Marrons

SOUTH DERBYSHIRE DISTRICT COUNCIL PART 2 LOCAL PLAN REVIEW

ISSUES AND OPTIONS CONSULTATION

REPRESENTATIONS

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Project Name:	South Derbyshire Local Plan Part 2 Review Representations
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[redacted]

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1. INTRODUCTION

1.1 OVERVIEW

1.1.1 Marrons is instructed by Davidsons Developments Limited to prepare these representations to the South Derbyshire District Council Part 2 Local Plan Review. South Derbyshire District Council ("the Council") has started work on updating the adopted Local Plan Part 2, which sets out the non-strategic policies and site allocations used to guide future planning decisions.

1.1.2 The current issues and options consultation (Regulation 18) seeks views on what the new Local Plan should cover and how the district should develop up to 2041. The consultation invites views on the challenges facing the District, and the potential options for addressing them.

1.1.3 Review of the Part 1 Local Plan is ongoing and underwent its Regulation 19 consultation in March/April 2025. As explained by paragraph 1.42 of the Regulation 19 draft of the Part 1 Local Plan Review:

> *"The South Derbyshire District Council Part 1 Review is a* focussed update *to the adopted plan with the purpose of ensuring the district's plan reflects national planning policy* and allocates key strategic sites which will assist with meeting Derby's unmet housing need.*"* [Emphasis Added]

1.1.4 Accordingly, the Part 1 review focuses on options for strategic sites on the edge of Derby, on the assumption that this, and this alone, is the most sustainable way to meet housing needs in the District to 2041.

1.1.5 The Part 1 Plan Review is progressing under the transitional provisions set out within paragraph 234 of the National Planning Policy Framework ("NPPF"), December 2024. Therefore, it will be examined against the provisions of the NPPF, December 2023. However, the potential review of the Part 2 Plan, to which this current consultation relates, will be undertaken against the NPPF 2024. All references to the NPPF below, therefore are references to the 2024 edition of the NPPF unless indicated otherwise.

1.1.6 The NPPF sets out tests of soundness at paragraph 36. These are:

- **Positively prepared** – based on a strategy that seeks to meet objectively assessed needs, including unmet needs from neighbouring authorities where it is reasonable to do so;
- **Justified** – founded on an appropriate strategy that is reasonable, realistic and based on proportionate evidence;

- **Effective** – deliverable over the plan period and based on effective joint working on cross-boundary strategic matters; and

- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the NPPF.

1.1.7 Below we set out responses to selected questions within the consultation document. Where the responses are lengthy, a summary answer has been provided followed by further detail.

2. APPROACH TO THE LOCAL PLAN

"Question 1: Should the Council produce a Local Plan Part 2 Review under the existing planning system, or should a single full Local Plan Review be undertaken under the new system?

Produce a Local Plan 2 Review under the existing system

Produce a single Full Local Plan under the new system

Other"

RESPONSE

Summary:

For the reasons set out below, Council should produce a full local plan.

The remit of the Part Plan 1 Review was expressly limited to meeting Derby's unmet need on the edge of Derby and contains no district-wide spatial strategy for housing whatsoever.

The Council's own clear commitment in the Regulation 19 Part 1 Plan Review confirms that a comprehensive plan review was to follow, not a freestanding Part 2 review.

Because Part 1 sets no pattern, scale or distribution of growth for the wider District outside of the Derby fringe, the local planning authority cannot now use a non-strategic Part 2 bring one forward.

That would reverse the plan-making hierarchy set out in the NPPF and amount to introducing strategic policy through a non-strategic plan. A Part 2 review which would establish a spatial strategy for housing for the rest of the District would therefore be plainly inconsistent with national policy.

