

Willington

Housing Needs Assessment (HNA)
Quantity Addendum

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Quality information

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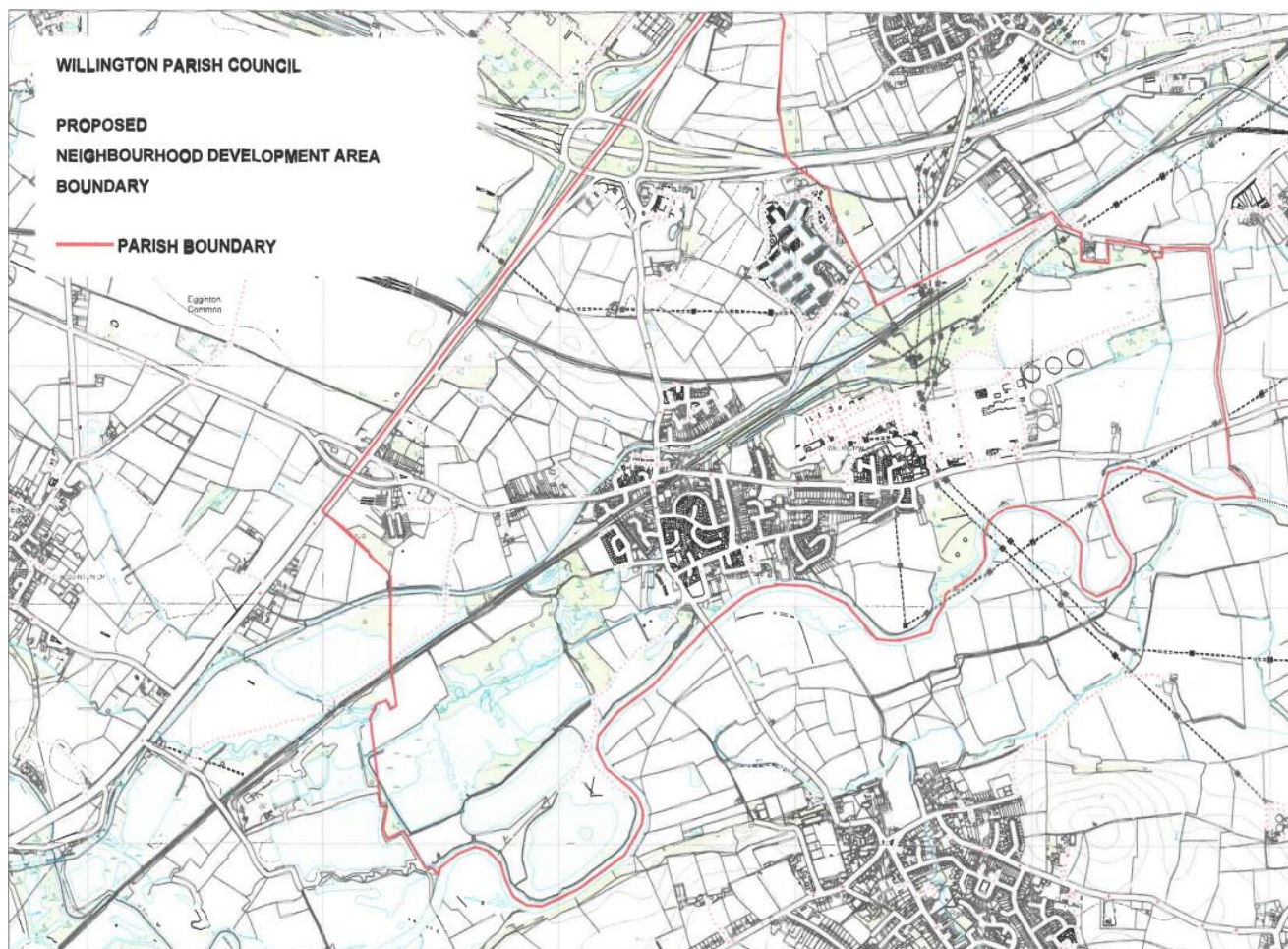
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Introduction

Local Context

1. Willington is a Neighbourhood Area (NA) located in the local authority area of South Derbyshire. The Neighbourhood Area boundary covers the areas administered by Willington Parish Council and coincides with the parish boundary. The 2021 Census shows a population of 3,275 residents and 1,477 households, having increased from 2,862 residents and 1,201 households in the 2011 Census.
2. A map of the NA appears below in Figure 1.

