

COUNCIL

24TH MARCH 2022

Report of Director of Regeneration and Policy

DERBYSHIRE DALES LOCAL PLAN – NEXT STEPS

PURPOSE OF REPORT

The purpose of this report is to set out the conclusions of the Local Plan Working Group in relation to meeting housing needs for the period 2017-2040. The report sets out the work that has been undertaken in respect of the identification of additional housing sites, and the extent to which those sites are capable of meeting future housing needs. Finally, the report sets out proposals for future work on the Local Plan.

RECOMMENDATION

It is recommended that:

1. That the work undertaken the identification of Housing Needs for 2017-2040 and the work undertaken on the Strategic Housing Land Availability Assessment is noted
2. That delegated authority be given to the Director of Regeneration and Policy to commission consultants to undertake a more detailed assessment of options for the delivery of a sustainable Derbyshire Dales that meets its agreed aspirations, as set out in Option 5 in paragraphs 4.15 and 4.16 below
3. That, subject to recommendation 2 above being agreed, approval is given for a supplementary revenue estimate of £60,000 in 2022/23 to be financed from the Local Plan Reserve
4. That the timetable for the ongoing modification of the Derbyshire Dales Local Plan as set out in Paragraph 5.12 be approved

WARDS AFFECTED

All Wards, with particular reference to Wards outside of the Peak District National Park

STRATEGIC LINK

The Derbyshire Dales District Council Local Plan will be a pivotal tool in the delivery of the Council's Corporate Plan, in particular those priorities relating to *Place* and *Prosperity*.

1 BACKGROUND

- 1.1 Derbyshire Dales District Council, is the local planning authority for that part of its area that sits outside of the Peak District National Park. In December 2017 the Derbyshire Dales Local Plan was formally adopted. It sets out the policies and proposals for the use and development of land for the period 2013-2033. Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review Local Plans at least once every five years

from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community.

- 1.2 At an Extraordinary Meeting of Council on 9th November 2020 Members resolved that a review of the adopted Derbyshire Dales Local Plan be undertaken and agreed a timetable for its review (Minute 141/20).
- 1.3 Members will recall that a report was presented to an Extraordinary Meeting of Council on 19th January 2022, which set out a detailed assessment of the contents of the adopted Derbyshire Dales Local Plan. Following consideration of this report it was resolved that for the purposes of Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 the review of the Derbyshire Dales Local Plan be determined as having been completed, and that detailed further work on those aspects of the adopted Derbyshire Dales Local Plan requiring modification be subject to scrutiny by the Local Plan Working Group prior to further reports to future meetings of Council. (Minute 241/21).
- 1.4 Members will also be aware, from the Member Workshops held in respect of Housing and Employment Land Requirements on 18th May 2021 and the Strategic Flood Risk Assessment on 7th September 2021, of the extent of work that consultants have undertaken on behalf of the District Council in these two areas.
- 1.5 A meeting of the Local Plan Working Group was held on 13th October 2021 to discuss the Housing and Employment Land requirements and options for the Local Plan review. At this meeting the Local Plan Working Group were advised about the initial findings of the Sustainability Appraisal¹ of the Housing and Employment Growth Options, as well as the need for Members to take into account the Corporate Plan, the District Council's Economic Plan and it's Covid-19 Economic Recovery Plan at the time when a decision is required by Council on which of the housing options to take forward for the period up to 2040.
- 1.6 A 'Call for Sites' as part of the Strategic Housing Land Availability Assessment process was undertaken between 26th May and 7th July 2021. This allowed developers, landowners and members of the public to nominate potential development sites for allocation in the Derbyshire Dales Local Plan for the period up to 2040. As a result of this process 106 sites were put forward for consideration. Following an initial assessment of all those sites submitted to the District Council a more detailed assessment of 69 sites, which met the initial selection criteria was undertaken.
- 1.7 Following completion of the Strategic Housing Land Availability Assessment the Local Plan Working Group met on 21st February 2022 to discuss the future housing needs requirements for the period 2017-2040 and the extent to which the potential housing supply could meet the future housing needs. The direction of travel from Members at that meeting of the Local Plan Working Group has formed the basis of the contents of this report.

