



DEVELOPMENT STRATEGY TOPIC PAPER

August 2026

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Executive Summary

- i. The spatial strategy chosen (as set out in paragraph 6.2.2 of the [Sustainability Appraisal Regulation 19 Addendum \(May 2026\)](#)) of large strategic sites on the edge of Derby, in brief summary is due to a housing requirement exceeding South Derbyshire District Council (SDDC) housing need to help to meet Housing Market Area (HMA) housing need in close proximity to Derby City from where a substantial proportion of the unmet need arises, but also in close proximity to the extensive services, employment and leisure opportunities within Derby. This contributes to minimising both the need to travel, the distance to travel, and the public transport options in place or to be provided to increase travel options without reliance on the private car. It gives the greatest benefit in terms of matching housing delivery with the necessary infrastructure provision to support development, both in terms of funding opportunities and securing housing where it can most benefit from existing infrastructure which is more focussed in and around Derby than in more rural parts of the District.
- ii. The spatial strategy provides opportunities for various facilities to be provided on each strategic site including a local centre, employment opportunities, education, recreation and health provision which cannot be provided to the same extent, or at all, on smaller sites and therefore is much more effective at internalising trips. It gives the greatest opportunity for a partnership approach to coordinate the provision of the more extensive and cross boundary infrastructure such as the A50 junction and link road at Infinity Garden Village (IGV), the A38 upgrade, and the vehicle connections between the A516 and A38 which will assist with the long-term provision of a South West Derby Integrated Transport route.
- iii. The quality achieved for the two strategic sites is important for placemaking but also for viability. The [Whole Plan viability assessment](#) refers to RICS research which found that the value of placemaking ranges between 5% and 56%. Even in low value areas good place making can achieve premiums of up to 20%. The main influences were the community provisions such as schools, parks, and community spaces that encouraged community engagement. In general, the premium grew over time as a sense of place and community developed. Reference is also made to [Lichfield's Research](#) which also concludes that “variety is the spice of life” in relation to housing delivery. Its analysis identifies a positive relationship between additional sales outlets and build-out rates and finds that schemes providing 30% or more affordable housing achieved higher average annual build-out rates than schemes providing lower proportions. Lichfields explains that affordable housing can support delivery, where viable,

because it accesses an additional source of demand alongside open-market housing.

- iv. In this regard the viability of sites is not a static matter over which Local Planning Authorities have no control. By focussing development on large strategic sites with policy requirements that the highest placemaking quality is achieved, and engaging proactively with partners in a masterplan led approach, gives the best opportunity of this higher viability being achieved.
- v. The spatial strategy minimises landscape harm and intrusion into the countryside and, with reference to comparison with reasonable alternatives, it ensures that the need for homes, jobs and infrastructure is met in full where it is most needed. This reduces the need for more dispersed, smaller scale development which will not provide the same benefits in terms of connectivity enhancements, matches housing provision with the infrastructure to provide it, and reduces negative transport implications such as longer trips with a reliance on the car and a failure to secure the same benefits of public transport improvements.
- vi. A failure to meet cross boundary housing need will result in reduced access to much needed housing, including affordable housing, and will lead to adverse health implications arising from this. The spatial strategy addresses issues raised by statutory consultees and amounts to effective cooperation with the Council's HMA neighbouring authorities and other public sector bodies. Statements of Common Ground have been signed with HMA partners and others are also under preparation with site promoters of the Strategic Sites. It is anticipated that these will be ready during Autumn 2026 at a similar time to when the Local Plan Part 2 is published.
- vii. The key components of the Spatial Strategy are:
 - Maintain the settlement hierarchy with Derby, Burton and Swadlincote urban areas at the top.
 - Recognise the single biggest driver to an increase of housing provision above SDDC housing need is unmet need arising from Derby City with Derby being capacity constrained.
 - Propose a housing requirement figure of 763 dwellings per annum which is an increase of 256 above the SDDC need figure (507) in line with the transitional arrangements set out in Annex A of the 2026 NPPF which cross references Annex 1 of the 2024 NPPF.
 - Allocate two housing led strategic sites at Infinity Garden Village (STRA1) and South Mickleover (STRA2) on the edge of Derby to assist in in meeting this need.

- Propose additional employment allocations at the Freeport (INF3), Infinity Garden Village (STRA1), Land South of Mickleover (STRA2) which benefit from close vehicular access to the Strategic Road Network and Drakelow (STRA 3) on the edge of Burton. This increases the surplus of employment land to provide choice and flexibility for business investors in terms of development location and scale in sustainable locations in close proximity to major housing growth, both in the currently adopted local plan and in this local plan.
- Recognise that with reliance on large sites delivery issues need to be addressed proactively, and collaborative work is ongoing with Homes England and East Midlands Combined Council Authority (EMCCA) to commission Development Framework Documents (including Strategic Masterplans) on these two strategic sites.
- Recognise that notwithstanding this, more housing site allocations will be needed in the Local Plan Part 2 and decisions on these allocations will be taken at the Council's Environmental and Development Services committee on 24 September, with the Local Plan part 2 also to be submitted by 31 December 2026 under the legacy system.

1. Transitional arrangements

- 1.1 The latest version of the National Planning Policy Framework (NPPF) published on 17 August 2026 states at Annex A paragraph 8 that in respect of Local Plans (submitted under the legacy system) these should be produced in accordance with the version of this Framework published in December 2024, unless any of the transitional arrangements in Annex 1 to that Framework apply (in which case those transitional arrangements continue to apply).
- 1.2 Annex 1 of the 2024 version of the NPPF states at paragraph 234 that for the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than when one or more of the following apply (*the only relevant one to SDDC being the publication timing and 80% housing need point which is repeated below*)
 - a. The plan has reached its Regulation 19 (pre-submission) stage on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need.
- 1.3 The Local Plan was published under Regulation 19 on 10 March 2025. The local housing need at the time was 580 dwellings per Annum (See [HMA Statement of Common Ground published in February 2026](#)) and the Local Plan had a draft housing requirement of 763 homes per Annum (131% of local housing need very significantly exceeding the 80% minimum). Once the affordability ratio was added this increased the figure to 592 homes per annum, and at submission the figure is 595 homes per annum. On any of these scenarios SDDC very comfortably meets the 80% requirement.
- 1.4 The context of these transitional arrangements are set out in the government response to the proposed reform to the NPPF and other changes to the

planning system (February 2025)¹ Questions 103 & 104 states that *“The government’s proposed transitional arrangement for local plans seek to maintain the progress of plans at more advanced stages of preparation, while maximising proactive planning for the homes our communities need”*.

