



**South
Derbyshire**
District Council
Community &
Planning Services



INVESTOR IN PEOPLE

Local Development Framework

SA

Sustainability Appraisal Addendum

Local Plan, Part 1

Non-Technical Summary

August 2015



South Derbyshire Changing for the better

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1 The South Derbyshire Part 1 Local Plan

- 1.2 The Council has been preparing the Part 1 Local Plan, which when adopted, will establish a long-term strategy (to 2028) to manage development, provide services, deliver infrastructure and create sustainable communities. It comprises the spatial vision and objectives and a spatial strategy (setting out how much growth is required and where strategic growth will be located).
- 1.3 The Part 1 Local Plan was submitted to the Secretary of State on the 8 August 2014. The independent examination on the plan commenced on Tuesday the 25th August and closed on Friday the 5th December 2014 sitting for six days over this period. This included a joint session for housing with Amber Valley Borough Council and Derby City Council. The purpose of the Examination is to consider whether all the legal and policy requirements of preparing a Local Plan have been observed.
- 1.4 Following the close of the examination the Inspectors for South Derbyshire and Amber Valley requested further information regarding how Derby City's unmet need has been apportioned between Amber Valley and South Derbyshire.

2 What is Sustainability Appraisal?

- 2.1 The South Derbyshire Part 1 Local Plan is being developed alongside a process of sustainability appraisal (SA), a legally required process that ensures that the likely significant effects of an emerging draft plan (and reasonable alternatives) are systematically considered and communicated. It is a requirement that the SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004. In addition national planning guidance requires that 'the sustainability appraisal should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives. It should provide conclusions on the overall sustainability of the different alternatives, including those selected as the preferred approach in the Local Plan.'¹

The Scope of the Appraisal

- 2.2 The joint Authorities consulted the consultation bodies on the scope and methodology of this appraisal for the statutory five weeks from the 6th July 2015.
- 2.3 In order to ensure consistency the Authorities have undertaken this joint appraisal based on the scope of the previously submitted SA work and existing evidence. The findings of each separate appraisal undertaken for each area using the respective frameworks have been brought together to provide an overall assessment in each report of the options for meeting Derby's unmet need across the HMA.

3 The Sustainability Appraisal Report Addendum

- 3.1 The District Council is producing this addendum to its Sustainability Appraisal published alongside the Local Plan Part 1 submitted in August 2014 in response to the Inspectors' concerns in respect of the City's unmet need and its apportionment. This document is a **non-technical summary** of the addendum report, it should be read alongside the main

¹ Paragraph: 018 Reference ID: 11-018-20140306, National Planning Policy Guidance. Revision date 06 03 2014

report as well as the Local Plan and Sustainability Appraisal submitted in August 2014. However, on its own provides a brief explanation of the options identified for meeting the City's unmet housing need and the potential effects of implementing those options.

4 Approach to Sustainability Appraisal

4.1 This Sustainability Appraisal has been undertaken by the three Authorities that Sit within the Derby Housing Market Area. These are Amber Valley Borough Council, Derby City Council and South Derbyshire District. The appraisal has been undertaken in 3 stages as follows:

- **Stage 1: Assessing Derby City's housing capacity.** This stage of work was led by the City Council, with input from Amber Valley and South Derbyshire. This work considered the capacity of Derby City to accommodate its own assessed housing need and the extent of unmet need
- **Stage 2: Distributing unmet need.** This stage of work was led by Amber Valley and South Derbyshire and identified options for apportioning and distributing Derby's unmet needs outside of the City
- **Stage 3: Sustainability appraisal.** Amber Valley and South Derbyshire have appraised the implications of each option in 'their area' using their respective SA Frameworks The findings of each separate appraisal are then brought together to present an overall joint assessment of the options

4.2 Amber Valley is carrying out a separate consultation on the findings of this joint appraisal work. Further information is available on Amber Valley Borough Council's at:

www.ambervalley.gov.uk/environment-and-planning/planning/community-planning/community-planning-latest-news.aspx.

4.3 Derby City started their Regulation 19 consultation on the 26th August 2015 which includes their SA/SEA work and consideration of this joint work also. Further information on this this can be found on the Council's website at: www.derby.gov.uk/part-1-consult.

5 Unmet Need and Options for Distributing It

5.1 The City Council has reviewed capacity within the City, taking account of a range of environmental and social constraints including greenbelt and green wedges, open space, wildlife sites, areas of flood risk, the world heritage site and its buffer, as well as land set aside for other uses such as schools or employment uses. It has also considered a number of options for increasing its housing target including through allocating additional sites, assuming greater delivery from strategic sites, assuming greater supply from non-strategic housing sites, assuming greater windfalls (sites not known about) and assuming fewer losses.

5.2 Following the review it has been reaffirmed by the City and agreed by Amber Valley Borough Council and South Derbyshire District Council that the capacity for Derby City is 'capped' at 11,000 dwellings for the plan period. The overall housing need for the City is 16,388 dwellings which leaves an unmet need of 5,388 dwellings to be found in the wider housing market area (i.e. to be shared between Amber Valley Borough Council and South Derbyshire District Council).

5.3 The Derby Housing Market Area Authorities have jointly identified a range of options for apportioning this unmet need between the two Authorities. In summary the options considered are:

Option 1 – Maximise Growth in South Derbyshire

5.4 *Target all growth to meet the City's unmet needs to the edge of the City in South Derbyshire*
This option would require South Derbyshire to increase the District's housing requirement to around 14,400 dwellings

Option 2 – Maximise Growth in Amber Valley

5.5 *Target all growth to meet the City's unmet needs to Amber Valley* This option would see Amber Valley's target increase around 12,700 dwellings.

Option 3 – Split based on the proportion of growth

5.6 This option would see a slighter higher apportionment of unmet need towards South Derbyshire. Growth of 17,000 dwellings is needed in Amber Valley and South Derbyshire. South Derbyshire will accommodate 56% (9,605) of this total and Amber Valley will be required to accommodate 44% (7,395). Splitting unmet need according to this apportionment would increase South Derbyshire's housing target to around 12,600 dwellings and Amber Valley's target to around 9,800 dwellings.

Option 4 – Split based on Commuting Flows

5.7 This option is based on commuting flows out of the two Authorities. Recent data indicates that 5,450 people from Amber Valley and 12,750 people from South Derbyshire commuted out of Borough/District to work in Derby City. Applying a split of 70% to South Derbyshire (reflecting the proportion of commuters from both areas) indicates a housing target of just under 14,400 homes in South Derbyshire and just over 9,000 in Amber Valley

Options to be ruled out early on without detailed appraisals

5.8 In addition to the options considered through the appraisal the Authorities have determined not to undertake detailed appraisals on a number of options which it considers to be 'unreasonable':

- **Business as Usual.** Reduced levels of delivery in the two Authorities which is insufficient to meet assessed need before even considering Derby's unmet need. It would also not conform with NPPF requirements to significantly boost the supply of housing delivery.
- **Meet OAN outside of the HMA.** There are likely to be sufficient sites to fully meet the HMA's need across the three Authorities if not where the need arises. Therefore there is no justification for considering any growth outside of the HMA area.

6 What Did Our Appraisal Tell Us?

6.1 **Option 1: Maximising Growth in South Derbyshire** would offer opportunity to deliver growth close to the Derby Urban Area (DUA) close to where housing need arises and in locations well served by existing and proposed infrastructure, services and employment and could increase housing choice for residents in South Derbyshire.

6.2 Concentrated growth in the DUA could have a potential significant effect on the City's local infrastructure. Whilst to some extent it is possible to address any adverse effects associated with growth there is a limit to what can be sustainably accommodated before mitigation is no longer sufficient or deliverable. Unconstrained growth around the DUA would in the view of the Authorities, be likely to lead to a situation where the effects outweigh the benefits. Moreover, maximising growth in South Derbyshire would create a housing requirement which is unlikely to be deliverable and could undermine the delivery of a sustainable pattern

of housing growth at the HMA level. Focussing growth on South Derbyshire could also have a range of adverse socio economic effects on Amber Valley such as limiting housing choice and affordability. It has been concluded by the Derby Housing Market Area Authorities that this option is therefore not the preferred approach to meeting the City's unmet need.

- 6.3 **Option 2: Maximising Growth in Amber Valley** could provide opportunity to boost housing delivery in Amber Valley which may have beneficial effects in respect of delivering new infrastructure, regenerating areas of the Borough, increasing housing choice and potentially supporting inward investment. However there are significant constraints to development in much of the Borough including heritage, landscape, green belt and flood risk. High levels of housing development could lead to unacceptable environmental effects.
- 6.4 A reduction in housing provision around the DUA in South Derbyshire could reduce access to labour for existing and future employers and would reduce local housing choice compared to higher growth options. It could also dislocate growth away from the City into AVBC creating potentially unsustainable travel patterns and could have implications for accessibility. In addition a reduction in housing growth in the DUA in South Derbyshire could affect the delivery of a number of cross boundary sites within South Derbyshire and Derby City. The loss of the South Derbyshire element of these sites could affect the wider sustainability of the Derby City sites. It has been concluded by the Derby Housing Market Area Authorities that this option is therefore not the preferred approach to meeting the City's unmet need.
- 6.5 **Option 3 – Split based on the proportion of growth.** Splitting growth with a slightly higher requirement for South Derbyshire would reflect the less constrained nature of sites in the DUA in South Derbyshire, compared to sites in Amber Valley. It would facilitate significant growth in the DUA which would meet housing need arising in both Derby and South Derbyshire which are well related to and accessible to communities living in the City and the northern part of the District but makes some provision for AVBC which could help support its growth and regeneration priorities, but at a level that can be accommodated without significant negative effects on cultural heritage and the natural environment constraints.
- 6.6 At this level of growth both Authorities consider that the housing target (comprising of OAHN and the suggested unmet need apportionment) is deliverable over the Plan period. However, even at this level it is a challenge for both councils to demonstrate a 5 year supply required by national planning guidance but this option gives the greatest prospect of each council demonstrating a robust supply. The Authorities also consider that some dispersal of development away from the urban fringe on the southern edge of the City could provide greater housing choice, and whilst it is self-evident that need is best met where it arises, the concentration of new developments to a narrow collar of land around the south and west of Derby could restrict housing choice at the HMA level. Accepting that this strategy for apportionment may not be 'as sustainable' in some respects as the delivery of the sites in urban areas well served by existing infrastructure given the nature of the site options, the Authorities consider that this option provides the best fit and importantly is deliverable. **It has been concluded by the Derby Housing Market Area Authorities that this option is the preferred approach to distributing the City's unmet need.**
- 6.7 **Option 4 – Split based on Commuting Flows.** This option would set growth at around 13,400 homes over the Plan period and would deliver significant growth adjacent to the DUA close to where housing need arises and in locations well served by existing and proposed infrastructure, public transport services and employment land. However there are a number of significant constraints around the City that will limit the opportunities to accommodate growth.

- 6.8 A concentration of growth into SDDC would have a potentially significant effect on local infrastructure. The probable effect on the City's transport network and the increasing pressure being generated on Derby's schools and health infrastructure are other important factors that constrain what it is possible to deliver sustainable housing development within the DUA. To an extent, the effects identified through our assessment are being addressed through the provision of new infrastructure. However, there is a limit to what is possible to deliver before the mitigation proposed is no longer sufficient or deliverable. Focusing large scale growth around the City would not be appropriate and would be likely to lead to a situation where the effects outweigh the benefits.
- 6.9 At this level, taking account of shortfall in provision since 2011 and having regard to the need to provide an appropriate buffer as set out national planning guidance South Derbyshire District Council would need to be able to deliver a minimum 1,327 homes per annum for the next five years to have a five year supply. This level of growth has not been achieved at any point since monitoring has been undertaken. Whilst the requirement in the NPPF is to boost significantly the housing supply delivery of this many homes is not considered feasible or realistic particularly when sites in South Derbyshire will be located close to large scale developments in the City.
- 6.10 Apportioning lower levels of growth to Amber Valley could reduce housing delivery in other parts of the Borough which in turn could limit housing choice and potentially affordability in areas which received lower levels of growth, such as Alfreton or Ripley. It is considered by the Council that development in the four main urban areas is needed to maintain their roles as key centres for the community and to deliver the economic and other objectives of the Core Strategy and therefore reducing the contribution that AVBC would provide to meet Derby's unmet need, compared to Option 3 would disadvantage the Borough. It has been concluded by the Derby Housing Market Area Authorities that this option is therefore not the preferred approach to meeting the City's unmet need.

7 Mitigation

- 7.1 A number of draft policies are set out in the submitted Local Plan to control the likely effects of additional development. These policies cover issues such as Built Design, Biodiversity, Cultural Heritage, Landscape and Townscape, Amenity, Flood Risk, Sustainable Drainage, Green Infrastructure, Sustainable Transport and infrastructure Delivery. Together these policies will help to mitigate the likely effects of new development to meet the city's unmet needs. A copy of the submitted Part 1 Local Plan is available to view on the Council's website at: http://www.south-derbys.gov.uk/Images/List%20of%20submission%20documents_tcm21-249887.pdf [C1]
- 7.2 No additional mitigation has been identified.

8 Next Steps

- 8.1 **The Sustainability Appraisal Addendum is out for consultation between Friday 28th August 2015 to Monday 12th October 2015** and is available to view, during normal opening hours at the Councils Offices: South Derbyshire District Council, Civic Offices, Civic Way, Swadlincote, DE11 0AH or via the District Council's website at www.south-derbys.gov.uk/saupdate
- 8.2 Comments arising through this consultation will be made available on the Local Plan section of the Council's website as soon practicable after the close of the consultation.
- 8.3 All comments on this Addendum should be made, in writing, and addressed to:

Nicola Sworowski
Planning Policy Manager
South Derbyshire District Council
Civic Offices
Civic Way
Swadlincote
Derbyshire
DE11 0AH

Or submitted via email to planning.policy@south-derbys.gov.uk

- 8.4 **Please ensure comments are received by 5:00pm Monday 12th October 2015**
- 8.5 Subsequent to the current consultation the Council will provide the responses received during this consultation to the Inspectors (Ms Kingaby and Mr Foster). The Information included in this addendum report and any consultation responses will then be considered through the Examination process.

9 Monitoring

- 9.1 At the time of Adoption a 'monitoring framework' will be published that sets out *'the measures decided concerning monitoring'*. At the current stage there is a need to present *'a description of the measures envisaged concerning monitoring'* only. This is included in the Environmental Report submitted in August 2014. This is available to view www.south-derbys.gov.uk/planning_and_building_control/planning_policy/local_plan_examination

South Derbyshire District Council
Community and Planning Services

Local Development Framework

**Sustainability Appraisal Addendum
Local Plan Part 1**

Non-Technical Summary
August 2015





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Local Plan, Part 1

**Addendum
Report**

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1 SECTION 1 BACKGROUND

1.1 Introduction

- 1.1.1 South Derbyshire District Council is currently preparing Part 1 of its Local Plan. This Plan will establish a long-term strategy (to 2028) to manage development, provide services, deliver infrastructure and create sustainable communities. It comprises a spatial vision and objectives, a spatial strategy (setting out how much growth is required and where strategic growth will be located), core policies to inform the detailed design of new development and information on the policies in the adopted local plan this document will supersede. Its effectiveness will be monitored through the Council's Monitoring Report. Further non-strategic housing sites and development management policies will be included in a subsequent Part 2 Local Plan.
- 1.1.2 The Part 1 Local Plan [C1]¹ was submitted to the Secretary of State on the 8 August 2014. The independent examination on the plan commenced on Tuesday the 25th August and closed on Friday the 5th December 2014 sitting for six days over this period. This included a joint session for housing with Amber Valley Borough Council and Derby City Council. The purpose of the Examination is to determine whether all the legal and policy requirements of preparing a Local Plan have been observed.
- 1.1.3 Following the close of the examination the inspectors for South Derbyshire and Amber Valley requested further information regarding how Derby City's unmet need has been apportioned between Amber Valley and South Derbyshire. This request was received via a letter from the inspectors dated December 10th 2014 [SDEX44]² that stated:

“Our outstanding concern relates to the matter of apportioning the HMA's requirement between the three Local Authorities. The Authorities have agreed that Derby City's contribution is capacity-capped. The reasoning behind this is apparent, but the apportionment between Amber Valley and South Derbyshire of the remaining housing is more difficult to understand. Whilst all Authorities have indicated their support for the planned distribution, the justification for the agreed numbers is not clear. No evidence has been provided to show whether any alternative distributions were considered formally, or that sustainability appraisal to justify the selected apportionment between the Authorities was undertaken. Ideally, this work would have been carried out at an early stage in plan-making to give a credible and robust starting-point for each Authority's housing numbers. However, in view of the assurance offered by the Authorities that they are prepared to co-operate in meeting the full OAN, we now advise the Councils to re-examine their planned apportionments of OAN and carry out a fresh joint sustainability appraisal of this matter”.

1.2 Background of the Derby Housing Market Area Housing Numbers and Distribution

- 1.2.1 The Regional Spatial Strategy (RSS) for the East Midlands (2009) considered the fact that Derby City was unlikely to be able to meet all of its growth within its own boundaries. Both Amber Valley Borough Council and South Derbyshire District Council had a split target that covered the Principal Urban Area (around the edge of Derby) and then the rest of the respective District/Borough. Out of the RSS requirement for the Derby HMA of 36,600 (2006 – 2026), there was to be 7,000 dwellings on the edge of the City – 6,400 in SDDC and 600 in AVBC together with 14,400 homes to be delivered within the City itself.

¹ http://www.south-derbys.gov.uk/Images/List%20of%20submission%20documents_tcm21-249887.pdf

² http://www.south-derbys.gov.uk/Images/List%20of%20Examination%20documents_tcm21-252168.pdf

- 1.2.2 The Housing Market Area (HMA) Authorities undertook an Issues and Alternative Options³ consultation in 2010 that set out the main alternatives for delivering the required growth as specified in the RSS. Following this, and the subsequent abolition of the RSS, the HMA took a step back from the position they had reached to consider the alternative strategic housing options through the Options for Housing Growth consultation (July 2011)⁴. This consultation was a joint Derby Housing Market Area consultation that considered a range of alternative housing growth options; balanced migration, current building trends, regional plan and government projections. The consultation also started to consider broad locations (including broad proportions) that could bring forward the housing growth.
- 1.2.3 Following this the Housing Requirements Study (2012)⁵ fully considered the housing need across the HMA and concluded that the overall total requirement should be 33,700 dwellings (2008 – 2028) which was based on the 2010 ONS Sub-National Population Projections. The Plan at this point was being considered over the 20 year period 2008 – 2028. This figure was used to consult upon the Preferred Growth Strategy which considered individual sites and whether they were preferred for development or not. Following on from the Options for Housing Growth consultation the distribution of the sites was proposed to support regeneration and prosperity in each city, town and appropriate village locations with the emphasis being on urban concentration – around Derby but also around the four towns in Amber Valley and the main town in South Derbyshire (Swadlincote).
- 1.2.4 Following the production of the 2011 Census and the 2011-based ‘Interim’ Sub-National Population Projections (SNPP) and Household Projections further work on housing need was undertaken that concluded that the overall Derby HMA housing need had increased to 35,354 dwellings over the period 2008 -2028. In order to address this 1,654 dwelling increase, the distribution of the sites was reconsidered and published as part of the Draft Local Plans for Amber Valley Borough Council (AVBC) and South Derbyshire District Council (SDDC). At this point Derby City Council looked again at its capacity cap and was able to accommodate some of this growth.
- 1.2.5 The Draft Local Plans of AVBC and SDDC therefore considered higher housing numbers to accommodate the remaining additional need. For South Derbyshire District Council this led to proposed allocations in suitable village locations and for Amber Valley Borough Council it led to more sites within their four main towns being identified as proposed allocations.
- 1.2.6 Sensitivity testing was requested by the AVBC Inspector which resulted in a further change to the housing number and also led to Amber Valley and Derby City rebasing their Plans to 2011. South Derbyshire’s Inspector has indicated that this approach is acceptable [SDEX44]⁶ and this Authority will consult on rebasing housing numbers as a modification to the Plan. The sensitivity testing considered four positions and the AVBC Inspector established that the testing for tracking the midpoint between the 2008- and 2011-based headship rates from the mid-2011 baseline was the most robust.

³ http://www.south-derbys.gov.uk/planning_and_building_control/planning_policy/local_plan/local_plan_part1/issues_alternative_options/default.asp

⁴ http://www.south-derbys.gov.uk/planning_and_building_control/planning_policy/local_plan/local_plan_part1/derby_hma_options_for_housing_growth/default.asp

⁵ http://www.south-derbys.gov.uk/planning_and_building_control/planning_policy/local_plan/evidence_base/hma_joint_evidence_base/default.asp

⁶ http://www.south-derbys.gov.uk/Images/List%20of%20Examination%20documents_tcm21-252168.pdf

- 1.2.7 Throughout this process the decisions made have been accountable through the Derby Housing Market Area Joint Advisory Board and each individual Authority's Committee/Cabinet. The sites selected have been considered through the HMA strategic objectives of brownfield regeneration and to support the City alongside the main towns of Alfreton, Belper, Heanor, Ripley and Swadlincote.
- 1.2.8 Amber Valley Borough Council's plan was examined in March/April 2014 and was suspended for amongst other things a lack of five year supply and to allow time for the sensitivity testing conclusions to be considered across the Derby HMA in order to address the increased housing OAHN. In July 2014 AVBC consulted upon and included 14 additional sites on the edge of the City and other locations to meet this requirement. This increased AVBC's target to 10,301.
- 1.2.9 Following this consultation Amber Valley Borough Council made the decision in October 2014 to include nine of those sites in its submission to a reconvened hearing. It was decided to not go ahead with some sites because they were deemed unsuitable or had constraints that would put their delivery in doubt. In October 2014 AVBC also agreed to amend its submission to reflect updated traffic modelling data and take out strategic housing sites around Ripley and Codnor. This left AVBC with a target of 9,651 dwellings.
- 1.2.10 SDDC's Plan was examined in November/December 2014 and like AVBC has been suspended to allow the Authority to address 5 year supply, viability and infrastructure issues raised by the Inspector.
- 1.2.11 In March 2015, SDDC received Full Council approval for an increase in their housing target by up to 277 dwellings. In July 2015 AVBC received Full Council approval for an increase in their housing target by up to 198 dwellings. It also approved the removal of the strategic sites of Kedleston Road, Quardon (400 dwellings), Amber Heights, Ripley (60 dwellings) and Bullsmoor, Belper and the addition of the Hall Road, Langley Mill (80 dwellings) site. The approval of these two reports allow for the 33,388 dwellings to be met across the Housing Market Area subject to the outcome of this piece of work.

