



Derby HMA Sustainability Appraisal of Housing Options

Site Options and Alternatives

Derby Housing Market Area

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Basis of Report

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Executive Summary

This Sustainability Appraisal (SA) study has been commissioned by the Derby Housing Market Area which consists of officer representatives from, Amber Valley Borough Council (AVBC), Derby City Council (DCC) and South Derbyshire District Council (SDDC). The study takes a consistent approach to assessing meeting housing needs within the Derby HMA taking into consideration options for scale, distribution and the apportionment of Derby's unmet housing need between AVBC and SDDC. The purpose of the study has been to assist the Derby HMA advise their members on decision-making regarding Derby's unmet housing need and to also inform the three authority's Local Plan development processes and parallel SAs.

A set of housing growth options has been established through close working with the Derby HMA officers. The housing growth options consist of three scale options and four distribution options:

- Scale 1: Standard method in full (including 35%); 36,584 dwellings across the HMA
- Scale 2: Standard method steps 1-3 (no 35% uplift); 31,008 dwellings across the HMA
- Scale 3: Standard method steps 1-3 (no 35% uplift) + 10%; 34,109 dwellings across the HMA.
- Distribution 1: Urban concentration
- Distribution 2: Urban concentration and urban fringe
- Distribution 3: Dispersed
- Distribution 4: Urban fringe focus

Distribution options 2-4 have sub options which apportion different ratios of housing development between AVBC and SDDC.

The options have been assessed against a framework of sustainability objectives which is consistent with SA frameworks established for the SAs of the local authorities' Local Plans. GIS data and other evidence has been used to inform the assessment, particularly the Derby Housing Market Area Growth Options Study (AECOM, August 2021). This study, along with Strategic Housing and Economic Land Availability Assessment (SHELAA) sites for AVBC and SDDC, have been used to identify potential development areas in AVBC and SDDC. A housing capacity study undertaken by Derby City Council, and independently reviewed by Aecom, has identified that there is capacity on identified sites within the Derby administrative area to accommodate 12,500 new homes.

The SA has found that options which concentrate all or most of Derby's unmet housing need into the Derby administrative area perform poorly for economy and employment (as a lack of identified housing sites in the city means that housing may have to be developed on economic/employment sites), climate change adaptation, biodiversity, historic environment, and landscape.

Options which concentrate all or most of the Derby unmet need into the Derby administrative area / Urban Fringe perform most positively for vibrant and viable centres, accessibility, quality of life, inequalities, sustainable transport and climate change mitigation.

Development in the SDDC Urban Fringe performs more positively than development in the AVBC Urban Fringe for sustainable transport as there is higher potential for transport infrastructure improvements and more existing routes into Derby.

Where an option which directs housing into the Derby administrative area is above the 12,500 capacity, housing delivery performs less positively in the SA, reflecting uncertainty over meeting needs for types and mix of housing in dense developments. SHELAA sites within the AVBC Urban Fringe area demonstrate there is capacity for approximately 3,000 new homes,



albeit it is unlikely that all of these would be deliverable by 2040. Similarly, where an option directs housing into the Amber Valley Urban Fringe above the identified 3,000 new homes capacity, housing delivery performs less positively for the same reason.

Options which distribute all of the Derby unmet need across AVBC and SDDC perform particularly poorly for sustainable transport, climate change mitigation and natural resources.

The analysis clearly shows that distribution options which perform most positively are those which reflect the limited capacity within Derby and distribute the Derby unmet need to the Urban Fringe areas, with an apportionment between AVBC and SDDC. Options which direct more of the Derby unmet need to the SDDC Urban Fringe would benefit from good potential for accessibility to services and facilities through achieving a degree of self-sufficiency within large urban extensions and through accessibility into Derby by sustainable transport.

The Derby HMA officers will consider the findings set out within this report with their respective members in order to make decisions regarding the housing strategy for the Derby HMA. The HMA authorities' Local Plans are currently under development. Each Local Plan will set out proposals for meeting identified housing needs including proposed housing allocation sites. Each Local Plan will be subject to a SA which will be informed by more detailed information about site characteristics and will therefore provide a more localised and detailed assessment of potential effects at this stage.