- 1.5 For the Purpose of Plan Making, paragraph 234 Annex 1 of the December 2024 NPPF² sets out the circumstances where the Local Plan would be examined under the relevant previous version of the Framework with the timing point (reached Regulation 19 by 12th March 2025) and content point (meets at least 80% of local housing need).
- 1.6 For this to apply then footnote 82 explains that *“In this context “reached Regulation 19” refers to when Regulation 19 has been complied with (i.e. when the planning authority has made a copy of each of the proposed submission documents and a statement of the representations procedure available, and the statements required in Regulation 19(b) have been sent to consultation bodies).”*

Reached Regulation 19 (pre-submission stage) on or before 12 March 2025

- 1.7 South Derbyshire District Council commenced its Regulation 19 consultation on 10 March 2025. Copies of the specifically referenced submission documents and statements were made available on this date. The Council has faced criticism through Regulation 19 representations that the transitional arrangements were not met as *“such supporting documents as in the opinion of the local planning authority are relevant to the preparation of the local plan”* (part e of Regulation 22³), such as the Transport Modelling and Plan Wide Viability Assessment were not available at the time of consultation.
- 1.8 SDDC note that at the recent Examination into the Greater Nottingham Strategic Plan, the debate related to the extent to which the Council's had met the 80% point and not whether every ‘supporting document’ was published by 12 March 2025. It is understood that the Greater Nottingham Council's had evidence in preparation at the time they published their Regulation 19 local plan on 12th March 2025 including their own transport modelling evidence. Whilst there was much debate on meeting the 80% point, there was no debate regarding the availability of documents.

Addendum

- 1.9 It has also been argued that the Council has not met the transitional arrangements because it has undertaken a further addendum consultation. Planning Practice Guidance (Paragraph: 054 Reference ID: 61-054-20190315) states that where a Local Planning Authority wishes to make changes to the publication version of the plan before it is submitted for examination they can *“include any changes in an addendum to the plan. Where the local planning authority intend the changes to be treated as part of the submitted plan, the addendum, together with any necessary sustainability appraisal of it, should be*

¹ [Government response to the proposed reforms to the National Planning Policy Framework and other changes to the planning system consultation - GOV.UK](#)

² https://webarchive.nationalarchives.gov.uk/ukgwa/20250225172715mp_/https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

³ [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#)

subject to further consultation (equivalent to the consultation on the publication version) before submission”.

- 1.10 The Council has undertaken an addendum consultation on proposed modifications which included an opportunity for public scrutiny of the Transport Modelling and Interim Affordable Housing Statement evidence. The proposed modifications did make amendments to the plan policies as a result of the new evidence (including the explicit need for a link road in STRA2 rather than the previous reference to a link road if required and the reduction from 40% affordable housing to 30% affordable housing) however the new evidence did not alter the spatial strategy of the Local Plan.

Draft housing requirement meets at least 80% of local housing need

- 1.11 The government response to the proposed reform to the NPPF and other changes to the planning system (February 2025)⁴ questions 103 & 104 states that “for plans at Regulation 19, if the draft housing requirement meets less than 80% of local housing need, authorities will be required to update their plan to reflect the revised local housing need figure and the revised National Planning Policy Framework prior to submission”.
- 1.12 The Local Housing need based on the Standard Method for SDDC at the time of the pre-submission consultation on 12 March 2025 was 580 dwellings per annum and at the time of submission the Local Housing need is 595⁵ per annum. The housing requirement included in the Local Plan is 763 per annum. In either case the Council has exceeded the housing requirement and therefore clearly meets the 80% criteria.
- 1.13 The Council was at an advanced stage of plan preparation having undertaken a Regulation 18 Issues and Options consultation, a Regulation 18 Draft Plan consultation and had commenced the pre-submission Regulation 19 consultation in advance of the 12th March 2025 deadline. The Local Plan exceeds the local housing need based on the Standard Method for the area and therefore SDDC considers that it has clearly demonstrated that the transitional arrangements have been met.
- 1.14 On this basis the Standard Method housing calculation is set out below.

SDDC Standard Method Calculation:

- 1.15 Based upon the Standard Method (2023) calculation the need for SDDC = 507 dwellings per annum
- 1.16 Based on a plan period 2022 -2042 (as extended by the Addendum consultation) the need for SDDC is 10,140 homes (507 x 20).

⁴ [Government response to the proposed reforms to the National Planning Policy Framework and other changes to the planning system consultation - GOV.UK](#)

⁵ Calculated in May 2026

2. National Planning Policy Framework (NPPF)

2.1 The NPPF (2023) says that:

20 “Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:

a) housing (including affordable housing), employment, retail, leisure and other commercial development;

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure); and

d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”

21 Plans should make explicit which policies are strategic policies. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non- strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.

22 Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

23 Broad locations for development should be indicated on a key diagram, and land use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non strategic policies).

2.2 Paragraph 35 of the NPPF says that:

Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

*a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

*b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

*c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

*d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*

3. Evidence to support the Local Plan Strategy

HMA Boundary Study (May 2019)

- 3.1 In 2019 the HMA authorities jointly commissioned a [Boundary Study](#) to review and confirm the Derby HMA and Functional Economic Market Area (FEMA) boundary based on Council boundaries. This followed a 2005 study which identified HMAs across the East Midlands Region based upon migration and travel to work patterns from the 2001 UK Census of Population.
- 3.2 The 2019 study concluded that the Derby HMA authorities of Amber Valley, Derby City and South Derbyshire are all located within the same HMA and FEMA and whilst there may be some overlaps between different areas in Derbyshire and East Staffordshire it is necessary for HMAs and FEMAs to follow local authority boundaries and the three authorities in the Derby HMA grouping remain the most appropriate grouping.