Figure 1: Map of the Willington Neighbourhood Area¹



Source: South Derbyshire Council website

3. The adopted South Derbyshire Local Plan (Part 1 was adopted in 2016 and Part 2 in 2017)² designates Willington as a Key Service Village. A Local Plan Review is underway at the time of writing, but since an Issues and Options consultation in 2022, no new Draft Local Plan has been published.
4. South Derbyshire District Council (SDDC), as the Local Planning Authority (LPA), has not yet given the emerging Willington Neighbourhood Plan (NP) a Housing Requirement, as requested, at the time of writing. The LPA has agreed in principle to AECOM producing an Interim Housing Requirement

¹ Available at [District-wide evidence | South Derbyshire District Council](#)

² [Adopted Local Plan | South Derbyshire District Council](#)

Figure, to support the progress of the emerging NP. This will later be superseded by an official Housing Requirement Figure from SDC.

5. The proposed Willington NP period starts in 2022 and extends to 2039, comprising a planning period of 17 years.
6. AECOM has carried out a Housing Needs Assessment (HNA) for Willington, which this Addendum supplements. The HNA describes the local housing market and planning policy context; the tenure, affordability, type, and size of the local housing stock; specialist housing need and supply for older people in the Neighbourhood Area; and next steps for the emerging NP as regards housing needs evidence. This information is not repeated nor updated in this Addendum, which should therefore be read in conjunction with the AECOM Willington HNA.

Objectives and Limitations of this Addendum

7. The objective of this Addendum is to understand what quantity of housing overall might be needed in the Willington NA over the NP period.
8. This question properly falls within the remit of SDDC as the LPA, to whom the National Planning Policy Framework (NPPF) gives responsibility for determining the overall housing need or requirement for any designated NA. More background on this point is provided in a brief Policy Context section below.
9. In the absence of a housing figure provided by the LPA, AECOM can supply an indicative estimate to help neighbourhood planning groups understand the potential scale of need in future years. This can be helpful context for the NP, particularly when considering the allocation of housing sites.
10. However, the indicative figure provided by AECOM has a lower status to one provided by an LPA and would be automatically superseded if an LPA-provided figure emerges in future. As well as having a different status to an LPA-provided housing figure, AECOM's indicative figure is more limited in how it can be calculated.
11. It is important to highlight that there is no established method for calculating the overall housing need of small areas. While the NPPF requires LPAs to provide figures for NAs upon request, neither the NPPF nor Planning Policy Guidance (PPG) set out exactly how this should be done. As a result, LPAs take a variety of different approaches.
12. Generally, the methods used are top-down in nature, meaning that they try to determine what share of the Local Authority area's need is attributable to the NA. It is possible to use a bottom-up approach, likely drawing on household survey evidence, but this tends to be less consistent in terms of the data used and risks distorting the wider picture when multiple such estimates are aggregated.
13. AECOM's approach to calculating the quantity of local housing need for an NP is quite limited and simplistic for reasons of consistency and because certain judgements would require a wider scope and/or remain in the remit of the LPA. For example, LPAs can make their own determinations about the suitability of the NA for housing growth, noting for example its infrastructure and environmental constraints, or the role it plays in the local area relative to other locations.

14. For this reason, the number provided here is termed a Housing Need Figure (HNF) rather than sharing the terminology generally used by LPAs, which would speak of a Housing Requirement Figure (HRF). An interim HNF is a simpler expression of what might be needed, irrespective of the additional objectives, constraints and wider targets that might go into a more formal requirement or housing target. In short, an LPA generated HRF can reflect the wider planning strategy in addition to local need to an extent that is not possible for AECOM to fully replicate here. However, the AECOM interim HNF can serve as a helpful placeholder to allow the NP to progress while the HRF is awaited.