1.3 South Derbyshire Spatial Strategy

- 1.3.1 The South Derbyshire Local Plan seeks to disperse strategic growth between the edge of Derby City (to meet both the City's unmet need and South Derbyshire's own need), the edge of Burton upon Trent, Swadlincote and some villages.
- 1.3.2 Spatial strategy options were outlined during the Derby Housing Market Area Options for Housing Growth consultation held in 2011 and the Draft Local Plan Consultation held in 2013 and has been subject to Sustainability Appraisal in the Environmental Report submitted alongside the Local Plan. This appraisal includes an appraisal of a range of distributional options and considers the likely environmental effects of each. The preferred option chosen by the Council is to concentrate most growth within the HMA within or adjacent to Derby City. This option will:
- help meet the needs of the City of Derby and will provide choice for South Derbyshire residents to live within easy reach of the City. This will assist in the delivery of services and facilities in the City and will ensure that a substantial number of new households are within easy reach of a range of employment opportunities.

- allow a significant amount of growth to support growth and regeneration in and around Swadlincote
- allocate notable levels of development in those key villages (according to the Settlement Hierarchy) where there would be distinct community benefits in doing so and other locations which would secure the sustainable reuse of previously developed land, such as Drakelow Park (adjacent to Burton on Trent)
- allow for growth in other villages and rural settlements throughout South Derbyshire on a scale appropriate to their size, role and characteristics on the basis of a settlement hierarchy allowing for regeneration where necessary.

Committed Growth

1.3.3 In respect of the proposed Housing Allocations in South Derbyshire's Local Plan, many are now committed and benefit from planning consent and would be likely to contribute towards the District's housing need even in the absence of a Local Plan. Sites which are not yet committed are principally located around the edge of Derby City (Boulton Moor Phases 2 and 3, Primula Way (part of), Wragley Way and Hackwood Farm. Away from the DUA the remaining housing allocations which are not committed are Broomy Farm in Woodville and Land north of Hatton. Put simply, around two thirds of housing to be delivered to 2028 is already committed.

Significant Potential Constraints:

1.3.4 Sites in South Derbyshire are likely to be affected by a range of development constraints. The following is not a comprehensive listing of all constraints but a consideration of the most significant development constraints affecting Growth in South Derbyshire:

- **Nottingham Derby Green Belt** which is located to the immediate south and east of Boulton Moor. Development in the Green Belt which undermines the function and purpose of that Green Belt may not be compliant with National Policy.
- **Burton on Trent Swadlincote Green Belt:** a narrow collar of green belt which only extends 700ha but separates Burton on Trent from Swadlincote. Development in the Green Belt which undermines the function and purpose of that Green Belt may not be compliant with National Policy
- **River Mease Special Area of Conservation and Sites of Special Scientific Interest.** There is limited capacity to accommodate growth in locations which are served by waste water treatment works discharging to the River Mease. The integrity of this site is being negatively impacted by development in the catchment and large scale growth could undermine actions to restore the Special Area of Conservation.
- **Flood Risk** - Around a quarter of the District is located in areas at flood risk. Areas most at risk are the northern villages lying along the Rivers Trent, Dove and Derwent including Shardlow, Willington, Hilton and Hatton. Development in areas of flood risk would need to pass the sequential test and would need to be subject to a level 2 Strategic Flood Risk Assessment.
- **Heritage Assets** – these are distributed widely across the District with concentrations of assets around Repton and Melbourne. Development in all locations would need to be considered in light of potential heritage effects.

Figure1: Key Diagram – South Derbyshire District



1.4 This Sustainability Appraisal Report Addendum

- 1.4.1 The South Derbyshire Part 1 Local Plan is being developed alongside a process of sustainability appraisal (SA), a legally required process that ensures that the likely significant effects of an emerging draft plan (and reasonable alternatives) are systematically considered and communicated. It is a requirement that the SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004.
- 1.4.2 National Planning Practice Guidance states:
*"The sustainability appraisal should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives. It should provide conclusions on the overall sustainability of the different alternatives, including those selected as the preferred approach in the Local Plan."*⁷
- 1.4.3 The reason for undertaking this work is that, as discussed at South Derbyshire Examination the published SA/SEA Environmental Report did not look sufficiently across boundaries regarding the likely split or apportionment of the City's unmet need. As SA/SEA is an iterative process up until adoption the District Council is producing this addendum in response to the Inspectors' concerns in respect of unmet need and its apportionment in order that specific consideration of issue could inform the ongoing preparation of the Derby HMA partners respective Plans.
- 1.4.4 The aim of this SA Report Addendum is to present the results of a joint sustainable appraisal undertaken by the Derby Housing Market Area Authorities. In order to achieve this this appraisal seeks to:
- Establish the capacity of Derby City to meet its own needs and identify the level of unmet need to be accommodated within Amber Valley and/or South Derbyshire
 - The options for distributing the City's unmet needs between the two Authorities
 - The likely significant effects of implementing those different options
- 1.4.5 This report has been prepared to accompany rather than supersede the SA report published by South Derbyshire District Council in August 2014. This addendum therefore needs to be read in conjunction with the 2014 SA report, (although efforts have been made within this addendum to minimise the need to cross reference).
- 1.4.6 Amber Valley will carry out a separate consultation on the findings of this joint appraisal work. Further information is available on Amber Valley Borough Council's at: www.ambervalley.gov.uk/environment-and-planning/planning/community-planning/community-planning-latest-news.aspx.
- 1.4.7 Derby City started their Regulation 19 consultation on the 26th August 2015 which includes their SA/SEA work and consideration of this joint work also. Further information on this this can be found on the Council's website at: www.derby.gov.uk/part-1-consult.

⁷ Paragraph: 018 Reference ID: 11-018-20140306. Revision date 06 03 2014

1.5 SCOPING CONSULTATION

- 1.5.1 The joint Authorities consulted the consultation bodies on the scope and methodology of this appraisal for the statutory five weeks from the 6th July 2015. A brief summary of comments received is set out below.
- 1.5.2 **Natural England** - Generally welcomes the proposed method of working and further recommends that Green Infrastructure should be considered within the topics of Biodiversity, Landscape, Population and Human Health and Climate Change. This would assist in ensuring that GI is an integral, cross-cutting theme throughout the assessments and demonstrate an ecosystems approach with regard to the provision of GI. Natural England also proposed additional monitoring indicators which could be used when the Authorities decide on the measures to be used for the purposes of monitoring. .
- 1.5.3 **Historic England**- Indicated that it was important that historic considerations were taken into account in the work and that both positive and negative effects should be considered through the appraisal. It also confirmed that it is important that environmental considerations are taken into account when testing distribution/ratios. Historic England also stated proper weight need be given to all environmental constraints, recognising that these are not equal across the Local Planning Authorities and requested further discussion on the methodology proposed by the Authorities and the weight to be attached given the differences in the importance of some environmental constraints across the HMA.
- 1.5.4 The Council's subsequently held a teleconference⁸ with an officer from Historic England to provide further information on the approach to sustainability appraisal and resolved outstanding issues.
- 1.5.5 **The Environment Agency** - Agreed that the approach at a cross boundary level is appropriate and indicated that they have no concerns with the existing Sustainability Frameworks for Amber Valley and South Derbyshire being used as many of the objectives address their priorities
- 1.5.6 In order to ensure consistency the Authorities have undertaken this joint appraisal based on the scope of the submitted SA work and no additional evidence has arisen that needs to be included in the addendum.

⁸ 13 August 2015

2 SECTION 2 METHODOLOGY

2.1 Approach to Sustainability Appraisal

2.1.1 Following the comments received back by the Inspectors South Derbyshire District Council has continued to work with the neighbouring Authorities in the Derby Housing Market Area to undertake a joint appraisal. This work has been undertaken in three key stages

Stage 1: Assessing Derby City's housing capacity

2.1.2 The objective of this stage of work is to review the scale of Derby City's unmet need having regard to capacity within the City.

In order to review Derby City Council's capacity the following issues have been considered:

- The barriers to DCC's assessed need being met within the city. This will include policy, technical issues, feasibility, viability and deliverability (including density) issues. For each of these issues the obstacles will be explained, and the repercussions of altering our approach to dealing with these issues set out. The outcome of this stage of work will be the identification of a housing capacity for Derby City.
- The alternatives for accommodating increased growth in the City and what are the consequences of the maximum capacity being ignored?

2.1.3 This work has been led by Derby City Council, with input from officers at Amber Valley Borough Council and South Derbyshire District Council. This work considers the capacity cap for Derby City and justifies the extent of unmet need. A summary of the findings of this stage of work is included in this Addendum at Section 3.

2.1.4 Output: Derby City's Sustainability Appraisal and Summary of unmet need issues in Section 3 of this Addendum

Stage 2: Distributing unmet need

2.1.5 The objective of this stage of work is to determine the appropriate proportion and distribution of Derby's unmet need to be accommodated within Amber Valley and South Derbyshire.

2.1.6 It is established that Derby City Council will be unable to fully meet its own housing needs and that consequently there will be a need to address any unmet need elsewhere within the Housing Market Area. This stage will address the allocation of Derby's unmet need in the following way:

- Establish parameters and constraints for development within the HMA including settlement pattern, settlement hierarchies and spatial strategies that have been established and help generate alternative distribution patterns for meeting Derby's unmet need.
- Test the alternative ratios / distributions. Test the deliverability of different ratios of housing between AVBC and SDDC where relevant. The rationale for each alternative that is tested will be clearly explained. An important step at this stage will be to determine which ratios/distributions may be undeliverable, and the reasons why.

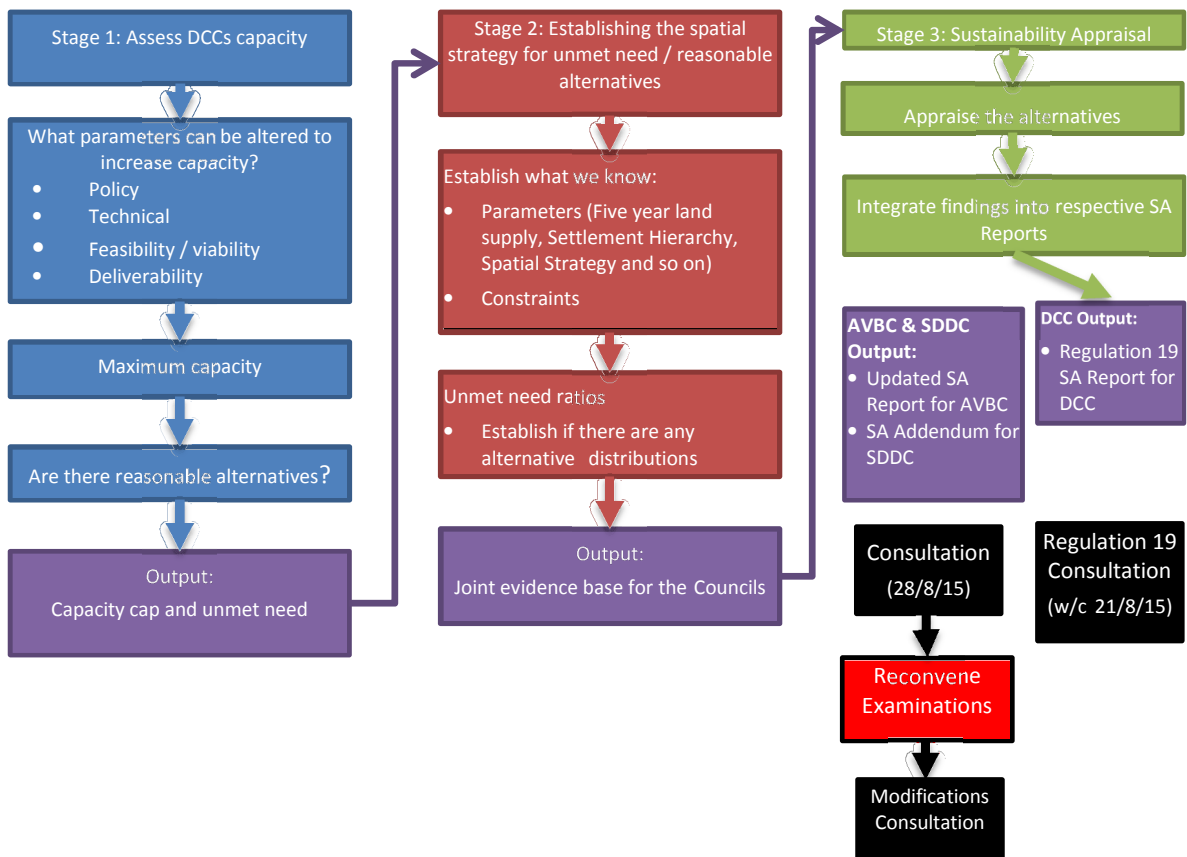
2.1.7 Output: The Councils produce a joint appraisal setting out the preferred distribution of housing and reasonable alternatives.

2.1.8 This will then be published as an Addendum to South Derbyshire's Sustainability Appraisal and an update to Amber Valley existing Environmental Report which also reflects proposed modifications to the Plan currently being consulted upon. The District's will carry out a consultation on the findings of this joint appraisal work before Examinations re-open.

Stage 3: Sustainability Appraisal

- 2.1.9 Amber Valley Borough Council and South Derbyshire District Council have developed locally specific Sustainability Appraisal Frameworks based on an evidence base that reflects local geographies. These frameworks cannot be swapped around in an arbitrary way as they reflect their locality and they have previously been consulted upon with the consultation bodies.
- 2.1.10 Each authority have appraised the implications of each alternative in 'their area' using their respective SA Frameworks based on a joint evidence base. The findings of each separate appraisal are then brought together to present an overall assessment in each report of the alternatives across the HMA (i.e. providing the comparison of effects between the different authorities).
- 2.1.11 The joint sustainability appraisal will be formally consulted upon before the respective examinations are reconvened and ahead of the submission of the Derby City Local Plan. The consultation will ensure compliance with the Environmental Assessment Regulations and will promote an open and transparent approach to plan making. Given the different stages of plan preparation and issues facing the three Authorities the outcomes of this joint appraisal will be presented in different ways. Figure 2 provides an overview of the HMA Authorities approach to undertaking an appraisal of unmet need and apportionment across the HMA

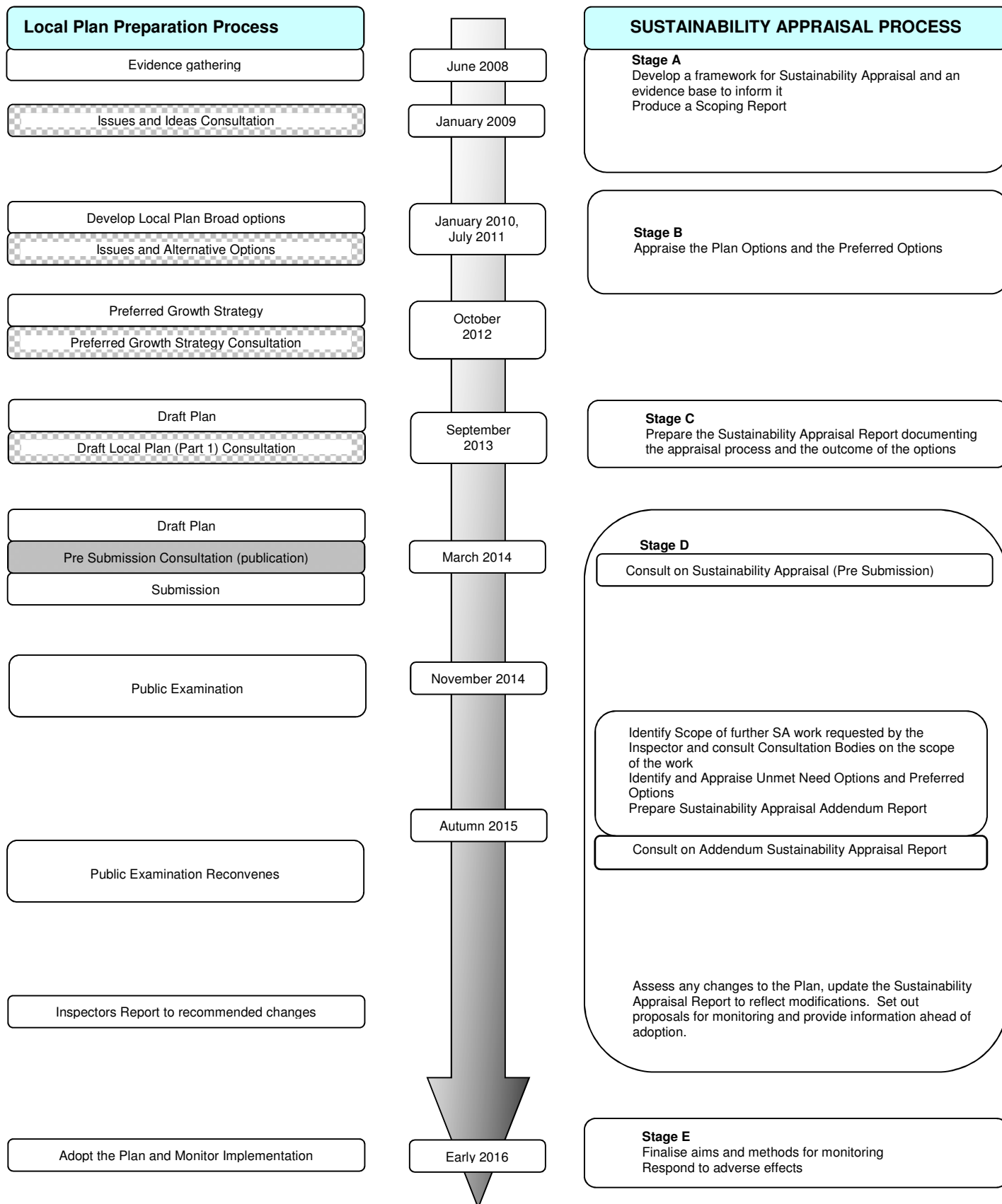
Figure 2: Approach to joint sustainability appraisal of unmet need and housing apportionment



2.2 Sustainability Appraisal to Date

2.2.1 The preparation of the Part 1 Local Plan has been ongoing since 2009. A Summary of the key stages of work undertaken is set out below in Figure 3.

Figure 3 Local Plan and Sustainability Appraisal process



- 2.2.2 Work on the Council's Sustainability Appraisal commenced just ahead of the Plan in late 2008 when the Council consulted on the Scope of the SA for the Part 1 Local Plan. A refresh of the Scoping Report was undertaken in July 2012.
- 2.2.3 Between January 2009 and September 2013 the Authority undertook a number of consultations as follows:
- South Derbyshire Local Development Framework Core Strategy – Issues and Ideas (January 2009)
 - South Derbyshire Local Development Framework Core Strategy – Issues and Alternative Options (January 2010)
 - South Derbyshire Local Development Framework Core Strategy – Neighbourhood Planning (Spring 2011)
 - Derby Housing Market Area – Options for Housing Growth (July 2011)
 - South Derbyshire Preferred Growth Strategy (October 2012)
- 2.2.4 Together these documents set out, and sought views on, a range of issues and options affecting South Derbyshire and the wider Derby Housing Market Area. Together with further evidence gathered during the plan making process the initial appraisal findings helped inform the production of the Draft Local Plan which was published for consultation alongside an interim Sustainability Appraisal in September 2013.
- 2.2.5 The Pre-Submission Local Plan and Sustainability Appraisal was published for consultation in March 2014 and then submitted alongside the consultation responses and other evidence to the Secretary of State in August 2014.

2.3 Who Has Carried Out the Sustainability Appraisal?

- 2.3.1 This is a joint appraisal which has been undertaken jointly by Amber Valley Borough Council Derby City Council and South Derbyshire District Council, with significant input from AECOM who are retained by Derby City and Amber Valley to undertake their Sustainability Appraisal work. The partner Authorities have worked collaboratively to establish the level of unmet need in Derby City, identify broad options for apportioning unmet need and reviewing the likely significant effects of implementing the different options.
- 2.3.2 The appraisal has been informed through consultation with the statutory Consultation Bodies on the proposed approach to appraisal at this cross boundary level is appropriate and that the use of the existing SA Frameworks is appropriate.

2.4 When Was the Sustainability Appraisal Undertaken?

- 2.4.1 As previously noted work on the Sustainability Appraisal for the Part 1 Local Plan commenced in 2008, with the appraisal of options being undertaken between 2009 and 2012. An interim Sustainability Appraisal report for the Part 1 Local Plan was prepared prior to the consultation of the Draft Local Plan in September 2013 and Submission Draft of the Plan and Sustainability Appraisal published in August 2014.
- 2.4.2 Work on this part of the Sustainability Appraisal, which considered options for apportioning Derby City's unmet housing need, commenced after the Examination into the Part 1 Local Plan in December 2014. The results of this appraisal are set out in this SA Addendum and will form part of the Sustainability Appraisal of the Part 1 Local Plan submitted in August 2014.

2.5 Consultation Information

2.5.1 The public consultation on this document will run from Friday 28th August 2015 to Monday 12th October 2015.

2.5.2 As set out above, the Council submitted the Local Plan for examination on 8th August 2014. As part of the examination process the appointed Planning Inspectors for Amber valley and South Derbyshire have requested that the Council undertakes additional Sustainability Appraisal work regarding the distribution and apportionment of Derby City's unmet needs. The Council is now publishing this additional SA work and is inviting comments on this work for the statutory period of six weeks (Regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004).

2.5.3 This addendum is available to view, during normal opening hours at the Councils Offices: South Derbyshire District Council, Civic Offices, Civic Way, Swadlincote, DE11 0AH or via the District Council's website at www.south-derbys.gov.uk/saupdate

2.5.4 Comments arising through this consultation will be made available on the Local Plan section of the Council's website as soon practicable after the close of the consultation. The comments will also be passed on to the Inspectors.

2.5.5 All comments on this Addendum should be made, in writing, and addressed to:

Nicola Sworowski
Planning Policy Manager
South Derbyshire District Council
Civic Offices
Civic Way
Swadlincote
Derbyshire
DE11 0AH

Or submitted via email to planning.policy@south-derbys.gov.uk

Please ensure comments are received by 5:00pm Monday 12th October 2015

3 SECTION 3 ASSESSING DERBY CITY'S HOUSING CAPACITY AND IDENTIFYING UNMET NEED

3.1 Introduction

3.1.1 The first stage of this joint appraisal work has been led by Derby City Council, with input from officers at Amber Valley Borough Council and South Derbyshire District Council. This work considers the capacity cap for Derby City and justifies the extent of unmet need.