Derby HMA Growth Options Study (August 2021)

- 3.3 The HMA Councils jointly commissioned a Growth Options Study ([Derby HMA Growth Options Study](#)) in 2021 to identify and assess strategic opportunities for housing-led sustainable growth within the Derby HMA. This was undertaken without reference to the housing need for Derby HMA or the individual authority areas. The study defined strategic growth locations as being capable of accommodating a minimum of approximately 1,000 homes at a reasonable net density of 35-40 dwellings per hectare, translated to a gross (site-wide) density of 17-20 dwellings per hectare. The 1,000 dwelling threshold was selected due to the level of social infrastructure that can be delivered at this scale. However, any strategic sites (even the smaller urban extension and co-dependent

options) should be able to demonstrate a level of self-containment that would reduce car-borne transport. The study was 'policy off' with regards to Green Belt designation. This is to say that being in the Green Belt per se does not render a location unsuitable for strategic development. However, the Green Belt purposes in the NPPF are built into the wider assessment criteria.

- 3.4 The study followed a two-stage approach to identify and analyse broad assessment areas to be subject to further interrogation (excluding Derby City which would be subject to its own capacity study) and assess the suitability of existing settlements to accommodate strategic growth in terms of their position in the settlement hierarchy and the extent to which they provide sustainable access to services. Stage 1 identified 6 assessment areas, 4 of which (West of Derby, Trent Valley, South Derbyshire North and South Derbyshire South) include land within South Derbyshire.
- 3.5 The study then went on to assesses the broad areas of search to define more refined locations that could be potentially suitable for strategic growth. 16 broad areas of assessment were identified for further integration through stage 2 (11 of which were identified in South Derbyshire). These were considered to be free of 'showstopping' or absolute constraints and are, or have the potential to be, connected (via sustainable transport modes) to existing places and services by sustainable means. A RAG based assessment was undertaken on these areas considering environmental and geo-environmental constraints, landscape and topography, transport and accessibility, infrastructure capacity and potential, heritage, housing demand, regeneration and economic development potential and spatial constraints and opportunities. Within South Derbyshire it concluded that 4 locations were suitable for strategic growth, 5 areas were potentially suitable for strategic growth, and 2 areas were unsuitable for strategic growth (shown in table 1 below).
- 3.6 The study found that there are fewer options for major new settlements of the order of 5,000+ to 10,000+, and so it would be necessary to consider a strategy that seeks to focus on constellations of smaller urban extension/co-dependent options centred on larger existing settlements and Derby. The study recommended that further work be undertaken to understand the amount of need that could be accommodated within the urban areas and on strategic sites, but noted that the area of land identified by the study is likely to be several times more than is needed to accommodate future housing need.
- 3.7 The study also recommended that the Derby HMA authorities consider what strategy and groups of sites work best together as 'baskets of sites' concentrated in sustainable transport corridors. In the West and South of Derby there are already extensive extant allocations (predominantly urban extensions) and that growth would need to be managed and phased carefully to deliver commensurate levels of supporting infrastructure. It would not be possible for all typology options to come forward concurrently in locations such as the West of Derby (in light of the extant urban extensions and identified infrastructure capacity issues). Mitigating measures that would be likely to be required to enable development were highlighted.

Table 1: SDDC relevant extract from Broad Areas of Search Assessment Summary in the Derby HMA Growth Options Study

Ref	Broad Areas of Search	Local Authority	Typology Option(s)	Broad Area of Search Summary
C1	Land to the West of Derby urban area	AVBC/SDDC/DCC	Urban extension(s) / garden village / Co-dependent Settlement / Autonomous Settlement	Suitable Area for Strategic Growth
C2	North of Tutbury and Hatton	SDDC	Co-dependent Settlement	Potential Area for Strategic Growth
D1	Hilton northern expansion	SDDC	Urban extension / Village Expansion	Suitable Area for Strategic Growth
D2	North of Willington	SDDC	Village Expansion	Potential Area for Strategic Growth
D3	Derby A50 Corridor Southern Extension	SDDC / DCC	Urban extension(s)	Suitable Area for Strategic Growth
E1	Land at Melbourne Road – Melbourne Eastern Extension	SDDC	Urban extension / Village Expansion	Potential Area for Strategic Growth
E2	Land between Burton Upon Trent and Swadlincote	SDDC	Urban extension / Village Expansion	Potential Area for Strategic Growth
E3	West of Swadlincote – Swadlincote Extension	SDDC	Urban extension	Unsuitable Area for Strategic Growth
E4	North-east of Swadlincote	SDDC	Urban extension	Suitable Area for Strategic Growth
E5	North-east of Smisby	SDDC	Village Expansion	Unsuitable Area for Strategic Growth
F1	North-east of Walton on Trent	SDDC	Co-dependent Settlement	Potential Area for Strategic Growth

3.8 The housing led Strategic Allocations in the local plan are within the ‘suitable area for strategic growth’ STRA 1 within D3 and STRA2 (and FLG1) within C1.

Derby and South Derbyshire Local Housing Needs Assessment (December 2023)

3.9 Derby City Council and South Derbyshire District Council jointly commissioned a Housing Needs Assessment [Housing Needs Assessment](#) to analyse the housing markets and requirements within each of the authority areas and ultimately determine the overall housing need for each area. This was undertaken by Icenl and concluded (para 1.27) that even when taking into account current and future trends and market signals (including affordable housing provision and the delivery of the East Midlands Intermodal Park – the

Freeport) there were no exceptional circumstances to deviate from the using the Standard Method.

