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Our Ref : SDDC Reg 19 Modifications  
Your Ref :  
Date : 10/06/2026  
Ask For : Matt Bowers  
Ext : [REDACTED]

Dear Steffan,

**Regulation 19 addendum: Proposed Modifications to South Derbyshire Local Plan Part 1 Review Publication Version (2022-2041) Consultation**

Thank you for formally consulting Amber Valley Borough Council on the Regulation 19 addendum: Proposed Modifications to South Derbyshire Local Plan Part 1 Review Publication Version (2022-2041) Consultation.

The Borough Council previously made comments on 25/04/2025 in response to the South Derbyshire Local Plan Part 1 Review 2022-2041 consultation (Regulation 19).

Since that time Amber Valley Borough Council has formally adopted its new local plan - Amber Valley Borough Local Plan 2022-2040 adopted on 2<sup>nd</sup> March 2026.

**Duty to co-operate**

In the Council's previous response, it was noted that the two Councils along with Derby City and Derbyshire County Council have a long history of working collaboratively on cross boundary strategic matters, confirmed in the signed Statement of Common Ground (December 2024) which was accepted by the Planning Inspectors for the Amber Valley Borough Local Plan.

In the Council's earlier response, it was noted that given the updated housing figures from Government since the Statement of Common Ground was signed, and the recommendations from the Amber Valley Local Plan examination, the parties agreed to provide an update prior to submission of the South Derbyshire Local Plan Part 1 Review. It was confirmed that good progress was being made to amend wording and numbers in the SoCG, and a new version was agreed. Given the recent changes to the inputs to calculating local housing need using the standard method it is recognised that further update may be required.

Notwithstanding this, the key strategic matter for the authorities to consider continues to be housing and unmet needs that arise within the Housing Market Area.

## Housing

### Proposed modification PM3 - Policy S1: Sustainable Growth Strategy

The proposed modification updates the housing numbers to ensure that the Local plan covers a 15 year period from adoption. It refers to housing meeting Derby's unmet need.

The Inspectors for the Amber Valley Borough Local Plan are satisfied that Amber Valley should provide 1320 homes within the Plan towards meeting HMA unmet need.

The proposed modification states:

*Over the plan period (2022 – ~~2041~~**2042**) at least ~~14500~~ **15,263** dwellings will be built within South Derbyshire. This comprises ~~9633~~ **10,140** homes to meet South Derbyshire's own needs and the remainder to help meet Derby City's unmet need to reflect the high level of housing delivery experienced in South Derbyshire in recent years; to provide flexibility in regard to site delivery and to help match affordable housing need with delivery as closely as possible.*

The revised figures imply an oversupply of 5,123 homes is to meet unmet needs arising from Derby City. However, the paragraph above also refers to providing flexibility and matching affordable housing need with delivery. It may be helpful to be clearer in the policy wording about how much of the requirement is to meet unmet need aside of South Derbyshire's. For consistency with the Amber Valley Borough Local Plan and the Statement of Common Ground, references throughout the Plan to unmet housing need associated with 'Derby City' should be amended to refer to meeting 'HMA unmet need'.

## Review Policy

### Proposed modification PM1 - Policy REV1: Review of the Local Development Plan

In our previous comments SDDCs inclusion of a review policy (REV1) in the plan was welcomed.

It is noted that the proposed modification now proposes the insertion of wording to reflect that in the Policy MR1 Monitoring and Review included in the recently adopted Amber Valley Borough Local Plan 2022 – 2040, which was suggested in the Council's previous response.

### Proposed additional modifications

Whilst the consultation does not specifically relate to the proposed additional modifications, the following comments may be helpful in the interests of accuracy:

AM15 - Amber Valley Borough Council has also adopted a local plan.

AM75 - The title of the plan is Amber Valley Borough Local Plan 2022-2040, and the relevant policy reference in that plan is Policy SGS1 – Brun Lane, Mackworth, which relates to an Area for Future Growth, and not SHGA1 as written in the proposed additional modification.

We would like to participate in the hearing sessions to provide further detail and reasoning to the appointed inspector if it is needed.

We look forward to continuing to work positively with you and colleagues as your plan progresses.

Yours sincerely

*MBowers*

Matt Bowers  
Interim Planning Policy Manager