3.1.2 The Councils have looked again at Derby's capacity to meet its assessed need in light of a range of constraints including technical issues, feasibility, viability and deliverability (including density) issues. For each of these issues the obstacles to delivering additional growth have been highlighted and the repercussions of altering the City's approach to meeting its housing need set out. A summary of this stage of work is set out below.

3.2 Assessing Derby City's Housing Capacity

3.2.1 It has been accepted throughout the plan making process that the City of Derby would not be able to meet all of its 'objectively assessed housing needs' (OAN) within its own boundaries. This conclusion has been accepted by all parties in the HMA and has not been seriously questioned in principle through any consultation exercise or alternative evidence.

3.2.2 This has not stopped the City Council endeavouring to identify as much new housing as it reasonably can within the City to meet its own needs in the interests of sustainable growth. It has gone through a number of rigorous and robust assessments of the *opportunities* that exist to meet needs and the *constraints* to growth in order to establish a *sustainable* and *deliverable* capacity of 11,000 new dwellings between 2011 and 2028. This capacity has been reassessed at each stage in the plan making process.



3.2.3 What follows is a summary of the factors that have combined to create this 'capacity cap'; focussing on the constraints that exist, the options for increasing the target have been considered and why they are not appropriate.

Capacity Constraints

3.2.4 When determining the growth strategy for the City, the Council has had to take account of a range of parameters (broadly reflected in the diagram above). The Derby City Core Strategy clearly has to meet the requirements of the NPPF. At the heart of this is the presumption in favour of *sustainable* development. This encompasses the three equally important dimensions of economic, social and environmental sustainability that must be balanced in decision making. While the NPPF clearly wishes to 'boost significantly the supply of housing', it does not suggest that this is done in such a way that ignores the core planning principles it seeks to establish. The NPPF still requires constraints and adverse impacts to be taken into account. Delivering housing should not be at the expense of other important planning objectives.

3.2.5 Notwithstanding this, perhaps the biggest – and most obvious – constraint to growth in Derby is the fact that it is a densely populated compact city, where development is already

pushing up to its borders in most directions and almost all 'available' land already has some recognised 'acknowledged importance' for uses other than housing. This limits the number of realistic opportunities to consider.

3.2.6 The nature of the City means that most sites will have some 'policy' constraint associated with them.

3.2.7 These include:

- Green Wedge
- Green Belt
- Open Space and other 'Green Infrastructure' (e.g. allotments)
- Biodiversity value (wildlife sites, corridors, protected hedgerows etc.)
- Flood Zones 2 and 3
- The World Heritage Site (WHS) and WHS Buffer
- Conservation Areas and Listed Buildings
- Air Quality Management Areas
- Areas of existing and proposed employment
- Existing school locations

3.2.8 While the impacts of residential development on the above issues have been major considerations, the map cannot illustrate others such as the impact of development on infrastructure – particularly transport and education - and the viability and delivery of development.

3.2.9 These constraints have not stopped the Council looking closely at each and every site opportunity submitted for consideration. Allocations *have* been made within areas of constraint where it has been demonstrated the impacts of doing so would be acceptable and/or where the impact can be mitigated.

3.2.10 The impact on the character of the City has been particularly important with regard to the consideration of 'Green Wedge' (GW) sites. There are thirteen areas that have been specifically protected from inappropriate development by successive local planning policies since 1989, helping to preserve their open and undeveloped character. Derby has successfully upheld this principle in successive planning documents and appeals. GW policy is also seen as having a high degree of consistency with the objectives of the NPPF. It is important to remember that purpose of Green Wedge policy is not about constraining housing, it is about retaining the character and identity of separate and distinct areas of the City. They are particularly important in terms of the 'social' and 'environmental' elements of sustainable development.

3.2.11 Retaining the *principle* of GWs is seen as a key objective of the Council's strategy and an important indicator of the *sustainability* of the plan. This is not to say that the Council has avoided the consideration of GWs for housing sites. The 'Green Wedge Review'⁹ analysed each wedge to assess whether they were still meeting the objectives of the policy and whether there was scope for development without undermining their role, function or character.

3.2.12 This concluded that there were parts of the wedge that could be developed while still maintaining the principle of a wedge in the area. The majority of these have been carried forward as allocations in the draft Core Strategy and the others have been identified for further consideration as part of a future plan. This inevitably means that those parts of the

⁹ www.derby.gov.uk/media/derbycitycouncil/contentassets/documents/reports/localdevelopmentframework/DerbyCityCouncil-Green-Wedge-Review.pdf

GW which remain take on far greater importance and deserve greater protection. This has to be factored in to any assessment of the limits to the City's internal growth.

- 3.2.13 The Government attaches great importance to the Green Belt (GB), and state that boundaries should only be altered in exceptional circumstances. The PPG indicates that "unmet housing need (including for traveller sites) is unlikely to outweigh the harm to Green Belt and other harm to constitute 'very special circumstances' justifying inappropriate development on a site within the Green Belt."
- 3.2.14 The amount of GB land in the City is relatively small but is part and parcel of wider areas in neighbouring authorities. Sites have been submitted to the Council for consideration and thus a decision has had to be made about the appropriateness of amending boundaries. A 'Green Belt Review' was prepared by Derbyshire County Council in 2012. This was a review of an earlier, more comprehensive, study which concluded that the GB between Derby and Nottingham was the most sensitive. The review also concluded that the designations in and around the City were still performing a valuable role and should continue to be protected. As such, while due regard has been given to the sites submitted, protecting the principle of Green Belt in the City has carried greater weight. This, therefore, constrains potential supply.
- 3.2.15 A considerable amount of the rest of the City is identified for a range of nature conservation or 'green infrastructure' type designations including areas of open space, local nature reserves and wildlife sites, trees protected by TPOs and important hedgerows. These are important constraints that limit opportunities. Where they are in close proximity to 'suitable' sites, they may also have the effect of limiting the scale and nature of development appropriate to the site.
- 3.2.16 The NPPF indicates that development in areas at risk of flooding should be avoided. In drafting local plans, LPAs are required to adopt a sequential 'risk based' approach to the location of development to avoid, where possible, flood risk to people and property. The Council has carried out a Strategic Flood Risk Assessment (SFRA) which demonstrates that large areas of the City are constrained by potential flood risk. While some of this is able to be mitigated, the scale of flood risk in the City and the suitability and cost of mitigation naturally constrains 'sustainable' and 'deliverable' supply.
- 3.2.17 Local authorities have to set out a positive strategy for the conservation and enjoyment of the historic environment. The City contains a World Heritage Site (WHS) and an associated 'buffer zone'. A number of Conservation Areas and statutory and locally listed assets are also identified across the City. In determining the overall strategy, the impact on these designations and their settings has been a key issue. Where it is deemed possible to develop within or near to such assets, their proximity is likely to limit the scale and nature of development that would be acceptable.
- 3.2.18 Securing economic growth is a constant theme running through the NPPF. Meeting the development needs of business is a key objective of the guidance and consequentially the Core Strategy. This generates a competing demand for land which may constrain the amount available for residential development. The evidence base for the Core Strategy indicates a need for around 199 hectares of land over and above that already in use.
- 3.2.19 In considering housing opportunities, regard has been had to the existing employment situation. As a result of this, a number of 'operational' employment sites *have* been identified for housing including Castleward and the former Rolls-Royce Main Works site in Osmaston. Assumptions have also been made about potential re-use of commercial space in the City Centre. It would also be expected that smaller employment sites will come forward in the Part 2 plan.

- 3.2.20 Not all proposed or existing employment sites are appropriate for housing. Firstly, not all are in suitable locations and could not create a satisfactory or sustainable form of development. Secondly, even if potentially suitable many sites are occupied by operational businesses – so the land is not available and ‘intervention’ from the Council may not be viable or in the public interest. Thirdly, it may create an imbalance between housing and employment – which could have a number of negative sustainability consequences. Finally, employment (or any brownfield site) may simply not be viable when considering the cost associated with making the site suitable for development. Delivery and viability are key considerations. The NPPF is clear that plans *must* be deliverable.
- 3.2.21 In terms of infrastructure limitations, it is recognised that growth in, and on the edge of, the City will have a significant impact on the transport network. Many junctions are already at capacity or will be once development takes place. A number of mitigation measures are proposed that will help reduce the impact but these will not be sufficient to produce a ‘nil-detriment’ situation. The capacity of the transport network is not necessarily a reason for capping the City’s target at 11,000. The fact that much of the decanted growth is being provided on the edge of the City will clearly impact on Derby’s network. However, there are fewer options available to mitigate the impact if a greater proportion of DUA development were to be focussed within the City boundary as a result of a higher target. This could lead to a situation where the functioning of the network would decline more rapidly over time, leading to increased delays and limited means to make measurable improvements. This would clearly be an undesirable situation.
- 3.2.22 The City has a number of other infrastructure capacity issues. The capacity of the City’s schools is a particular issue. A number are at or above their capacity already or are expected to be so in the short to medium term. In considering the scale of development possible to achieve, the impact on existing schools is an important factor. Where capacity is limited, then the ability to provide additional spaces has to be considered. This may not always be possible to achieve and still maintain a viable or suitable development. This is, therefore, also a naturally constraining factor.
- 3.2.23 The above is just a brief summary of the issues facing the city and is not exhaustive. It is recognised that most areas will be subject to similar constraints. However, the tightly drawn boundaries of the City and its compact, high density nature pulls these constraints together in a small area; increasing their importance and sensitivity in many cases.
- 3.2.24 There are few ‘easy’ sites in Derby which don’t raise significant planning issues. There is little or no point in the Council preparing a strategy that is at odds with national policy or which prejudices the delivery of wider Council objectives. This means that a balanced approach has to be taken which recognises the importance of delivering housing but does not ignore the need to protect and enhance the most important parts of the City’s urban and natural environment, promotes sustainable economic growth, provides for the needs of existing and new neighbourhoods and, above all, the need for it all to be delivered. The key here is ‘balance’. The strategy for the City does not shy away from difficult decisions. Rather, it has sought to address each issue carefully and come to a sensible conclusion as to the level of impact generated and whether it can be minimised or mitigated. This is why development *is* taking place in Green Wedges, on existing employment sites, on difficult brownfield sites and in areas of environmental sensitivity.
- 3.2.25 There will inevitably be a limit, however, to what is possible to achieve or what is sensible to propose in such a constrained area within the plan period. This limit has been reached.

Options for Increasing Derby’s Target

- 3.2.26 Notwithstanding the constraints on the City, the Council has considered if there any ways in which the target could be increased. The options available are:

1. Allocate additional strategic sites
2. Assume greater delivery from strategic sites and locations
3. Assume a greater supply from 'non-strategic' SHLAA sites
4. Assume a greater windfall allowance over the plan period
5. Assume fewer losses

3.2.27 A number of other strategic scale sites were considered but have not been carried through to the strategy. The majority of these have either significant planning and/or delivery constraints which have ruled them out of consideration. To one extent or another, allocating any of the sites rejected would undermine the objectives of the Council's Strategy in one or more of the following ways:

- It would undermine the role, character and function of a number of important Green Wedges across the City by either:
 - unacceptably narrowing them at sensitive locations
 - closing their 'mouths' and undermining their role in terms of bringing the countryside into the City
 - undermining their open and undeveloped character, and/or
 - undermining their function in terms of defining the character of existing neighbourhoods
- It would increase the City's target without corresponding certainty over delivery or viability.
- It would undermine Council objectives in terms of open space and promoting healthy lifestyles
- It would have an unacceptable impact on the character and environment of existing neighbourhoods or sensitive parts of the City's heritage;
- It would generate localised instances of severe traffic problems without the ability to provide appropriate mitigation
- It would introduce development in areas that have poor access to facilities and/or which do not relate well to existing communities, resulting in an unsustainable pattern of development
- It would undermine economic objectives of the plan by removing important employment allocations without suitable replacement sites being available
- It would have an unacceptable impact on education provision, without the ability to mitigate impacts (either as a result of sites not being of sufficient scale to justify a new school and/or nearby schools not being able to expand)
- It would be contrary to the NPPF in terms of the protection of Green Belt

3.2.28 Two GW sites were identified in the 'Preferred Growth Strategy' as having *potential* to come forward in Part 2. While broadly comfortable from a GW perspective, there were outstanding issues to resolve before they could be allocated. This amount to about 350 dwellings between them. Importantly, allocating these would *not* mean the Council could increase its target.

3.2.29 The Core Strategy identifies a 'residual' requirement of just under 1,300 dwellings to be met in Part 2. The two sites highlighted above form part of the pool of potential sites to meet this requirement. They do not constitute *new* opportunities and have already been factored into the assessment of overall capacity and delivery.

3.2.30 Allocating any of the other 'rejected' sites to increase the target would be seen as having too great an impact on the strategy to be an acceptable approach.

- 3.2.31 Increasing the net development densities of allocated sites to increase their delivery is also seen as inappropriate. Densities and the developable area of sites have been carefully considered to ensure appropriate forms of development, infrastructure provision and delivery. An appropriate balance between these issues has been struck. Setting arbitrary or unrealistic densities will not lead to greater delivery. This is not a realistic option.
- 3.2.32 The plan identifies two broad locations within which we expect residential development to come forward; Osmaston and the City Centre. There is no scope to identify further opportunities within Osmaston at this time.
- 3.2.33 The City Centre is a more complex issue. A figure of a minimum of 530 units were identified in the Draft Plan as a realistic estimate of delivery based on our understanding and knowledge of each opportunity and the prevailing market and economic conditions.
- 3.2.34 Since this time, the situation has changed considerably. The Council has now established the 'City Living Fund' which can provide loan funding at preferential rates. The City Centre has also recently been identified as a Government 'Housing Zone'. Again, this unlocks preferential rate loan funding and access to the HCA's ATLAS team who can provide expert advice and assistance in bringing sites forward. These measures should assist with the financing of schemes. The Council has also recently published a revised 'City Centre Masterplan' which identifies and promotes a number of regeneration priority sites.
- 3.2.35 This, coupled with increasing interest in the private rented sector (PRS) and student accommodation (which can count toward housing numbers to an extent) and relaxed permitted development rules, means that a much more positive outlook now exists.
- 3.2.36 The most recent analysis of supply indicates that there is likely to be more scope for development than previously thought. A revised estimate of likely delivery would be at least **1,000** new dwellings between 2011 and 2028; an increase of 470 over the Draft Plan. At present, this figure is less than the number of 'opportunities' that have been highlighted in the SHLAA, but a degree of flexibility and comfort is needed in light of the volatile nature of the City Centre market and the possibility of the same sites being put to a range of acceptable uses. Therefore, at this time, 1,000 units is a realistic and robust assessment.
- 3.2.37 If all things had remained equal, this change *could* have resulted in the City increasing its target without any negative consequences to the strategy. However, while the situation has improved within the City Centre, a strategic site identified in the Draft Plan has had to be removed from the supply.
- 3.2.38 The Sinfin Lane site was allocated for 700 units in the Draft Core Strategy. Since this time, the ownership of the site has changed, the planning application for housing withdrawn and the permission that existed on part of the site has lapsed. There appears to be no intention in the short to medium term to make the site available for residential development. The plan continues to identify the potential of the site to come forward for new housing but there can no longer be any certainty that the site *will* come forward. As such, while the broad strategy and objectives of the plan remain the same, the components of supply have had to be amended to reflect the current context.
- 3.2.39 This means that the increase to the City Centre target *cannot* be translated into an overall increase in the sustainable and deliverable capacity of the City as whole.
- 3.2.40 An assessment of non-strategic sites in the SHLAA suggests that the 'residual' of 1300 units to be addressed through the Part 2 plan would still be achievable. However, in order to maintain a realistic prospect of delivery, there are insufficient appropriate opportunities to increase this with any confidence.

- 3.2.41 Assuming a greater windfall allowance would also be inappropriate. The estimate of 900 dwellings over the plan period has been based on a thorough analysis of past trends and a recognition that, as more emphasis is being placed on identifying possible housing sites through the SHLAA, the number of windfalls is likely to fall. There is also a risk in having a higher allowance in that it will increase levels of uncertainty about where development will take place. This has a number of undesirable sustainability implications. As such, it is considered that the current windfall allowance is robust and should not be increased.
- 3.2.42 It is inevitable that there will be losses to the housing stock during the plan period. The assumption of 336 losses between 2016 and 2028 is conservative but robust. Any change to this component could only have a negligible impact on the target, probably insufficient to justify a change. This is also, therefore, an unreasonable way of seeking to increase the City's target over 11,000.
- 3.2.43 In conclusion, Derby's capacity is constantly being reviewed to ensure the Core Strategy target is robust. The most recent assessment did suggest a more optimistic outlook for the City Centre and indicate that this component of supply could deliver considerably more dwellings than previously suggested. However, this has been offset by the probable 'loss' from the supply of the Sinfin Lane regeneration site – at least for now. There are no other sustainable or deliverable options for increasing the City's target.
- 3.2.44 As such, when taking all things into account, 11,000 dwellings between 2011 and 2028 remains the best indication of the City's sustainable and deliverable capacity.

3.3 Unmet Need

- 3.3.1 It has been determined by Derby City Council (DCC) and agreed by Amber Valley Borough Council and South Derbyshire District Council that the capacity for Derby City is 'capped' at 11,000 dwellings. The overall housing need for the City for the period 2011 - 2028 has been calculated as 16,388. This leaves an unmet need of 5,388 dwellings to be found in the wider Derby housing market area

3.4 Distributing Unmet Need (Options Development)

- 3.4.1 The Derby Housing Market Area Authorities have jointly identified a range of options for meeting Derby's unmet need. These represent a range of approaches to apportioning housing between the two Authorities. In summary the options considered are:

- Option 1: Maximise Growth in South Derbyshire
- Option 2: Maximise Growth in Amber Valley
- Option 3: Split based on the proportion of growth
- Option 4: Split based on commuting flows

- 3.4.2 The process of identifying a range of options allows for comparison between different ways of approaching an issue and enables each option to be tested against the SA objectives to determine the likely significant effects .

Option 1 – Maximise Growth in South Derbyshire

- 3.4.3 *Target all growth to meet the City's unmet needs to the edge of the City in South Derbyshire*
 This option would require South Derbyshire to increase the District's Housing Requirement to around 14,400 dwellings. It would reduce Amber Valley's requirement to around 8,000 dwellings and assumes AVBC only meets its own housing need and only contributes towards the delivery of homes to meet the City's unmet need on the committed site at Radbourne Lane, Mackworth (620 dwellings).

Option 2 – Maximise Growth in Amber Valley

3.4.4 *Target all growth to meet the City's unmet needs to Amber Valley*

This option would see Amber Valley's target increase around 12,700 dwellings and South Derbyshire's to around only its assessed need.

Option 3 – Split based on the proportion of growth

- 3.4.5 This option would see a slighter higher apportionment of unmet need towards South Derbyshire. Growth of 17,000 dwellings is needed in Amber Valley and South Derbyshire. South Derbyshire will accommodate 56% (9,605) of this total and Amber Valley will be required to accommodate 44% (7,395). Splitting unmet need according to this apportionment would increase South Derbyshire's housing target to around 12,600 dwellings and Amber Valley's target to around 9,800 dwellings.

Option 4 – Split based on Commuting Flows

- 3.4.6 This option is based on commuting flows out of the two Authorities. The Derby HMA Strategic Housing Market Assessment update includes data taken from the Local Economic Assessment. This data indicates that 5,450 people from Amber Valley and 12,750 people from South Derbyshire commuted out of Borough/District to work in Derby City. Labour flows from the two Authorities combined account for 18,100 people or 13.9% of all people working in Derby City. Of this number around 70% of out commuting is from South Derbyshire, compared to 30% from Amber Valley.

Options to be ruled out early on without detailed appraisals

- 3.4.7 In addition to the four reasonable options identified by the joint Authorities the Councils have also identified a number of options which it considers to be 'unreasonable'. Accordingly the Authorities have determined not to undertake detailed appraisals of these options:

1. **Business as Usual.** Reduced levels of delivery in the two Authorities which is insufficient to meet assessed need before even considering Derby's unmet need. It would also not conform with NPPF requirements to significantly boost the supply of housing delivery.
2. **Meet OAN outside of the HMA.** There are likely to be sufficient sites to fully meet the HMA's need across the three Authorities if not where the need arises. Therefore there is no justification for considering any growth outside of the HMA area.

SECTION 4 OPTIONS APPRAISAL

4.1 INTRODUCTION

- 4.1.1 As previously noted the approach to testing different apportionment and distribution options is to appraise the implications of each alternative using the SA Framework of each Authority. The findings are then brought together to present an overall assessment of the alternatives across the HMA (i.e. providing the comparison of effects between the different authorities).
- 4.1.2 In undertaking this appraisal a number of assumptions have been made as follows:
- Implicit in all of the options set out at Section 3.3 is the fact that the City's unmet need is best located adjoining the city assuming growth is best met where the demand arises. Opportunities for delivering strategic levels of growth away from the City (in South Derbyshire) in locations well related to the city are limited owing to the small scale of many of the settlements in the northern part of the District and having regard to the scale of growth villages are already accommodating to meet South Derbyshire's own needs..
 - The starting point for reducing housing provision in respect of the Derby's unmet need is the reconsideration of sites earmarked for allocation but not yet committed.
- 4.1.3 The Sustainability Appraisal Framework adopted by the Authority is set out at Section 4 of the August 2014 Environmental report which is available at: www.south-derbys.gov.uk/planning_and_building_control/planning_policy/local_plan_examination. The appraisal results of the 4 strategic options identified by the HMA partners using South Derbyshire's SA Framework can be viewed in Section 4.2 of this report and Appendix 1.

What May Happen if the Local Plan is Not Prepared

- 4.1.4 A significant majority of the housing sites being allocated in the South Derbyshire Part 1 Local Plan now benefit from planning consent and are commitment and many are currently being built out. Due to the mixture in the size of allocations put forward in the Local Plan Part 1, the delivery of dwellings on these sites will be seen through the short and medium term but also across the entire plan period. Put simply a significant amount of housing development will take place up to 2028 on existing committed sites including on the edge of Derby City– even in the absence of the Plan. However without a coordinated approach to apportion and deliver homes to meet the City's unmet need it is unclear whether sufficient development would come forward in a timely fashion and would meet fully that proportion of Derby's need which cannot be accommodated within its own administrative boundary.
- 4.1.5 In addition, without a plan, it would also be difficult to phase the delivery of sites and plan comprehensively to ensure the wider benefits of planning are fully delivered to local communities. A lack of sufficient housing sites may also frustrate the ability of developers to deliver adequate numbers of new homes consistently throughout the plan period.