Relationship with the Part 1 Plan Review

2.1.1 The review of the Part 1 Local Plan is ongoing. It underwent its Regulation 19 consultation in March and April 2025. Paragraph 1.42 of the Regulation 19 draft explains that:

> *"The South Derbyshire District Council Part 1 Review is a* focused update *to the adopted plan, designed to ensure that the District's plan aligns with national planning policy and* allocates key strategic sites to assist in meeting Derby's unmet housing need.*"* [Emphasis Added]

2.1.2 Accordingly, the Part 1 Plan Review concentrates on options for strategic sites on the edge of Derby, on the assumption that this is the most sustainable way to meet Derby's unmet housing needs to 2041. It therefore proposes several strategic site allocations on the edge of the city.

2.1.3 The Part 1 Plan Review also incorporates Policy REV1: Review of the Local Development Plan, which **confirms that plan-making for a comprehensive South Derbyshire District Local Plan will begin immediately upon adoption of the Part 1 Review**.

2.1.4 Paragraph 1.44 of the Regulation 19 version reiterates this commitment, stating that, on adoption of the Part 1 Review, the process of a comprehensive plan review will commence, bringing together the current Part 1 and Part 2 plans and **considering issues such as retail provision, the future development of Swadlincote, and the planning of service villages and rural areas across the District.**

2.1.5 The approach of undertaking a review to the Part 2 plan rather than a comprehensive plan marks a substantial departure from the approach set out by the Council in the Part 1 Plan Review.

2.1.6 The Part 1 Plan Review is intended as a partial review to address unmet need from the Derby urban area. Policy REV1 of the Part 1 review was intended to "bridge the gap" between a plan that effectively only addresses only a single strategic issue – unmet need from Derby – and a comprehensive plan, which addresses housing need across the District of South Derbyshire.

2.1.7 Given the narrowly defined scope of the Part 1 Plan Review, it did not seek to address housing needs in other parts of the District, nor did it consider any sites or strategies for growth outside the Derby fringe. This was an inevitable consequence of its limited purpose: to address unmet housing need arising solely from Derby. As a result, the Plan contains no strategic housing policies for the remainder of South Derbyshire, neither in terms of overall numbers nor spatial distribution.

2.1.8 It is therefore concerning to us that these fundamental strategic issues, matters which should have been examined transparently and rigorously through the Part 1 Review, might be dealt with instead through the Part 2 Plan, which is non-strategic. This approach fragments the logical sequence of plan-making and creates a situation in which the relationship between the Part 1 and Part 2 reviews is incoherent.

Strategic and Non-Strategic Policies

2.1.9 There is nothing within the Part 1 Plan Review that provides any strategic direction for the rest of the District beyond the Derby fringe. It contains no spatial apportionment to the District's settlements, no district-wide distribution strategy, and no indication that such matters would be deferred to a separate Part 2 plan. In the absence of any strategic framework for the wider District

being set through the Part 1 Plan Review, it is deeply concerning that the Council could now seek to address these strategic issues through a non-strategic plan.

2.1.10 Paragraph 20 of the National Planning Policy Framework states that:

> "Strategic policies should set out an overall strategy for the pattern, scale and design quality of places…and make sufficient provision for: housing (including affordable housing), employment, retail, leisure and other commercial development."

2.1.11 By design, the Part 1 Plan does not set out an "overall strategy" for the District as a whole, but only for the Derby urban fringe in order to address the city's unmet need. Non-strategic policies cannot then be used to "fill in the gaps" to deliver that wider strategy. The National Planning Policy Framework distinguishes clearly between strategic and non-strategic policies and requires that strategic matters be dealt with through the strategic plan. In this case, the strategic plan is the Part 1 Plan Review.

2.1.12 However, because the Part 1 Review contains no strategy for housing growth beyond the proposed allocations on the Derby fringe, the non-strategic Part 2 Plan Review cannot legitimately introduce that missing strategy. To do so would invert the plan-making hierarchy set out in the NPPF, and would, in effect, use a non-strategic plan to retroactively establish strategic spatial policy.

NPPF Transitional Provisions

2.1.13 A further concern arises from the fact that the Council itself acknowledges that the Part 2 Review will be examined under the 2024 NPPF, whereas the Part 1 Review is being examined under the transitional arrangements and therefore against the 2023 NPPF.