- 3.10 The report found that South Derbyshire's housing stock (47,500 dwellings) was the lowest in the HMA but has seen the highest absolute and percentage increase since 2011 with new build housing delivery regularly exceeding that of Derby. At the time the assessment was undertaken the Standard Method generated a minimum local housing need for Derby at 1,266 dwellings per annum (including the 35% uplift) and South Derbyshire at 522 dwellings per annum. The potential impact of the Freeport at East Midlands Intermodal Park was examined and it was concluded that it did not justify a higher housing need across the study area and it was considered that there are no exceptional circumstances to deviate from the Standard Method.
- 3.11 Population growth was shown in all age bands with the strongest numerical growth projected for the 16-64 age group (between 2022 – 2039), but in proportional terms, the increase in the number of people aged 65 and over was most significant. It was estimated that over 31,000 additional jobs could be supported by the changes to the resident labour supply over the 2022-39 period across the two local authorities.
- 3.12 When looking at needs from households unable to buy or rent, the analysis suggests a need for 214 affordable rental homes per annum in South Derbyshire. However, the report concluded that despite the level of need, it was not considered that this points to any requirement for the Council to increase the Local Plan housing requirement due to affordable needs (paragraph 1.34), although it was recommended that the Council seek to maximise the delivery of such housing at every opportunity (paragraph 1.35).

Employment need

- 3.13 There is a more detailed Employment Topic Paper, and the points below comprise a summary of the employment evidence in so far as this supports the overarching strategy for employment provision and any uplift in housing provision above the Standard Method. The [Employment Land Review](#) (ELR) published in October 2023 was jointly commissioned by Derby City Council and South Derbyshire District Council. This forecast qualitative need using three different methodologies with the preferred one being past employment land take up. On this basis the Local Plan Review found that there was a surplus of supply for South Derbyshire of 10.23ha.
- 3.14 In qualitative terms the study identified the main issues the Local Plan should support were the accommodation needs of smaller businesses requiring premises of less than 1000sqm and for office uses in appropriate locations. It also recommends that policy should continue to allow established businesses to expand, to encourage economic diversification in appropriate locations and

to protect existing employment areas from redevelopment for non-employment uses.

- 3.15 The study also recommends that consideration be given to the identification of new strategic scale sites at Eggington Common (The Freeport site) and the south-western part of the former Drakelow power station, in addition to additional employment provision at Infinity Garden Village (STRA1). These sites are included as allocations in the Local Plan. No further recommendations for site allocations were made.
- 3.16 Icení (consultants undertaking the Local Housing Needs Assessment) had sight of the ELR and were cognisant of its recommendations when concluding that market signals did not support an uplift above Standard Method housing need.
- 3.17 The sites recommended for allocation for employment purposes have been allocated at IGV (STRA1), Drakelow (STRA3) and the Freeport (INF3). As with housing, the employment provision in the Local Plan significantly exceeds evidenced needs and is secured in sustainable locations with good existing and proposed links to centres of population. The employment provision at IGV is directly to the south of the Rolls Royce campus with opportunities for complementary employment provision to be explored through the Development Framework Document (DFD), The Freeport (and Toyota) are in close proximity to STRA2 and establishing cycling and walking links to these employment centres will be a key role of the DFD. Drakelow is immediately adjacent to Burton on Trent with a bridge over the River Trent to the A38/ Burton nearing completion.

Settlement Growth Study (October 2024)

- 3.18 SDDC commissioned a [Settlement Growth Study](#) to consider the overall housing need for individual settlements within the District (excluding the Derby Fringe and smaller Rural Areas). This was undertaken based upon a range of assumptions around migration (zero migration, zero net migration and 10-year migration based on past trends) for the period 2022-2039.
- 3.19 Only Coton Park, Hilton, Swadlincote and Swarkestone show population growth in models based on zero / zero net migration. Church Broughton, Hatton, Milton, Mount Pleasant and Smisby all show negative population and positive household growth as the ageing population will be more likely to be living as separate households.
- 3.20 For areas which are projected to see negative population and household growth, this does not imply that they will have a surplus of houses. Instead, the models are saying that local population and households will reduce, but any available properties are likely to be filled by in-migrants.

- 3.21 When considering past migration trends, areas such as Etwall, Melbourne, Overseal and Repton all saw house building between 2011 and 2021 and this in turn saw higher levels of in-migration and projected population and household growth.
- 3.22 Across all three migration assumptions, in many areas the population is projected to fall, but the population aged 75 years and over is projected to rise. This is the result of an ageing population where fewer births will occur than deaths, but where the remaining population will age. This is a significant issue for planning for new housing because a share of the population aged 75 years and older are likely to require dedicated older person housing.

Derby HMA Sustainability Appraisal of Housing Options (September 2024)

- 3.23 The HMA authorities jointly commissioned a Sustainability Appraisal of the Housing Options to support a consistent approach to assessing meeting housing needs within the Derby HMA taking into consideration options for scale, distribution and the apportionment of Derby's unmet housing need between Amber Valley Borough Council (AVBC) and SDDC.
- 3.24 At the time the assessment was undertaken Derby's housing requirement from the standard methodology was 21,522 homes over an agreed local plan period (2023-2039) which resulted in a shortfall of 9,022 homes, this included a 35% uplift added to the requirement as a result of Derby being one of the top 20 largest English cities. This is reflected in Scale 1 of the assessment; Scale 2 did not include the uplift in order to establish a baseline and Scale 3 includes a more modest uplift. It was not considered to be a reasonable alternative to consider a scale option below the identified need. Consideration was also given to a higher than 35% uplift but given that Derby was already unable to meet its need this was also considered not to be a reasonable alternative.
- 3.25 The housing growth options consist of three scale options and four distribution options:
- Scale 1: Standard method in full (including 35%); 36,584 dwellings across the HMA
 - Scale 2: Standard method steps 1-3 (no 35% uplift); 31,008 dwellings across the HMA
 - Scale 3: Standard method steps 1-3 (no 35% uplift) + 10%; 34,109 dwellings across the HMA.
 - Distribution 1: Urban concentration
 - Distribution 2: Urban concentration and urban fringe
 - Distribution 3: Dispersed
 - Distribution 4: Urban fringe focus
- 3.26 Distribution options 2-4 have sub options which apportion different ratios of housing development between AVBC and SDDC.
- 3.27 The SA was undertaken within the context of a housing capacity study undertaken by Derby City Council, and independently reviewed by Aecom, that

has identified that there is capacity on identified sites within the Derby administrative area to accommodate 12,500 new homes.