¹ The purpose of the Sustainability Appraisal being to assess the likely social, environmental (including climate change) and economic effects of the growth options, both positive and negative and to ensure that decisions are made which contribute towards achieving sustainable development.

2 HOUSING NEEDS 2017-2040

2.1 As Members will be aware, the research undertaken by Iceni Projects identified 4 potential scenarios for the future needs requirements for the period 2017-2020. These are set out below:

1. Standard Methodology	230 homes p/a	2,120 jobs
2. Baseline Economic Scenario	239 homes p/a	2,436 jobs
3. Recovery Scenario	275 homes p/a	3,718 jobs
4. High Growth Scenario	302 homes p/a	4,675 jobs

2.2 The Standard Methodology is the Government's minimum housing requirements for a local authority area, and takes account of forecast changes in household growth plus an allowance for an affordable housing multiplier which is related to the District Council's published House Prices Ratio.²

2.3 As part of the research undertaken by Iceni Projects they assessed the level of jobs growth that would result from the Standard Methodology, which suggested that it would result in an additional 2,120 jobs.

2.4 A further three economic growth scenarios was considered. The first scenario utilised baseline forecast data from Cambridge Econometrics – this indicated employment growth of 2,436 jobs over the period up to 2040. When translated into housing requirements this indicated a requirement of 239 dwellings per annum.

2.5 A second 'Recovery' scenario forecasts 3,718 jobs aligned with the Council's Recovery Plan focusing on the Recovery Plan sectors whilst allowing for some stronger growth in tourism.

2.6 A third and final 'Higher Growth' scenario forecasts 4,675 additional jobs and an increase in the economically active population of about 4,400.

2.7 The following key points differentiate the recovery and higher growth scenarios from the baseline scenario:

- A more rapid recovery in Accommodation and food than the baseline forecast (particularly given the potential staycation market). For the 'Higher Growth' there is continued employment growth to 2040 closer to the historic performance of this sector;
- Stronger performance in ICT, given the strength of past performance and the outlook at the regional level
- Reflecting on the Derbyshire Dales and LEP growth / recovery plans, as well as historic performance in Derbyshire Dales, an improved outlook for higher value manufacturing (electronics, electrical and machinery) as well as architecture and engineering
- Better performance is expected in 'Other services' (including tourism related Arts and Recreation) reflecting strong local growth in the past. The 'Higher

² <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

Growth' scenario sees job growth moving closer to the historic trend than the 'Recovery' scenario; and

- A limited increase to the outlook for Transport & storage given the move to e-commerce online retailing.

2.8 Translating these economic forecasts into housing requirements it indicates 275 dwellings per annum under the Recovery scenario and 302 dwellings per annum under the Higher Growth Scenario.

2.9 The housing needs set out in the adopted Derbyshire Dales Local Plan was based upon the guidance in place at that time which required local planning authorities to meet their Objectively Assessed need for Housing. The outcome of the research undertaken by G L Hearn in 2015 provided a single requirement.

2.10 The current advice in the National Planning Practice Guidance Government is that the Standard Methodology is the minimum level of housing need for an area, and there may be circumstances which might dictate where it is appropriate to consider whether the housing needs should be higher than the standard methodology indicates.

2.11 The District Council's Corporate Plan³ has 'Prosperity – Supporting Better Homes and Jobs' as one of its key priorities because of the low local wages and high local house prices. It sets out that this will be achieved by promoting housing development that meets the needs of the present and future population of the District, and taking forward initiatives that will boost the Derbyshire Dales Economy.

2.12 The District Council's Economic Plan 2019-2033⁴ sets out an aspiration to see growth in higher value jobs in manufacturing, professional, scientific and technical jobs, along with a growth in workplace earnings, GVA and occupied employment land.