2.1.14 This creates a situation in which two halves of what should be, in practice, a single Local Plan strategy will be tested against two different national policy frameworks. On its own, that divergence would already warrant caution. However, when read alongside the Issues and Options document, it appears that the Council is now considering using the non-strategic Part 2 Review to introduce or pre-empt matters that properly belong within the scope of the strategic Part 1 Review.

2.1.15 The approach of reviewing the Part 2 local plan to address gaps in the Part 1 Plan Review would also avoid addressing higher levels of housing need that would arise under the 2024 NPPF/standard method. By introducing strategic policies that do not deliver or respond to the level of objectively assessed housing need indicated by the 2024 standard method, the Part 2 Plan would not be positively prepared.

Conclusion

2.1.16 Overall, we consider that any using of a Part 2 Review to introduce, supplement or compensate for strategic policy would fail the soundness tests because:

- It avoids meeting housing needs (not positively prepared).
- It has not been tested through reasonable alternatives (not justified).
- It creates an internally incoherent strategy split across two Plans (not effective).
- It inverts the statutory hierarchy by introducing strategic matters in a non-strategic plan (not consistent with national policy).

3. HOUSING SUPPLY & NEED

"Question 2: Where should housing needs be met? Please provide site details including projected delivery timescales and the specific need being met."

RESPONSE

Summary:

The Part 2 Plan cannot legitimately determine where housing needs should be met because the Council has not set a district-wide spatial strategy through the Part 1 Review, as required by the NPPF.

The Part 1 Review considered only Derby-fringe options, failed to test reasonable alternatives for towns, service villages or rural settlements, and did not address locally specific housing needs identified in the LHNA.

It also relies heavily on two large SUEs with long lead-in times and unproven delivery assumptions, meaning even minor delays would push completions beyond 2041. The overall supply in the Part 1 Review, at best, matches the minimum requirement, offers no flexibility, and in fact there is a 57-dwelling supply shortfall against the minimum housing requirement.

In order to provide the appropriate flexibility and contingency, a 20% supply buffer is required. While smaller and medium-sized sites across the District's towns and villages could provide quicker and more flexible delivery, any such distribution must follow a coherent, District-wide strategy established through strategic policies.

3.1.1 As per our response to question one, the Part 2 Plan cannot properly answer the question of where housing needs should be met because the Council has not set a district-wide spatial strategy through the Part 1 Review.

3.1.2 The NPPF is clear that decisions about the pattern and distribution of growth are strategic matters that must be established in the strategic plan, not through a non-strategic Part 2 document. In the absence of a district-wide strategy for meeting housing growth outside of the Derby fringe tested against the reasonable alternatives through Sustainability Appraisal, any attempt by the Part 2 Plan to identify where housing needs should be met would be unsound.

3.1.3 However, recognising that the Council has nonetheless asked the question, the following points can be made:

Balanced Growth / Distribution

3.1.4 Part 1 Review did not consider the full spatial pattern of need across South Derbyshire. The Sustainability Appraisal work only evaluated scenarios focused on Derby's unmet need and did not test genuine alternatives involving the District's towns, key service villages, or rural settlements. The Sustainability Appraisal underpinning the Part 1 review confirms that options were "narrowly framed" around Derby's fringes and that no reasonable alternatives were developed for growth beyond the fringe.

3.1.5 The Part 1 Plan review has therefore failed to consider locally-specific settlement-based needs, including the roles and functions of rural communities and market-accessible villages across the District. Evidence from the Council's Local Housing Needs Assessment clearly identifies housing pressures outside of Derby, including acute affordable housing needs, yet these have not been spatially planned for.

3.1.6 The Derby-centric focus of the Part 1 Plan Review has failed to meet housing need within the rest of the District which has not been properly understood or planned for. This clearly indicates that further housing should be directed to the District's towns and villages.

Flexibility & Contingency

3.1.7 The Part 1 Plan Review relies heavily on two very large Sustainable Urban Extensions on the edge of Derby. These emerging allocations have inherently long lead-in times, and we strongly disagree with the statement on page 10 of the issues and options consultation document that the delivery profiles for these sites have been informed by "realistic assessments."