The Characteristics of the District Likely to be affected by Housing Delivery

- 4.1.6 The delivery of new homes (including those to meet any apportionment of the City's unmet need) will increase pressures on wastewater and water supply infrastructure, the local and strategic road network, health and social care facilities, recreation areas as well as formal and informal greenspaces such as sports pitches, allotments public rights of way and amenity and wildlife areas. Development will lead to the loss of significant areas of greenfield (agricultural) land and the urbanisation of the countryside. New development would also give rise to landscape impacts, as well as potential impacts on local heritage assets, although the extent of any impact would be based on the characteristics of individual sites and how sites are built out.

The Likely Significant Effects on the Environment of the Local Plan Including on Areas of Known Environmental Importance.

- 4.1.7 It is unlikely that unmet need for the City would lead to any significant development in the River Mease Catchment. This special area of conservation (SAC) is located in the rural south of the District and is poorly connected and geographically distant to Derby City such that additional growth to meet the City's unmet need would not have any discernible impact on this site or its interest features. Elsewhere large scale housing growth could impact on water quality in other river catchments which are not meeting Water Framework Objectives in respect of water quality including the River Trent and Derbyshire Derwent, although effects could be largely mitigated through appropriate capacity improvements to the foul water network and the separate treatment and discharge of surface waters.
- 4.1.8 Significant growth on the edge of Derby could impact on air quality management areas (AQMAs) located on the southern edge of Derby City especially where growth in South Derbyshire acts in combination with long-term housing growth in Derby City, although site design and travel management from new development could reduce potential effects. New housing development in South Derbyshire, irrespective of location, would not have an impact on any sites protected pursuant to the 'Birds Directive'.
- 4.1.9 Additional housing to meet the City's unmet need could increase noise and light pollution within and adjacent to existing urban areas or communities, development could also affect local landscape and townscape character although such impacts will be partially dependent on the precise location, scale and design of any site. Development will also lead to the loss of greenfield (agricultural) land owing to the fact limited brownfield sites remain within the District and none are identified in the DUA in South Derbyshire. Depending on location development could have a detrimental impact on protected or locally important habitats and species or geological sites. Major growth in some near urban locations, could also lead to the loss of archaeological heritage or effect the District's cultural heritage including the setting of listed buildings.
- 4.1.10 The Local Plan will provide further accommodation to meet the needs of the rapidly growing population in South Derbyshire (and unmet need of the City) and could provide greater housing choice. However growth would also increase pressure on existing social infrastructure such as schools, doctor's surgeries and community facilities. New housing provision will also support further types of development such as employment and retail by ensuring businesses have access to nearby workers and customers.

SECTION 4.2 APPRAISAL OF OPTIONS AGAINST SOUTH DERBYSHIRE'S SUSTAINABILITY APPRAISAL FRAMEWORK

Table 1: Summary of Broad Options Appraisal

Housing Apportionment Options	To avoid damage to designated sites and species (including UK and Local BAP Priority Habitat and Species) and enhance biodiversity and geodiversity across the District	To provide decent and affordable homes that meet local needs	To improve the health and well-being of the population	To improve community safety and reduce crime and fear of crime	To improve educational achievement and improve the District's skills base	To promote social inclusion and reduce inequalities associated with deprivation across the District	To improve local accessibility to healthcare, education employment food shopping facilities and recreational resources (including open spaces and sports facilities) and promote healthy and sustainable travel or non-travel choices.	To make best use of existing infrastructure and reduce the need to travel and increase opportunities for non-car travel (public transport walking and cycling)	To achieve stable and sustainable levels of economic growth and maintain economic competitiveness	To diversify and strengthen local urban and rural economies and create high quality employment opportunities	To enhance the vitality and viability of existing town and village centres	To improve the quality of new development and the existing built environment.	To minimise waste and increase the reuse and recycling of waste materials	To promote sustainable forms of construction and sustainable use of natural resources	To reduce water, light, air and noise pollution	To minimise the irreversible loss of undeveloped (greenfield) land	To reduce and manage flood risk and surface water runoff	To reduce and manage the impacts of climate change and the District's contribution towards the causes	To protect and enhance the cultural, architectural and archaeological heritage of the District	To improve access to the cultural heritage of the District for enjoyment and educational purposes	To conserve and enhance the District's landscape and townscape character
Option 1: Maximise Growth in South Derbyshire	X	✓✓	✓	--	?	--	✓✓	X	✓	--	--	?	--	--	XX	XX	--	X	X	✓	X
Option 2: Maximise Growth in Amber Valley	✓	✓	?	--	?	--	?	?	X	--	--	?	--	--	X	X	--	X	X	✓	X
Option 3: Split based on the proportion of growth	X	✓	✓	--	?	--	✓	X	✓	--	--	?	--	--	XX	XX	--	X	X	✓	X
Option 4: Split based on commuting flows	X	✓✓	✓	--	?	--	✓	X	✓	--	--	?	--	--	XX	XX	--	X	X	✓	X

4.2.1 The above summary of likely effects of options should be considered alongside the table at Appendix 1 setting out potential effects of the different options in respect of South Derbyshire. A joint appraisal of the options on South Derbyshire and Amber Valley is set out at Section 4.4 of this report.

Option 1

4.2.2 This option would see the growth in South Derbyshire increased by around 1,800 dwellings with only limited growth on the committed sites in Amber Valley being delivered to meet the City's unmet need. In assessing this option South Derbyshire District Council would look to accommodate a larger proportion of the City's unmet need by focussing additional growth in locations well related to the City.

4.2.3 This option would allow housing need to be met near to where need arises and could help ensure that sustainability benefits associated with higher growth can be delivered, particularly in respect of accessibility and meeting housing needs in areas with access to employment and key

facilities. Higher levels of growth could also have a positive effect in respect of health and wellbeing of local residents by ensuring new homes and other infrastructure is delivered and support the wider economy. However, higher levels of growth would have generally negative effects in respect of environmental objectives including those to protect biodiversity and geodiversity, reduce pollution, minimising the irreversible loss of greenfield sites, reducing the district's contribution towards climate change and conserving the districts landscape and townscape character. Uncertain effects are identified in respect of objectives concerning education and the quality of new development. No discernible effects are identified in respect of objectives to improve community safety, promote social inclusion, diversifying and strengthening the economy, enhancing the vitality of the district's town and village centres, minimising waste, delivering sustainable forms of construction and reducing and managing flood risk.

Option 2

- 4.2.4 This option would see growth in South Derbyshire potentially reduced from the level proposed in the Part 1 Local Plan Submitted in August 2014. This option would most likely see a reduction in housing requirements in South Derbyshire around the Derby Urban Area. The sites in the Plan which remain uncommitted in this area are principally cross boundary in nature. These sites could therefore support the delivery and or sustainability of sites within the city through the provision of infrastructure or other facilities. Examples of this include sites at Hackwood Farm, Wragley Way and Boulton Moor. Notwithstanding the above, lower levels of growth to the south of the City in South Derbyshire could reduce pressure on the City's infrastructure including the foul water network and transport infrastructure. However it could also reduce housing choice for the residents wanting to live within or close to the City although would not directly affect the ability of South Derbyshire to meet its own objectively assessed housing need.
- 4.2.5 Moreover given that some growth is likely to be delivered to meet the City's unmet need in South Derbyshire (there are already a significant number of sites which benefit from planning consent in this area) it is likely that even a reduced apportionment (i.e. lower level of growth) would give rise to some negative effects in respect of the environment including landscape and townscape effects, impacts on cultural heritage, climate change effects and greenfield land losses. A reduction in the scale of housing provision in the DUA could enable the delivery of minor biodiversity gains where development affecting local wildlife sites or geological sites can be avoided as a result of lower growth although this would be dependent on how any reduce requirement would be met. New housing growth even at reduced rates would support some improvements to cultural heritage in the vicinity of the City edge. No discernible effects are identified in respect of objectives to improve community safety, promote social inclusion, diversifying and strengthening the economy, enhancing the vitality of the district's town and village centres, minimising waste, delivering sustainable forms of construction and reducing and managing flood risk. Uncertain effects are likely in respect of objectives to improve health and wellbeing, improve educational achievement, improving accessibility, making best use of infrastructure, improving the quality of new development.

Option 3

- 4.2.6 This would see the City's unmet housing need distributed according to objectively assessed need of the respective Authorities. Within these strategies unmet need is split between the two Authorities with South Derbyshire accommodating just over half of the total requirement.

4.2.7 This level of growth would make a positive contribution towards the delivery of decent and affordable homes (although at a reduced level compared to Options 1 and 4). It would also perform positively against sustainability objectives to improve the health and wellbeing of the District's population, making best use of existing infrastructure, achieving stable and sustainable levels of growth and improving access to the cultural heritage of the District. The most notable negative effects of this option relate to minimising the loss of greenfield sites and reducing pollution associated with developments. Other negative aspects in relation to this option include against objectives to avoid damage to biodiversity/geodiversity sites, making the best use of existing infrastructure, reducing and managing the climate change effects, protecting and enhancing cultural heritage and conserving and enhancing the local landscape. No discernible effects are identified in respect of objectives to improve community safety, promote social inclusion, diversifying and strengthening the economy, enhancing the vitality of the district's town and village centres, minimising waste, delivering sustainable forms of construction and reducing and managing flood risk. Uncertain effects are likely in respect of objectives to improve educational achievement and improving the quality of new development.

Option 4

4.2.8 This option would see south Derbyshire looking to increase housing provision by around 800 dwellings compared to Option 3, or reduced by around 1000 dwellings compared to Option 1. The sites which could deliver this increased provision Like option 1 would be focussed in locations well related to the City additional sites would be required although the actual number of sites could be dependent on the scale of sites identified.

4.2.9 This option could ensure that the bulk of Derby's unmet need is located close to where need arises (i.e. adjoining the DUA). However this option would have generally positive effects against sustainability objectives to improve health and wellbeing, improve local access, achieve stable and sustainable levels of growth and improve access to cultural heritage in South Derbyshire. Higher of levels of growth would have generally negative effects in respect of environmental objectives including those to protect biodiversity and geodiversity, reducing pollution, minimising the irreversible loss of greenfield sites, reducing the district's contribution towards climate change and conserving the districts landscape and townscape character. Uncertain effects are identified in respect of objectives concerning education and the quality of new development. No discernible effects are identified in respect of objectives to improve community safety, promote social inclusion, diversifying and strengthening the economy, enhancing the vitality of the district's town and village centres, minimising waste, delivering sustainable forms of construction and reducing and managing flood risk.

SECTION 4.3 AMBER VALLEYS OPTIONS APPRAISAL

4.3.1 Having jointly identified broad options for apportioning the City's unmet needs Amber Valley Borough Council has also sought to identify the likely effects of these options against its own Sustainability Appraisal Framework. A copy of Amber Valley's appraisal is set out Appendix 2. An updated Sustainability Appraisal Environmental Report has been published by Amber Valley Borough Council explaining the likely sustainability effects of the different apportionment options and is available to view www.ambervalley.gov.uk/environment-and-planning/planning/community-planning/local-plan-part-1-core-strategy.

SECTION 4.4 WORKING TOGETHER TO IDENTIFY A PREFERRED OPTION FOR MEETING DERBY CITY'S UNMET NEED

4.4.1 The appraisal of the options is set out below within a table that sets out the 'broad implications' for the SA topics - it is important to note that these symbols are not used to indicate significant effects. This table is for illustrative purposes and for detailed commentary please see the main appraisal sections.

4.4.2 The symbol definitions are:

- ↗ Positive Implications
- ↔ No Implications
- ↘ Negative Implications
- ? Uncertain Implications

Table 2 Broad Implications of the Options on each SEA topic

SEA TOPIC	OPTION 1		OPTION 2		OPTION 3		OPTION 4	
	AV	SD	AV	SD	AV	SD	AV	SD
BIODIVERSITY	↔	↔	↔	?	↔	↔	↔	↔
POPULATION AND HUMAN HEALTH	↘	↗	↗	?	↗	↗	↘	↗
MATERIAL ASSETS	↘	↗	↗	↘	↗	↗	↘	↗
SOIL, WATER AND AIR	↘	↘	↘	↔	↔	↘	↘	↘
CLIMATIC FACTORS	↘	↘	↘	↔	↘	↘	↘	↘
CULTURAL HERITAGE	↔	↔	↘	↔	↔	↔	↔	↔
LANDSCAPE	↔	↘	↘	↔	↘	↘	↔	↘

Option 1 Maximise Growth in South Derbyshire

4.4.3 This option would require South Derbyshire (SDDC) to make available a number of additional sites to those suggested in the submitted Local Plan Part 1 and would increase the District's Housing Requirement to maximum of around 14,400 homes between 2011 and 2028. It would reduce Amber Valley's (AVBC) requirement to around 8,000 homes over the same period and assumes AVBC only meets its own housing need and only contributes towards the delivery of homes to meet the City's unmet need on the committed site at Radbourne Lane, Mackworth. In delivering this level of growth in SDDC, the Council would need to look again at the sites included in its Strategic Housing Land Availability Assessment (SHLAA) to identify if potential further sites are capable of accommodating this level of growth. Preference in site selection would be given to the urban area to reflect the preferred distributional strategy for SDDC as set out in Policy S1.

4.4.4 SDDC's SHLAA includes a number of large strategic sites on the urban edge. However where growth is not capable of being delivered on the urban edge of Derby, the Authority would then need to consider at other SHLAA sites away from the urban edge with preference to those areas with the best connectivity to the City.

4.4.5 The corollary of increasing the apportionment of Derby's unmet need to SDDC would be a reduction in the unmet need to be provided in AVBC. Given that the proposed growth

strategy in AVBC concentrates growth in its four main urban areas and through the delivery of a 'mixed use development' at Denby, it is likely that a reduction in the housing requirement in AVBC would see the removal of sites proposed for allocation in the submitted Core Strategy for AVBC away from the Derby Urban Area. The site at Denby would be retained given the regeneration and other benefits the development of the site would bring, as set out in the Preferred Growth Strategy for AVBC. The sites most likely to be taken out of the Core Strategy would be likely to be those least well related to Derby and/or the four main urban areas i.e. within one or more of the Alfreton, Heanor and Ripley urban areas, since that is where the majority of the site allocations are.

Looking at the effects of this option across the Housing Market Area

Biodiversity, Flora and Fauna

- 4.4.6 Maximising growth in SDDC (and reducing housing delivery in AVBC) would not have a significant effect on biodiversity or geodiversity assets.

Population and Human Health

- 4.4.7 This option would provide greater opportunity to ensure housing is delivered close to where need arises (i.e. to Derby City) as the unmet need would be focused on the DUA in SDDC. On this basis it is likely that this option would have a limited positive effect in respect of SDDC by increasing overall housing choice in this area. This would be balanced against a limited negative effect of reduced overall housing choice in AVBC. In Ripley, where there is an emerging Neighbourhood Plan, a desire has been put forward to see the range of facilities in the town increase and for the town to become more self-sufficient. Decreasing the number of sites within the Ripley urban area may therefore make this desire harder to achieve.
- 4.4.8 Development at the scale proposed in this option could also contribute towards the improved/extended provision of healthcare facilities in the vicinity of Derby City which could benefit new and existing communities in the northern part of SDDC.
- 4.4.9 Within AVBC, the removal of sites around one or more of the four main urban areas would be likely to result in the loss of potential benefits from new housing development including local health care and other facilities as well as reduced accessibility to new facilities which would be concentrated in Denby, in other larger sites in Amber Valley and in SDDC.
- 4.4.10 This polarisation of growth might also result in indirect effects on local communities and community cohesion. Where existing issues are not addressed, there could be a number of negative effects on those areas where proposed development sites are removed, including anti-social behaviour and an exodus of residents to areas where growth and development are planned/happening.
- 4.4.11 Maximising growth in SDDC would significantly increase the need for schools provision in the Derby Urban Area. The scale of growth would be likely to require the provision of additional primary and secondary schools. Additional primary schools are already planned on the edge of the City at Boulton Moor, Chellaston Fields, Wragley Way, Highfields Farm, and Hackwood Farm. Growth at this level would create the need for further primary school provision beyond that already anticipated in the submitted SDDC Local Plan Part 1.
- 4.4.12 In respect of secondary schools the submitted Core Strategy for SDDC indicates the need for a further school in the Derby Urban Area later in the Plan period, although this will be considered in detail through the Part 2 Local Plan. Significantly increased growth could trigger the need for earlier delivery of this. However additional growth may also help support the delivery of a new school. Put simply it is unclear whether higher growth in the Derby Urban Area could support or affect the ability of the Local Education Authority to meet their statutory requirement.

4.4.13 The removal of housing sites in AVBC would not be likely to have any notable effects in respect of schools provision. However secondary school development plans have been identified in the Derby HMA Education position statement for the Alfreton area; a reduction in growth could make those plans less viable.

4.4.14 The further provision of homes and related infrastructure could also offer benefits to existing communities in SDDC. However excessive levels of growth could, in some locations, affect community cohesion and the delivery of in excess of 8,000 homes on the urban edge of Derby over a short time frame could negatively affect existing communities.

Material Assets

4.4.15 The allocation of further sites in SDDC could increase the potential for development well related to existing facilities in Derby City. Sites are mostly larger scale than those in AVBC and could therefore contribute to the provision of new services and infrastructure including public transport provision which could further ensure sites are accessible and served by sustainable and non-travel choices. Many of the sites in AVBC are in locations which are poorly served by existing facilities or transport and reduced levels of growth could affect the delivery of additional infrastructure and services in these areas. On balance however it is likely that sites close to the City would provide greater access to new and proposed facilities.

4.4.16 Maximising growth in SDDC is likely to have a positive effect in respect of the local economy, as it would ensure that the local labour market grows in an area well related to existing and proposed employment development in the City. The reduction in growth in AVBC could however reduce labour market growth, which could affect investment into AVBC.

Soil, Water and Air

4.4.17 This option would not have any notable effects in respect of waste generation or in respect of natural resources at the HMA level as the overall housing figure would remain the same. Higher growth in SDDC would increase waste at the District Level. The sewerage network to the south and west of the City is already constrained and the level of growth proposed under this scenario could lead to increased incidence of sewer flooding or the triggering of Combined Sewer Overflows to the south of the City. Unmitigated, these effects would be negative and potentially significant, but higher growth may also provide opportunity to deliver strategic improvements to the foul sewer network. Though, Severn Trent would be required to ensure sufficient capacity is provided through their asset management programme. By shifting the location of development to SDDC, services and facilities would be further away from communities in AVBC. This would be likely to result in increased car journeys and associated air pollution.

4.4.18 The potential removal of sites in AVBC could have a negative effect since it could see some brownfield allocations being removed in AVBC and substituted with greenfield sites in SDDC.

Climatic Factors

4.4.19 Greater development is unlikely to exacerbate surface or fluvial flooding and therefore this option would have a negligible effect. It might mean that the Asher Lane site in AVBC, which is partly located in Flood Zone 3 and partly within Flood Zone 2, could remain undeveloped. However the majority of sites in AVBC are not subject to flood risk.

4.4.20 Focusing growth on the edge of Derby would ensure that growth is well related to existing facilities and well served by public transport services. It could therefore deliver more sustainable travel behaviour and in turn minimise greenhouse gas emissions. This would be in contrast to potential increases in such emissions in AVBC caused by changes in travel patterns and due to the locations of new development.

Cultural Heritage

- 4.4.21 High levels of growth in SDDC in the Derby Urban Area are unlikely to have any notable effects on cultural heritage features, although localised effects could occur in a number of locations on the urban edge. Development in the vicinity of the City could also offer limited opportunities to improving access to cultural heritage locally. Reducing the level of growth in AVBC is unlikely to have any effect (positive or negative) given that none of the further sites that would be likely to be removed from the Core Strategy have significant heritage constraints

Landscape

- 4.4.22 The sites in AVBC most likely to be removed from the Core Strategy are those in the Alfreton and/or Ripley Urban Areas located away from the Derwent Valley Mills World Heritage Site and its Buffer Zone. The effects would most likely remain the same as that predicted in the SA for the Core Strategy. The only strategic sites allocated in the World Heritage Site would be those within Belper which already have planning permission. Sites in SDDC most likely to be considered afresh for growth are similarly not constrained by landscape designations but the scale of growth in these areas would have a negative effect on the local landscape. However site design and layout could help ameliorate the worst effects of large scale development on the urban edge.
- 4.4.23 Higher levels of growth focussed into SDDC would not affect the ability of the City and SDDC to jointly deliver sites proposed at Hackwood Farm, Wragley Way or Boulton Moor and deliver the necessary infrastructure to support housing delivery in both areas.

Having reviewed this option jointly, it is concluded by all Authorities that this is not the preferred approach to meeting the City's unmet housing need.

This option may offer an opportunity to deliver growth adjacent to the Derby Urban Area close to where housing need arises and in locations well served by existing and proposed infrastructure, public transport services and employment land. However there are a number of significant constraints around the City that will limit the opportunities to accommodate growth, for example Green Belt designations to the north and east of the City.

From Derby City's perspective, the concentration of growth into SDDC would have a potentially significant effect on local infrastructure. The probable effect on the City's transport network and the increasing pressure being generated on Derby's schools and health infrastructure are other important factors that constrain what is possible to deliver 'sustainably' within the DUA. To an extent, the effects identified through the assessment are being addressed through the provision of new infrastructure. However, there is a limit to what is possible to deliver before the mitigation proposed is no longer sufficient or deliverable. At present no other proposals have been identified that could provide significant mitigation over and above that identified in the strategy particularly from a transport perspective. This naturally creates a limit to what is appropriate within the DUA. Unconstrained growth around the City would not be appropriate and would, in the view of the Authorities, be likely to lead to a situation where the effects outweigh the benefits

From SDDC's perspective, setting growth in SDDC at 14,400 homes would create a need for the delivery of around 850 homes per annum. Going forward this would require the delivery of new housing development in SDDC each year to be at a level not achieved in the District since 2008. This would present a challenge particularly since significant growth would also occur on cross boundary sites, or sites very close to the District boundary with the City. Representations have been made which suggest a limit to what can be delivered annually in any one 'area' as a result of market forces. On this basis, it would be appropriate for some of Derby's unmet need to be accommodated within AVBC to achieve a sustainable pattern of

housing growth and to actually be able to deliver the HMA housing target given the market's capacity to deliver this level of development.