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Acronyms and Abbreviations

AVBC	Amber Valley Borough Council
DCC	Derby City Council
URBAN FRINGE	Derby Urban Area
DVMWHS	Derwent Valley Mills World Heritage Site
HMA	Housing Market Area
NPPF	National Planning Policy Framework
PPG	Planning Policy Guidance
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SDDC	South Derbyshire District Council
SHELAA	Strategic Housing and Economic Land Availability Assessment



1.0 Introduction

Amber Valley Borough Council (AVBC), Derby City Council (DCC) and South Derbyshire District Council (SDDC) are in the process of producing individual, but aligned, Local Plans. However, there is a need to collaborate and a specific 'Duty to Cooperate' to ensure strategic cross boundary issues, such as housing need, across the Derby Housing Market Area (HMA), are addressed. A Statement of Common Ground, agreed by the HMA Authorities in March 2020, recognises the need to address such issues whilst supporting the preparation of a broad, non-statutory HMA Strategy. The authorities along with Derbyshire County Council come together regularly to work collaboratively on strategic spatial planning matters. Erewash Borough Council attend meetings as observers.

SLR Consulting has been commissioned to undertake a Sustainability Appraisal (SA) of options for housing growth including scale and location within the Derby HMA. The SA work will inform the HMA Strategy and provide evidence to inform decision making. The spatial extent of the SA work is the Derby HMA which encompasses the administrative areas of AVBC, DCC and SDDC. The SA work is non-statutory as the Derby HMA is not preparing a joint statutory plan; however, the SA is to inform the preparation of the Amber Valley, Derby City, and South Derbyshire Local Plans. The SA work will provide evidence to support plan development and the Local Plans SA processes and has been designed to align with the current and future SA processes for each Local Plan.

This document presents the findings of the SA of the Site Options Assessment undertaken as part of Stage B of the SA process, 'Developing and Refining Options'. It also sets out the methodology for assessing potential site options and the process for selecting sites through predicting and evaluating the likely significant effects of reasonable alternatives from an appraisal of potential site options.

1.1 Background

There is an identified shortfall in Derby City's capacity to meet its housing requirement in full. This situation has been exacerbated by the city being included in the top 20 largest English cities and urban centres by central Government. These cities have had a 35% uplift added to their housing requirement as assessed by the national 'standard methodology'. Derby City Council have approached Amber Valley Borough Council and South Derbyshire District Council under the Duty to Cooperate to inform them of the shortfall and ask for consideration that some of the City's need is accommodated within Amber Valley and South Derbyshire.

Derby City's most recent assessment of its housing capacity is 12,500 dwellings. Given a housing requirement from the standard methodology, of 21,522 homes over an agreed 17-year local plan period (2023-2039), this results in a current shortfall of 9,022 homes. Attempting to accommodate this shortfall within the HMA is likely to give rise to significant impacts, for example, with relation to access to open space, access to facilities, transport and flood risk. This will need to be assessed, alongside other potential reasonable alternatives for scale options. Furthermore, given existing infrastructure and the number and range of constraints across the Derby HMA, assessing the most sustainable areas for such growth to be accommodated is also necessary. Please note, although the number of homes relate to those expected to be delivered between 2023-2039, due to the level and strategic nature of this work, it is considered that the conclusions are applicable should the 2039 timeframe be extended by a couple of years.

This report provides baseline information on the environmental, social, and economic characteristics of the plan areas and sets out a proposed framework for the assessment of the options. The purpose of this report is to provide information to the statutory consultees on the



proposed scope of this piece of SA work which will inform the Local Plan SAs in each authority area.

The output of the assessment of options is included in this report which sets out the potential sustainability effects of the options which will assist AVBC, DCC and SDDC in identifying the best locations for housing development to take place, and at what scale. This should help to alleviate the identified shortfall in Derby City's capacity to meet its housing requirement in full. The report also provides evidence for the SAs of each of the Local Authorities when preparing their future Local Plans.

1.2 Legislative Requirements

SA assesses the significant environmental, social and economic effects of the Local Plan, the "reasonable" alternatives to strategy, policies and proposals, and the reasons for discounting alternatives. It also incorporates a process called Strategic Environmental Assessment (SEA). SA of Local Plans is required under Section 19 of the Planning and Compulsory Purchase Act 2004. The National Planning Policy Framework (December 2023) also requires SA of Local Plans.