3.1.8 No such evidence was provided at any stage of the Part 1 Plan Review process and are not provided now. In any event, even minor delays to the delivery of these SUEs would push a substantial proportion of their anticipated completions beyond 2041, with the result that the Plan's minimum housing requirement could not be delivered within the plan period.

3.1.9 As set out in our representations to the Part 1 Plan Review, the components of supply identified within the Part 1 Plan Review equate to exactly the minimum housing requirement and no allowance for flexibility or contingency has been made to account for delayed delivery. It has now emerged, as set out in page 8 of the Issues and Options consultation document, that there is in fact a shortfall of 57 dwellings against the **minimum housing requirement** within the Part 1 Plan Review.

3.1.10 Whilst we agree with the statement on page 8 of the consultation document that the plan review should allocate enough sites to ensure flexibility in the supply, that opportunity has been lost because the strategic policies of the Part 1 Plan Review focus on meeting Derby's unmet need on the edge of Derby and do not consider the amount or distribution of housing need elsewhere within the District or the need to provide a supply buffer for flexibility and contingency. A non-

strategic Part 2 plan cannot now rectify that deficiency for the reasons explained in our response to Question 1.

3.1.11 There is no clarity within the Issues and Options consultation document as to what is meant by "housing needs" in this context, nor whether it refers to the shortfall of 57 dwellings identified on page 8 or to some other figure.

3.1.12 In any case, the 57-dwelling figure simply represents the additional supply required to achieve parity with the minimum housing requirement; it does not reflect the true extent of the shortfall if the Council's desire is to provide contingency and flexibility to ensure an effective strategy for the Plan period. As set out in our representations to the Part 1 Review, the overall supply more or less sits at the minimum requirement, meaning that substantial additional allocations are required to provide the necessary flexibility. We recommended a 20% buffer to ensure a resilient and deliverable supply.

3.1.13 Smaller and medium-sized sites at the fringes of the District's rural settlements and towns are particularly well-placed to provide this contingency. Consistent with paragraph 73 of the NPPF, such sites typically have shorter lead-in times and are built out more quickly, making them critical to maintaining delivery across the plan period. However, any apportionment of growth must still form part of a coherent district-wide spatial strategy, tested through a legally compliant Sustainability Appraisal that considers all reasonable alternatives. This can only be undertaken through a coherent review of the District's strategic policies, not through making non-strategic allocations in isolation.

Land at Jawbone Lane, Melbourne

3.1.14 Notwithstanding the above, should the Council see fit to make additional site allocations through the Part 2 Plan review, we would advocate that Land at Jawbone Lane, Melbourne represents a suitable and sustainable location to accommodate proportionate growth within Melbourne to address district-level housing need.

3.1.15 Davidsons have been actively promoting the Site for several years, including making representations to previous Local Plan consultations, SHELAA submissions, and the submission of a planning application seeking outline permission for 66 dwellings. The reference for this application, which is under consideration by SDDC at the time of writing, is DMPA/2023/1662. The application proposes 66 dwellings, in addition to provision of land and facilities for an extension to the village cemetery, public open space, and associated infrastructure.

3.1.16 The application has been under consideration for some time and is progressing well, having gained the support of the Parish Council following some recent amendments to the scheme. The application clearly proposes a raft of benefits, including the provision of cemetery land which meets a unique need identified by the local community.

3.1.17 In terms of the Site itself, it extends to approximately 4.21 hectares of agricultural land on the North East side of Melbourne. The site comprises two agricultural fields, one north of Jawbone Lane which rises to the North West and one south of Jawbone Lane which falls to the South East. Landscape features, for the most part, are confined to hedgerows, interspersed with trees along the existing field boundaries on the site edges. The agricultural field north of Jawbone Lane continues to the North West and the land south of Jawbone Lane is bound by Station Road on its southern boundary. Vehicular access is to be taken directly from Jawbone Lane to both field parcels. The residential development associated with Stafford Close is located to the west of the site. Existing residential development associated with Jawbone Lane borders the northern parcels northern boundary, while the residential development along Station Road borders the southern parcels eastern boundary.