From an AVBC perspective, the development of land north of Denby is a key component of the Core Strategy, given its regeneration and other benefits and would remain allocated regardless of the extent to which AVBC contributes to meeting Derby's unmet need. Under this option, Denby would contribute to meeting AVBC's own housing need and sites would need to be deleted within the 4 main urban areas. The reduction in housing development in other parts of the borough could however have a range of socio-economic effects, such as limiting housing choice and affordability.

Higher levels of growth focussed into SDDC would not affect the ability of the City and SDDC to jointly deliver sites proposed at Hackwood Farm, Wragley Way or Boulton Moor and deliver the necessary infrastructure to support housing delivery in both areas.

Option 2 Maximise Growth in Amber Valley

- 4.4.24 This option would see AVBC take significant growth over and above the agreed housing target of 7,395 to around 12,700. To accomplish this AVBC would look at its overall housing growth strategy of concentrating the growth around the four main towns with some on the edge of Derby to help meet Derby City's unmet need.
- 4.4.25 The strategy for housing distribution in the submitted Core Strategy for AVBC is that most of the growth will take place in and surrounding the four urban areas of Alfreton, Belper Heanor and Ripley with the remaining growth taking place on the edge of Derby at Radbourne Lane, Mackworth, on a mixed use site north of Denby and within district centres and local centres.
- 4.4.26 Whilst maintaining the principles of this strategy the first sites that would be looked at under this option to accommodate the additional growth to meet Derby City's unmet need would be SHLAA sites within the Derby Urban Area (DUA) on the basis that sustainable development principles would guide allocating growth as close as possible to where the need arises. Given that a significant area of the land adjacent to Derby City within AVBC is allocated as Green Belt the sites that would be considered first would be those to the west of the A6 corridor and north and south of the A52 corridors. However the suitability of those SHLAA sites has been assessed in terms of their impact on heritage assets within the area, through the preparation of a Historic Environment Statement by environmental consultants ECUS published in June 2015. This statement concluded that development of these strategic sites would have a significant impact on heritage assets within the area, some of which are designated as being of national and/or international importance.
- 4.4.27 Given the constraints to further development within AVBC on the edge of Derby City, the next sites that would be considered to meet the additional growth would be around the four main urban areas in the Borough. These would include those sites previously considered as part of the Proposed Changes to the Local Plan Part 1 Core Strategy document that was published for consultation in July 2014. However, these sites would not be sufficient in themselves to deliver the quantum of additional growth, so further SHLAA sites around the four main urban areas would also need to be considered.
- 4.4.28 This would mean that further sites would need to be considered around the Alfreton, Ripley and Heanor urban areas. Given that there are no SHLAA sites above 400 dwellings in and around those urban areas that are not within the Green Belt, this would require a wider range of sites with capacity of between 80 and 200 dwellings each. Also, the scale of the additional growth required under this option would present a significant challenge in terms of identifying suitable and deliverable sites around the urban areas of Alfreton, Ripley and Heanor. This challenge would mean having to consider both sites adjacent to Derby City and sites within the Derwent Valley Mills World Heritage Site and Buffer Zone, both locations where development could have a significant adverse impact on heritage assets, as set out in the ECUS Historic Environment Statement.
- 4.4.29 The increase in the housing apportionment to AVBC under this option would logically lead to a commensurate decrease in housing delivery in SDDC to meet Derby City's unmet need. However most of the proposed allocations in SDDC's submitted Local Plan Part 1 already benefit from planning permission.
- 4.4.30 Sites within SDDC which are not yet committed are mainly located in the DUA at Boulton Moor, Wragley Way, Primula Way (although a third of this site has consent) and Hackwood Farm. Outside the DUA, proposals for 400 homes at both Hatton and Woodville have not yet been determined. Of the uncommitted sites in the DUA, Hackwood Farm, Wragley Way and Boulton Moor are of a cross boundary or co-dependent nature with Derby City. A reduction in the housing target for SDDC may offer potential to look again at the need for these sites. The removal of these sites from the Local Plan could however potentially reduce the level of infrastructure provision that will help support development within the City.

4.4.31 This may lead to less satisfactory or sustainable forms of development on areas currently identified for cross-boundary development. The removal of SDDC's elements of cross boundary sites could, in turn, increase the amount of unmet need to be met outside of the City. Elsewhere in SDDC sites proposed for allocation in the submitted Core Strategy which are as yet uncommitted, are located in Hatton and Swadlincote, both of which are poorly related to Derby City and will deliver locationally specific infrastructure to benefit their wider area which would otherwise not be deliverable.

Biodiversity, Flora and Fauna

4.4.32 Maximising growth in AVBC (and reducing growth in SDDC) would not have a significant effect on biodiversity or geodiversity assets in AVBC, although it is noted that a small number of sites in AVBC are located relatively close to SSSIs (Markeaton Stones is 400m from a SSSI for example). The provision of additional sites in AVBC would mostly have localised effects on Local (County) Wildlife Sites or priority/protected species. Given the scale of sites potentially available, impacts to a number of sites could lead to cumulative effects on biodiversity effects. These effects could be positive or negative as it is acknowledged that in some cases development can create net gains in biodiversity if designed appropriately.

4.4.33 For SDDC, the potential removal or scaling down of development on the edge of Derby could reduce effects on County Wildlife Sites at Hackwood Farm, and the Sinfin Moor Regionally Important Geological Site.

Population and Human Health

4.4.34 This option could potentially allocate housing delivery away from where the need is derived. However it would increase housing choice in the main towns of AVBC. In Ripley, where there is an emerging Neighbourhood Plan, a desire has been put forward to see the range of facilities in the town increase and for the town to become more self-sufficient. Increasing the number of sites within the Ripley urban area may therefore help to support this desire.

4.4.35 For SDDC, a lower housing target as a result of the unmet need from Derby City being maximised in AVBC would not affect the ability of SDDC to meet its own housing need, but housing choice could be significantly reduced. Reduced growth could also restrict opportunities to secure improved/extended provision of healthcare facilities including in the vicinity of Derby City where potential facilities could be lost due to cross boundary sites not having the critical mass to deliver such facilities (for example Hackwood Farm) should sites in SDDC no longer be taken forward for development.

4.4.36 Maximising growth in AVBC could significantly increase the need for schools provision. However it may be more difficult to deliver new primary and secondary schools, or extensions to existing schools with a more dispersed pattern of growth to meet a higher housing target. Many sites are also poorly related to existing primary and secondary schools and would be unlikely to be large enough in themselves to deliver new schools. The provision of many small sites could place pressure on existing infrastructure including roads, waste water and potable water and community facilities. Development would need to be carefully planned to ensure that economies of scale can be achieved where possible.

4.4.37 A reduction in the scale of growth in SDDC (and most likely in the DUA) would reduce the need for the delivery of new primary schools, but could impact the delivery of a primary school on the Hackwood Farm site. This could affect the sustainability/deliverability of the 400 homes located on this site in Derby City. In AVBC the need for primary school expansion has been identified in all four urban areas to accommodate proposed levels of growth. Further amounts of growth may require further expansion. This would present a particular challenge in the south of the Alfreton urban area where it has been identified that it is not feasible to expand existing school sites.

4.4.38 In respect of secondary school provision a significant reduction in the level of growth in the DUA in SDDC could reduce development to a level where a further school may not be required in the Plan period. However this could place significant pressure on existing schools. However where sufficient growth does take place to still justify the delivery of a secondary school, lower levels of growth may be insufficient to fund the delivery of such a facility. In AVBC the further growth under this option may be able to be accommodated through existing secondary schools however other constraints may mean that the growth is not even over the four urban areas and therefore exceeding the existing capacity of those schools, with the greatest challenge again being around the south of the Alfreton urban area.

Material Assets

4.4.39 Higher growth in AVBC would increase the number of sites allocated around the four main towns. This additional growth could support the provision of new infrastructure and facilities in areas which are identified as having constrained access to services, public transport or cycle routes (of which there are a number in the Alfreton / Ripley / Heanor area). However sites in AVBC are more dispersed and of a smaller scale which could pose challenges in generating a 'critical mass' of development that would make this investment viable. Furthermore, this may not fully address accessibility issues where this is related to the distance from facilities rather than a lack of capacity to accommodate growth. Overall however higher growth would present opportunities to deliver new infrastructure to support that growth.

4.4.40 The potential reduction in sites in the DUA in SDDC could make the delivery of key infrastructure necessary to support growth on the southern edge of Derby City challenging. As previously stated this could reduce the sustainability credentials of some sites within Derby and the level of mitigation provided to support growth within the City..

4.4.41 Maximising growth in AVBC may lead to new homes being located away from employment opportunities which either already exist or will be provided over the Plan period in Derby City. This could lead to more commuting and could affect access to local labour where growth is targeted to areas with poor public transport/non-car access to employment areas in the City.

Soil, Water and Air

4.4.42 This option would not have any notable effects in respect of waste generation or in respect of natural resources at the HMA level but higher growth in AVBC would increase waste at the Borough level. A reduction in the level of growth in the DUA could reduce the pressure on the local sewerage network in and around the south and west of Derby City. However, it is unclear whether reduced growth would ultimately have a reduced effect as it could remove mitigation options available to Severn Trent that could be more effective at improving sewerage capacity.

4.4.43 Higher levels of development in AVBC may have localised and potentially detrimental effects on the sewerage network and waste water treatment works in some areas.

4.4.44 A reduction in the quantum of development in the DUA in SDDC could help minimise any increase in traffic flows around the urban edge including the inner ring road which are designated in part as an Air Quality Management Area (AQMA) in the City.

4.4.45 The more dispersed pattern of development that would be required to deliver the higher growth levels in AVBC might have a number of negative effects on natural resources, including through the need to allocate greenfield sites and/or high quality agricultural land. In respect of greenfield land losses, the potential removal of sites in AVBC could have a minor positive effect in SDDC as it would shift development away from an area which is exclusively greenfield and could offer potential to develop previously developed sites in AVBC.

Climatic Factors

- 4.4.46 Distributing higher growth in AVBC could have two implications. Firstly, some of the sites around the four main urban areas are susceptible to flooding. Secondly, the pattern of growth would be likely to generate increased greenhouse gas (GHG) emissions from vehicles due to increased distances to travel to and from Derby to access employment opportunities.
- 4.4.47 Sites around Derby in SDDC are generally located in areas at low flood risk (or in respect of Primula Way a flood alleviation scheme to be developed as part of the consented scheme). Diverting development could therefore lead to a greater reliance on sites at flood risk i.e. those in AVBC to deliver the HMA housing target (although clearly any development in such locations would need to be sequentially tested and flood risk mitigated were such sites to be taken forward).

Cultural Heritage

- 4.4.48 The impact on heritage assets of a number of sites in the AVBC DUA and within the Derwent Valley Mills World Heritage Site and Buffer Zone have been subject to detailed consideration through the ECUS Heritage Environmental Statement published in June 2015, which concluded that development of many of these sites would have a significant adverse impact on heritage assets, some of which are designated as being of national or international importance. For example, planning permission for housing development at Kedleston Road, Quarndon has been refused, following detailed consideration of the impact of the application proposals on a number of heritage assets within the vicinity of the site. High levels of growth focussed in AVBC could have significant effects on heritage assets should they be focused in the DUA. However, the Council have determined that rather than cause potentially significant effects to these assets (and constraints in terms of the Green Belt) that the increased growth proposed by this option would be ideally be allocated in sites away from the DUA and focused on the four urban areas. This should minimise any effect on these sensitive sites, however the scale of development proposed in this option may mean sites having to be allocated that could have an impact on the areas cultural heritage.
- 4.4.49 The reduction of sites in the DUA in SDDC could potentially have minor beneficial effects as uncommitted sites have limited potential to affect archaeological assets or the setting of listed buildings. At a HMA level, and particularly in AVBC, this option could potentially give rise to significant negative effects. This is due to the fact that whilst the focus is on providing sites in and around the four main urban areas within the Borough, there will become a point where sites in these areas are not deliverable / viable. In this case, the Council would need to look to the DUA and sites in and around Belper to deliver the higher growth although this would be by a minor proportion of the overall additional quantum.
- 4.4.50 Reducing the scale of development around the City in SDDC may reduce access to cultural assets including the Trent and Mersey Canal (from Wragley Way) and Elvaston Castle (from Boulton Moor) by foregoing identified opportunities to deliver improved footpaths and cycle links in the vicinity of the southern edge of the City

Landscape

- 4.4.51 There is greater potential for negative effects on sites in AVBC in respect of Landscape and Townscape particularly where sites are located within the Derwent Valley Mills World Heritage Site and/or its Buffer Zone, or where they could have a significant effect on the setting of nationally and internationally significant cultural assets such as Kedleston Hall. As discussed previously, under this option the Council would look to allocate further sites in the four urban areas. As these additional sites within AVBC are likely to be smaller and the pattern of development more dispersed this will make a cohesive approach to mitigating landscape impacts challenging and is likely to harm landscape character.
- 4.4.52 In contrast sites in SDDC around the DUA, or indeed around other uncommitted sites identified as suitable growth in the Submitted Plan are larger scale and located in areas not

subject to local landscape or townscape designations. The potential reduction in growth could reduce the scale of potential landscape effects around SDDC, although it is likely that, at a HMA level, this option could have greater landscape or townscape effects due to the identified sensitivities in AVBC.

Having reviewed this option jointly, it is concluded by all Authorities that this is not the preferred approach to meeting the City's unmet housing need.

This option may offer an opportunity to boost housing delivery in AVBC which may have beneficial effects in respect of delivering new infrastructure, regenerating the Borough, increasing housing choice and potentially supporting inward investment. However the scale of growth coupled with the nature of sites closely related to Derby (which tend to be subject to greater environmental constraints in respect of heritage impacts, flood risk and Landscape in particular) could notably worsen the environmental effects associated with development, compared to growth concentrated on large sites around the DUA as reflected in Option 1.

A significant reduction in new homes required in SDDC, most likely around the DUA could reduce access to labour for existing and future employers in the City as it could dislocate growth away from the City into AVBC, creating issues with accessibility, GHG emissions and potential social cohesion as some of the areas would change their character entirely. It could also significantly reduce the delivery of homes in an area close to where actual need arises compared to other considered options which could lead to less sustainable travel patterns.

In addition, the loss of cross boundary/co-dependent sites in SDDC including at Hackwood Farm, Wragley Way and Boulton Moor could affect the ability of the City to deliver its growth target as it would potentially affect the sustainability/viability of a number of sites in the city and/or the delivery of key cross boundary infrastructure.

Ultimately however, it is clear that in environmental terms this scale of growth would be difficult to accommodate in AVBC without potentially significant environmental effects particularly on its heritage assets. Moreover it would move a very significant proportion of the City's growth to locations which are not well related to Derby. Given the co-dependent nature of many of the uncommitted sites in the DUA it may be difficult, in practice, to remove a number of proposed, but not yet unconsented developments in the DUA as these will be needed to support the delivery of critical infrastructure which, if not delivered could potentially affect growth in Derby City itself and further increase unmet need.

Option 3 Split Based on Proportion of Growth (44% in AVBC 56% in SDDC)

- 4.4.53 Cumulatively there is a need for 17,000 homes in the HMA outside of Derby of which 9,605 are needed in SDDC and 7,395 homes in AVBC). This Option would represent an apportionment of Derby's unmet need to SDDC of 3,017 dwellings and to AVBC of 2,371 dwellings. This apportionment would be proportionate to the housing need arising within AVBC and SDDC respectively as identified most recently in the sensitivity testing. In relation to Derby's unmet need, SDDC have proposed a contribution of 2,736 dwellings in their submitted Core Strategy, with approval for an increase of up to between 2,934 and 3,013 dwellings whilst the AVBC have proposed a contribution of 2,256 dwellings in their submitted Core Strategy, with approval for an increase of up to between 2,375 and 2,454.
- 4.4.54 In respect of AVBC the level of provision under this option is higher than the level of growth proposed at the time of the Core Strategy examination, but additional sites have subsequently been proposed, consistent with the overall housing distribution strategy as in the submitted Core Strategy and have been subject to further sustainability appraisal and public consultation.
- 4.4.55 This level of growth is also higher than that proposed in the SDDC Local Plan Part 1 and considered at examination though SDDC has still at least 600 dwellings to consider through its Part 2 of the Local Plan. In addition supply outside of that proposed through the Local Plan could also contribute towards this higher level of growth

Biodiversity, Flora and Fauna

- 4.4.56 This level of growth in SDDC would see the City's unmet need, together with some of SDDC's own need, met on the urban edge of Derby. Growth in AVBC to meet the City's needs would mostly be located at Denby and at Radbourne Lane, Mackworth with the remaining coming through smaller sites in towns and local centres that relate well to Derby and in these locations would not give rise to significant biodiversity or geodiversity effects but could have localised effects in some locations.

Population and Human Health

- 4.4.57 This option would see the bulk of the City's unmet need being delivered in the Derby Urban Area. Within AVBC, this would include development on the edge of the city, including on sites already committed or identified at Radbourne Lane, Mackworth, but with development away from the edge of Derby. This would be Land North of Denby and also in smaller sites in towns and district centres most well related to the Derby Urban Area. This option would potentially support housing choice more widely than either Options 1 and 2 by distributing unmet need across a larger area. This approach could also support the delivery of health facilities (and indeed other infrastructure) across a broader area although it is unlikely that smaller scale sites could, on their own, support the delivery of new health facilities (although they could support the expansion of existing ones) where this option lead to the delivery of many smaller sites rather than strategic level developments.
- 4.4.58 This option would generate the need for new primary schools in the Derby Urban Area within SDDC at Boulton Moor, Chellaston; Wragley Way; Highfields Farm and Hackwood Farm. It would also create the need for the provision of an additional secondary school for later in the Plan period. An initial consultation has been undertaken already on the potential location of a new secondary school.
- 4.4.59 It has been identified through the sustainability appraisal that this level of provision would present opportunities to improve access to housing and employment. It would also help to maintain the viability of town centres, which could have knock-on benefits in terms of cohesion, wellbeing and safety. However, higher levels of growth could also put undue pressure on facilities in existing communities, so inappropriate development could widen inequalities in areas of need. It has been recognised that some areas might experience pressure in terms of school places within the Derby Urban Area given the capacity at Ecclesbourne School in Duffield.

4.4.60 The provision of this level of unmet need to AVBC could lead to potential access problems. This would need to be dealt with through the proposed sites making contributions to improve the local road infrastructure. The proposed level of overall growth however provides the opportunity in AVBC to bring forward mixed use schemes that will have positive economic and environmental impacts for the local population.

Material Assets

4.4.61 The greater provision of sites to SDDC could increase the potential for development well related to existing facilities and employment areas in Derby City. Sites are mostly larger scale than those in AVBC and could therefore contribute to the provision of new services and infrastructure including public transport provision which could further ensure sites are accessible and served by sustainable and non-travel choices.

4.4.62 It is recognised that by being heavily constrained around the DUA, AVBC would need to allocate sites for Derby's unmet need in areas that are not as well related to Derby. This will have advantages and disadvantages. Additional growth around the Borough's main towns and a new settlement at Denby could provide opportunity to increase the sustainability of locations subject to development. However at a HMA level this option is likely to lead to increased need to travel as 'Derby's housing' is further away from Derby than it would be if allocated in SDDC on the DUA for example. Locating the majority of growth in SDDC is likely to have a positive effect in respect of the local economy as it would ensure that the local labour market grows in an area geographically close to and connected to existing and proposed employment development in the City such as Infinity Park and Derby Commercial Park.

4.4.63 Accommodating a notable proportion of the City's growth in AVBC could provide access to employment areas to the north of the City but also help to provide employment and housing choice to a wider geography i.e. the four towns.

Soil, Water and Air

4.4.64 The sewerage network to the south and west of the City is already constrained and the level of growth proposed under this scenario could lead to increased incidence of sewer flooding or surcharging. Unmitigated, these effects would be negative and potentially significant albeit reduced compared to Option 1. Though, Severn Trent would be required to ensure sufficient capacity is provided through their asset management programme.

4.4.65 The allocation of unmet need to AVBC could slightly exacerbate issues in the DUA where this is on the edge of the City, but elsewhere localised hydraulic capacity improvements could still be required.

4.4.66 Directing some unmet need outside of the Derby Urban Area could also reduce the significance of air quality impacts on the City's AQMA where it leads to a reduction in traffic flows around the inner ring road. Overall dividing growth between the authorities could have a beneficial, albeit limited effect in respect of air quality particularly in Derby City as it would effectively meet some of the City's housing need away from the urban area.

4.4.67 This option could also provide opportunity to reduce the proportion of greenfield land to be released as it would provide opportunity to regenerate brownfield sites in AVBC not only in Denby but also in and around the four towns. In contrast, uncommitted sites in SDDC are all greenfield and would lead to the loss of greenfield land mainly around the urban edge.

Climatic Factors

4.4.68 Spreading housing growth across the two Authorities would allow both Authorities to avoid sites at greatest risk of flooding, although increased housing provision could be accommodated in the DUA given the limited level of flood risk in this general area.

4.4.69 Meeting some of the City's unmet need in AVBC away from the DUA could lead to increased traffic movements and/or more unsustainable travel patterns where residents continue to access employment and services in Derby City, but the overall negative effects could be mitigated through the provision of new facilities to support development, the development of sites not well related to the City.

Cultural Heritage

4.4.70 Development in the DUA in SDDC at this scale is unlikely to have significant effects on heritage assets although individual sites could have notable localised effects particularly in respect of below ground archaeology or in some locations impact on the setting of listed buildings.

4.4.71 Development in and around the four main urban areas in AVBC would provide the opportunity to regenerate areas and enhance character and minimise effects on the most environmentally 'sensitive' areas of landscape near the Peak Fringe and the parklands of Kedleston Hall and Meynell Langley in the south. There is also the possibility that development could have an adverse impact on the character of the built and natural environments.

4.4.72 Despite the majority of strategic housing sites being identified in the Ripley and Alfreton urban areas, there are some allocated strategic growth sites within Belper, although the smaller scale of growth and the topography of the sites should make it easier to secure appropriate mitigation / enhancement through design.

4.4.73 There are historical buildings and features associated with some of the allocated sites. The setting of which, will be impacted as a result of housing development, but good design could minimise effects so that impacts were only minor. Indeed, a number of site policies require development to be secured that respects and where possible enhances not just the heritage assets themselves, but the setting of these features too.

4.4.74 Although some sites do not fall within areas of sensitivity, development here could still affect the setting and tranquillity of areas due to increased traffic and impacts on views in and out of the most sensitive areas.