Policy Context

15. Willington does not benefit from a specific housing requirement or need figure from South Derbyshire District Council over and above allocations made as part of the **adopted Local Plan Part 2**, which allocates a site for 50 homes in Willington.
16. The December 2023 **NPPF** (paragraph 67) states that “Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations”.
17. NPPF paragraph 68 states that “Where it is not possible to provide a requirement figure for a neighbourhood area (NPPF footnote 34: Because a neighbourhood area is designated at a late stage in the strategic policy-making process, or after strategic policies have been adopted; or in instances where strategic policies for housing are out of date), the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority”.
18. In calculating this HNF, it should be noted that paragraphs 66 and 67 place specific obligations on strategic or local planning authorities and no other parties (i.e. AECOM is not obliged to follow directly paragraphs 66 and 67). That said, AECOM’s calculation will be of most use as a starting point if it can seek to mirror the NPPF suggested approach as closely as possible, and so this is the reasonable approach that has been taken.
19. PPG published in 2020 to provide guidance on widening housing opportunity and choice (and since superseded by newer PPG³, but still relevant) stated that “Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing

³ [Planning practice guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/planning-practice-guidance)

requirement figure and preparing policies to address this such as site allocations”.

20. A HNF is a ‘policy-off’ figure. This means that, while it takes account of the factors set out in paragraph 68 of the NPPF and dwelling completions over the course of the Plan period, it is an expression of total housing demand unconstrained by the limits of the land available to build on. It is also unconstrained by the impact of policies that either facilitate or obstruct development. A policy-off figure can then be reviewed in light of further evidence, including environmental constraints, land availability, relevant Local and NP objectives and policies, to formulate a ‘policy-on’ HRF.
21. This, again, is the difference between the HNF calculated here and the HRF that the NP may take forward based upon it, or which (preferably) would be provided by the LPA. The HNA figure represents a blunt expression of need rather than a requirement.

Approach

22. The number of new dwellings that might be planned for in the NA over the Plan period (Interim HNF) is estimated by AECOM using a step-by-step approach. This seeks, as far as possible, to reflect the NPPF 2023 and PPG advice.
23. Our approach can be summarised as follows:

Step 1: Standard Method – The Local Housing Need (LHN) figure for South Derbyshire

- a. Using detailed guidance in government’s PPG on the standard method; and
- b. Taking note of the urban centres uplift.

The Urban Centres Uplift is a 35% uplift which is applied for those urban local authorities in the top 20 cities and urban centres list (ranked by population). At the time of writing, neighbouring Derby is one of the 20 cities to which this applies⁴. This has implications for its neighbouring authorities, including South Derbyshire, where Willington is located.

Step 2: Local Proportion of Standard Method LHN - Pro-rating the LPA LHN to the NA using population statistics for the parish, to produce a baseline / fall-back assessment of need.

Step 3: LPA Planning Strategy - Applying South Derbyshire’s strategy for the distribution of development, based on the adopted settlement hierarchy and other relevant information.

Step 4: Dwelling Completions - Deducting any completions within the NP period so far.

⁴ The cities and urban centres list is devised by ranking the [Office for National Statistics list of Major Towns and Cities](#) by population size using the latest mid-year population estimates (nomis, official labour market statistics)

Step 5: Referencing Outstanding Commitments - Making reference to any outstanding commitments, to acknowledge that if they were all built out, the residual need would be reduced, but acknowledging that these commitments cannot be discounted as yet. This is considered at the scale of both the Willington NA and wider South Derbyshire (to the extent permitted by data available in the 2024 Housing Position Paper).

24. This HNA Addendum assesses a range of evidence to ensure its findings are robust for the purposes of developing policy at the NP level and are locally specific. This includes data from a range of **data sources**, including:

- Census 2021 and 2011;
- Other Office of National Statistics (ONS) datasets providing more up-to-date demographic information at District and neighbourhood level;
- South Derbyshire Authority Monitoring Report Appendix 2: Housing Position Paper January 2024⁵; and
- South Derbyshire District Council Strategic Housing Market Assessment, January 2020⁶.

⁵ [Monitoring | South Derbyshire District Council](#)

⁶ [District-wide evidence | South Derbyshire District Council](#)

1. Standard Method Local Housing Need (LHN)

25. South Derbyshire’s Housing Position Paper January 2024 states that:

“The standard method currently gives an annual requirement of 522 dwellings, as opposed the Local Plan based annual target of 742. ... The Local Plan target includes part of the need generated within Derby City whilst the standard method does not”.

“This target includes a contribution of 3,013 dwellings towards meeting some of Derby City’s unmet housing need. The period covered by the Plan is 2011 to 2028”.