3.1.18 Melbourne plays an important role in the District as a Key Service Village, second tier of the Council's settlement hierarchy, which provides a range of retailing provision and other services, including a convenience store and a Post Office; Melbourne Infant and Junior Schools are located approximately 650m from the site entrance (an 8 minute walk); and a bus stop 300m from the site which offers an hourly connection to the East Midlands Gateway, Swadlincote and Burton via the 9 bus service.

3.1.19 As mentioned above, engagement in relation to this Site has long pre-dated the planning application. This has included assessment under the SHELAA, where the Site was considered to be available, achievable and suitable for development. Under SHELAA methodology the Site could yield as many as 103 dwellings (though noted that BNG requirements could reduce this), though the planning application utilised a lower density to provide a better quality development, more appropriate for the village location.

3.1.20 To consider the SHELAA in greater depth, the Site scored mainly green and amber ratings in the RAG rated assessment.

3.1.21 Of note are the green ratings for having no impact on protected sites; not being within the Green Belt; being close to primary education provision; benefitting from good public transport links and utilities; not being in a mineral safeguarding area; having no impact on Air Quality Monitoring Areas; not being at risk from flooding; having low landscape constraints; and having a mainly flat topography. Davidsons would agree with these assessments, noting in particular that close links have been established with the local Infant School who would support the development of the Site as they are concerned about falling numbers.

3.1.22 In respect of trees and hedgerows an amber rating has been given based on the assumption that some hedgerow would be lost for creation of safe site access, and in consideration of the Site being surrounded by hedgerow. However, as demonstrated within the application's supporting information, the Site is capable of delivering a 14% net gain in hedgerow units which goes above the basic requirement. This is in addition to a 10% gain in habitat units.

3.1.23 An amber rating was scored in respect of retail provision due to being within 800m of a convenience store. This is the case, however that does not tell the full picture, in that the Site is an 11 minute walk from a Spar store and 13 minutes' walk from a Sainsburys Local. These facilities provide much in the way of day to day needs and are easily accessible on foot or by bicycle.

3.1.24 While the Site received a red rating for access to health facilities, it should be noted that the Melbourne Surgery is just 1.1km from the Site which equates to a 14minute walk, and in the context of a rural district is considered to be a good provision.

3.1.25 In respect of walking routes into the village centre, the Site has been rated amber, which does not accurately represent its connectivity. These amenities can be accessed via sustainable means of travel such as by foot or cycle as the proposed development would be supported by footway provision which would tie into existing provision along Jawbone Lane providing a fast, convenient and direct route into the settlement.

3.1.26 It is accepted that the Site is greenfield. Any allocation in the village, which will be necessary in consideration of its status as a Key Service Village, will require a small loss of greenfield land. Given that the Site is located on the edge of t he settlement and is well served by public transport and local services, there may be potential for densities to be maximised in line with government policy and this could therefore help reduce the need for greater greenfield losses elsewhere in the District including in locations with higher quality agricultural land.

3.1.27 Overall the Site is considered to be a sustainable location for development, and is achievable, available and deliverable in the short term, which could provide a boost in housing land supply to aid in establishing a housing land supply position upon adoption of a new Local Plan.

Question 3: "Are there any other mechanisms that the plan should consider to securing housing delivery in addition to allocating specific sites (e.g. identifying indicative broad locations/areas for future growth adjacent to existing settlements, extending settlement boundaries, supporting certain changes of use)? Yes/No Please provide a reason for your answer."