- 3.28 The SA has found that options which concentrate all or most of Derby's unmet housing need into the Derby administrative area perform poorly for economy and employment (as a lack of identified housing sites in the city means that housing may have to be developed on economic/employment sites), climate change adaptation, biodiversity, historic environment, and landscape.
- 3.29 Options which concentrate all or most of the Derby unmet need into the Derby administrative area / Urban Fringe perform most positively for vibrant and viable centres, accessibility, quality of life, inequalities, sustainable transport and climate change mitigation.
- 3.30 Development in the SDDC Urban Fringe performs more positively than development in the AVBC Urban Fringe for sustainable transport as there is higher potential for transport infrastructure improvements and more existing routes into Derby.
- 3.31 Where an option which directs housing into the Derby administrative area is above the 12,500 capacity, housing delivery performs less positively in the SA, reflecting uncertainty over meeting needs for types and mix of housing in dense developments.
- 3.32 Options which distribute all of the Derby unmet need across AVBC and SDDC perform particularly poorly for sustainable transport, climate change mitigation and natural resources.
- 3.33 The report concluded that distribution options which perform most positively are those which reflect the limited capacity within Derby and distribute the Derby unmet need to the Urban Fringe areas, with an apportionment between AVBC and SDDC. Options which direct more of the Derby unmet need to the SDDC Urban Fringe would benefit from good potential for accessibility to services and facilities through achieving a degree of self-sufficiency within large urban extensions and through accessibility into Derby by sustainable transport.
- 3.34 At this point in time in the summer of 2024, it was clear to the HMA authorities that to meet HMA need in full as close to where it arises (Derby) was the most sustainable strategy when compared to reasonable alternatives. The SDDC Local Plan strategy of large strategic sites on the edge of Derby is consistent with the evidence in the [Growth Options Study](#), the [SA](#) and the [Infrastructure Delivery Plan](#) and comprises the best option to secure the necessary housing as close as possible to where the unmet need arises. It also supports the option that offers the greatest benefits via delivery on large sites of 2000+ homes of securing the full suite of on-site green and social infrastructure to contain trips, and provides housing in locations which minimise the length of trips that are needed with most of the trips being to Derby to access the employment and services within the city. This minimises the distance travelled and gives a greater potential for such trips to be via public transport.
- 3.35 Shortly after this the AVBC hearing sessions were undertaken and SDDC published its preferred option Local Plan under Regulation 18.

- 3.36 The SDDC specific [SA](#) concluded that of the four options for strategic allocations the two selected comprised Sustainable development. This formed the basis of a Derby HMA Statement of Common Ground ([2024](#)) which was later updated in [2026](#).

Whole Plan Viability Assessment

- 3.37 Aspinall Verdi were commissioned to undertake a [Whole Plan Viability Assessment](#) which was concluded in September 2026. A draft report was available to the Council and was considered prior to the decision to submit the Local Plan on 26 August 2026. The viability assessment was undertaken in the knowledge of the conclusions of the transport modelling work and the position in relation to key pieces of infrastructure to support delivery of the two housing led strategic sites at STRA1 and STRA2.
- 3.38 Their findings are that the two strategic sites at STRA1 and STRA2 are viable with 30% affordable housing. The analysis is at section 7 (page 60) of their report. In relation to STRA2 there is viability headroom. In relation to STRA1 less so, but the fundamental point of their viability assessment is that viability is a matter that Local Plan policy can positively shape with a place shaping premium (i.e. the higher the quality, the better the viability position will be). Both STRA1 and STRA2 require Development Framework Documents including Strategic Masterplans and this work is underway having been commissioned by South Derbyshire District Council, Homes England and EMCCA in partnership, and Mace are the appointed lead consultants with their work progressing to inform this Local Plan Examination.
- 3.39 The viability of some locations away from the Derby Fringe is more challenging particularly in Swadlincote. However, this Local Plan Part 1 does not allocate additional housing sites outside of the Derby Fringe. The Local Plan Part 2 does (as advocated by the development industry), and the Whole Plan Viability Assessment is clear that the challenging viability now is at a point in time reflecting significant build costs/ inflation and slowing house sales. This is a temporary situation and does not imply longer term viability difficulties in Swadlincote or elsewhere in the District which remains a desirable location for housebuilders to build, and this is summarised in paragraph 8.9 in the conclusions of the Whole Plan Viability Assessment.
- 3.40 It is acknowledged that South Derbyshire has historically demonstrated strong housing delivery, including the delivery of affordable housing at levels consistent with the Council's existing policy. This historic performance provides useful context but does not, in itself, determine the level of affordable housing that can viably be supported under current market conditions. The relationship between residential values, construction costs, finance, planning obligations and other development costs has changed materially since the

previous viability evidence was prepared to establish the existing policy requirement.

