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**From:** Philip Stephenson [Redacted]  
**Sent:** 15 June 2026 16:50  
**To:** Steffan Saunders <Steffan.Saunders@southderbyshire.gov.uk>; Amanda Hammond <Amanda.Hammond@southderbyshire.gov.uk>  
**Cc:** Paul Clarke [Redacted]  
**Subject:** Officer Representation from Derby City Council regarding the SDDC Reg 19 Addendum

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**Officer Representation from Derby City Council**  
*South Derbyshire Local Plan Part 1 Review 2022–2041 — Addendum Consultation on Proposed Modifications (Main and Additional Modifications to the Publication Version, March 2025)*

Dear Steffan,

Thank you for the opportunity to comment on the proposed Main and Additional Modifications to the South Derbyshire Local Plan Part 1 Review. Derby City Council strongly supports the continued joint working between the Derby Housing Market Area (HMA) authorities and welcomes the role the Part 1 Review plays in accommodating housing need arising from Derby City that cannot be met within the city's boundaries. The City Council's own Proposed Submission Local Plan for Derby (Regulation 19) plans for a minimum of 12,500 homes within the city over the period 2023–2043, with the balance of need met in South Derbyshire and Amber Valley in line with the agreed HMA strategy.

The City Council supports the proposed modifications. A small number of matters are raised below where the City Council makes comment, principally to ensure consistency between the two emerging plans and the robustness of the shared HMA evidence base at examination.

## **1. Strategic housing matters**

### **Plan period and housing requirement**

The City Council supports the extension of the plan period to 2042 and the increased requirement of at least 15,263 dwellings, of which 10,140 meet South Derbyshire’s own needs. The contribution of 5,123 dwellings towards housing need arising from Derby City is welcomed and is critical to the soundness of both plans.

However, the City Council asks that the following points be addressed, principally through an updated Statement of Common Ground prior to submission:

- Quantum of unmet need. Derby’s housing need under the standard method is currently 953 dwellings per annum, equating to a minimum of 19,060 dwellings over the city’s plan period (2023–2043). With the city planning for a minimum of 12,500 homes, the residual unmet need is approximately 6,560 dwellings. The combined contribution of South Derbyshire (5,123) and Amber Valley (1,320) is approximately 6,443 dwellings, leaving a residual shortfall in the order of 120 dwellings before any allowance for delivery risk. The HMA authorities should jointly set out how the full unmet need will be met or identify the mechanism by which any residual will be addressed (perhaps by monitoring later in the plan period).
- Plan period alignment. The South Derbyshire plan period (2022–2042) starts one year before, and ends one year before, the Derby plan period (2023–2043). The Statement of Common Ground should set out the two periods and confirm how completions in 2022/23 and delivery in 2042/43 (including the post-2042 delivery at STRA1 and STRA2 identified in the trajectory) count towards Derby’s requirement.

### **PM42 — Housing trajectory [Support]**

The trajectory includes 250 dwellings at Brun Lane, Mackworth (Policy FLG1) from the late 2030s. Policy FLG1 requires the South Derbyshire land to come forward only through a comprehensive master planned approach with the adjoining land in Amber Valley. The City Council supports the principle of a comprehensively planned growth area at this location, and its own Policy T2 supports the associated A52–B5020 link road and active travel connections into the city.

## **2. STRA1: Infinity Garden Village**

### **“PM5 and PM8 — Retail provision and anchor store [Support]**

These modifications respond directly to the City Council’s Regulation 19 representations regarding retail provision and the need for an anchor store. They will ensure the new community’s day-to-day needs are met on site without detriment to existing centres within Derby and are supported. An anchor food store capable of meeting convenience needs on site in the region of 1,500sqm could be discussed through a site-based statement of common ground. A slightly larger floorspace may better encourage a range of healthy foods.”

### **PM9 — Healthcare provision – Sinfin Health Centre [Comment]**

The modification establishes an expectation that healthcare provision for STRA1 will comprise a refurbished Sinfin Health Centre. That facility lies within Derby City. The City Council’s Proposed Submission Local Plan and emerging Infrastructure Delivery Plan do not currently identify this project, and the Council is not aware of a formal agreement with the City Council or the Integrated Care Board to this effect. The City Council requests that: (a) the arrangement be confirmed with the City Council and the ICB and recorded in the Statement of Common Ground; and (b) the flexibility set out in the proposed justification text at AM72 — contributions to refurbish Sinfin Health Centre “or appropriate medical centres within close proximity to the site” — be part of site specific statement of common ground.

### **PM12 — Enhancements to the setting of the Derby Canal [Support]**

The City Council supports this modification. For consistency, the justification text could usefully note that within the city the route of the Former Derby Canal is protected under Policy T4 of the Proposed Submission Local Plan for Derby, with the focus on delivery of a multi-user active travel route on the understanding that the route would be altered should the canal be restored. The two plans are aligned on this basis.

### **PM14 — Pedestrian and cycle routes; Swarkestone level crossing [Comment]**

The City Council supports the requirement for continuous walking and cycling routes connecting to existing and proposed routes within Derby, consistent with Policies T2 and T4 of the city's plan and the Key Cycle Network. A minor correction: the references in PM14 (and in the justification text at AM72) to "National Rail" should read "Network Rail".