3.1.28 The Part 2 Plan cannot properly consider mechanisms for securing housing delivery such as identifying broad locations, extending settlement boundaries, or supporting other forms of growth because all of these mechanisms are strategic in nature. As set out in our earlier responses, the Council has not established a district-wide spatial strategy through the Part 1 Review, which only addressed Derby's unmet need and did not determine how housing growth should be distributed across South Derbyshire. Strategic decisions about the pattern, scale and distribution of development must be set in the strategic plan and tested through Sustainability Appraisal against reasonable alternatives, not introduced through a non-strategic Part 2 document.

3.1.29 Without a district-wide strategy, any additional mechanisms to secure delivery would be devoid of strategic context and the appropriate sustainability appraisal testing, risk predetermining spatial outcomes in isolation, and would therefore be unsound. This includes identifying broad growth areas, altering settlement boundaries, or facilitating changes of use that imply a settlement-level or District-wide distribution of housing. These choices can only be made through a coherent review of strategic policies.

Question 4: "Are there any other issues that the Council should consider when ensuring the timely delivery of the right homes in the right places (e.g. policy criteria for looked after children, re-allocating implemented employment allocations)? Yes/No Please provide reasons for your answer."

3.1.30 In responding to this question, it is important to recognise that while the Part 2 Local Plan cannot set new strategic policies or determine the distribution of housing where there is no corresponding strategic policy, there are nevertheless certain non-strategic mechanisms that could legitimately support the timely delivery of appropriate homes.

3.1.31 One such mechanism would be the inclusion of a policy similar to that used in the Settlements and Countryside Local Plan (Part 2) for Daventry District (Policies RA1 and RA2), which allow development outside settlement confines where it is clearly demonstrated that the proposal meets an identified local need that cannot reasonably be met within the defined settlement boundary.

3.1.32 In the former Daventry District, this is supported through evidence in the form of a Housing Needs Survey or a Housing Needs Assessment, ensuring that the exception operates only where there is a robust and up-to-date demonstration of need. A comparable approach in South

Derbyshire would enable the most sustainable rural settlements to address genuine, evidenced local housing requirements in a proportionate manner, while maintaining overall control over the scale and form of development.

3.1.33 Although the Part 2 Local Plan will ultimately be examined under the 2024 NPPF, it is also relevant that the draft 2025 NPPF, currently subject to consultation, signals an emerging direction of travel that supports development outside settlements where it would address an evidenced unmet need.

3.1.34 Policy S5 of the draft NPPF 2025 proposes that certain forms of development should be approved unless the adverse impacts would significantly and demonstrably outweigh the benefits, including proposals that help meet unmet housing need. While the emerging Framework is not yet in force, this direction of travel reinforces the value of a local needs-based policy that allows sustainable rural settlements to grow in response to evidenced circumstances rather than being constrained solely by settlement boundaries which may not adequately reflect the scale or nature of housing need.

4. ACCELERATING HOUSING DELIVERY

Question 7: "What could the Council do to speed up the delivery on strategic allocations? Please provide details?"

4.1.1 In response to this question, it is important to state at the outset that the premise is fundamentally flawed. The Council cannot "speed up" the delivery of strategic allocations in any meaningful sense. Delivery timetables for large, complex strategic sites are driven by factors outside the Council's control, including land assembly, major infrastructure requirements, market absorption rates, resourcing and the willingness and capacity of developers to bring schemes forward.

4.1.2 What the Council *can* do is ensure that its strategic plan makes available a sufficient range and choice of sites, in the right places and at the right time, to provide the flexibility necessary to maintain delivery across the plan period to meet objectively assessed needs. This requires a proper contingency allowance and a robust understanding of deliverability, neither of which is adequately reflected in the Part 1 Plan Review.

4.1.3 As we explained in our earlier responses, the Part 1 Plan Review relies heavily on a small number of large, complex Sustainable Urban Extensions on the edge of Derby. These sites have inherently long lead-in times, significant infrastructure requirements and, as we set out in our representations to the Part 1 Review, considerable uncertainties regarding their delivery trajectories. Those concerns have never been satisfactorily addressed. Indeed, the Issues and Options document for the Part 2 Review now reveals that the Part 1 Review contains a shortfall even against the minimum housing requirement, confirming that the absence of any contingency allowance was a serious and consequential omission and one that cannot now be rectified through the Part 2 Plan.