“It has... been determined that the South Derbyshire five year housing land supply should be calculated using both the Local Plan target and the housing need figure derived using the standard method pending consideration of the appropriate distribution of housing provision among the three HMA local authorities in the context of their respective Local Plan reviews”.

26. Therefore, AECOM deems it appropriate to use the figure of 742 dwellings as an the most realistic expression of annual need going forward. This represents an uplift of 42% on the most recent standard method result.

27. However, the share of Derby City’s unmet need (also reflecting its urban centres uplift) that will be attributed to South Derbyshire for its emerging Local Plan review, is yet to be determined. It should be emphasised that this figure, when confirmed, will be a key input for understanding South Derbyshire’s and also Willington’s housing need. Predictions about how Derby’s unmet need should be distributed to South Derbyshire are beyond the scope of this HNA Addendum.

28. In the absence of a clear steer on this matter, it is difficult to be definitive about South Derbyshire’s overall housing need or how this might be distributed to Willington. It is therefore considered appropriate to use the Local Plan figure of 742 dwellings per annum as a placeholder, which may be replaced with any figure arising from discussions between South Derbyshire, Derby and other relevant authorities in due course.

2. Local Proportion of Standard Method LHN

29. The 2021 Census population for
 - South Derbyshire was 107,205 residents, and for
 - Willington was 3,275.
30. Willington thus represents 3% of the local authority's population.
31. A **baseline / fall-back assessment of need** could therefore be 3% of the local authority's annual target of 742, which equates to a housing needs estimate for Willington of:
 - **22.26 dwellings per annum**, or
 - **378 dwellings over the 17-year plan period 2022 - 2039**.
32. Alternatively, if this calculation were applied to the **standard method figure** for South Derbyshire of 522, the result would be an estimated need figure of **15.66 dwellings per annum** for Willington, which equates to **266 additional dwellings** over the plan period.
33. These two approaches produce a **range of 15.7 – 22.3 dwellings per annum**, or **266 – 378 dwellings over the plan period**.

3. LPA Planning Strategy

34. Policy H1 in South Derbyshire's **adopted Local Plan Part 1** sets out the local authority's settlement hierarchy, based on the range of services and facilities that are offered by each settlement. The level of development for each settlement should be of a scale appropriate to the size and role of that settlement.
35. The two top tiers of the settlement hierarchy are as follows:
 - 1) Urban Areas – the urban areas of Swadlincote including Woodville, adjacent to Derby and adjacent to Burton upon Trent.
 - 2) Key Service Villages - Aston on Trent, Etwall, Hatton, Hilton, Melbourne, Overseal, Repton, Shardlow, Willington, and Linton.
36. Willington is thus identified as being one of 10 Key Service Villages, which represents the second tier of the hierarchy, following Urban Areas.
37. For Urban Areas and Key Service Villages, Policy H1 states that development of all sizes within the settlement boundaries will be considered appropriate, as will sites adjacent to settlement boundaries as an exceptions or for the purpose of cross-subsidy as long as not greater than 25 dwellings.
38. The hierarchy does not set out the percentage of development that should take place in service villages, but it proposes 50 homes in Willington. In the latest Annual Monitoring Report for South Derbyshire (January 2024), this site (Local Plan Policy H23I: Kingfisher Way) is still marked as an allocation without planning consent or application, and has thus generated no completions to date.