4.4.75 Overall this level of growth would lead to sites being allocated that would have some impact on heritage assets however given this impact is significantly lower and more easily mitigated than the large impact of the heritage assets of AVBC that would need to be considered with levels of growth in Option 2.

Landscape

4.4.76 There is greater potential for negative effects on sites in AVBC in respect of landscape and townscape particularly where sites are located within the Derwent Valley Mills World Heritage Site and/or its Buffer Zone, or where development could have a significant effect on the setting of nationally and internationally significant cultural assets such as Kedleston Hall. This option gives a level of growth that allows impacts on those assets to be minimised.

4.4.77 In contrast sites in SDDC around the DUA, or indeed around other uncommitted sites identified as suitable growth in the Submitted Plan are larger scale and located in areas not subject to local landscape or townscape designations. The splitting of growth between AVBC and SDDC could have a potentially more detrimental effect than Option 1 at the HMA level, but could be much reduced compared to Option 2 (which would require AVBC to identify sites in more sensitive locations).

Having reviewed this option jointly, it is concluded by all Authorities that this is the preferred approach to meeting the City's unmet housing need.

Splitting growth with a slightly higher requirement to SDDC which would reflect the less constrained nature of sites in SDDC within the DUA, compared to sites in AVBC.

It would facilitate significant growth in the DUA which would meet housing need arising in both Derby and SDDC which are well related to and accessible to communities living in the City and the northern part of SDDC, but makes some provision for AVBC which could help support its growth and regeneration priorities, but at a level that can be accommodated without significant negative effects on cultural heritage, and the natural environment constraints around the AVBC boundary of the DUA.

At this level of growth both Authorities consider that the housing target (comprising of OAN and the suggested unmet need apportionment) is deliverable over the Plan period. However, even at this level it is a challenge for both councils to demonstrate a 5 year supply but this option gives the greatest prospect of each council demonstrating a robust supply.

The Authorities also consider that some dispersal of development away from the urban fringe on the southern edge of the City could provide greater housing choice, and whilst it is self-evident that need is best met where it arises, the concentration of new developments to a narrow collar of land around the south and west of Derby could restrict housing choice at the HMA level. It is also worth reiterating that representations have been made which suggest there is a limit to what can be delivered annually in any one 'area' as a result of market forces. On this basis the decanting of some of Derby's growth to AVBC continues to be considered an appropriate and sustainable strategy overall.

Accepting that this strategy for apportionment may not be 'as sustainable' in some respects as the delivery of the sites in urban areas well served by existing infrastructure given the nature of the site options, the Authorities consider that this option provides the best fit. Whilst the delivery of this scale of housing will be challenging for both AVBC and SDDC, they consider that this option is deliverable and can be accommodated without unacceptable effects on the City's infrastructure. This option is generally in line with the submitted Plans of the two Authorities when also considering the Committee approvals for increased housing targets.

Option 4 Split Based on Commuting Flows (30 % in AVBC and 70% in SDDC)

- 4.4.78 In 2008, 18,100 people (5,450 from AVBC and 12,750 from SDDC) commuted out of the Borough/District to work in Derby City¹⁰ area, accounting for 13.9% of all people working in Derby City. As 70% of this out commuting is from SDDC, compared to 30% from AVBC, orientating a greater proportion of growth to SDDC could help to support relatively higher levels of employment growth proposed in the City.
- 4.4.79 Apportioning housing growth according to this split would set SDDC's overall target at 13,377 dwellings and AVBC's overall target at 9,011 dwellings. This would mean SDDC contributing 3,772 dwellings towards Derby's unmet need and AVBC providing the remaining 1,616 dwellings, which would be a reduction of 750 dwellings in AVBC and a consequent increase in SDDC, compared to Option 3

Biodiversity

- 4.4.80 Maximising growth in SDDC (and reducing housing delivery in AVBC) at this scale would not have a significant effect on biodiversity or geodiversity assets.

Population and Human Health

- 4.4.81 Option 4 would provide greater opportunity than Options 2 and 3 to ensure Derby's unmet need is delivered close to where need arises i.e. Derby. On this basis it is likely that this option would have a limited positive effect in respect of SDDC by increasing overall housing choice in the vicinity of the DUA but would be balanced against a potential limited negative effect of reduced overall housing choice in AVBC. It should be noted that the designation of specific sites to meet Derby's unmet need is largely academic. There is no way to control who buys which houses on these sites. It is assumed that in general sites close to Derby would likely attract residents that work in or close to Derby.
- 4.4.82 Development at this scale could also contribute towards the improved/extended provision of healthcare facilities in or immediately adjoining the City which could benefit new and existing communities in the northern part of SDDC.
- 4.4.83 Under this option, within AVBC, the land north of Denby would be retained partly on the basis of its potential to contribute to Derby's unmet need and partly on the basis of the regeneration and other benefits that would be delivered at this location. This option would potentially support housing choice more widely than either Options 1 and 2 by distributing unmet need across a larger area. This approach could also support the delivery of health facilities (and indeed other infrastructure) across a broader area although it is unlikely that smaller scale sites could, on their own, support the delivery of new health facilities (although they could support the expansion of existing ones) where this option lead to the delivery of many smaller sites rather than strategic level developments.
- 4.4.84 This polarisation of growth might result in indirect effects on local communities and community cohesion. Where existing issues are poor and not addressed, or are left to decline, then there could be a number of negative effects including anti-social behaviour and an exodus of residents to areas where growth and development are planned / happening. This could negatively affect areas where development is removed. These effects are likely to be of a greater magnitude than Option 2 and the positives gained from Option 3 would not materialise.
- 4.4.85 This option would increase the need for schools provision in the DUA. The scale of growth may require the provision of additional primary school places (compared to those set out at Option 3), although this would be dependent on how additional homes are distributed or

¹⁰ LEA data 2008

located in relation to existing and proposed primary schools. In respect of secondary schools the submitted Core Strategy for SDDC indicates the need for an additional school in the DUA later in the Plan period. Further consideration will be given to this in the Part 2 Local Plan, although the County Council has undertaken initial consultation on the location of a new secondary school. It is unclear however whether this level of increased growth compared to Option 3 could trigger the need for earlier delivery of this new secondary school. Put simply it is presently unclear whether higher growth in the DUA could support or impact the ability of local education facilities to meet local need.

4.4.86 The removal of housing sites in AVBC would be unlikely to have any notable effects in respect of schools provision since the sites that would be removed under this option would be provided provision as part of the development.

4.4.87 The further provision of homes and related infrastructure in SDDC could also offer benefits to existing communities in the District. However excessive levels of growth could, in some locations, impact community cohesion and the delivery of in excess of 7,000 homes on the urban edge of Derby over a short time frame may have adverse effect on existing communities.

Material Assets

4.4.88 The addition of further housing sites in SDDC under this option, compared to Option 3, could increase the potential for development well related to existing facilities in Derby City owing to the potential to accommodate further growth in the DUA. Development is likely to be accommodated on larger scale sites than within AVBC and could therefore better contribute to the provision of new services and infrastructure including public transport provision which could further ensure sites are accessible and served by sustainable and non-travel choices.

4.4.89 Similarly, higher levels of growth in SDDC are more likely to have a positive effect in respect of the local economy as it would ensure that the local labour market grows in an area well related to the majority of existing and proposed employment development in the City. The reduction in growth in AVBC could reduce labour market growth, which could affect investment into AVBC away from the City albeit not to the extent as with Option 1.

Soil, Water and Air

4.4.90 This option would not have any notable effects in respect of waste generation or in respect of natural resources at the HMA level but would lead to slightly increased waste generation in SDDC compared to lower growth options. The sewerage network to the south and west of the City is already constrained and the level of growth proposed under this scenario could lead to increased incidence of sewer flooding or triggering of Combined Sewer Overflows to the south of the City. Unmitigated, these effects would be negative and potentially significant, but higher growth may also provide opportunity to deliver strategic improvements to the foul sewer network. Though, Severn Trent would be required to ensure sufficient capacity is provided through their asset management programme. The removal of sites in AVBC would have less significant effects on the sewerage network but would still require infrastructure improvements to deliver additional capacity.

4.4.91 While the majority of the sites lost in AVBC would be greenfield sites some of the potential site losses such as Asher Lane are brownfield. This could see the reduction of growth on previously developed sites in AVBC in favour of greenfield development in SDDC.

Climatic Factors

4.4.92 Greater development is unlikely to exacerbate surface or fluvial flooding and therefore this option is would not have any discernible effect. It could allow for the sites with a higher risk of flooding to be removed from the plan. However the majority of sites in AVBC are not subject to flood risk so effects would be limited.

4.4.93 Focusing growth on the edge of Derby would ensure that growth is well related to existing facilities and well served by public transport services. It could therefore deliver more sustainable travel behaviour and in turn minimise greenhouse gas emissions compared to smaller scale developments in AVBC which are less well related to existing services and may not contribute significantly to the provision of additional facilities.

Cultural Heritage

4.4.94 High levels of growth focussed in SDDC on the DUA are unlikely to have any notable effects on cultural heritage features, although localised effects could occur in a number of locations around the urban edge. Development in the vicinity of the City could also offer limited opportunities to improve access to cultural heritage locally. Reducing the level of growth in AVBC is unlikely to have any effect (positive or negative) given that none of the sites that are likely to be removed from the Core Strategy have significant heritage constraints – the sites that remain would be at Denby and those that are most closely linked to the four main urban areas and would including those already with planning permission within Belper.

Landscape

4.4.95 The sites in AVBC most likely to be removed from the Core Strategy would be those located away from the Derwent Valley Mills World Heritage Site and its Buffer Zone (within the Ripley and/or Alfreton Urban Areas). The effects would most likely remain the same as that predicted in the sustainability appraisal for the submitted Core Strategy. Sites in SDDC most likely to be considered afresh for growth are similarly not constrained by landscape designations but the scale of growth in these areas would have a negative effect on the local landscape. However site design and layout would help ameliorate the worst effects of large scale development on the urban edge of Derby.

Having reviewed this option jointly, it is concluded by all Authorities that this is not the preferred approach to meeting the City's unmet housing need.

This option may offer an opportunity to deliver growth adjacent to the Derby Urban Area close to where housing need arises and in locations well served by existing and proposed infrastructure, public transport services and employment land. However there are a number of significant constraints around the City that will limit the opportunities to accommodate growth.

A concentration of growth into SDDC would have a potentially significant effect on local infrastructure. The probable effect on the City's transport network and the increasing pressure being generated on Derby's schools and health infrastructure are other important factors that constrain what it is possible to deliver sustainable housing development within the DUA. To an extent, the effects identified through the assessment are being addressed through the provision of new infrastructure. However, there is a limit to what is possible to deliver before the mitigation proposed is no longer sufficient or deliverable. At present no other proposals have been identified that could provide significant mitigation over and above that identified in the strategy particularly from a transport perspective. This naturally creates a limit to what is appropriate within the DUA. Unconstrained growth around the City would not be appropriate and would be likely to lead to a situation where the effects outweigh the benefits

Setting growth in SDDC at 13,377 homes would create a need for the delivery of around 787 homes per annum. At this level, taking account of shortfall in provision since 2011 and having regard to the need to provide an appropriate buffer as set out in the NPPF then SDDC District Council would need to be able to deliver a minimum 1,327 homes per annum for the next five years to have a five year supply. This level of growth has not been achieved

at any point since monitoring has been undertaken. Whilst the requirement in the NPPF is to boost significantly the housing supply it has to be acknowledged that this is not considered feasible or realistic to achieve. This option would lead to significant growth occurring on cross boundary sites, or sites very close to the City boundary. Previously representations have been received that suggest there is a limit to what can be delivered annually in any one 'area' as a result of market forces and this has to be considered.

AVBC considers that the site north of Denby remains an important element of their strategy, due to the regeneration and other benefits that the site can deliver, as previously set out in their Preferred Growth Strategy. A lowering of the District's housing requirement would not alter the Council's policy approach to Denby; however, it could reduce housing delivery in other parts of the Borough which in turn could limit housing choice and potentially affordability in areas which received lower levels of growth, such as Alfreton or Ripley. It is considered by the Council that development in the four main urban areas is needed to maintain their roles as key centres for the community and to deliver the economic and other objectives of the Core Strategy and therefore reducing the contribution that AVBC would provide to meet Derby's unmet need, compared to Option 3, would disadvantage the Borough.

Higher levels of growth focussed into SDDC would not affect the ability of the City and SDDC to jointly deliver sites proposed at Hackwood Farm, Wragley Way or Boulton Moor and deliver the necessary infrastructure to support housing delivery in both areas.

A lower level of growth in AVBC compared to that considered in option 1, is unlikely to affect any cross boundary or co-dependent sites in the City.

SECTION 4.5 MITIGATING THE POTENTIAL IMPACTS OF THE PREFERRED SPATIAL OPTION

Table 3: Option 3 Split based on the proportion of growth – Identified mitigation

Sustainability Objective	Impacts	Likely Impacts of Preferred Option
Biodiversity, Fauna and Flora		
To avoid damage to designated sites and species (including UK and Local BAP Priority Habitat and Species) and enhance biodiversity and geodiversity across the District	<p>Short Term Minor to Moderate (Temporary) Negative Impact</p> <p>Medium to Long Term Minor to Moderate Positive Impact</p>	<p>This option will see over half of Derby City's unmet need located on the urban edge in South Derbyshire. There is potential for impacts on protected species across all sites as well as impacts on County Wildlife Sites and non-statutory regionally important geology sites on some sites on the southern edge of the City. No housing sites would affect biodiversity sites afforded statutory protection in the DUA.</p> <p>Due to the scale of growth proposed and the large scale nature of sites within this option it is likely that some short term impacts during construction from proposed growth would occur. These are likely to be negative and of minor to moderate significance arising from the loss of predominantly agricultural land and impact on protected species or habitats. However temporary impacts from construction could be offset in the longer term by new habitat creation and management. Impacts could be of minor to moderate and positive in the longer term depending on the extent to which biodiversity gain is delivered on site. Positive effects would be supported by the inclusion of a Biodiversity Policy (see submitted policy BNE3) in the Plan.</p>
Population and Human Health		
to provide decent and affordable homes that meet local needs	Moderate Positive Impact	<p>The delivery of around 3,000 homes to meet Derby City's unmet need on the edge of the City would ensure that most homes are provided close to where need is derived. Moreover it could offer opportunity to deliver increased market and affordable housing across the District which will benefit residents of South Derbyshire in respect of housing choice. Impacts would be positive and of potentially moderate significance.</p> <p>At the HMA level housing requirements would be fully met by ensuring that housing targets of the three authorities combined provide for the total HMA housing requirement.</p>
to improve the health and well-being of the population	Minor Positive Impact	<p>The provision of new housing will support the delivery of new, or the expansion of existing healthcare facilities which could be accessible to existing communities in South Derbyshire as well as new residents buying homes in the DUA and could therefore improve healthcare choice. Impacts could therefore be positive although most likely of limited significance. The inclusion of a</p>

		<p>policy around Sustainable Transport could ensure opportunities for new and existing residents to access facilities is secured (see submitted policy INF2).</p> <p>New development will provide for the provision open space and of formal and informal leisure opportunities</p>
to improve community safety and reduce crime and fear of crime	No Effect	No significant impacts are identified.
to improve educational achievement and improve the District's skills base	Uncertain	Impacts are likely to be dependent on the scale of new development in specific locations, its phasing and its impact in combination with other development including housing delivery in the City. However evidence indicates that many primary schools attended by South Derbyshire pupils within the City are at, or close to, capacity and will be unable to fully meet the requirements of new development for the whole of the Plan period without additional capacity being provided. At the same time however, new development could provide opportunities to deliver new, or expand existing facilities although it is unclear in some locations whether existing schools would be able or willing to expand to meet the need for additional pupil numbers. At a secondary school level, it is known that two Derby City schools have expansion room but that a new school in the DUA wider area will still be required in the longer term. As such impacts are considered uncertain. Continued working with relevant partners will help to ensure the effects of significant growth within and adjoining Derby City are mitigated appropriately.
to promote social inclusion and reduce inequalities associated with deprivation across the District	No Effect	No significant impacts are identified.
Material Assets		
To improve local accessibility to healthcare, education employment food shopping facilities and recreational resources (including open spaces and sports facilities) and promote healthy and sustainable travel or non-travel choices.	Minor Moderate Positive Impact	Locating around 3,000 homes across a number of sites adjacent or well related to the Derby Urban Area would provide opportunity to deliver new infrastructure and facilities across a range of locations within the DUA. Where new housing sites are proposed then compliance with proposed housing and infrastructure policies proposed in the plan (see submitted policies H12-H18 and INF1, INF2 and INF6) could ensure the new and existing residents gain improved access to new facilities.
to make best use of existing infrastructure and reduce the need to travel and increase opportunities for non-car travel (public transport walking and cycling)	Minor Negative Impact	Locating this scale of growth could allow developments to make use of existing infrastructure where capacity exists to serve growth. However in respect of the Derby urban area there are known infrastructure issues in respect of schools capacity, sewerage and highways capacity. In particular, the sewerage network could be negatively affected by growth, although the preparation of an Infrastructure Delivery Plan and continued liaison with Severn Trent will provide certainty over timescales for delivery of new homes. In respect of schools capacity continued working with partner agencies could ensure that new school places are delivered in a timely fashion with secondary provision being considered through the Part 2 Local Plan. Similarly in respect of

		highways provision, then local capacity improvements should be identified in the Plan (see submitted policies INF2 and INF4) for delivery alongside growth to ensure that the effects of new development are minimised.
to achieve stable and sustainable levels of economic growth and maintain economic competitiveness	Minor Positive Impact	The delivery of an additional 3,000 dwellings adjacent or well related to the urban edge could ensure that existing and proposed employment sites (i.e. Infinity Park) to the South and East of the City are well related, and connected to significant new development in the Derby Urban Area in South Derbyshire.
to diversify and strengthen local urban and rural economies and create high quality employment opportunities	No Effect	No significant impacts are identified.
to enhance the vitality and viability of existing town and village centres	No Effect	No significant impacts are identified in respect of existing town and village centres although growth around the DUA could support the delivery of new local centres in the DUA.
to improve the quality of new development and the existing built environment	Uncertain	Impacts would be largely determined by the design and layout of individual sites. Requiring new development in South Derbyshire to conform to a proposed design excellence policy to be included in the Plan (see submitted policy BNE1) could help ensure that new housing development contributes towards improving the quality of the public realm in South Derbyshire.
Soil, Water and Air		
to minimise waste and increase the reuse and recycling of waste materials	No Effect	No significant impacts are identified.
to promote sustainable forms of construction and sustainable use of natural resources	No Effect	No significant impacts are identified.
to reduce water, light, air and noise pollution	Minor Moderate Negative Impact	New development is likely to have a negative impact on the natural environment and could lead, to increase levels of, or incidents of air and water pollution in/around the DUA. It is likely the significance of these can be largely controlled through the detailed design of new development and the delivery of additional infrastructure to mitigate potential effects. Of particular note around the DUA is the potential for new transport related air quality impacts on Air Quality Management Areas (AQMAs) including on the inner ring road. Measures to reduce reliance on car transport set out in a policy (see submitted policy INF2) could help reduce potential effects. Similarly effects of additional growth in the DUA on the sewerage network, could be reduced through the inclusion of measure to reduce potable water use on housing sites (see submitted policy SD3) and to ensure Sustainable Urban Drainage is utilised in all new developments to prevent surface water flows into the sewerage network (see submitted policies SD2 and SD3). Significant effects in respect of noise or light pollution are unlikely to arise as a result of additional housing development in the DUA.
to minimise the irreversible loss of undeveloped (greenfield) land	Moderate Major	In meeting in excess of half of the City's unmet need as urban extensions in locations well related to Derby City a notable amount of previously undeveloped (greenfield) land will be lost close to the

	permanent Negative Impact	urban edge. Housing development will inevitably lead to the loss of greenfield sites, where there are insufficient sites to ensure growth is accommodated on previously used sites, although coordinated strategies between HMA partners are trying to ensure that access to open space is delivered through developments within and adjacent to the DUA and that key green buffers including the City's Green wedges still provide access to the wider countryside for many communities living close to proposed development. Moreover a policy (see submitted policy BNE4) seeks to protect the best and most versatile agricultural land and direct development to lower quality agricultural land is included in the Submitted Plan..
to reduce and manage flood risk and surface water run-off	No Effect	No significant impacts are identified.
Climatic Factors		
to reduce and manage the impacts of climate change and the District's contribution towards the causes	Minor Negative Impact	<p>New development close to existing urban areas could reduce the need for new residents to travel long distances to access employment and local services compared to development elsewhere in South Derbyshire as homes would be adjacent or well related to Derby City. Nonetheless, in relation to South Derbyshire only, accommodating around 3,000 dwellings in addition to the Districts own housing need to meet the city's unmet needs would lead to increased greenhouse gas emissions.</p> <p>Whilst the development of new homes would, on aggregate have a negative impact against this objective of minor significance, new development would perform better than existing housing stock in respect of energy and water consumption. The effects of this option would be partially reduced by:</p> <ul style="list-style-type: none"> - Promoting sustainable travel choice and alternative travel options - Ensuring homes are designed to make the best use of resources - Reducing flood risk and the contribution of new development towards flood risk through careful design and inclusion of SuDS - Ensuring provision of appropriate open space and green infrastructure to provide space for flooding, urban cooling and tree planting. <p>Following mitigation residual impacts are likely to be negative but of limited significance.</p>
Cultural Heritage (including Architectural and Archaeological Heritage)		
to protect and enhance the cultural, architectural and archaeological heritage of the district.	Minor Negative Effect	Significant levels of development around Derby have the potential to affect the setting of listed buildings or other heritage features such as ridge and furrow. However effects would range from no overall effect to minor significant effects depending on the implementation of any proposed development. The inclusion of a heritage policy in the Local Pan (see submitted policy BNE2) could help ensure that effects on cultural heritage are mitigated.

to improve access to the cultural heritage of the district for enjoyment and educational purposes	Minor Positive Effect	New development close to the urban edge could help improve local walking and cycling provision and improve accessibility to a number of local heritage assets including Elvaston Castle Park and Garden, Radbourne Hall and the Trent Mersey canal. A policy that (see submitted policy INF2) makes provision for the Authority to seek opportunities to improve public access to heritage features should be included in the Plan.
Landscape		
to conserve and enhance the District's landscape and townscape character.	Short term Negative Landscape Impact Long Term Reduced Landscape Impacts	New housing development in the DUA is likely to take place on greenfield agricultural sites. The retention of landscape elements such as field trees, hedgerows and local landform could help integrate development into the local landscape in the long term and could help reduce the likely effects of development in the short term. Impacts are likely to be most significant during the construction and early occupation of sites, but where appropriate mitigation (mounding, strategic tree planting etc.) is secured it is likely that effects would lessen over time as planting matures. The inclusion of a policy in the Plan to retain key landscape elements in new development coupled with requirements for development to reflect local landscape character could help lessen likely landscape effects (see submitted policy BNE4).

