

13 September 2019

Belper Neighbourhood Plan Steering Group  
The Butts  
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Dear Members of the Steering Group

In September 2016 AECOM produced a Housing Needs Assessment (HNA) in support of the Belper Neighbourhood Plan. It considered both the quantity and the characteristics of housing needed in Belper (including type, size, tenure and the need for specialist housing for older people).

We have reassessed this document at the request of the Steering Group in light of recent circumstances, including the period of time that has elapsed since the HNA was produced and the Neighbourhood Plan's now advanced stage of development, in order to determine whether it remains a reliable evidence base.

Given that three years have passed since its completion, it is true that there may be ways in which the HNA could be updated, expanded and improved. However, having carefully reviewed the existing text, we do not consider that any of them would substantially alter its overall conclusions, increase its relevance to the Neighbourhood Plan policies, or be necessary for the Neighbourhood Plan to pass the Basic Conditions. These considerations are explained in further detail in the second part of this letter.

The Steering Group has made it clear that in all fundamental respects that they believe the 2016 HNA continues to be a robust, valid underpinning. Having now evaluated the document and its context three years later, we are happy to confirm that we agree.

Yours sincerely,



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### Considerations as to the potential to update the HNA with regard to the quantity of homes needed

While Planning Practice Guidance relating to the calculation of the quantity of housing needed at Local Authority level changed in November 2018, and it would be possible to apply this new methodology to Amber Valley and determine what proportion of that figure should be delivered in Belper, the introduction of this change to methodology does not render all Housing Needs Assessments produced prior to that date invalid.

This is in large part because alongside the change to methodology came a new and clear emphasis on tasking the relevant Local Planning Authority (LPA) - here, Amber Valley - to calculate a housing requirement figure (HRF) for Neighbourhood Plans within its area. As such, the onus is now on the LPA, rather than AECOM, to update the quantity conclusions of the 2016 HNA by providing Belper with an HRF in line with their obligations under NPPF 2019 paragraphs 65 and 66.

In the event that Amber Valley is unable or chooses not to provide Belper with an HRF, the quantity figure provided in the 2016 HNA in any case is an average of four projections drawn from data that remain valid as of this letter (including the same household projections that are used currently). As such, in the absence of a figure provided by Amber Valley, it retains its original value and it is our view that it is not necessary for it to be replaced in the present circumstances.

Moreover, the Belper Neighbourhood Plan as currently drafted does not in any case rely on the quantity figure as a defined housing target or policy objective, but simply cites it as context. The Neighbourhood Plan also seeks to plan positively for new development through the allocation of a number of housing sites. It does not allocate sites to meet the exact number of dwellings specified in the quantity figure nor does it use that figure as justification to limit future residential development. Rather, it takes the pragmatic and admirable approach of working with the LPA to monitor progress towards meeting outstanding need. In this context, whether the underlying quantity figure is considered too high or too low is broadly less relevant.

It is also worth noting that the Neighbourhood Plan period has changed from 2011-2028 (at the time of the 2016 HNA) to 2019-2035 (at the time of writing). The identified need of approximately 80 dwellings per year stands but should therefore be extended to cover the new period: this would equate to 1,280 new dwellings between 2019 and 2035 (minus completions between the start of 2019 and the time of writing) rather than 1,360 over the period 2011-2018 (minus completions, which totalled 403 at the time of the 2016 HNA). While we recommend (assuming that the original calculation is not superseded in the meantime by any figure provided by Amber Valley) that this update should be referenced in the next iteration of the Neighbourhood Plan, with the HNA calculations cited as the source, it does not need to be reflected in the HNA itself.

### Considerations as to the potential to update the HNA with regard to other issues

In relation to the other characteristics of housing need considered in the report (i.e. housing type, tenure and so on), the HNA remains robust. The vast majority of its findings depend on two sources of evidence: the Derby HMA Strategic Housing Market Assessment Update (July 2013), and the 2011 and 2001 Censuses. The former has not been updated or replaced since the HNA was produced, and the 2011 Census will not be superseded until approximately 2022. It is therefore not necessary or indeed possible to update the vast majority of data or conclusions any further.

While it would in theory be possible to gather new evidence from other sources, such as demand for Affordable Housing on the LPA's Housing Register, completions data, changes to the stock of specialist older people's housing, and so on, it is our opinion that this would not have a material impact on the conclusions reached. There is always potential to update minor data inputs into the constantly changing data that underpins housing need but it is not always necessary, desirable or practicable to constantly make such updates. It is both reasonable and standard practice for neighbourhood planning evidence base studies to comprise snapshots in time, given the need for the evidence base at this level to be proportionate. At Local Plan level, as noted previously, the housing need evidence base has not been updated since 2013, presumably for similar reasons.

More importantly, the HNA conclusions are not in any case used as significant justification in the Neighbourhood Plan for key policy choices. There is only one policy (NP11 A Mix of Housing Types) pertaining to the characteristics of housing to be supplied. NP11 simply requires that planning proposals reflect the need identified in the most recent HNA, which is a standard and reasonable requirement. Over a Neighbourhood Plan period extending to 2035, the function of 'the most recent HNA' cited in NPP11 would be performed as well by the 2016 study as it would by one updated in 2019.