2.13 The Derbyshire Dales Covid-19 Economic Recovery Plan⁵, approved by the District Council in November 2020 sets three priority actions:

1. Invest in regenerating housing and employment sites
2. Re-Invest in Bakewell Road, Matlock
3. Re-shape Regeneration Services to drive investment in brownfield and other key housing/employment sites

2.14 The approved Covid-19 Economic Recovery Plan also includes the following action:

- Ensure the forthcoming review of the Derbyshire Dales Local Plan (and the studies and surveys commissioned in support of the Local Plan review) addresses economic recovery as a key theme, including residential and leisure uses in town centres, broadband investment, and clean growth

³ https://www.derbyshiredales.gov.uk/images/C/Corporate_Plan_2020-24_for_web.pdf

⁴ https://www.derbyshiredales.gov.uk/images/documents/E/Economic%20Development/Derbyshire_Dales_Economic_Plan_2019-2033_A.pdf

⁵ https://www.derbyshiredales.gov.uk/images/documents/E/AGENDA_09-11-2020_Economic_Recovery_Plan.pdf

- 2.15 In light of these priorities it is considered that there is sufficient justification for the District Council to adopt a housing need requirement that is above the Standard Methodology.
- 2.16 Members, at previous meetings of the Local Plan Working Group, have indicated taking all these factors into account (including a sustainability appraisal of the different options) that whilst the Standard Methodology and Baseline Forecast scenarios would result in some benefits to the local economy they do not match the ambitions which are set out in the Economic Plan or the Covid Recovery Plan.
- 2.17 The Local Plan Working Group considered that whilst higher levels of growth may result in some adverse environmental impacts, so long as these were subject to relevant mitigation measures then it was appropriate that either the Recovery or Higher Growth scenarios form the basis of the future housing requirements for the period to 2040.

3 CAN THE RECOVERY OR HIGHER GROWTH SCENARIOS BE ACHIEVED?

- 3.1 As set out above parallel to the work that has been prepared on the housing need requirements for 2017-2040 work on a Strategic Housing Land Availability Assessment (SHLAA) has been undertaken.
- 3.2 The National Planning Practice Guidance (NPPG) sets out that Strategic Housing and Economic Land Availability Assessments should:
- Identify sites and broad locations with potential for development, primarily housing & employment, but land for potential development for other uses are to be identified too, including gypsies & travellers; leisure and recreation and new village sites;
 - Assess their development potential; and
 - Assess their suitability for development and the likelihood of development coming forward (the availability or achievability);
 - Identify if there is a sufficient supply of sites to inform the housing target for inclusion within the review of the Derbyshire Dales Local Plan.
 - If there is a shortage of land identified; change and adapt the methodology, then re-assess sites to increase supply.
 - The development potential of sites identified as deliverable will inform the distribution of strategic housing, employment land, sites for gypsy & travellers as well as sport & recreation allocations within the Derbyshire Dales Local Plan.
- 3.3 To date, two stages of work have been undertaken on the updated Derbyshire Dales SHLAA. This report sets out the initial conclusions of the work completed so far. On the basis of the assessments undertaken of sites included in this report Members can be assured that it provides a substantive evidence base for this stage in taking the Local Plan forward.

Stage 1 – Site Identification

3.4 A 'Call for Sites' was undertaken between 26th May and 7th July 2021. This allowed developers, landowners and members of the public to nominate potential development sites for allocation in the Derbyshire Dales Local Plan for the period up to 2040.

As a result of this process 106 sites were put forward for consideration.

Stage 2- Site Assessment

Stage A

3.5 The initial assessment of the sites determined whether it is one suitable to be carried forward for a more detailed review. It considered the extent to which a site was:

- Within a floodzone
- Within a Special Areas of Conservation, Special Protection Areas, RAMSAR sites or SSSI
- Located in an unsustainable location
- Identified as Permitted Development Rights.

3.6 It also took into account a site size threshold – The NPPG sets out that it may be appropriate to consider all sites and broad locations capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares (or 500 square metres of floor space) and above. Any site below this threshold was not taken forward for any further assessment.