Additional Work to secure both quality and delivery

Infinity Garden Village (IGV)

- 3.41 IGV is a major mixed-use development of national significance spanning 360 acres across SDDC and Derby City Council. Designated as one of 14 government-backed Garden Villages, IGV aims to deliver over 4,500 homes, 3.45 million sq. ft. of employment space, schools, and transport infrastructure, generating around £1bn GVA and 5,000 jobs.
- 3.42 IGV is identified as a flagship development for early delivery within EMCCA's Trent Arc Spatial Growth Strategy, hosting Rolls-Royce's Nuclear Skills Academy and located adjacent to Rolls-Royce's global civil aerospace headquarters and nuclear submarine reactor facilities in Derby, it sits within 15 minutes of major OEMs like Toyota, Alstom, and JCB, offering strong supply chain connectivity and proximity to East Midlands Airport and the UK's only inland Freeport. With parts of the site benefiting from both Enterprise / Investment Zone status, it is recognised as key driver for regional economic growth a top priority for delivery within EMCCA's East Midlands Strategic Place Partnership project pipeline.
- 3.43 To the west lies Housing Allocation Wragley Way (H15), allocated for housing development in the 2016 Local Plan. Chellaston lies to the east of the site, and Derby City's Local Plan Employment Allocation Infinity Park Derby (AC15) lies to the north.
- 3.44 The draft Policy 'STRA1: Infinity Garden Village Mixed Use Allocation' proposes an allocation to the east of the masterplan area for 2,000 homes and 70 ha of employment space. A Development Framework Document (DFD) was adopted in 2020. The draft policy requires an updated DFD including a strategic masterplan and the policy area for the Masterplan is included below in **Figure 1**.
- 3.45 There are two live applications to the west of the masterplan area - for 1,850 homes (Ref: DMPA/2019/1097) and for 51,000sqm of employment land (Ref: DMPA/2019/1091). The illustrative masterplan submitted is shown in **Figure 2**.
- 3.46 A new access link road from the A50 to support development at the site was consented in 2021 and is currently being implemented.

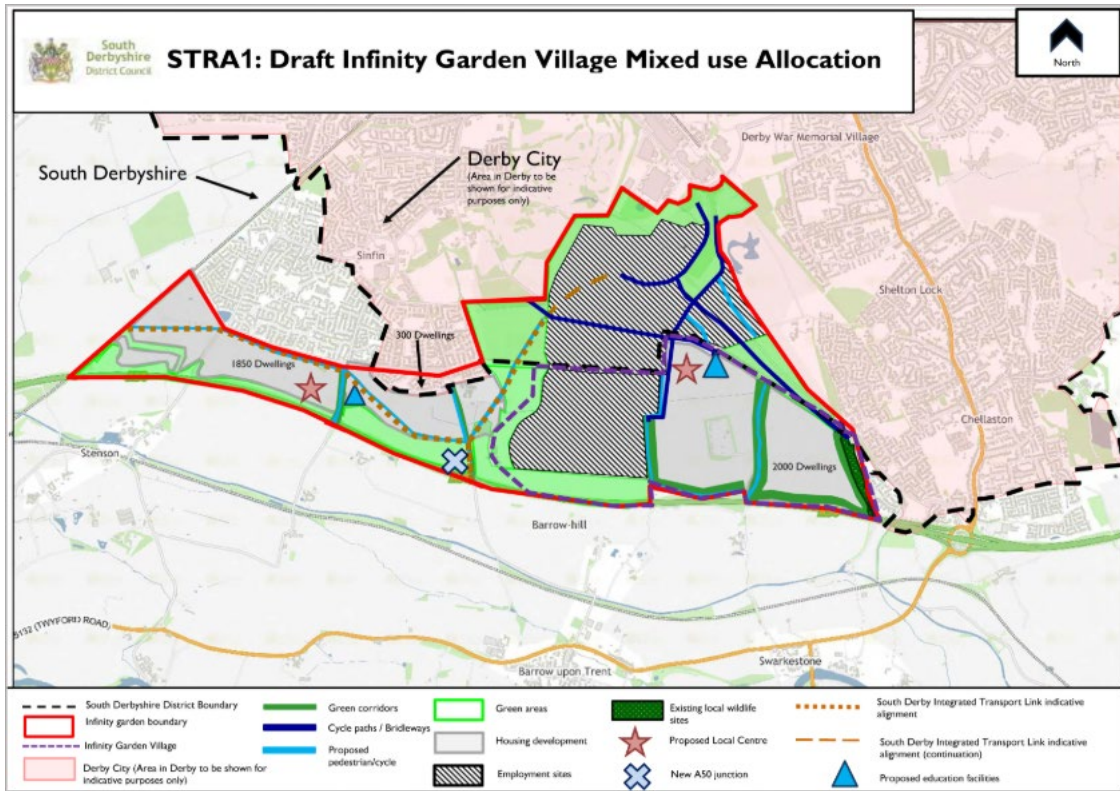


Figure 1: IGV masterplan area from the draft Local Plan (2025)