4.1.4 If South Derbyshire wishes to improve the timeliness and certainty of delivery on its strategic allocations, it must ensure that the strategic plan sets out a clear spatial strategy supported by a sufficient range of deliverable and developable sites to maintain momentum across the plan period. That includes providing an appropriate level of contingency and responding to the full objectively assessed housing need through a distribution strategy that is justified and deliverable. The Part 1 Review does not do this, and the Part 2 Review cannot remedy it.

Question 7: "Should the Council allocate Land South of Mackworth for development within the plan period? Yes/No Please provide a reason for your answer."

4.1.5 In response to the question of whether Land South of Mackworth should be allocated for development within the plan period, we do not consider that the Council has provided sufficient evidence to justify such an allocation at this stage. The Part 1 Local Plan Review identified this land only as a potential area for up to 250 homes **beyond** the plan period to 2041. The Issues and

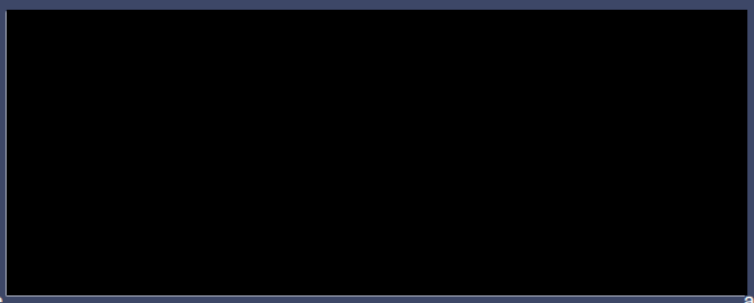
Options document for the Part 2 Review now implies, without any accompanying explanation or evidence, that these homes could instead come forward within the plan period. No information or context is provided about what has changed, why the delivery assumptions have been brought forward, or whether any of the previously identified constraints have been resolved.

4.1.6 The site at land South of Mackworth would be delivered in conjunction with land off Brun Lane that Amber Valley Borough Council has identified for future residential development in their Local Plan. In viewing the site as such, it should be noted that the Brun Lane site was initially proposed within Amber Valley's draft Local Plan as a strategic allocation of 2,000 homes. However, through the course of the Plan's examination it was made clear that the landowner is presently unwilling to release all of the land for development. This meant that the site could not be relied upon and was removed as an allocation and instead identified as an "Area for Future Housing Growth".

4.1.7 Given that the site forms part of a wider strategic development within Amber Valley, there is a real possibility that infrastructure dependencies, cross-boundary coordination, phasing requirements and long lead-in times will restrict its timely delivery. These are precisely the kinds of constraints that prevented the site being considered deliverable within the plan period during the Part 1 Review. Nothing in the Part 2 consultation demonstrates that these constraints have been reassessed, addressed or evidenced, and we therefore have no confidence that the site could contribute reliably to housing supply within the timescales suggested.

4.1.8 In addition, the allocation of this Site has not been subject to any robust Sustainability Appraisal testing against reasonable alternatives, either around Derby or across the wider district. The Part 1 SA (the Council's own admission) only assessed narrowly framed Derby-fringe options and did not consider reasonable alternatives in towns, service villages or rural settlements. The Part 2 Review provides no updated SA, no comparative assessment and no districtwide evaluation of options. Allocating Land South of Mackworth without this assessment would be unsound.

4.1.9 Even if the site were deliverable within the plan period, the supply of 250 dwellings would be wholly inadequate to meet the flexibility and contingency required for an effective housing strategy. While it would address the recently identified shortfall of 57 dwellings and provide a small buffer, it would still fall significantly short of providing the headroom necessary to maintain delivery and respond to delay, particularly given the heavy reliance on large and complex strategic allocations in the Part 1 Review. A 250-unit site does not provide the level of contingency required when the strategic plan itself contains no districtwide spatial strategy and no broader distribution of supply across different settlements.



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