## **3. STRA2: Land South of Mickleover**

### **PM16 — Northern access to the A516 [Support]**

This modification responds to the City Council's representation regarding direct access for local bus services from the northern side of the site to the A516, as part of a southwest Derby integrated transport route. It is supported.

### **PM21 — A516–A38 link road [Support]**

The City Council supports the firming-up of the requirement for a vehicular link between the A516 and A38 as part of a comprehensive development of the site, forming part of the South Derby Integrated Transport Link, consistent with the HMA Transport Modelling and with Policy T2 of the city's plan. The Council requests clarification of the expected phasing and delivery triggers for the link relative to housing occupations.

Related to this, the modifications remain silent on the future treatment of Staker Lane. The City Council's Policy HA5 (The Hollow, Mickleover) requires the land parcels north and south of Staker Lane to be masterplanned with the wider strategic location through an agreed cross-boundary Development Framework. Should Staker Lane be downgraded, as appears to be implied in the promoter's emerging masterplan, there is potential for A38-bound traffic from Mickleover to divert onto Haven Baulk Lane and Rykneld Road within the city. The City Council requests that the any site based statement of common ground address the intended treatment of Staker Lane, informed by the HMA Transport Modelling, and would welcome further officer discussion of this point.

### **PM22 — Revised indicative layout [Comment]**

The revised indicative layout shows an indicative housing area adjacent to the western part of the City Council's Rykneld Road allocation (Policy HA1 of the Proposed Submission Local Plan for Derby), and the trajectory separately identifies "STRA2b: Rykneld Road" (142 dwellings). The City Council requests clarification of the status of this land: whether it forms part of the STRA2 allocation, how it relates to the main body of the site, and how its masterplanning, access and pedestrian/cycle connectivity will be coordinated with the HA1 allocation. The City Council would welcome the connectivity between the two allocations being addressed in the policy or justification text.

### **PM18–PM20 — Overhead electricity lines and renumbering [Support]**

No objection; the safeguarding of existing electricity infrastructure is noted and supported.

## **4. Development management policies**

### **PM26 and PM27 — Policy H20: self and custom build [comment]**

The city council notes the requirement for 10% of housing capacity on sites of 30 or more homes to be serviced self and custom build plots, with flexibility provided through new criterion F. Applied to the strategic allocations this would imply in the order of 250 serviced plots at STRA2 alone, which substantially exceeds

South Derbyshire’s own evidenced need (351 plots district-wide over the plan period, per the updated figures at AM85) which could lead to uptake/ delivery issues. The City Council comments that through a site-specific statement of common ground this requirement could be varied, applied on a sliding scale, or expressly flexed for strategic allocations, so that plot provision reflects evidenced demand without prejudicing delivery rates.

**PM29 — Policy H22: Gypsy and Traveller pitch delivery [Support]**

The requirement for pitches on strategic sites to be provided concurrently with, or prior to, residential completion is a sensible strengthening of the policy and is supported.

**5. Strategic transport mitigation (PM14, PM40 and related policy wording)**

**[Comment / further agreement sought]** The HMA Transport Modelling identifies impacts arising from the strategic allocations that extend beyond the currently committed mitigation, including at the A38(T)/Rykneld Road junction and on the Uttoxeter Road corridor, both within Derby City. Neither the STRA1 and STRA2 policies (which refer to “measures necessary to mitigate the transport impact of the site” and travel plans, in accordance with Policy INF2) nor Policy INF2 as modified by PM40 contains an explicit requirement for developer contributions towards off-site highway mitigation, including where the impacts arise within a neighbouring authority’s area. The City Council comments that through a site-specific statement of common ground this requirement could be agreed, to ensure delivery of contributions towards off-site junction and corridor mitigation identified through the HMA Transport Modelling, including within Derby City, secured in consultation with the relevant highway authorities. The City Council would welcome the opportunity to agree wording with South Derbyshire officers ahead of submission.

**AM30 — Delivery beyond the plan period [Support]**

The recognition that the strategic allocations will continue to deliver housing, economic and other infrastructure beyond 2042 is welcomed. As set out under PM2–PM4 above, the City Council requests that the relationship between this continuing delivery and Derby’s 2023–2043 plan period be made explicit in the updated Statement of Common Ground.

**AM63 and AM120 — Transport authority references [Support]**

The updated references to the East Midlands Combined County Authority as transport authority are noted and supported, consistent with the city’s plan.

**7. Statement of Common Ground and next steps**

Through the Joint Advisory Board, and our own Housing Market Area Strategy group, we look forward to the continuing update of the Statement of Common Ground between the authorities. We also would welcome involvement in statements of common ground on allocations with cross boundary implications.

Kind regards,

Phil

**Philip Stephenson** MRTPI | Team Leader, City Growth & Vibrancy | Derby City Council, The Council House, Corporation Street, Derby, DE1 2FS | [REDACTED] | [www.derby.gov.uk](http://www.derby.gov.uk)



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