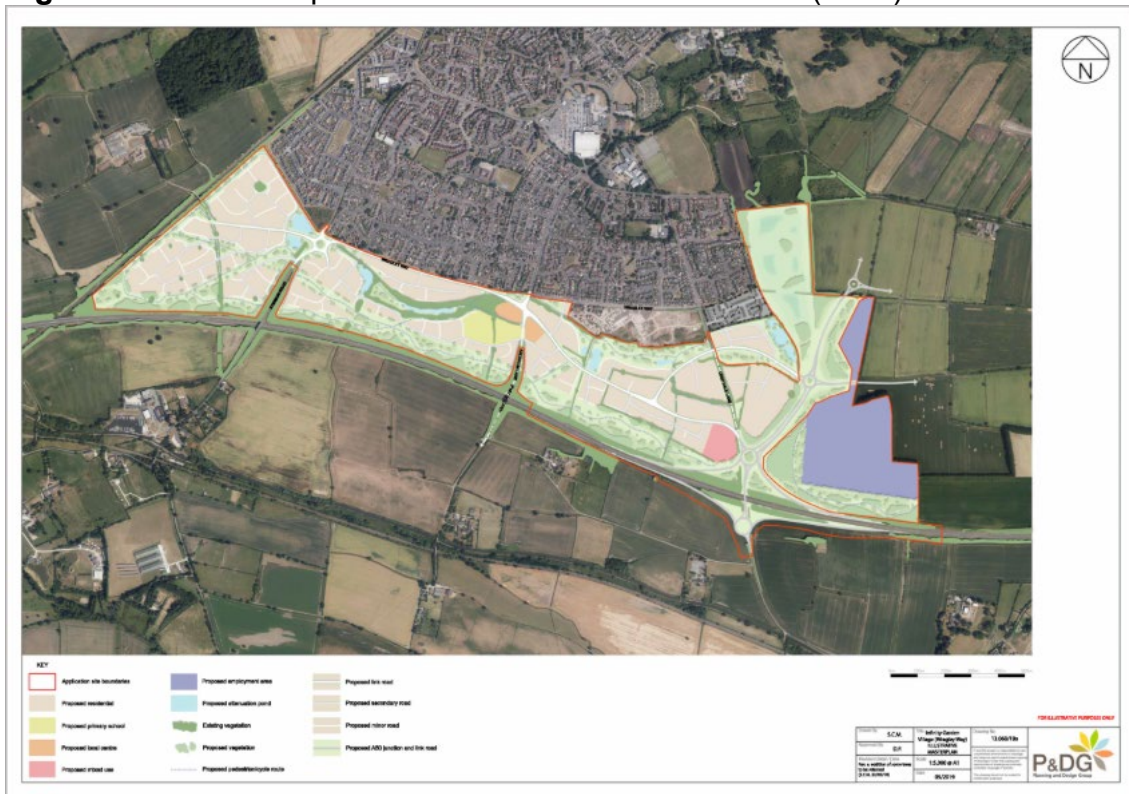


Figure 2: Illustrative masterplan submitted with live planning applications (2019)

Land South of Mickleover

- 3.47 The draft Local Policy 'STRA2: Land South of Mickleover Mixed Use Allocation' proposes an allocation to the south of Derby City for approximately 2,500 homes and 5-10 ha of employment space (shown in **Figure 3**).

- 3.48 There are no live planning applications on the site. In November 2025, a scoping opinion request was submitted to SDDC (Ref: DMOT/2025/1599). The scoping report states that the proposed development will provide up to 2,300 units with associated infrastructure. The applicant has undertaken a pre-application public consultation in early 2026. This represents the majority, but not all of the site to be allocated. Other parcels of land have the capacity to deliver circa 340 homes in the northeast promoted by Pegasus, 260 units to the south of this, 150 units on the eastern side of the A38 and 400 units at the south of the site adjacent to the A38. Whilst the 2,500 indicative dwelling figure is not a ceiling, the masterplan framework will need to consider appropriate densities, having regard to the overarching requirement for extensive green infrastructure provision.
- 3.49 Transport Modelling work has confirmed that a new link road between the A38 and the A516 is required as mitigation and this is expected to be provided as part of a comprehensive development of the site forming part of the South Derbyshire Integrated Transport Link. There may be the opportunity (in line with Figure 3 shown below) to deliver housing along the A516 in conjunction with the new link road.
- 3.50 SDDC are exploring options for early delivery of initial phases for the west of the site along the A516 and to the east of the site beyond the A38 and are working collaboratively with developers whilst planning application proposals are being prepared.