Potential Mitigation Measures Identified During the Review

- 4.5.1 The Local Plan should include the following to ensure that any apportionment of unmet need towards South Derbyshire is appropriately mitigated:
- the inclusion of a Biodiversity Policy within the Plan to ensure that that development sites deliver a net gain in biodiversity
 - a coordinated approach to housing delivery to ensure that Housing Market Area Authorities fully meet housing needs
 - the inclusion of a sustainable transport policy which supports the enhancement of existing and the delivery of new walking and cycling routes and public transport infrastructure.
 - Coordination with Local Education Authorities and other partners to Plan for the delivery of new secondary education provision.
 - the inclusion of a sustainable transport policy and infrastructure delivery policy to ensure that new development is supported by appropriate facilities
 - the inclusion of a design excellence policy to ensure that new development contributes to improvements in public realm and make the best use of resources
 - the inclusion of policies to ensure the provision of sustainable drainage systems within new developments
 - the inclusion of a water efficiency policy to reduce foul flows to the sewerage network
 - the inclusion of a policy to protect the best and most versatile agricultural land
 - The inclusion of a policy to deliver open space sport and recreation resources.
 - The inclusion of a heritage policy in the plan to ensure new development do not have unacceptable effects on cultural heritage facilities and where appropriate contribute towards improving access to cultural heritage resources
 - Continued working and coordination with neighbouring Authorities in respect of cross boundary sites, including through specific policy requirements set out in housing policies.

4.6 Difficulties Encountered in undertaking the Sustainability Appraisal

- 4.6.1 One of the difficulties encountered in the SA process has been in undertaking the assessment of the likely effects of the different options as some effects are likely to be beyond the geographical scope of the South Derbyshire Local Plan as some growth is likely to take place in neighbouring authority areas and will be planned for through the plans of partner Authorities. However, South Derbyshire District Council has undertaken this appraisal work with Amber Valley and Derby City Council's in order that an appropriate understanding of likely effects beyond South Derbyshire's boundary can be fully understood.

SECTION 5: NEXT STEPS AND MONITORING

5.1 Next Steps

- 5.1.1 The aim of this part of the report is to explain the steps that will be taken up to the point where the three Local Plan documents are adopted, and also to present measures envisaged concerning monitoring.
- 5.1.2 Subsequent to the current consultation the Council will look to provide this SA Addendum and a summary of responses received during this consultation to the Inspector. The Information included in this addendum report and any consultation responses will then need to be considered through Examination process. Subject to the Part 1 Local Plan being found sound the District Council would look to Adopt the Local Plan.

5.2 Monitoring

- 5.2.1 At the time of Adoption a 'monitoring framework' will be published that sets out *'the measures decided concerning monitoring'*. At the current stage there is a need to present *'a description of the measures envisaged concerning monitoring'* only. This is included in the Environmental Report Submitted in August 2014. This is available to view at: www.south-derbys.gov.uk/planning_and_building_control/planning_policy/local_plan_examination/default

Appendix 1: Appraisal of Options Against South Derbyshire's Sustainability Appraisal Framework

SA Objective	Option description Option 1: Maximise Growth in South Derbyshire Option 2: Maximise Growth in Amber Valley Option 3: Split based on the proportion of growth (44% in Amber Valley and 56% in S. Derbyshire) Option 4: Split based on commuting flows (30% in Amber Valley and 70% in S. Derbyshire)	Rank of preference			
		1	2	3	4
	Commentary				
1. To avoid damage to designated sites and species ((including UK and Local BAP Priority Habitat and Species) and enhance biodiversity and Geodiversity across the District	<p>Maximising growth in South Derbyshire could lead to the further allocation of sites compared to the Submitted Part 1 Local Plan most likely around the west and south of Derby City most likely around Mickleover, Sunnyside or Chellaston. No sites around the edge of Derby would affect a Natura 2000 site, Sites of Special Scientific Interest, National Nature Reserves, or Local Nature Reserves. Further development could lead to the loss of sites which surround or lie adjacent number of county wildlife sites such as Black Osier Woods and Ladybank Wood/Four Acre Plantation at Newhouse Farm, Derby Canal, adjacent to Lowes Farm; Hell Meadow Woodland to the south of Primula Way. Given that no statutory sites would be affected impacts are likely to be negative, but would be unlikely to be significant. No housing sites are likely to lead to the physical loss of wildlife sites. All additional housing sites due to their scale and existing use could have impacts on protected species and habitats. However in the longer term all sites could deliver biodiversity gain consistent with the requirements of the NPPF and hence have a positive effect in respect of this objective.</p> <p>Maximising growth in Amber Valley could lead to reduced housing provision either on the edge of Derby (at Boulton Moor (phases 2/3), Wragley Way or Hackwood Farm) or at unconsented sites in Swadlincote and Hatton. Reduced provision around the Wragley Way site could help protect part of the Sinfin Moor Regionally Important Geological site (RIGS). It should be noted, however that Wragley Way only covers a small proportion of this RIGs and the loss of a small part of the RIGS is unlikely to affect its overall integrity. Nonetheless reduced development around the southern edge of the City may have a minor beneficial effect in respect of geodiversity. Reduced housing provision in the vicinity of the Hackwood Farm site could help safeguard a local wildlife site adjacent to the sites northern edge from disturbance and therefore could have a limited positive biodiversity effect. The removal of sites at Woodville and Hatton would not have any impact on local wildlife sites, although the removal of sites in the National Forest would reduce opportunities to seek National Forest planting.</p> <p>Splitting need (Option 3) would result in growth of a comparable scale to that already proposed by the Part 1 Local Plan. This would see some development in locations which could affect adjacent wildlife sites (Chellaston, Hackwood Farm etc.)</p> <p>Based on Option 4 it is likely that at least one, and possibly more additional sites could be required in South Derbyshire to meet the City's unmet need. No potential additional sites around the DUA would affect any biodiversity of geodiversity sites receiving statutory protection. Nonetheless the effects of this scale of development could be</p>	2	3	4	1

	negative and of limited significance as sites have potential for effects on wildlife sites of local biodiversity value and protected species. Effects could be mitigated through careful design and construction. Post development all sites offer opportunity for biodiversity gain given their current use and scale.				
2. To provide decent and affordable homes that meet local needs	<p>The distribution options are concerned with the allocation of Derby City's unmet need. As such, the options are likely to have limited effects on the provision of housing to meet South Derbyshire's local needs which would be met irrespective of how the City's unmet need is to be delivered.</p> <p>The delivery of additional sites within South Derbyshire to meet the City's unmet needs could lead to the provision of additional sites around the southern or western edge of the City given the Authority's preferred distribution strategy. The further provision of sites would not alter the ability of South Derbyshire to meet its own housing need, but could provide limited benefits to South Derbyshire's residents by providing greater housing choice. This option could provide greater HMA wide benefits, however as it could potentially facilitate the provision of new homes close to where actual need arises. At least two additional large sites in the DUA would be required to fulfil this option.</p> <p>Option 2 would see some, as yet uncommitted growth reallocated to Amber Valley. Sites which currently do not benefit from planning consent around the Derby Urban Area include Hackwood Farm, Wragley Way and Boulton Moor (phase 2/3) or outside of the DUA at Broomy Farm (Swadlincote) and land North East of Hatton. Any loss of specific sites would not undermine the ability of the Plan to fully meet South Derbyshire's own objectively assessed housing need, but the loss of some DUA sites could affect how Derby City would meet its own housing target.</p> <p>Splitting need equally (Option 3), would be broadly consistent with the apportionment set out in the Part 1 Local Plan submitted in August 2014 and could be met through the strategy set out in the Submitted Plan.</p> <p>Option 4, would require the addition of at least 1 large site or a number of smaller sites be delivered on the edge of the City compared to the submitted plan. South Derbyshire's OAN would be met irrespective of the proportion of the City's unmet need allocated to South Derbyshire. Additional housing provision could provide limited benefits by providing South Derbyshire's residents with greater housing choice and could most likely ensure the majority of the City's unmet need could be accommodated in the DUA.</p>	1	4	3	2
3. To improve the Health and Wellbeing of the Population	<p>Given the allocations are concerned only with Derby City's unmet need the effects on health and wellbeing for the District's residents are likely to be limited irrespective of the quantum of growth as additional healthcare facilities and capacity to fully meet South Derbyshire's healthcare needs will be delivered alongside housing development for the District.</p> <p>Health care infrastructure delivery is likely to increase in line with the provision of additional housing sites and therefore Options 1 and 4 could support the expansion of healthcare services in the vicinity of the City or deliver new facilities (including on cross boundary sites), which could increase choice for the South Derbyshire's residents particularly those who live in the northern part of the District and access healthcare services in the City.</p>	1	4	3	2

	<p>Allocating higher level of growth to Amber Valley (Option 2) would likely result in some of the City's unmet need being dispersed away from the City edge in South Derbyshire to locations in Amber Valley. This could potentially reduce accessibility (and hence choice) for South Derbyshire's residents and may undermine the delivery of healthcare provision on a number of cross boundary sites including Hackwood Farm. However, there remains significant uncertainty over whether uncommitted DUA sites will be required to deliver any new facilities.</p> <p>Option 3 would provide some flexibility to expand healthcare infrastructure in and around the City as it would provide for broadly half of the City's unmet needs to be met in South Derbyshire. Clearly where additional infrastructure is provided either on site, or within the City to support this growth these facilities could be accessible to existing and future South Derbyshire residents.</p>				
4. To improve community safety and reduce crime and fear of crime	Sites on the edge of South Derbyshire would all perform similarly in respect of this objective as no sites are identified as being significantly affected by specific crime or safety issues (i.e. no sites are derelict or have been identified as having significant issues regarding highways safety or antisocial behaviour).	-	-	-	-
5. To improve educational achievement and improve the District's Skill base	<p>Maximising growth in South Derbyshire could have an uncertain effect. This is because large scale growth could create the need for additional schools provision including within the City itself. Depending on the scale of growth, its relationship to existing and potential new schools sites, the mix of housing sites selected and their viability this could help deliver additional new school places (either as extensions or new sites) which could benefit existing communities in South Derbyshire. However growth could also place greater demands on existing schools to an extent that it could negatively affect access to local schools.</p> <p>Maximising growth in Amber Valley could also have an uncertain effect given that it could divert potential growth away from Derby Urban Area which could potentially undermine the ability to deliver new schools to meet expected long term needs both within and around the City.</p> <p>Apportioning the City's unmet need equally between the two Authorities (Option 3) or assigning a larger share of growth to South Derbyshire (Option 4) would also have uncertain effects which are likely to be determine by a range of factors including the timing of growth, the ability of existing schools to accommodate further growth, the location of schools and their catchment areas etc.</p> <p>The Council are continuing to work with the Local Education Authorities for the City and County and local schools to resolve school placement issues although responsibility for school place planning lies with the Local Education Authorities.</p>	-	-	-	-
6. To promote social inclusion and reduce inequalities associated with	Given the allocations are concerned only with Derby City's unmet need direct effects on social inclusion and inequality are likely to be very limited. That said changes to apportionment could have minor beneficial effects in respect of providing greater housing choice for residents living in South Derbyshire with higher growth options most likely to deliver the greatest benefit.	1	4	3	2

deprivation across the District.					
7. To improve local accessibility to healthcare, education and employment, food shopping facilities and recreational resources (including open spaces and sports facilities) and promote health and sustainable travel or non-travel choices.	<p>Maximising growth in South Derbyshire could help support the delivery of additional facilities and services which could ensure new, and in some case existing communities, have greater access to facilities either as part of new developments or in existing locations. Areas most likely to be affected by additional housing delivery would be to the south or west of the Derby Urban Area, this would be in addition to existing committed and proposed growth allocated in the Submitted Local Plan at Boulton, Chellaston, Stenson, Littleover and Mickleover. However very large scale growth in South Derbyshire coupled with growth in the City could also place existing facilities under greater pressure and may lead to longer travel times where facilities become overwhelmed or closed to new residents. On balance, given the need for new development to support the delivery of new facilities to meet its own need; the expansion of existing employment land already committed and proposed in the DUA and having regard to the expansion of existing facilities which would increase local choice effects would be beneficial and likely to be greatest for higher apportionment options.</p> <p>Maximising growth in Amber Valley could lead to new investment in facilities being reduced around the edge or in the City compared to levels proposed through the Submitted Plan. However, even at reduced levels of growth, sufficient new infrastructure and facilities would be accommodated to meet South Derbyshire's and any element of the City's unmet need. A reduction in the number of new homes being accommodated in the DUA could also ease pressure on existing facilities and services compared to higher growth scenarios. However significantly reduced levels of growth could have negative effect on a number of cross boundary sites (and the facilities to be delivered on these) as it could undermine the delivery of new proposed transport routes (Wragley Way) or new facilities on or infrastructure on sites at Hackwood Farm and Boulton Moor Phase 2). Impacts of this option are therefore uncertain.</p> <p>The apportionment of growth broadly equally between Amber Valley and South Derbyshire would provide opportunities to deliver new or improve existing services and facilities dispersed around the edge of the City (including in locations already well served by public transport) and well related to community facilities and jobs including at Boulton Moor, Chellaston, Sinfin, Littleover and Mickleover as proposed in the Part 1 Local Plan. This option could therefore make a notable contribution towards improving accessibility to new communities and those living in villages close to Derby in South Derbyshire. Overall effects would be positive and of minor even or moderate significance depending on the infrastructure and facilities to be accommodated on respective sites.</p> <p>Option 4 would perform similarly to Option 1, although would see some reduction in the overall level of growth in South Derbyshire, and therefore the additional infrastructure and facilities to be delivered alongside growth.</p>	1	4	3	2
8. To make best use of existing infrastructure and reduce the need	Option 1 would most likely meet Derby City's unmet need adjacent to the existing urban edge reflecting South Derbyshire's preferred distributional strategy. Sites to meet this additional need are likely to be strung out along the southern edge of the City with sites additional to the Submitted Local Plan likely to be located to the west and south of the City. Growth to the west of the City in particular would be less well related to employment sites which are mainly	3	4	1	2

<p>to travel and increase opportunities for non-car travel (public transport, walking and cycling).</p>	<p>located to the south and east of Derby City. Large scale growth could negatively affect the strategic and local highways network. This option would also increase pressure on the sewerage infrastructure which is known to be under pressure on the southern and western edge of the city owing to a lack of existing capacity and the need for sewerage to be piped to the Waste Water Treatment Works (WwTW) near Spondon. Significant improvements to the sewerage network would therefore be required to support very large scale growth on the edge of the City in South Derbyshire. However in the short term growth could exacerbate identified sewer flooding incidences and use of combined sewer overflows to the south of the City. Overall impacts would be negative and of potentially minor to moderate significance depending on the exact timing and combination of growth and future infrastructure improvements. (It should be noted however that new infrastructure could create the additional capacity to accommodate this growth in the longer term (for example A38 improvement works, investment in sewerage infrastructure during AMP6/7/8 investment periods etc.).</p> <p>Maximising growth in Amber Valley could notably reduce the scale of growth on the Derby fringe in South Derbyshire or elsewhere in South Derbyshire). This would help minimise additional pressures on existing infrastructure, however some growth to meet South Derbyshire's need would still take place around the edge or close to the City and this could still affect the local transport network and sewerage network. Those developments that would remain to be built on the edge of the City (i.e. committed sites) are (or would be) generally well served by public transport given their proximity to existing housing sites in the City as well as community services and facilities. For example Boulton Moor would be served by a new local centre and Park and Ride site; Stenson Fields and Primula Way is well related to Sinfyn District Centre, whilst Highfield's Farm and Chellaston would be served by new facilities such as shops, schools, private childcare etc.). Overall, however a reduction in growth would see potential new infrastructure such as the South Derby Integrated Transport Link, bus priority measures on the A6 as well as other localised transport improvements being potentially forgone which may affect the wider sustainability of sites in the DUA. Overall a reduction in delivery would have an uncertain effect.</p> <p>Splitting growth would have a potentially negative effect against this objective. This is because higher levels of growth would place additional demand on existing infrastructure around the edge of the City. Like options 1 and 4, however new infrastructure could create the additional capacity to accommodate this growth in the longer term (for example delivery of South Derby Integrated Transport Link, bus priority measures on the A6 , proposed A38 improvements investment in sewerage infrastructure during AMP6/7/8 investment periods to accommodate growth etc.</p> <p>Option 4 would perform similarly to Option 1. Although the exact scale of effects may be reduced depending on the timing and combination of development proposals to meet a higher proportion of the City's unmet need. Impacts against this SA objective would be negative but would be less significant than Option 1.</p>				
<p>9. To achieve sustainable and stable levels of economic growth</p>	<p>Maximising growth in South Derbyshire would provide new homes close or relatively close to existing and proposed additional employment land in and adjacent to the City and would support local businesses by providing access to a growing labour market. Large scale growth could also support local businesses in South Derbyshire especially those in the retail or construction sectors. Impacts would be positive but of limited significance given that this appraisal is</p>	1	4	3	2

and maintain economic competitiveness	concerned with the effect of housing sites. Lower growth options (in respect of the City's unmet need would have a proportionately reduced effect. Option 2 could have a limited (and potentially negative effect) where it leads to growth being met in Amber Valley according to their own distributional strategy (ie with growth focused on main towns away from the DUA and large scale employment provision in the City)				
10.To diversify and strengthen local urban and rural economies and create high quality employment opportunities	All apportionment options are likely to have no significant effect against this objective as they are primarily concerned with housing delivery.	-	-	-	-
11.To enhance the vitality and viability of existing town and village centres	All apportionment options are likely to have no significant effects against this objective given South Derbyshire distributional strategy. This is because growth to meet the City's unmet needs in South Derbyshire would be mostly likely met on the edge of the city it is likely that this growth would look towards the City's Local and District retail facilities rather than those in the villages or Swadlincote in South Derbyshire. Notwithstanding the above a number of local centres are planned in the consented housing schemes at Boulton Moor, Chellaston Fields and Highfields Farm. However these sites are likely to be delivered in the absence of the Plan given that they benefit from planning consent.	-	-	-	-
12.To improve the quality of new development and the existing built environment	Irrespective of the apportionment of Derby City's unmet need new housing on the edge of the city would have an uncertain effect against this objective. Sites on the edge of Derby City (committed or otherwise) are all greenfield urban extensions rather than derelict or underused sites and their performance against this objective would be mainly dependent on how schemes are designed and built out rather than the scale/apportionment of growth proposed. To date only a small proportion of committed sites benefit from full planning consent and the detail of most consented schemes remains to be determined through reserved matters or conditions.	-	-	-	-
13.To minimise waste and increase the reuse and recycling of waste materials	New development is likely to increase waste generation in aggregate terms, with higher growth options (1 and 4) most likely to lead to the greatest increase in waste generation. Option 2 would lead to the smallest increase in additional waste generated. However the quantity of waste collected by Local Authorities (from local homes and businesses) is relatively small compared to other waste streams with only around 10% of all waste coming from this source in Derby and Derbyshire. On this basis a slight variance in waste volumes related to accommodating any scale of the City's unmet need is unlikely to be significant in the context of overall waste generation at a District level and imperceptible at the County level. No waste generation issues have been identified concerning any of the specific sites on the edge of Derby in South Derbyshire. Moreover the ability of sites to contribute to recycling and reuse of waste would be dependent on their design and layout (i.e. being designed to accommodate space for bin storage, the inclusion of bring sites etc). All apportionment options are likely to have very limited effects against all options. The nature of effects could be partially	2	3	4	1

	mitigated through the design/implementation of sites.				
14.To promote sustainable forms of construction and sustainable use of natural resources.	New development would lead to a general increase in resource use, although this would be greatest for Options 1 and 4 and least for option 2. Options 3 would have an intermediate effect. However in all locations new homes would be relatively well related to existing facilities and services, or would be expected to provide further services. Moreover new sites would be generally well served by public transport services already serving the City or surrounding area. Coupled with this, new homes would be built to modern energy and water efficiency standards and would support the efficient use of resources compared to the existing housing stock in South Derbyshire. No sites on the edge of Derby, or elsewhere in South Derbyshire have been identified as likely to the sterilisation of commercially viable minerals resources. Overall the delivery of new housing in any proportion is unlikely to have any significant or discernible impact against this objective.	2	3	4	1
15.To reduce water, light, air and noise pollution	<p>Option 1 (Maximise Growth in South Derbyshire) could lead to increase incidents of sewer flooding and sewer overflows on the southern edge of Derby City owing to the existing lack of capacity in the local sewerage network. Additional growth in all locations could increase such occurrences but could be particularly significant to the west of the City as foul flows would have to be conveyed across the City to reach the treatment works at Spondon. In addition large scale growth to the south of the City could exacerbate air quality within the City including on AQMAs located on the Inner Ring Road around Chellaston, Sinfyn and Littleover areas. The unmitigated impacts of this option would be negative and of moderate to potentially major significance. However, impacts could be significantly reduced through the appropriate timing and phasing of developments and the provision of new infrastructure.</p> <p>Option 2 (Maximise Growth in Amber Valley) would lead to lower levels of growth, with uncommitted sites to the east and the south of the City most likely being replaced by development in Amber Valley (this option could also provide limited opportunity to remove sites further afield in South Derbyshire on uncommitted sites at Hatton and Woodville). However given the number of existing commitments growth would still occur on the Derby urban fringe at Littleover, Sinfyn, Chellaston and Boulton Moor and some of this growth could meet the city's unmet need. These sites would affect air quality in the City owing to increases in traffic flows through main transport corridors, and increased flows into the foul sewer network. Impacts from this option would be negative and of potentially moderate significance.</p> <p>Splitting growth broadly equally, between Amber Valley and South Derbyshire would see growth located around Boulton Moor, Chellaston, Sinfyn and Stenson, Littleover and Mickleover as set out in the Council's submitted Plan in August 2014. This level of growth across the southern edge of South Derbyshire would increase traffic flows into the City and could exacerbate air quality issues on the City's AQMAs along the inner ring road, although effects may be partially moderated by the provision of new transport infrastructure . It would also exacerbate known capacity issues in Derby City's sewerage network, although again effects could be mitigated through the provision of new sewerage infrastructure.</p> <p>Option 4 would perform similarly to option 1 although given the slightly reduced level of growth would lead to a commensurate reduction in the likely effects. Moreover the magnitude of negative effects would be largely determined by the number and combination of sites identified to meet higher levels of growth, their phasing and the mitigation</p>				