Stage B

3.7 Following the Stage A assessment a total of 70 sites were taken forward for a more detailed consideration.

3.8 The assessment of these sites at this stage involved input from the following internal and external partners and agencies:

- Development Management & Conservation
- Environmental Health
- Leisure
- Economic Development
- Derbyshire Wildlife Trust
- Environment Agency
- Highways Authority
- Archaeology DCC
- Waste & minerals– DCC
- Landscape Officer – DCC Gary Ellis or Mary & Anton?
- CCG – Health and GP surgeries
- Education Authority
- Local Flood Lead Authority
- Broadband & BT Open reach
- Severn Trent

- 3.9 This stage has been completed and a review of the consultee responses has been undertaken to determine which sites have the best potential for inclusion (allocation) within the Derbyshire Dales Local Plan for the period up to 2040.
- 3.10 As a result of this exercise, along with a peer review with Development Management, **24 sites have been identified as being considered suitable for allocation** for 10 units or more, within the Derbyshire Dales Local Plan for the period up to 2040. The final part of Stage B was to consider the potential capacity of those sites that were considered suitable for development up to 2040. The sites and their estimated capacity are set out in Appendix 1.
- 3.11 Of the 24 sites identified in Appendix 1, **16 are existing allocations within the adopted Derbyshire Dales Local Plan and 8 are new sites** not previously identified. These provide a **total estimated capacity of 3,142, of which the new sites contribute an estimated capacity of just 201 units.**
- 3.12 The locations of these sites, and those other sites considered under Stage B are set out in Appendix 2.
- 3.13 The detailed assessment of the sites, included in this report is available on the Members Portal and the District Council's website.

Development Phasing.

- 3.14 Following completion of the site capacity assessment a detailed phasing profile for each of these sites for the period 2021-2040 was undertaken. The phasing profile for each is an Officer judgement based upon the trajectory set out in the current Authority Monitoring Report and is set out in Appendix 3. In taking sites forward for inclusion within the Local Plan the phasing profile would normally be agreed with landowners, and developers. However given that there has been regular contact with the landowners and developers of the majority of these sites previously it is considered that this can be viewed as a reasonably accurate future trajectory, at today's date.
- 3.15 Taking account of the phasing profile, and the extent of completions and commitments at 1st April 2021 the following position is achieved for each of the four housing need scenarios:

	Standard Methodology	Baseline Growth	Recovery	Higher Growth
Annual Requirement	230	239	275	302
No Years 2017-2040	23	23	23	23
Overall Requirement	5290	5497	6325	6946
No. of Completions 2017-2021				
DDDC	1454	1454	1454	1454
National Park	129	129	129	129
	1583	1583	1583	1583
Outstanding Requirement	3707	3914	4742	5363

	Standard Methodology	Baseline Growth	Recovery	Higher Growth
Existing Deliverable Commitments DDDC 2021-2026	894	894	894	894
National Park 20p/a 2021-2026	100	100	100	100
Windfall 15 p/a 2021-2026	75	75	75	75
Local Plan Allocations 2021-2026	291	291	291	291
5 Year Supply 2021-2026	1360	1360	1360	1360
Requirement Beyond 2026	2347	2554	3382	4003
National Park 2026-2040 20p/a	280	280	280	280
Windfall 2026-2040 15p/a	210	210	210	210
Potential Local Plan Allocations 2026-2040	2562	2562	2562	2562
	3052	3052	3052	3052
Outstanding	705	498	-330	-951

3.16 This suggests that for the Standard Methodology and Baseline Growth scenarios that there is likely to be adequate housing sites available to meet their overall needs. It also indicates that for the Recovery scenario and the Higher Growth scenario that additional land would need to be found and considered suitable for allocation in order for those two scenarios to be achieved.

3.17 On the basis of the identified sites, their capacity and phasing this gives an average annual rate of 261 dwellings per annum over the period 2017-2021:

Completions	1583
0-5 Years	1360
5 Plus Years	3052
TOTAL	5995
Average Rate Per Annum	261

3.18 This would suggest that a level of housing need somewhere between the Baseline Growth and Recovery scenarios could be achieved. However this is contingent on all 24 sites being included and all the assumptions made about the site phasing being met.