SEA in England is mandated by the SEA Directive (Directive 2001/42/EC: Assessment of the Effects of Certain Plans and Programmes on the Environment) and is regulated by the Environmental Assessment of Plans and Programmes Regulations 2004 Statutory Instrument No.1633 ('the SEA Regulations'). The SEA Regulations aims at a high level of protection of the environment, and to integrate the consideration of the environment into the preparation and adoption of plans, with a view to promoting sustainable development. It is common practice to incorporate the requirements of SEA into a broader SA which addresses more social and economic topics, rather than just taking an environmental focus.

1.3 This Document

This document presents the findings of the SA of the Site Options Assessment undertaken as part of Stage B of the SA process, 'Developing and Refining Options' in preparation of the new Local Plan.

The remaining sections of this document are structured as follows:

- **Section 2: Approach to the SA** - describes the approach to the SA process and to the option assessment methodology. This section is supported by Appendices A (baseline review) and B (detailed options assessments);
- **Section 3: Assessment Findings** - presents the potential significant effects for the site options considered. This section is supported by Appendix B;
- **Section 4: Summary of Potential Cumulative and Transboundary Effects** - describes the cumulative effects which may arise;
- **Section 5: Mitigation Measures** - describes the recommended mitigation and enhancement measures to address the potential effects identified for the options. This section is supported by Appendix B; and
- **Section 6: Next Steps** - sets out the next stages in the SA process.



2.0 Identification of Options

2.1 Reasonable alternatives

The purpose of this stage of the SA is to identify and assess reasonable alternative options for the delivery of housing within the Derby HMA. These alternatives need to be able to be realistically implemented, and help to address the identified need.

2.1.1 Scale Options

The Derby HMA has identified the following scale options:

- Scale 1: Standard method in full (including 35%); 36,584 dwellings across the HMA;
- Scale 2: Standard method (no 35% uplift); 31,008 dwellings across the HMA; and
- Scale 3: Standard method 1-3 (no 35% uplift) + 10%; 34,109 dwellings across the HMA.

As previously mentioned, although the number of homes relate to those expected to be delivered between 2023-2039, due to the level and strategic nature of this work, it is considered that the conclusions are applicable should the 2039 timeframe be extended by a couple of years.

Scale 1 is the housing need calculated for the entire Derby HMA (as at April 2023) using the national 'standard methodology' and includes the 35% uplift on top of the housing need identified for Derby City because it is included in the top 20 English cities by the Government.

The Scale 2 option is an alternative to Scale 1 and is being tested in order to understand the sustainability implications of not including the 35% uplift. Scale 3 includes a more modest uplift of 10% as an interim scale option.

Through the options development process, some options may have been considered to be not reasonable, and therefore have not been subject to assessment as part of the SA. In considering the growth options, Derby HMA have examined the potential for providing housing growth below the identified need, however, following independent professional planning advice, considering a scale option below the identified need was not deemed to be a reasonable alternative. The rationale for this, is set out below which, it should be noted, is based on general points without reflecting on the application to the specifics of the Derbyshire area.

The 'advisory starting point' to determine the 'minimum number of homes needed', as required by para 61 of the NPPF (December 2023), is always the Standard Methodology. The PPG sets out the Standard Methodology. Broadly, the Standard Methodology uses a combination of household growth projections (step 1) and an adjustment for affordability using the affordability ratios to calculate the need (step 2). A cap can then be applied if steps 1 and 2 result in the figure been more than 40% above the average annual housing requirement in existing policies (step 3) and finally a 35% urban uplift is added to the biggest cities (which includes Derby) (Step 4). This provides the Standard Method need figure which is the 'starting point'. This figure is calculated on an authority wide basis.

The National Planning Policy Framework (NPPF) para 61 does then go onto state:

'There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'

It is also worth highlighting para 35 (a) and (b) of the NPPF in relation to examining plans states that plans are 'sound' if they are:

- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs¹⁹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.*

Planning Policy Guidance (PPG), paragraph 010 also provides some further guidance on when a different housing figure may be appropriate¹, as listed below.

The review has not looked at the specific circumstances of Derbyshire but nevertheless, general reasons to justify a deviation from the Standard Methodology figure, fall into the following categories:

- Meeting Unmet need;
- Affordable Housing Need;
- Economic Growth Ambitions;
- Green Belt;
- Spatial Constraints (i.e. AONB, National Park etc);
- Habitat issues (i.e. Nutrient Neutrality);
- Infrastructure improvement/constraints;
- Lack of Deliverable, Achievable and Suitable Sites; and
- Contingency Buffer.

This is not an exhaustive list but covers the more common reasons debated at examination regarding justifications for a deviation from the Stand Methodology.