39. The Monitoring Report projects delivery for 2026-2028.
40. Local Plan paragraph 5.21 sets out that “In line with the hierarchy, the Strategy directs larger development sites to those areas which offer a degree of self-containment in terms of availability of everyday services and facilities. In particular, priority is afforded to those places which are served by high quality public transport services offering sustainable travel at frequent intervals throughout the day and evening to employment and higher order service destinations. Similarly, the availability of a convenience shop offering a range of day-to-day goods, combined with other community and civic facilities are recognised as being essential Ingredients to sustainable communities”.
41. Willington contains a railway station, as well as a post office, supermarket and other shops, pharmacy, restaurants, pubs, a GP practice, church, and primary school. Based on its available services and its place in the settlement hierarchy, it is clearly a location considered suitable for development.
42. While the **ongoing Local Plan Review** is still at its earlier stages, it is flagged that the settlement hierarchy will be reviewed but using similar principles as before. At this stage only broad options for accommodating growth have been identified, not specific locations.
 - Option 1: Urban Extensions – focus development adjoining existing urban areas.
 - Option 2: Key Service Villages – focus development on these ten villages.
 - Option 3: Dispersed development – focusing on both Key and Local Service Villages.
 - Option 4: Create a new settlement or significant urban extension.
43. Willington, as a larger village containing key services, will therefore likely continue to be one of the locations prioritised for growth.
44. However, there is insufficient information to quantify to what extent this may be the case, as this will depend on sites identified as available, suitable, and achievable for growth in the forthcoming Strategic Housing Land Availability Assessment, and subsequently selected for allocation. This information is not yet available at the time of writing.
45. AECOM concludes that there is no meaningful way of quantifying the likely proportion of growth which should be assigned to Willington and that therefore, we have to fall back on the pro-rated range given in Step 2.
46. However, there is a possibility that in practice that this range may be exceeded because Willington, as a Key Service Village containing key services, is likely to be assigned more than its pro-rated share of district growth in the emerging Local Plan.

4. Dwelling Completions

47. The NP period for Willington commences in 2022. Therefore, AECOM deducts 4 completions between 2022-2024 in Willington, as listed in the January 2024 Annual Monitoring Report. At present we do not have further completions figures for 2023-24, as they are not yet released.

48. The resulting net range of need over the plan period 2022-2039 is **262 – 374 dwellings** (266 – 378 dwellings minus 4 completions since the start of the plan period in 2022).

5. Referencing Outstanding Commitments

49. The main **outstanding commitment** is the **50-unit site** allocated in the adopted Local Plan Part 2. However, as stated above, its delivery is currently uncertain, with no application or permission registered for this site at the time of writing, despite the allocation having been adopted since 2017.
50. Nevertheless, this is the closest available proxy for the level of development that can be expected during the plan period in the near term, based on current allocations, although there may be issues with the viability or deliverability of that specific site allocation, since it has not been taken forward to date.
51. The Willington NP is therefore, as a minimum, likely to need to find land for **212 – 324 dwellings** (262 – 374 net need minus 50 units on committed land).
52. However, it is relevant to also consider the impact of completions and commitments against housing need targets for wider South Derbyshire.
53. SDDC's 2024 Housing Position Paper states that 'There is forecast to be no remaining shortfall in housing provision over the Local Plan period' (paragraph 31). The accompanying tables (8 and 9) demonstrate that completions to date and projected completions to 2028/29 together exceed projected needs based on both the Plan Period requirement and standard method calculations. This means that any housing need across the wider District, at least to 2028 but likely also beyond this date (though specific longer-term figures are not provided in the Position Paper), has effectively been met through existing allocations and committed sites.
54. The 50-unit allocation referenced above directly contributes to South Derbyshire's strong housing supply position. However, the broader ability of the District to meet its wider needs to 2028 could well further influence SDDC's approach to distributing future housing need or requirement figures to Neighbourhood Planning areas (including Willington).
55. It is reasonable to suppose, for instance, that Neighbourhood Plan housing requirements to 2039 would reflect the fact that needs have been met at least to 2028, meaning that only 11 years' worth of housing growth (2028-2039) needs to be accounted for – rather than 17 years' worth (2022-2039).
56. If that approach were applied to the overall housing need figures identified for Willington, as detailed above, the need range of 15.7 – 22.3 dwellings per annum would be multiplied by 11 instead of 17 years to produce a lower residual total range of **169 – 241 additional homes to 2039** (173 – 245 minus 4 completions since 2022).
57. The same principle could also apply if SDDC's housing supply results in no shortfall beyond 2028, although specific figures for housing supply past that date are not currently available.

