby City and Nottingham City both have an unmet housing need and a lack of joined up working between the neighbouring authorities is seeing this matter remaining unaddressed.

HBF suggest that the new/revised Derbyshire Dales Local Plan should include a Vision that references the need to meet the current and future housing needs of the whole community in full, including the need to make a contribution to the unmet need of Derby. The Plan should be explicit about the need for both new market and affordable housing. The Local Plan should also recognise the connection between housing and the future aspirations for the local economy.

The SA, which the Council says has been summarised in the leaflet says has should recognise the benefits of new development for the environment, in particular in relation to Biodiversity Net Gain (BNG). BNG requires development to leave biodiversity 10% better than its pre-development value in line with national mandatory BNG policies that came in on Feb 12th 2024 for large sites and 2nd April for small sites.

HBF have been unable to locate the full SA document that has been 'summarised'. A full version of the SA should be made available on the Local Plan website.

3. Do you support the majority of new homes taking place in Matlock, Ashbourne and Wirksworth, and housing to meet local needs in the smaller villages?

Yes

No

See below

3a. Please explain your reasoning

HBF do not comment on individual site allocations, but we would wish to see the new Plan/Plan Review set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation.

The spatial strategy of the Plan should also recognise that there may be clusters of villages that provide a range of services for that area within reasonable travelling distance of each other, so villages may need to be grouped together. These areas might be able to sustainably support a substantial level of development but may not have all the services within one particular village.

Similarly, the Local Plan should recognise that settlements that currently do not have services could expand to include those services if new development is allocated in those areas. The current range of village services should not be used as a basis for only locating development close to existing services, it could in fact also identify where services could be improved through new development. Allocating housing sites in rural areas can also provide opportunities for small sites which are particularly helpful for SME builders.

As HBF are suggesting that the housing requirement for Derbyshire Dales should be higher, additional, not fewer, housing sites will be needed.

4. Which of the sites identified in this leaflet do you consider should be retained in the Local Plan. Please tick all that apply.

Ashbourne Airfield Phase 2, 1100 homes, Brownfield Site
Cavendish Drive, Ashbourne, 28 homes, Greenfield Site
Old Hackney Lane Darley Dale, 30 homes, Greenfield Site
Old Hackney Lane Darley Dale, 27 homes, Greenfield Site
Stancliffe Quarry Darley Dale, 100 homes, Brownfield Site
Gritstone Road, Matlock, 430 homes, Greenfield Site
Middleton Road, Wirksworth, 150 homes, Brownfield Site
Middlepeak Quarry, Wirksworth, 645 homes, Brownfield Site
Cawdor Quarry, Matlock, 402 homes, Brownfield Site
RBS Bank, Matlock, 24 homes, Brownfield Site
Other Sites, 113 homes

HBF Response- All

As HBF are suggesting that the housing requirement for Derbyshire Dales should be higher, additional, not fewer, housing sites will be needed.

4a. Please explain your reasoning

5. Which of the sites identified in this leaflet do you consider should be withdrawn from the Local Plan by the District Council. Please tick all that apply.

Ashbourne Airfield Phase 2, 1100 homes, Brownfield Site
Cavendish Drive, Ashbourne, 28 homes, Greenfield Site
Old Hackney Lane Darley Dale, 30 homes, Greenfield Site
Old Hackney Lane Darley Dale, 27 homes, Greenfield Site
Stancliffe Quarry Darley Dale, 100 homes, Brownfield Site
Gritstone Road, Matlock, 430 homes, Greenfield Site
Middleton Road, Wirksworth, 150 homes, Brownfield Site
Middlepeak Quarry, Wirksworth, 645 homes, Brownfield Site
Cawdor Quarry, Matlock, 402 homes, Brownfield Site
RBS Bank, Matlock, 24 homes, Brownfield Site
Other Sites, 113 homes

HBF Response- None

As HBF are suggesting that the housing requirement for Derbyshire Dales should be higher, additional, not fewer, housing sites will be needed.