Consideration has also been given to a higher growth option than Scale 1 but this has been discounted as unreasonable given that Scale 1 already includes a cities and urban centres 35% uplift identified by central Government and it is agreed that Derby City is unable to meet this.

Spatial Constraints

Spatial constraints and designations, such as heritage and landscape designations, widespread flooding issues, ecology designations etc and others, may limit potential for suitable and sustainable development and hence could, if very constrained, lead to an argument for a reduced housing requirement. This would need to be well evidenced to demonstrate the clear methodology as to how such a conclusion was reached as this is likely to be strongly challenged at examination. Spatial constraints within the Derby HMA are shown in Figure 1.

¹ paragraph 010 of the PPG at <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

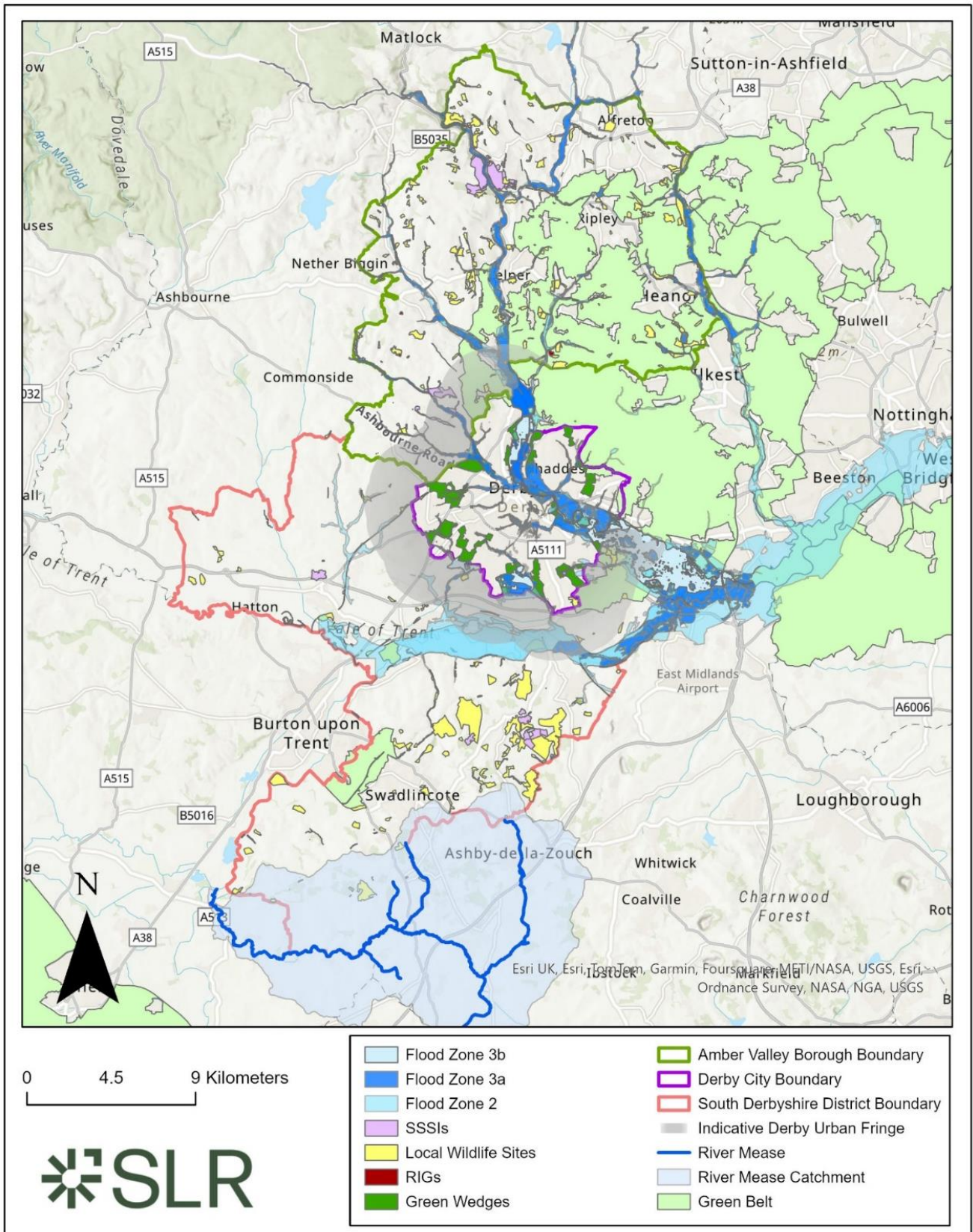


Figure 1: Spatial Constraints across the Derby HMA

Habitat issues

Aside from specific designated sites, there are more widespread ecology related issues (normally which intersect with the Habitats Regulations) which can prevent development. One fairly widespread issue in England is the 'Nutrient Neutrality' issue; this is having an impact on the River Mease Special Area of Conservation, which passes through South Derbyshire. This may justify a reduced or stepped housing figure if solutions are limited or still been advanced meaning development cannot come forward without impacts on the designated habitat sites. The counter argument to this is that it should be for the plan to address these kind of issues strategically and as such they should not be used as an excuse for reducing housing figures.

Infrastructure Improvements/Constraints

The PPG states that 'strategic infrastructure improvements are likely to drive and increase in the homes needed locally'. This could be, for example, where new rail connections are coming forward which may improve the attractiveness and sustainability of an area and as a consequence drive inward migration and housing need.

On the flip side, particular infrastructure constraints may also form part of an argument for a lower or stepped housing figure – this most often relates to water (foul and supply) constraints such as nutrient neutrality and water neutrality. However, as above in relation to habitat issues, the counter argument would be it should be for the local plan to be part of the solution to these kinds of issues and not a reason for a lower figure.

Lack of Deliverable, Achievable and Suitable Sites

This looks more widely at other 'spatial' issues that may make a site or strategy less attractive (for example the site/strategies sustainability or ability to be made sustainable). If there is no viable way to achieve sufficient 'deliverable, achievable and suitable' sites there could be an argument for a lower housing figure, but this would need to provide 'exceptional circumstances' to demonstrate that development could not be sustainably accommodated. This again would likely be debated at examination, particularly where developers/promoters sites are excluded and a lower than Standard Methodology housing target is being argued for.