3.19 These calculations, however, do not allow for any flexibility in the event that sites do not come forward or that sites come forward at a slower rate than anticipated. The

adopted Derbyshire Dales Local Plan included provision which equated to a 17% flexibility allowance being built into the overall housing supply. The Inspector in his report commented on this:

“..The 17% figure is consistent with non-implementation and lapse rates found elsewhere, albeit not as high as the Derbyshire Dales Local Plan, Inspector’s Report November 2017 20% ‘reserve’ recommended by some such as the Local Plan Expert Group. This greater flexibility in the Plan is necessary..”

3.20 It is therefore necessary to build in some degree of flexibility into the housing supply calculations to address this requirement. The following position is arrived at when assessed against the average of 261 dwellings per annum:

20% Flexibility	217 per annum
15% Flexibility	227 per annum
10% Flexibility	237 per annum

3.21 This suggests that given the level of potential supply over the plan period and the need to build in flexibility that there is sufficient supply to meet only the Standard Methodology scenario, with only a 10% allowance for flexibility built in. This is below what is generally accepted as being the normal allowance for flexibility. Again, it requires all 24 sites to be included.

3.22 To achieve 20% flexibility such that the level of housing need equates to 261 dwellings per annum would require the identification of land for an additional 1,208 dwellings over the plan period 2017-2040 (An extra 52 dwellings per annum). A total of 313 dwellings per annum or 7,204 dwellings in total.

3.23 Reviewing this against all four scenarios the following position is arrived at:

	Standard Methodology	Baseline Growth	Recovery	Higher Growth
Annual Requirement	230	239	275	302
No Years 2017-2040	23	23	23	23
Overall Requirement	5,290	5,497	6,325	6,946
Estimated Supply 2017-2040	5,995	5,995	5,995	5,995
Total with 20% Flexibility Allowance	6,348	6,596	7,590	8335
Difference	389	601	1,595	2,340

	Standard Methodology	Baseline Growth	Recovery	Higher Growth
Total with 15% Flexibility Allowance	6084	6322	7274	7988
Difference	88	327	1279	1993
Total with 10 % Flexibility Allowance	5819	6047	6958	7641
Difference	-176	52	963	1,646
Balance Point for Flexibility	13%	9%	-5%	-14%

3.24 This suggests, taking account the current estimate of site capacity and **building in a reasonable allowance for flexibility that the Standard Methodology is the only one of the four scenarios that the District Council has the potential to demonstrate is a ‘deliverable’ position over the period 2017-2040.**

3.25 The calculation of Five Year Supply as set out in Appendix 4 does however indicate that the plan would be unlikely to fail on this ground alone.

4 OPTIONS FOR THE FUTURE

4.1 A decision on the future housing requirements cannot be made in isolation. In coming to a view on what the level of future housing requirements are account needs to be taken of the potential social, economic and environmental impacts.

4.2 Given the relationship between the potential economic growth and the future housing requirements consideration needs to be given to the District Council’s adopted position in respect of its future economic aspirations as set out in the in the Corporate Plan, the Covid Recovery Plan and the Economic Development Plan.

4.3 The following table seeks to summarise the sustainability appraisal work undertaken in respect of the future housing requirements for Derbyshire Dales:

		Impact on Environmental Objectives	Impact on Economic Objectives	Impact on Social Objectives
Standard Methodology	230 homes pa			
Baseline Scenario	239 homes p.a.			
Recovery scenario	275 homes p.a.			
Higher growth scenario	302 homes p.a.			

KEY

	Least mitigation measures required in order to achieve identified Sustainability Objectives.
	Achievement of Sustainability Objectives likely to be achieved in some instances with minimum mitigation whilst others may require more mitigation measures to be achieved.
	Sustainability Objectives unlikely to be achieved without mitigation measures put in place by way of offset.