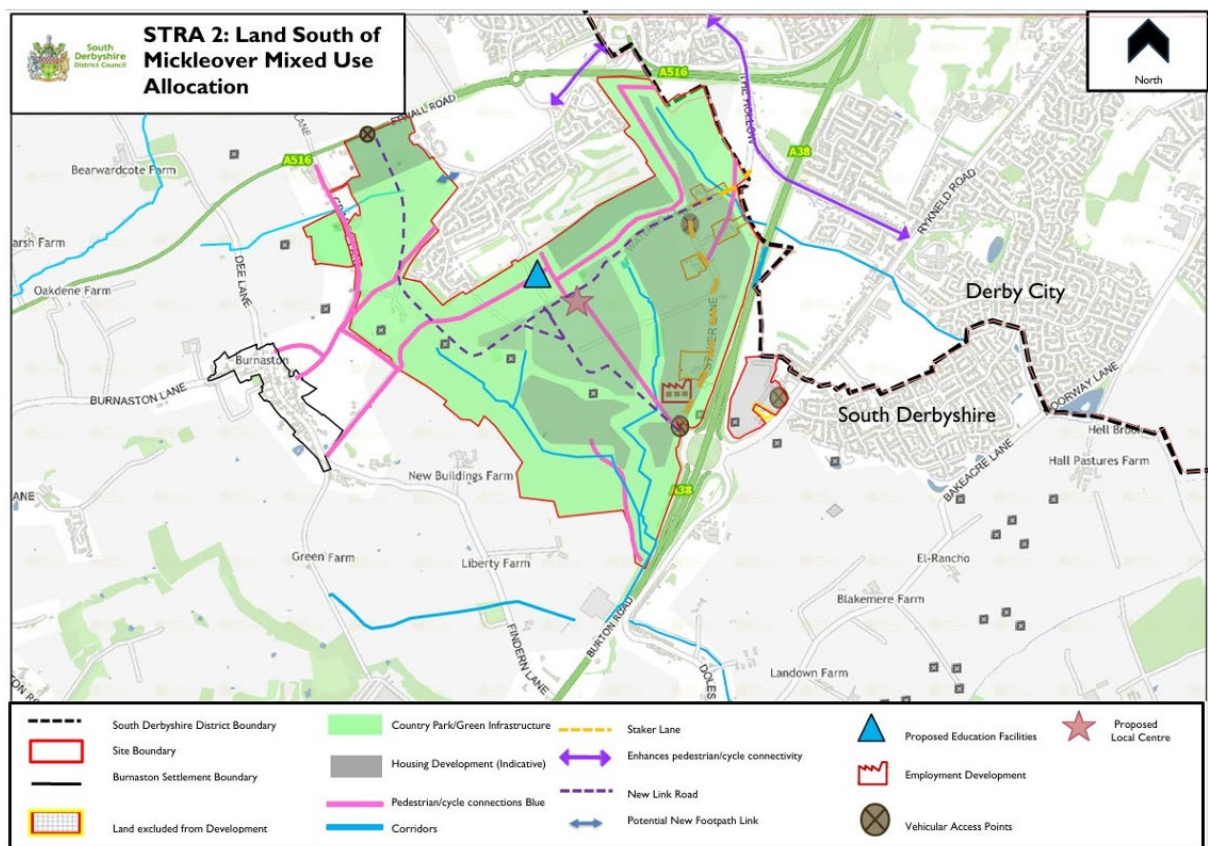


Figure 3: Land south of Mickleover draft masterplan area

Technical Summary

- 3.51 A range of technical work and site investigations has already been undertaken to inform the allocation and development of both Infinity Garden Village (STRA1) and Land South of Mickleover (STRA2). This material forms part of the evidence base supporting the Local Plan Part 1 Review.
- 3.52 The key sources of technical evidence include:
- the Local Plan Part 1 Review evidence base, including studies relating to employment and the economy, housing, design, infrastructure and transport, climate change, environment and flood risk, heritage and sustainability;
 - infrastructure planning and delivery evidence, including the Infrastructure Delivery Plan and supporting inputs from statutory service providers;
 - design led evidence, including Design Review Panel reports (January 2025) and Shaping Streets Design Reviews (July 2025), which provide guidance on layout, placemaking and movement;
 - environmental and technical assessments, including flood risk considerations, Sustainable Drainage Systems (SuDS), biodiversity, and landscape and heritage constraints.
- 3.53 These documents establish a robust baseline understanding of the opportunities and constraints affecting each site, including infrastructure requirements, environmental considerations, and design principles.
- 3.54 The Council in partnership with Homes England and EMCCA have appointed Mace to build upon this existing evidence base, with further technical work undertaken as necessary to support the preparation of DFDs and subsequent planning applications.

Future Location for Growth (FLG1).

- 3.55 The delivery of the Future Location for Growth is partly reliant on work in Amber Valley where the majority of the wider site is located. Delivery uncertainty was identified within Amber Valley; however, additional road frontage delivered within South Derbyshire is expected to assist with the delivery of the wider site. It is considered that delivery can commence from the south which would result in delivery within south Derbyshire in advance of Amber Valley. Irrespective of this, SDDC have included delivery projections at the very end of the plan period with development to commence in 2037 to provide adequate time to resolve any delivery issues.

4. Summary of Strategy and Selected sites to deliver it.

- 4.1 The Council has prepared a Local Plan Strategy that meets SDDC need in full based on the 2023 NPPF and both subsequent versions in 2024 and 2026, with the Standard method housing need figures fluctuating between 507 dwellings per annum (the NPPF against which the Local Plan is to be assessed) 592 and

595 now. With a housing requirement figure of 763 dwellings per annum, the SDDC Standard Method housing need is substantially exceeded.

- 4.2 The main driver for this excess of housing provision is to assist in meeting unmet housing need in Derby. This is consistent with the difficulties in Derby in securing more than 12,500 homes within its administrative area, and SDDC has progressed in lockstep with both Derby City Council and Amber Valley Borough Council in preparing a Local Plan that makes the largest contribution to addressing unmet need from Derby.
- 4.3 The manner in which this is done is primarily with two large housing led strategic allocations on the edge of Derby which comprises sustainable development (SA), is deliverable, (IDP and PWV), and has the best prospect of securing the highest quality of development (Design Review) and (DFD Mace).
- 4.4 The Council has not been dismissive of legitimate concerns from the development industry that in the absence of smaller sites more evenly distributed around the District, there is a risk of housing delivery falling behind that needed. The housing delivery topic paper contains more detail including significant availability of sites distributed around the District. In summary the excess housing provision of 5,163 homes in the Local Plan part 1 Review is primarily to address the unmet housing need arising from Derby with additional provision of affordable housing, and on the two Strategic Sites at STRA1 and STRA2, this is primarily to address affordable housing needs arising from Derby. The Housing trajectory in this Local Plan part 1 Review indicates a small exceedance of 194 homes (which is reduced to 144 with the removal of one existing allocation at Stenson Fields) of the minimum housing requirements set out in the Local Plan. The latest [Housing Position Paper](#) (April 2026) set out a number of steps the Council continues to take to secure delivery of housing and part of this is an acknowledgement that additional sites will be needed in the Local Plan Part 2. Shortly after the submission of this Local Plan a report will be taken to the Council's Environmental and Development Services Committee on 24 September seeking approval to publish the Local Plan Part 2. The allocated sites within this Local Plan Part 2, will provide additional sites to provide additional flexibility in regard to site delivery (Policy S1i) and assist in meeting a five year housing land supply, and will also provide the necessary buffer to ensure if delivery is slower than anticipated on the large strategic sites, there is a range of size of sites and geographical location to give the best prospect of securing annual completions of a minimum of 763 homes.
- 4.5 The government consulted on removing funding from the A38 upgrade very late in the Local Plan process. SDDC and other LPA partners contributed to the EMCCA response that was submitted on 14 September 2026. The Council has considered the implications of this and there is no option available to SDDC that would secure addressing cross boundary housing need in a sustainable

manner in a more dispersed way ([Sustainability Appraisal Regulation 19 Addendum \(May 2026\)](#)). The Council considers that to significantly reduce the Local Plan housing requirement at such a late stage would be bad planning, would result in planning by appeal, and delays in securing much needed housing including affordable housing in sustainable locations.

5. Conclusion

- 5.1 The Local Plan strategy has been prepared in close and ongoing cooperation with all HMA local authority partners, Infrastructure providers and the site promoters of the respective sites,
- 5.2 There are no outstanding issues with Local Plan Authority neighbours and the February 2026 SoCG is in the process of being updated to accommodate the approach towards the potential formation of a new Council as a result of Local Government reorganisation. There are no issues of principle with any statutory consultee, and although there are concerns from the development industry that there are risks to delivery as a result of relying on large strategic sites, the Council's approach to address this is in its Local Plan Part 2 review which will be subject to its Regulation 19 publicity period well in advance of any Local Plan Part 1 examination hearing sessions.
- 5.3 The Local Plan Strategy secures housing and employment growth in the most sustainable manner when compared to reasonable alternatives, secures the best prospect of matching housing delivery with the infrastructure to support it, and provides a strong basis for making a case for funding of national projects such as the A50 access and link road for STRA1 and the A38 upgrade for STRA2.