58. Theoretically, the 50 units on committed land could then be deducted as above to produce a lower residual range of need for 119 – 191 additional homes to 2039.
59. However, there is a risk of double-counting here, in that this step may effectively account for future supply twice: once by deducting the years for which need is met across South Derbyshire as a whole, and again for Willington's specific contribution to that pipeline of supply (namely, the 50-unit allocation, which is also expected to complete by 2028). The reduction in Willington's potential range of need to reflect South Derbyshire's supply position reduces the range by 93 – 113 homes in total (the difference between the 262 – 374 and 169 – 241 ranges highlighted above). Since both ends of this range are higher than 50, they should – in AECOM's view – be seen as reflecting both Willington's own contribution to future delivery and a top-up deduction to reflect the wider District's supply position. As such, it would represent double-counting to additionally deduct the 50-unit site from the adjusted range of 169 – 241 homes to 2039.
60. To clarify: if it is considered appropriate for Willington's housing need figures to reflect South Derbyshire's supply position to 2028, the appropriate range is **169 – 241 homes to 2039**. Otherwise, the range of need should revert to **212 – 324 homes to 2039**. Both of these ranges reflect the expected delivery of the 50-unit site, but in the former case that deduction is topped-up to reflect the wider South Derbyshire position.
61. That said, whether and to what extent SDDC's current housing supply position should influence Neighbourhood Plan housing requirements is a matter sitting properly with SDDC. This scenario is presented hypothetically here to reflect an important point of context. It may be valid for the resulting lower figures to be taken forward in the Willington Neighbourhood Plan (if a definitive figure from SDDC remains unavailable at that time), but this should ideally be discussed with SDDC.
62. This issue is explored here to recognise further layers of uncertainty around housing requirements for Neighbourhood Plan areas in South Derbyshire (beyond those relating to the District's eventual share of Derby City's unmet needs, discussed earlier in this chapter). Given that SDDC are presently updating Part 1 of the Local Plan (which is concerned with strategic-scale sites) rather than Part 2 (which is more likely to consider smaller-scale growth and settlement boundaries), it may be some time before more definitive guidance is available. It is therefore helpful to think through relevant flexibilities, even if it is not appropriate for AECOM to make clear determinations. Further discussions with SDDC on this point are strongly advised.

6. Conclusions & Next Steps

63. This NP HNA Addendum aims to provide Willington with evidence to support a local Interim HNF, while awaiting an official HRF from South Derbyshire District Council.
64. We recommend that the NP should identify land to meet the net HNF range of **212 – 324 dwellings** over the plan period 2022-2039.

65. However, we caveat that the eventual official HRF from South Derbyshire may well be higher because:
- The distribution of housing requirement between the different parts of the District and wider Housing Market Area is as yet undecided;
 - As a settlement which is high up in the settlement hierarchy of the Local Plan, Willington is likely to be expected to accommodate more than its prorated share of growth (to recognise that some household growth will be generated by more rural areas which provide less sustainable locations for growth than Willington); and because; and
 - The future of the allocated site for 50 dwellings is uncertain, as it has, as yet, no planning application associated with it, despite being allocated since 2017.
66. All of this may mean that sites for more than these 212 – 324 dwellings may need to be found as part of the NP, unless the emerging Local Plan identifies more suitable sites in the NA or elsewhere.
67. That said, any requirement figure for Willington may also be lower given South Derbyshire's strong housing supply position, as discussed in the previous section. If this is considered appropriate to reflect in Willington's figure, the appropriate range may be 169 – 241 homes to 2039.
68. Particularly given the uncertainties relevant to housing growth in South Derbyshire, we recommend that the neighbourhood planners should, as a next step, discuss the contents and conclusions of the AECOM HNA and this Addendum with South Derbyshire District Council, with a view to agreeing and finalising an official HRF, bearing in mind:
- The suitability and sustainability of Willington as a location to accommodate future growth;
 - All Neighbourhood Planning Basic Conditions, but in particular Condition E, which is the need for the NP to be in general conformity with the strategic policies of the adopted development plan;
 - The views of South Derbyshire District Council;
 - The views of local residents;
 - The views of other relevant local stakeholders, including housing developers and estate agents; and
 - Numerous relevant supply-side considerations, including local environmental constraints, the location and characteristics of suitable land, and any site capacity work carried out by the NA Steering Group and / or by South Derbyshire District Council.
69. This assessment has been provided in good faith by AECOM consultants on the basis of housing data, national and local policy and guidance, and other relevant and available information at the time of writing.
70. Bearing this in mind, it is recommended that the NP Steering Group should carefully monitor strategies and documents with an impact on housing policy produced by the Government, South Derbyshire District Council, or any other relevant party, and progress the NP accordingly, to ensure that general conformity is maintained.

71. At the same time, monitoring on-going demographic or other trends over the plan period will help ensure the continued relevance and credibility of its policies.