- 4.4 Consequently **being able to only demonstrate delivery of the Standard Methodology, whilst limiting environmental impacts, does little to achieve priority economic and social objectives.**
- 4.5 On the basis of the evidence above, all existing allocations in the adopted Derbyshire Dales Local Plan will need to be taken forward and additional land for residential development would need to be identified to ensure that the Baseline Growth, Recovery and Higher Growth Scenarios can be achieved.
- 4.6 Notwithstanding the development of new policies to assist with the determination of planning applications, if any of the these scenarios were set as the Strategy for the Local Plan for the period 2017-2040 on the basis of the above evidence the District Council would not be able to deliver a plan which would be capable of satisfying an Inspector at Examination in Public that it was a sound plan.
- 4.7 It is therefore appropriate to consider what options are available to the District Council at this time in taking the Local Plan forward. The following are considered to be reasonable options for Members to consider:

Option 1 – Only Deliver Standard Methodology

- 4.8 Accept that the Standard Methodology is the only realistic scenario that is capable of being delivered in the Local Plan up to 2040 and accept that this will achieve neither corporate priorities nor sustainability objectives. In taking forward this option it is anticipated that a new Local Plan could be in place by the June 2023 as set out in the

original timetable, and allow for the District Council to have an adopted framework for use in the determination of planning applications for the period up to 2040. If this option is taken forward then it may be feasible to work with our consultants to seek to identify and maximise the benefits that can be achieved from development, without those having an adverse impact upon their overall viability.

- 4.9 Furthermore if this option were considered our Consultants should be asked to model the social and economic impacts of restricted growth on an ageing population, on town centres that are already experiencing vacancies and decline, and on productivity, GVA and wages.

Option 2 – Reassess Failed SHLAA Sites

- 4.10 This Option would involve reassessing all the sites that have come forward through the SHLAA process and the extent to which any of the sites could be identified as providing additional capacity to achieve a higher level of growth. This option would involve delay the timetable for the preparation of the revised Local Plan of approximately 2-3 months as for some sites it will involve seeking further evidence from the landowner and their agents about the extent to which they could overcome some of the constraints identified by the key stakeholders and which had led to their rejection. There is a significant risk associated with adopting this strategy alone, that it will not generate anywhere near the additional numbers required to deliver the higher growth targets. However reassessment alongside other options would be reasonable.

Option 3 – Invoke the Duty to Co-operate with Neighbouring Authorities

- 4.11 The District Council has a requirement to ensure that it co-operates with other strategic bodies in relation to the preparation and revisions of the Local Plan. This Option would take as its starting point that the District Council is seeking to achieve one of the higher growth scenarios, and seek to reach agreement with the neighbouring authorities to accommodate the shortfall in the numbers for each of those scenarios.
- 4.12 Whilst we are obliged to enter into dialogue this approach is however unlikely to be successful and agreed to by any of our neighbouring authorities. Each is struggling to identify sufficient land to meet its own needs, regardless of any request to meet additional land to meet our shortfall. This option is most unlikely to achieve positive results.

Option 4 – Undertake Public Consultation on Growth Options

- 4.13 This option would involve undertaking a period of public consultation to assess the extent to which there was support for the each of the four growth scenarios, and then on the basis of the outcomes of this exercise take the production of a revised Local Plan forward. This approach would allow the District Council to set out the impacts of each scenario from the sustainability appraisal, and for residents and stakeholders to provide a view of each scenario.
- 4.14 This option would require a period of 2-3 months to undertake, before Members could further consider how best to address the results of such a public consultation exercise. Furthermore there is no guarantee that such an exercise would give a clear mandate to take the Plan forward, and inevitably there would be focus upon the location and

distribution of sites. It would be reverting to a process normally used at the start, not the end, of a Local Plan review. It would not achieve the identification of further sites.

Option 5 – Take a Pro-Active Approach to Achieving Growth

- 4.15 This Option would involve the District Council being much **more pro-active in its approach to seeking and allocating additional land for residential development** to meet economic and social recovery aspirations (i.e. additional to the 24 sites identified so far).
- 4.16 This could involve for example **developing options that would deliver housing led major infrastructure projects across the Local Plan area and/or considering the feasibility of bringing forward District Council led proposals for a New Village.** To do this piece of evidence gathering could delay the preparation of a revised Local Plan by 9-12 months whilst technical research etc. is undertaken.