	<p>possible to support any further development.</p> <p>No options are likely to have significant effects in respect of noise and light pollution subject to appropriate design of schemes.</p>				
16.To minimise the irreversible loss of undeveloped (greenfield) land	<p>Maximising growth in South Derbyshire would lead to notable further losses of previously undeveloped (greenfield) land assuming that additional growth to meet the City's unmet need is accommodated in the DUA where all additional sites are greenfield in nature. Option 2 would still lead to some greenfield losses as a proportion of growth to meet the City's unmet needs is already committed. However the overall scale of impacts would substantially reduced compared to higher growth options. Splitting growth between South Derbyshire and Amber Valley (Option 3) would lead to notable greenfield land losses mainly around the eastern and southern part of the City at Boulton Moor, Chellaston, Sinfen/Stenson and Littleover, although some losses would also occur at Hackwood Farm (Mickleover) to the south west of the City</p> <p>Option 4 would most likely perform as Option 3 but could see further greenfield land losses elsewhere in the DUA, for example to the south and south west of the city on one or more greenfield sites.</p> <p>All options would lead to the permanent loss of greenfield land.</p>	2	3	4	1
17. To reduce and manage flood risk and surface water run-off	<p>Maximising growth on the edge of the City is unlikely to have any notable effects on flood risk and surface water run off given that most identified sites on the southern edge of the City are either located in Flood Zone 1 or have been consented and include measures to reduce flood risk on site to an acceptable level. On all sites run off would be retained at greenfield run off rates or better and sites would be expected to not increase flood risk elsewhere consistent with national policy asset out in the National Planning Policy Framework (NPPF).</p> <p>Similarly reducing the scale of growth or splitting growth between the Authorities is unlikely to lead to any discernible effects against this objective given the nature of the sites. All options would therefore have no significant effect against this objective.</p>	-	-	-	-
18.To reduce and manage the impacts of climate change and the District's contribution towards the causes	<p>Maximising growth on the edge of Derby City would increase the District's housing target by up to 50% (against the District's OAN) up to the period to 2028 where Derby City's unmet housing need was maximised in South Derbyshire. Growth at this scale would add notably to the number of households and transport generation in the District. Notwithstanding this fact locating development close to existing facilities and services in Derby City close to where housing need arises would help lessen effects of development in respect of this objective. Overall, however higher level of growth would perform more negatively against this SA objective.</p> <p>Maximising growth in Amber Valley would reduce the overall amount of growth in South Derbyshire, which in turn would reduce the emission of climate change gases associated with housing and transport. However a notable amount of growth would still take place to the east and south of the City on committed sites with some of this growth meeting the City's unmet need.</p>	2	3	4	1

	<p>Option 3 would see slightly higher levels of growth with around half of the City's unmet needs accommodated in South Derbyshire. At this level around a quarter of South Derbyshire's overall housing target would be comprised of homes to meet Derby's needs. Clearly additional homes would increase carbon emissions associated with heating and lighting as well as increase transport usage in the District. Impacts at this level would be negative.</p> <p>Option 4 would lead to the majority of the City's unmet need being accommodated on the edge of the City in South Derbyshire. Impacts would be negative, with the scale of effects being less than Option 1, but greater than option 3. .</p>				
19. To protect and enhance the cultural, architectural and archaeological heritage of the District	<p>Higher levels of growth in South Derbyshire consistent with Option 1 could lead to further growth to the south and west of the City. Development in these locations could have limited potential to affect the setting of listed buildings or affect other heritage features such as ridge and furrow. Overall this option could range from no overall effect to having a potentially negative impact of limited significance depending on the design and implementation of development and precise location.</p> <p>Option 2 (Maximise growth in Amber Valley) could see a reduction in the level of growth mainly to the south and east of Derby's urban edge. Reduced provision in this broad location would still result in growth on committed sites such as Boulton Moor or Chellaston which could affect the setting of local heritage assets. Like Option 1 effects from this scale of growth could range from no overall effects to having a limited negative effect.</p> <p>Options 3 would be broadly consistent with the provisions of the Part 1 Local Plan. It would allocate a range of sites across the southern edge of the City chiefly around Boulton Moor, Stenson Fields, Chellaston and Littleover (all consented) with additional sites at Boulton Moor and Sinfin and Hackwood Farm. Overall both options could have no overall effect or a potentially negative effect depending on the design and implementation of individual developments.</p> <p>Options 4 could have no, or a limited negative impact, in respect of this objective, the scale of effects would be dependent on how developments are designed and implemented.</p>	4	1	2	3
20. To improve access to cultural heritage of the District	<p>Option 1 would most likely lead to further development to the west and south of the City. Further development in these areas could offer opportunity to improve the local footpath network and could offer opportunity to connect to local heritage and cultural assets around the edge of the City (sites to the west could connect to existing PROWs network and Radbourne Hall and beyond). Development to the south of the City around Chellaston and Sinfin could offer potential to connect to the Trent and Mersey Canal as well as potentially support the reinstatement of the Derby to Sandiacre Canal (now a wildlife site lying to the west of Chellaston). Development to the east of Derby City would support access improvements to Elvaston Castle Historic Park and Garden. Overall higher levels of growth could have a limited beneficial effect in respect of this objective</p> <p>Option 2 would potentially lead to the loss of sites which could improve local access to nearby heritage and cultural assets in some locations, however even at reduced growth levels some improvements in respect of this objective could be delivered, For example committed sites around Chellaston would improve local access to the Trent and Mersey Canal, whilst committed development at Boulton Moor could improve local access to Elvaston Castle. A</p>	1	4	3	2

	<p>reduction of sites elsewhere away from the DUA would have no or limited effects in respect of this objective. The site at Broomy Farm is however located in the National Forest.</p> <p>Based on Option 3 new urban extensions would be built around Boulton Moor, Chellaston, Sinfin, Stenson Fields, Littleover and Hackwood Farm. This widespread dispersal of growth set out in the Part 1 Local Plan would secure further improvements to the local footpath network across the edge of Derby City in South Derbyshire. These improvements could have a limited beneficial impact against this objective by improving footpaths and other routes to heritage assets lying close to the edge of the City including Elvaston Castle, the Trent and Mersey Canal and Radbourne Hall.</p> <p>Option 4 is likely to perform similarly to Option 1, with greater opportunity to connect the southern and western edge of the City with local heritage assets in South Derbyshire.</p>				
<p>21.To Conserve and enhance the District's landscape and Townscape Character.</p>	<p>Option 1 (Maximise growth in South Derbyshire) could lead to the allocation of further sites to the south or west of Derby City in addition to those proposed through the Part 1 Local Plan Submitted in 2014. Some landscape to the south and west of the City is identified as having a higher degree of sensitivity in the County Council's Areas of Multiple Environmental Sensitivity which accompanies the Landscape Character of Assessment published by the County Council in 2013. However, there are no locally or designated landscaped around the edge of Derby in South Derbyshire. This level of growth would have a detrimental effect although this could be partially ameliorated by the dispersal of sites.</p> <p>Option 2 would see the apportionment of the City's unmet need focussed primarily on Amber Valley. For South Derbyshire this could lead to reduced levels of growth compared to those proposed in the Submitted Plan. However even accommodating a limited level of the City's unmet needs could have a detrimental effect on the local landscape.</p> <p>Option 3 and 4 would perform similarly to Option 1 with options all requiring additional sites in varying combinations and locations. However all sites would be subject to similar issues, with effects most likely to be of local significance given the lack of landscape or townscape designations around the edge of Derby City and the lack of landscape defined as sensitive through the AMES work. Effects would therefore be of local significance only and are therefore likely to negative and of potentially limited significance.</p>	2	3	4	1
<p>Summary: The issue of the allocation of sites throughout the HMA is a complex one. It ties in not only complexities of geography and demographics but also the deliverability and viability of three Local Plans. In respect of South Derbyshire higher growth options perform better in terms of social and economic aspects, whilst the lower growth options are likely to lead comparatively reduced environmental effects.</p>					

Appendix 2: Appraisal of Options Against Amber Valley's Appraisal Framework

SA Objective	Option description Option 1: Maximise Growth in South Derbyshire Option 2: Maximise Growth in Amber Valley Option 3: Split based on the proportion of growth (44% in Amber Valley and 56% in S. Derbyshire) Option 4: Split based on commuting flows (30% in Amber Valley and 70% in S. Derbyshire)	Rank of preference			
		1	2	3	4
	Commentary				
1. To ensure that the present and future provision of housing within the Borough is in line with local needs.	<p>Option 1 would take all of Amber Valley's unmet need (bar Radbourne Lane) into South. Derbyshire. It is considered by the Council that the regeneration of Denby is a cornerstone of the Core Strategy and thus would remain allocated. This would mean that there would likely be a reduction in the unmet need distributed to the four towns. Indirectly, there would be a borough wide reduction in housing provision, this might limit choice and have an effect on housing affordability in the borough. The shift of growth from the four towns to Denby (likely to be from Alfreton (including Somercotes, Riddings and Swanwick) and Ripley Urban Areas) would mean that these areas would see less of a benefit from development. These conclusions are based on the assumption that whilst Derby's unmet need is ostensibly allocated to sites such as Denby, there is no certainty that market houses will be bought by those linked to Derby. An overall reduction in housing might then lead to negative effects identified above.</p> <p>Option 2 would add to Amber Valley's total housing allocation and require further sites to be allocated in their Core Strategy. These sites in the first instance would likely be those closely linked to Derby and therefore in the DUA. However, the sites that have been identified in this area are <u>highly</u> constrained by both the Derwent Valley WHS but also Green Belt. It is likely that further sites would be identified in areas less well related to Derby but in line with Amber Valley's preferred spatial strategy i.e. in the four towns of Alfreton, Belper, Heanor and Ripley. Given the geography of Amber Valley, the additional growth would be allocated in a large number of small sites (circa 100 dwellings or less) rather than fewer large sites as might be the case in South Derbyshire. This would then focus development away for those areas geographically well linked to Derby potentially flooding the local housing markets with inappropriate development (e.g. tenure and house sizes).</p> <p>Option 3 offers a more balanced approach and would include development at Denby - the local authority considers that the allocation of a strategic mixed-use site at Denby (which is already allocated for mixed-use development in the adopted Local Plan) can make a significant contribution to meeting the objectively assessed housing need in the Borough. It also takes some of the pressure off the Green Belt land surrounding the main towns, particularly Belper.</p> <p>Option 4 would see a significant proportion of the Derby City unmet need go to S. Derbyshire but a fair proportion remain. In this scenario, Denby would be retained but sites such as those in Alfreton that are not well linked to Derby City would not be allocated.</p> <p>All the options should enable Amber Valley to meet its OAN however; some options may serve to distort the housing market in Amber Valley. Option 1 may result in reduced housing options and affordability whereas Option 2 may result in over-</p>	-	-	-	-

	supply of inappropriate housing in less sustainable areas.				
2. To improve the health and wellbeing of local people and reduce health inequalities across local communities, including better access to recreational sites and facilities	<p>The key is to ensure that cumulatively, recreation sites and other facilities are able to meet the combined demand. Indirectly there may be issues in terms of lack of provision (where a site is allocated away from Amber valley wider regeneration goals may not be achieved) or over demand (additional sites allocated may over burden transport and services and facilities).</p> <p>It is likely that under Option 1, Denby would be allocated as the site is a cornerstone of the Council's Core Strategy. This would mean that sites in and around the Alfreton and Ripley Urban Areas would be removed from the plan. The benefits of retaining Denby would be kept (improvements to local infrastructure and so on) but the benefits to Alfreton and Ripley would be lost (potentially community facilities)</p> <p>Under Option 2, should further sites be allocated in AV, these are likely to be around Belper / Somercoates / Ridings. These areas have issues in terms of access to a GP, proximity to a cycle network and to Local Wildlife Sites. Development can bring positive effects to the areas considered, and it is possible that the if site constraints can be met that the four towns would benefit from better facilities and services as a result of greater development activity.</p> <p>Option 3 would see growth slightly skewed to S. Derbyshire and thus would affect the sites in Amber Valley to a lesser extent (i.e. less sites would need to be reallocated from AV to S. Derbyshire). Therefore any effect on this option would essentially be proportionality less than that for Option 1.</p> <p>Option 4 would also likely maintain Denby as a strategic site but the option would still have the effect of isolating development gains in Denby and not addressing the shortcomings in other areas of Amber valley (the four towns). This may exacerbate inequality across the borough.</p> <p>The key consideration for this objective is what the effect of removing sites will have on Amber Valley. It could be argued that removing sites would have a positive effect through avoiding impacts that would otherwise have occurred. However, the opposite could also be argued in that the positive effects of development would not then be felt by Amber Valley (e.g. community facilities, high quality housing, economic growth and so on). In this sense, a balanced option that delivers development and growth without sacrificing opportunities or the environment would be preferred (Option 3).</p>	4	2	1	3
3. To provide better opportunities for maintaining and expanding the Borough's Green Infrastructure and protecting its greenspaces.	<p>It is not certain that these options would affect the expansion of the Borough's Green Infrastructure. It could be argued that Option 1 would protect environmental assets by not developing certain sites, Option 2 and 3 would put pressure on greenfield sites. However, green infrastructure is as much about protection as it is enhancement and connectivity. In this regard Option 1 may have negative consequences as there would be less development that could serve to enhance / develop green infrastructure (as with Option 4).</p> <p>However, much is dependent on site design and negotiation with applicants over planning conditions and as such the effects of these options are uncertain at this stage.</p>	-	-	-	-
4. To reduce crime and the fear of	If the development at Denby is prioritised and other towns 'lose out' in terms of receiving growth then there may be an effect on community cohesion amongst communities in the four towns (i.e. that the positive effects of development are being	-	-	-	-

<p>crime and promote safer and more cohesive local communities across the Borough</p>	<p>focused on Derby). Conversely should unsustainable levels of development be allocated to the four towns then this may put pressure on the local communities.</p> <p>Much is dependent on site design and there is the added uncertainty of not knowing what exact make-up the developments will have in terms of meeting Amber Valley's need vs. DCC (i.e. would some towns become Derby dormitories or would Derby's unmet need be 'pepper potted' and better integrated?) and as such the effects of these options are uncertain at this stage.</p>				
<p>5. To conserve and enhance levels of biodiversity and the quality of their habitats across the Borough.</p>	<p>Under Option 1, maximising the growth in S. Derbyshire would have the effect of removing some sites from the plan, these would likely be those around Alfreton and Ripley Urban Area as these are the sites that are least well related to Derby. This might have a positive effect in terms of the allocated site at Outseats Farm as potential issues were raised with regard to its proximity to Local Wildlife Sites (although it is understood that this site has been granted outline planning permission).</p> <p>Maximising growth in AV would mean allocating further sites in AV which have been identified as less sustainable than the preferred option. The areas likely to be allocated further growth would be the four towns but specifically around Alfreton, Heanor and Ripley. The areas where development may occur are not constrained by nationally or internationally designated sites for biodiversity, however there are some Local Wildlife Sites that might be affected. It is therefore considered that there are unlikely to be significant effects on this objective through Option 2 (and this applies to Option 4).</p> <p>In terms of effects on biodiversity, it is unlikely that any of the options would result on a significant effect given that the primary sensitive areas to be affected are Local Wildlife Sites. In this context, Option 1 could be seen as the most preferred given that there is the potential to remove sites from the plan that may affect wildlife sites. Conversely, Option 2, by bringing forward more sites might increase reassurance on the Local Wildlife Sites in AV (and the UNESCO designated areas indirectly).</p> <p>Option 3 whilst identified as having sites that are in proximity to SSSIs (Kedelston Road) Has not been identified as likely to have any significant constraints with regard to international and nationally designated sites.</p>	1	4	3	2
<p>6. To preserve and enhance sites, features and settings of cultural heritage, archaeological, historical value across the Borough</p>	<p>Under Option 1, reallocation of sites in and around Alfreton / Ripley are unlikely to have any effect on this objective given that none of the sites have been identified as having significant heritage constraints.</p> <p>Under Option 2, the allocation of additional sites to meet Derby's unmet need would theoretically go in those areas most closely linked to Derby City e.g. Belper and the Derby Urban Area. Allocating further sites in this area would lead to unacceptable impacts on the Derwent Valley World Heritage Site (a number of applications have had planning permission refused due to their impact on the Derwent Valley Mills World Heritage Site). This being the case, further sites would need to be found in the four towns. The Heanor/Ripley/Alfreton areas have a number of heritage constraints such as listed buildings, ancient monuments and Conservation Areas but it is considered that with due consideration of the asset and its setting that the effects should be able to be mitigated.</p> <p>Option 3 has significant constraints identified (on the WHS) in the Belper area in addition to other national and local designations.</p>	1	4	3	2

7. To protect, enhance and manage the character and appearance of the Borough's landscape and townscape.	<p>Maximising development in S. Derbyshire is likely to have the benefit of removing sites within the DUA and areas that might have a negative impact on the WHS and other landscape features. This would serve to protect special heritage and landscape / townscape assets further. That's not to say that development would harm these areas but that the question might ever arise if the sites were not allocated.</p> <p>Maximising growth in AV has the potential to create significant impacts on heritage assets and the townscape and landscape that underpins it. The sites that could potentially be allocated initially would not pose too much of a problem as they are unconstrained in regard to this objective. However, as more sites would need to be found to meet the maximum target, it is likely that these sites would be drawn from wider areas around the four towns. This scale of development in these areas has the potential to cause negative effect on both townscape and landscape dependent on the sites taken forward.</p>				
8. To manage and preserve the quality of the Borough's natural resources and minimise the generation of waste.	<p>Theoretically speaking, the less development allocated to Amber Valley, the less resources would be used and the less waste generated in Amber Valley. This is of course in the context of the wider HMA issue which would result in the same number of dwellings being built and the same amount of resources being used and waste generated.</p> <p>From an AV perspective, Option 1 would be preferable as it diverts the delivery of DC unmet need to S. Derbyshire. Following this logic, Option 4 would be less preferred followed by 3 and then 2.</p>	1	4	3	2
9. To reduce the Borough's contribution to Climate Change and manage its effects, including flooding and drought.	<p>Option 1: Around Alfreton, Land to the North of Alfreton is partly at risk of flooding. In the area around Ripley, Asher Lane Business Park is at risk of flooding. Similarly, parts of the Land North Of Denby are at risk of flooding as is part of Hall Road, Langley Mill. Transfer of this allocation to S. Derbyshire may have a positive outcome in reducing the amount of allocated sites in AV that are susceptible to flood risk. Also, reallocation of sites that are less well linked to Derby City may have the effect of reducing GHG emissions. This is due to the reduction of commuters to Derby.</p> <p>Option 2: Some of the sites around Ripley/Heanor and Alfreton that could be proposed to take further elements of Derby's unmet need are (in part) susceptible to flood risk and a few have been identified as having water capacity issues. It is assumed that development on sites that are partly at risk of flooding / risk of flooding will be undertaken in accordance with the NPPF and therefore not worsen flood risk in those areas. However there may be additional pressure on water demand and therefore capacity as a result of this option.</p>	1	4	3	2
10. To promote an inclusive approach to local transport that reduces the need for car dominated travel and increases the use of public transportation,	<p>Under Option 1, should some of the allocated sites in the Alfreton / Ripley area may be reallocated, it is likely to reduce the constraints related to transport for those sites. When looking across the criteria, there are a number of sites that could be considered, specifically Coppice Farm (access to bus routes and train stations), Asher Lane (access to a GP, primary and secondary schools, bus routes and train stations), Butterly Hall (access to GP, primary schools and trains station). The removal of these sites might reduce the demand for local transport services.</p> <p>Under Option 2, and given the stated aim of AV to focus development in the four towns, it should be a question of how best to provide a public transport service in these areas. In fact, it might be argued that increased development in these four towns, and specifically DCC unmet need, may generate a high level of demand for public transport that connects them with</p>	4	3	1	2

walking and cycling.	Derby. Conversely, commuting activities might drive up the use of the private car to access job opportunities in Derby and services / facilities in other towns.				
11.To create wide range of employment opportunities across communities in the Borough.	<p>Maximising growth in South Derbyshire would remove new homes close to existing and proposed additional employment land in and would not support businesses as there would be a reduction in the local labour market. The borough would also lose out on any additional skills / employment generated by the construction / development sector.</p> <p>Higher levels of growth in Amber Valley (through Option 2) would deliver new homes and a boost to the local labour market. This could result in a catalyst for investment to the area or conversely, high levels of unemployment should access to jobs be an issue.</p> <p>Splitting growth would provide for a significant proportion of the City's unmet need being met in Amber Valley. This would support the expansion of the local labour market close to the city and in the towns.</p>	-	-	-	-
12.To encourage initiatives that promotes innovation, enterprise and better access to learning and skills opportunities in the Borough.	<p>Option 1 would likely result in additional employment land needing to be allocated in S. Derbyshire in order to ensure a robust link between housing and resident population and access to jobs / economic activity. The corollary to this is that by moving housing development out of Amber Valley, jobs and economic activity might follow.</p> <p>Through biasing the delivery of growth to Amber valley, further land will need to be found to ensure employment opportunities for the resident population, further pressurizing the land availability in the four towns.</p>	-	-	-	-
13.To create thriving and economically vibrant local communities with relevant spatial and physical structures to stimulate and support economic growth and attract inward investment	See objective 11.	-	-	-	-

Summary: The issue of the allocation of sites throughout the HMA is a complex one. It ties in not only complexities of geography and demographics but also the deliverability and viability of three Local Plans. The choice of some sites hinges not only on their sustainability credentials but also their role in fulfilling the objectives of the plan(s). This being the case, the Council has determined that Derby should be developed whatever the option chosen given its sub-regional importance and the scale of development required to ensure its viability. This may be at the expense of the other towns in the borough as under Option 1 for example they would experience less growth and the correlating benefits that this brings.

Options that focus high levels of development in the borough are faced with challenges in distributing this growth amongst the four villages and at sites that are

less sustainable / deliverable. This is likely to have more socio-economic impacts than environmental but could threaten community cohesion and access to facilities and services.

Overall, a balanced approach is preferred (Option 3) as it spreads the benefits of development equally but without undue risk of socio-economic effects.

South Derbyshire District Council
Community and Planning Services

Local Development Framework

**Sustainability Appraisal
Local Plan Part 1**

Addendum Report
August 2015

