



Steffan Saunders

Head of Planning

South Derbyshire District Council,
Civic Offices, Civic Way,
Swadlincote, Derbyshire DE11 0AH.

www.southderbyshire.gov.uk

@southderbyshiredc on Facebook

Email:

plans.admin@planninginspectorate.gov.uk

Please ask for Steffan Saunders

Phone 07971 604326

steffan.saunders@southderbyshire.gov.uk

Date: 26th August 2026

Dear Planning Inspectorate

Submission of the South Derbyshire Local Plan Part 1 Review

South Derbyshire District Council are pleased to formally submit the South Derbyshire Local Plan Part 1 Review (2022 – 2041) and Regulation 19 Addendum: Proposed Modifications for independent examination under the legacy system in accordance with the Planning and Compulsory Purchase Act 2004 (as amended in 2012) and the Town and Country Planning (Local Development) (England) Regulations 2012 (as amended in 2016).

The South Derbyshire Local Plan Part 1 Review (2022 – 2041) and Regulation 19 Addendum: Proposed Modifications in combination contain the strategic policies and allocations for the District. The Local Plan seeks to significantly boost housing development with a proposed housing requirement of 763 dwellings per annum above the SDDC Standard Method figure of 507 (in line with the transitional arrangements set out in Annex 1 of the NPPF 2024) and allocates a surplus of employment land to ensure choice and flexibility for business investors in terms of development location and scale in sustainable locations in close proximity to major housing growth. The Local Plan also seeks to protect the environment and address climate change issues by directing development away from areas of flood risk or environmental sensitivity (such as the River Mease Special Area of Conservation catchment), ensuring that development is located so as to maximise the potential benefits from existing infrastructure and sustainable and active travel options, and by ensuring that new development provides sufficient high quality green and blue infrastructure. The Local Plan has no outstanding issues of principle with any statutory consultee.

1. Submission documents

The following documents are being submitted for examination:

- South Derbyshire Local Plan Part 1 Review Publication Version (2022 – 2041)
- Regulation 19 Addendum: Proposed Modifications
- Policies Map
- Sustainability Appraisal - Publication Version

- Sustainability Appraisal – Regulation 19 Addendum
- Consultation Statement (Regulation 22)
- Representations Received
- Co-operation Statement
- Supporting documents relevant to the production of the South Derbyshire Local Plan Part 1 Review

The Council has also included a tracked change version of the South Derbyshire Local Plan Part 1 Review Publication Version (2022 – 2041) with the Regulation 19 Addendum: Proposed Modifications for information only.

All submission documents, including copies of the representations made under Regulation 20 are available to view online at [Local Plan Part 1 Examination - Submission Documents | South Derbyshire District Council](#) and at the Council Offices.

2. Main Matters raised in representations

Copies of all representations received under Regulation 20 have been provided in plan order by respondent. The key issues raised by respondents are covered within the Consultation Statement (Regulation 22), where the Council has indicated their initial response to the representation. In relation to this the Council consider the following matters to be the main issues for examination:

- Whether the Local Plan strategy to assist in meeting the unmet need arising from Derby primarily on two large strategic sites (STRA1 and STRA2) on the edge of Derby, is supported by the evidence including Sustainability Appraisal and Infrastructure delivery.
- The extent to which the ongoing masterplan process in relation to STRA1 and STRA2 will be effective in addressing any obstacles to delivery including the early delivery of housing.
- Notwithstanding points 1 and 2 whether the policies in this Local Plan Part 1 Review together with allocations to be made in the Local Plan Part 2 Review provide sufficient contingency in the event of delivery on the large strategic sites or other sites is slower than anticipated.
- The extent to which the Local Plan approach to employment delivery is positive planning having regard to the evidence and consideration of alternatives through the Sustainability Appraisal process.
- Whether the Council's proposed Main Modifications to the Plan published as an addendum to the Regulation 19 consultation are sound including with reference to extending the plan period to 2042, the reduction in the affordable housing requirement to 30% and the need for a link road between the A516 and A38 at STRA2.
- Whether the Local Plan policies and site allocations are effective in ensuring the necessary housing delivery is accompanied by the provision of the necessary infrastructure including social, green and blue infrastructure at the appropriate time.
- Whether the Regulation 19 addendum consultation and the extent of availability of all supporting documents at the time of the Regulation 19 consultation in March 2025 has a bearing on meeting the transitional arrangements set out in Annex 1 of the NPPF 2024
- Whether the Local Plan contains a sound approach to the provision of Gypsy and Traveller accommodation to meet the evidenced need.

3. Pre-Examination Checklist

A copy of the Pre-Examination Checklist and the Response are available in the Councils 'Evidence Base' on the website [Local Plan Part 1 Review Examination - Evidence Base | South Derbyshire District Council](#). The documents referred to below are included in either the submission documents (with references prefixed with 'CD') available on the 'Submission Documents' webpage [Local Plan Part 1 Review Examination - Submission Documents | South Derbyshire District Council](#) or as evidence documents (referenced using other prefixes).