Option 6 – Set Aside Flexibility Parameters

- 4.17 This option would involve setting aside the normal practice of building a flexibility requirement into the housing supply figures. On the basis of the above evidence this would enable the District Council to achieve the Baseline Growth scenario but still require the identification of additional land to meet the Recovery or Higher Growth scenarios.
- 4.18 However, this approach is likely to be challenged by the development industry and unlikely to be supported by an Inspector at Examination in Public. In all probability it not would result the Local Plan being found to be sound.
- 4.19 Experience indicates that for a number of potential sites allocate within the Local Plan there are deliverability issues. This indicates that a conservative view of flexibility is highly appropriate for the Derbyshire Dales. It is clear that losing any of the existing allocated sites could quickly render the Plan unadoptable.

5 CONCLUSIONS AND RECOMMENDATIONS

- 5.1 There is a complex relationship between growth in the local economy and the need for additional housing to ensure that there is adequate supply of economically active residents to deliver that future growth.
- 5.2 This report has demonstrated that, of the four housing need scenarios, only two of are considered to be of an appropriate scale to meet the economic and social recovery aspirations for the Derbyshire Dales set out in the District Council's Corporate Plan and other economic plans and strategies.
- 5.3 This report has indicated that on the basis of the available evidence at this time that the potential level of housing supply is not sufficient to deliver the District Council's growth aspirations. As such it is recommended that further research is undertaken, prior to the allocation of any new sites for residential development in the Local Plan.
- 5.4 The Local Plan Working Group at their meeting on 21st February 2002 considered this matter and were generally of the view that Option 5 was the most appropriate to

consider further, involving further consultation (i.e. utilising some of the principles of Option 4 too).

- 5.5 Paragraph 16 in the National Planning Policy framework sets out that in preparing Plans they should:
- a) be prepared with the objective of contributing to the achievement of sustainable development;
 - b) be prepared positively, in a way that is aspirational but deliverable;
 - c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- 5.6 As such, the approach that is being considered for the Local Plan for the period up to 2040 of aspirational but deliverable development is consistent with the NPPF. Similarly the desire to undertake public consultation as a means of shaping additional development within Derbyshire Dales is also consistent with the guidance in the NPPF.
- 5.7 However the District Council is not undertaking the preparation of a new Local Plan; rather it is completing the review of an existing adopted Local Plan and taking the plan period forward to 2040.
- 5.8 The completed review of the adopted Local Plan approved by Members at Council on 19th January 2022 did not alter the strategic approach to the achievement of sustainable development through the Settlement Hierarchy.
- 5.9 Public consultation that seeks views on the Growth Scenarios is unlikely to result in anything meaningful that the District Council could use to provide a clear mandate to the Local Plan going forward in its need to deliver sustainable development. It is therefore recommended that Option 4 is not taken forward at this time, but the principle of consultation is used when taking forward Option 5.
- 5.10 The evidence in this report indicates that **if Members wish to achieve the level of economic and social recovery that their adopted strategies and plans seek, then additional land for residential development (beyond the 24 sites identified so far) needs to be identified and allocated within the Local Plan.** As such it is **recommended that Option 5 should be taken forward** as a priority action at this time, as set out in paragraphs 4.15 and 4.16 above. It is further recommended that delegated authority be given to the Director of Regeneration and Policy to commission consultants to undertake a more detailed assessment of options for the delivery of a sustainable Derbyshire Dales that meets its agreed aspirations for growth.
- 5.11 Public Consultation is a statutory requirement as part of the preparation of a Local Plan. It is considered that public consultation should take place as part of the process set out in Paragraph 5.10 above when more proactive options for future growth can be considered and debated further.
- 5.12 On the basis of these recommendations it is considered that the following timetable is appropriate for taking forward the Local Plan:

Milestone	Date
Completion of Additional Options Appraisal	May 2023
Draft Modifications	October 2023
Draft Submission Modifications	April 2024
Submit Modifications to Secretary of State	June 2024
Examination in Public (End)	October 2024
Adoption of Modifications	December 2024

6 RISK ASSESSMENT

6.1 Legal

The preparation of a Local Plan will need to be taken forward in accordance with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). This is a statutory requirement and the proposals accord with the provisions of the relevant legislation.

At the current time, the legal risk connected to this report as has been assessed as low.