The NPPF requires Local Plans to identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, unless there are strong reasons why this cannot be achieved. HBF has undertaken extensive consultation with its small developer members. One of the chief obstacles for small developers is that funding is extremely difficult to secure without a full, detailed, and implementable planning permission. Securing an implementable planning permission is extremely difficult if small sites are not allocated. Without implementable consents lenders are uneasy about making finance available or the repayment fees and interest rates they set will be very high. Small developers, consequently, need to invest a lot of money and time up-front in the risky business of trying to secure an allocation and a planning permission, and this is money that many small developers do not have.

The Council will need to set out in the Plan's policies and evidence base to set out how the plan will deliver 10% of homes on sites of less than one hectare, as required by paragraph

69 of the NPPF. Indeed, the HBF would advocate that a higher percentage of small sites are allocated if possible. Such sites are important for encouraging the growth in SME housebuilders who will tend to develop these sites but rarely see the benefits that arise from the allocation of sites in a local plan. Up until the 1980s, small developers once accounted for the construction of half of all homes built in this country resulting in greater variety of product, more competition, and faster build-out rates. Since then, the number of small companies has fallen by 80%.

HBF also note that support for small and medium builders need not be limited to only small sites of less than 1Ha. SMEs also deliver on other types of non-strategic sites (for example up to 100 units). The inclusion of a range of sites including non-strategic allocations could be used to expand the range of choice in the market and be of a scale that can come forward and make a contribution to housing numbers earlier in the plan period.

Against this background, the allocation of small sites in rural area can be particularly helpful for smaller developers, a sector of the industry that the Government is keen to support and see flourish. The de-allocation of housing sites in rural areas would seem to fail the requirement of a plan being positively prepared, effective and justified. It also seems contrary to the purpose of plan-making to provide certainty in the longer term for developers and local communities. Such an approach would therefore also seem contrary to national policy guidance. The Government remains committed to the 300,000 a year housing target.

5a. Please explain your reasoning

6. Are you aware of any other suitable sites the District Council could develop for housing? If yes please provide details below:

Please ensure that you complete the contact details form at the end of the survey as we may be in touch to discuss any suggested site in the future.

HBF do not comment on individual site allocations, but as we are suggesting that the housing requirement for Derbyshire Dales should be higher, additional, not fewer, housing sites will be needed.

7. We are interested in the understanding the views of our rural communities, which village do you live in?

HBF Response- N/A

However, as we are suggesting that the housing requirement for Derbyshire Dales should be higher, additional, not fewer, housing sites will be needed. As mentioned previously the role of new housing in supporting sustainable rural communities should be recognised.

8. How many new homes do you consider are needed in your village between now and 2040?

None

Less than 10

10 to 20

21 to 30

31 or more

HBF Response- N/A

However, as we are suggesting that the housing requirement for Derbyshire Dales should be higher, additional, not fewer, housing sites will be needed.

9. Would you support your Parish Council and your local community working with the District Council to identify a suitable site or sites to meet local housing needs?

Yes

No

HBF Response- HBF do not comment on individual site allocations, but as we are suggesting that the housing requirement for Derbyshire Dales should be higher, additional, not fewer, housing sites will be needed.

10. What community infrastructure do you think is missing from your village ?

HBF Response- N/A

However, HBF request that the Council, and the Pla/Plan Review fully recognise the benefits of new development for communities, this includes the delivery of affordable housing, provision of infrastructure and section 106 contributions towards community facilities, education, transport and other facilities as required by Local Plan policies.

11. Would small-scale infill and consolidation in the smaller villages be beneficial?

Yes

No

HBF request that the Council, and the Pla/Plan Review fully recognise the benefits of new development for communities, this includes the delivery of affordable housing, provision of infrastructure and section 106 contributions towards community facilities, education, transport and other facilities as required by Local Plan policies.

12. Are there any other ways the District Council could maintain the sustainability of smaller villages other than through new development proposals?

As discussed earlier allocating smaller sites for housing in the Local Plan/Plan Review can not only support SME developers but also improve the sustainability of rural communities. The de-allocation of sites would have the opposite effect.

Should you wish to be registered onto the Planning Policy Consultation Database please provide your contact details below.

By providing your contact details you consent to Derbyshire Dales District Council contacting you whenever we are carrying out public consultation on the Local Plan or associated documents.

If you wish to update your information or have your information removed, please get in touch by emailing localplan@derbyshiredales.gov.uk

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