- Q2.1 - An updated Local Development Scheme (CD14) is available on the Councils website.
- Q2.2 - The Statement of Consultation (CD10) has been reviewed and updated and is available on the Councils website.
- Q2.3 – 2.5 A Cooperation Statement (CD13) is available on the Councils website.
- Q2.3 - and 2.6 Statements of Common Ground (SoCG01 – SoCG4) are available on the Councils website.
- Q2.8 - The most up to date version of the SA Report is the May 2026 Regulation 19 Addendum: Proposed Modifications (CD06). Section 3.1 (p33) of the Regulation 19 Addendum: Proposed Modifications SA Report 5th May 2026 sets out the relationship with the Derby HMA authorities. Section 3 describes the geographical and plan making scope of the Local Plan. Section 6.2 (p46) of the Regulation 19 Addendum: Proposed Modifications SA Report 5th May 2026 explains that scale and distributions options work for the Derby HMA group has informed the consideration of spatial strategy options for the South Derbyshire Local Plan. Section 6.2.1 (p49) goes on to explain how spatial distribution options were revisited following Regulation 19 consultation.
- Q2.9(a) - The most up to date version of the SA Report is the May 2026 Regulation 19 Addendum: Proposed Modifications (CD06). The SEA Regulations (Schedule 2, Regulation 12(3)) require *"1. An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes."* An outline of the contents and main objectives of the Local Plan are set out in Section 3.2 (P33-34) of the Regulation 19 Addendum: Proposed Modifications (CD06). Section 3 also sets out the planning context of the Local Plan and relationship with the Derby HMA group. Section 4 sets out the relationship between the Local Plan and other plans and programmes relevant to the Local Plan. These are presented in full in Appendix A of the Regulation 19 Addendum: Proposed Modifications (CD06b). This appendix is cross referenced within the SA Report on page 36 within Section 4 *Review of Other Policies, Plans and Programmes* (and in other places in the SA Report). Section 2.2 (p6) of the Regulation 19 Addendum: Proposed Modifications (CD06) explains that the SA Framework of objectives used to test the Local Plan and it's alternatives was developed using the PPP review. There is no specific requirement in the SEA Regulations for the Local Plan objectives to be informed /shaped by the objectives of other relevant plans, policies and programmes. Through SA assessment and amendment of the Local Plan in line with mitigation and enhancement measures, the Local Plan has been informed by other relevant plans, policies and programmes.
- Q2.9(d) - Existing environmental problems which are relevant to the plan are set out within Section 5 (Table 5-1 on p41) of the Regulation 19 Addendum: Proposed Modifications (CD06). Table 5-1 includes reference to an area of particular

environmental importance (the River Mease Special Area of Conservation). The parallel Habitats Regulations Assessment (HRA) is also referenced in Section 8.

- Q2.9(e) Section 4 of the Regulation 19 Addendum: Proposed Modifications (CD06) sets out the relationship between the Local Plan and other plans and programmes relevant to the Local Plan. These are presented in full in Appendix A of the Regulation 19 Addendum: Proposed Modifications (CD06b). This appendix is cross referenced within the SA Report on page 36 within Section 4 *Review of Other Policies, Plans and Programmes* (and in other places in the SA Report). Existing environmental problems which are relevant to the plan are set out within Section 5 (Table 5-1 on p41). Detailed baseline information is set out in Appendix B of the Regulation 19 Addendum: Proposed Modifications (CD06c). Appendix B is cross referenced on page 40 of the Regulation 19 Addendum: Proposed Modifications (CD06). Section 2.2 (p6) of the Regulation 19 Addendum: Proposed Modifications SA Report 5th May 2026 explains that the SA Framework of objectives used to test the Local Plan and its alternatives was developed using the baseline data and PPP review. There is no specific requirement in the SEA Regulations for the Local Plan objectives to be informed /shaped by the objectives of other relevant plans, policies and programmes. Through SA assessment and amendment of the Local Plan in line with mitigation and enhancement measures, the Local Plan has been informed by the environmental protection objectives of other relevant plans, policies and programmes and environmental considerations identified within the baseline information.
- Q2.9(h), Q2.11, Q2.12 - The reasons and process of selecting the four strategic site options is explained in Section 6 (pages 46-47) of the Regulation 19 Addendum: Proposed Modifications (CD06). Summarised findings of the assessment of the four strategic site options are presented within Section 6.3. This section is supported by detailed assessments in Appendix D (CD06e). The reasons for choosing the preferred strategic sites are set out in Section 6.3.5 (p58-59).

4. Cooperation

A Cooperation Statement is included in the submitted documents. It contains relevant Statements of Common Ground. There are no outstanding issues of principle with any statutory consultee.

5. Main Modifications

In accordance with the guidance, prior to submission the Council has undertaken consultation on an addendum of proposed modifications to the Local Plan on the same basis as the Regulation 19 consultation and wish the changes to be considered as part of the submitted plan. These modifications are included as party of the formal submission.

Under the terms of Section 20(7C) of the Planning and Compulsory Purchase Act 2004, the Councils requests the appointed Inspector(s) to recommend modifications as may be further required to make the Plan legally compliant and sound.

6. Programme Officer

The Council has appointed Melissa White as the Programme Officer for the South Derbyshire Local Plan Part 1 Review examination. Her contact details are as follows:

- Email: Programme.Officer@southderbyshire.gov.uk
- Telephone: 07423 110154

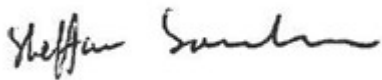
7. Hearing Sessions

Considering the issues raised through the Regulation 19 consultations and the number of respondents who may wish to appear at examination, the Councils believe that around 6 hearing days would be required, although this will need to be determined by the Inspector.

The Council will provide an examination venue capable of hosting in person, blended or virtual meetings for the examination hearing sessions and are happy to discuss further the format as deemed to be appropriate by the Inspector.

Should you require any further information or would prefer to receive any of the enclosed documents in an alternative format, please do not hesitate to contact either myself or the Programme Officer.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Steffan Saunders', with a stylized, flowing script.

Steffan Saunders
Head of Planning