6.2 Financial

The cost of commissioning consultants to undertake the scope of work identified in this report will be in the order of £50,000 to £60,000. There is no current revenue budget to cover these additional costs, so a supplementary revenue estimate would be required for 2022/23. This could, however be funded from the existing Local Plan Reserve. This would reduce its forecast balance to approximately £100,000 at 31 March 2023. However, there this is expected to be sufficient for future requirements.

The financial risk is therefore assessed as low.

6.3 Corporate

The Local Plan is one of the pivotal tools for delivery the District Council's Corporate Plan aspirations. A Local Plan which does not meet these aspirations could lead to reputational damage, as well as a failure to deliver growth necessary to maintain the sustainability of the Derbyshire Dales. Whilst the recommendations in this report may result in delays to the finalisation of the revised Local Plan, any longer delays are likely to expose the District Council to significant risk in relation to its ability to make and defend decisions on planning applications.

7 OTHER CONSIDERATIONS

7.1 In preparing this report, the relevance of the following factors has also been considered: prevention of crime and disorder, equalities, environmental, climate change, health, human rights, personnel and property.

8 CLIMATE CHANGE

8.1 Recommendation Two sets out how more detailed assessment of options for the delivery of a sustainable Derbyshire Dales that meets agreed aspirations may be undertaken. A full climate change impact assessment has not been carried out at this time as there is not yet sufficient detail available to understand the climate change impacts of any changes to the Local Plan in respect of site allocations and housing need.

8.2 A detailed Sustainability Appraisal (SA) is underway. As set out in 1.5 'The purpose of the Sustainability Appraisal being to assess the likely social, environmental and economic effects of the growth options, both positive and negative and to ensure that decisions are made which contribute towards achieving sustainable development'

8.3 The assessment objectives of the SA set out clearly how climate change impacts and adaptation will be considered - SA4 'To support the development of linked green spaces and make provision for their long-term management', SA5: 'To minimise energy use and to develop the area's renewable energy resource in order to reduce contributions to climate change' and SA11: 'To provide everybody with access to an affordable home which is resilient to the effects of climate change'

8.4 All sites will be reviewed against these objectives during the ongoing detailed assessment work, as set out in 4.15 and 4.16. This proactive approach should ensure that the District Council meets the three overarching objectives of the NPPF – economic, social and environmental - in a mutually supportive ways. It also presents a potential opportunity to design 'in' the measures such as low carbon infrastructure and enhanced biodiversity net gain as part of housing led major infrastructure projects.

8.5 The review of the Local Plan will be subject to ongoing scrutiny, as per the timetable set out in 5.12.

9 CONTACT INFORMATION

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10 BACKGROUND PAPERS

Description	Date	Location
Adopted Derbyshire Dales Local Plan	December 2017	https://www.derbyshiredales.gov.uk/images/L/DDDC_Planning_Doc_2018_vweb2.pdf

National Planning Policy Framework	July 2021	https://www.gov.uk/guidance/national-planning-policy-framework
Planning Practice Guidance	June 2021	https://www.gov.uk/government/collections/planning-practice-guidance
Report to Council on Local Plan Review	November 2020	https://www.derbyshiredales.gov.uk/images/AGENDA_09-11-2020_Local_Plan_Review_7pm.pdf
Report to Council on Local Plan Review	19 th January 2022	https://www.derbyshiredales.gov.uk/images/2022-01-19_AGENDA_Council_E.pdf
Report on Housing Need Requirements – Icení Projects	September 2021	https://www.derbyshiredales.gov.uk/images/DDDC_Housing_Study_Final_Report_clean.pdf
Report on Employment and Retail Needs – Icení Projects	July 2021	https://www.derbyshiredales.gov.uk/images/Derby_Dales_ELR_final_July_2021_clean.pdf https://www.derbyshiredales.gov.uk/images/documents/R/DDDC_Retail_Study_Final.pdf
Initial Strategic Housing Land Availability Assessment	March 2022	

11 ATTACHMENTS

APPENDIX 1 – LIST OF POTENTIAL SITES

APPENDIX 2 – SITE LOCATIONS

APPENDIX 3 – DRAFT SITE PHASING 2021-2040

APPENDIX 4 – DRAFT FIVE YEAR LAND SUPPLY CALCULATIONS 2021-2026