Contingency Buffer

Once a housing 'requirement' is determined based on the above, it is normally argued that a buffer should be applied to the figure to allow for any slippages in forecast housing delivery, for example if an allocated site is delayed or falls away. There is no 'set' way of working this out, but it often ranges between 5-20% of the total figure, with arguments for a greater buffer tending to be stronger where there is a bigger reliance on larger, strategic, sites. Note, this should be separate to any 'unmet need' or urban uplift. There has been no buffer included in this project at this point in time.

In conclusion, should the assessment of the options defined by the Derby HMA identify capacity issues / potential significant effects on environmental constraints, an alternative approach may be considered by the HMA to consider a lower scale option. All reasonable options to allocate sites and the identification of how many deliverable and spatially appropriate sites available would need to be considered in the first instance.

2.1.2 Distribution Options

The Derby HMA authorities have identified four different options for the distribution of the potential housing growth, as follows:

- D1 Urban Concentration – all of Derby's unmet need is met within the Derby City administrative area. AVBC and SDDC meet their own 'standard methodology' needs;

- D2 Urban Concentration and Urban Fringe – the unmet need is split between Derby City administrative area and land adjoining the city (an arbitrarily Urban Fringe area defined for the purposes of this study, shown on Figure 1) in AVBC and SDDC. The Derby administrative area plus the Urban Fringe is referred to as the Derby Urban Area;
- D3 Dispersed – the unmet is split between land adjoining the city (Urban Fringe) in AVBC and SDDC and then within the Towns and Key Service Villages in each area as per Local Plan spatial strategies (outside of the Urban Fringe); and
- D4 Urban Fringe Focus - All unmet need including the 10% / 35% uplifts is met within land adjoining the city / Urban Fringe in AVBC and SDDC. This only applies to scales 1 and 3 as there is no uplift included in Scale 2. This distribution applies to all three scale options, however for Scale 2 it is referred to as 'D2'.

Within the D2-D4 distribution options there are different apportionment options for the Derby unmet need between AVBC and SDDC. Table 2-1: presents a matrix of the options including scale, distribution and apportionment of housing growth across the Derby HMA. In total, 34 different options have been assessed.

Table 2-1: Growth Options Assessed

Distribution	Apportionment
Scale 1- 36,584 new homes	
S1_D1	D1 Urban Concentration – City focus (all of Derby’s unmet need of 9,022 homes delivered within the Derby City administrative area)
S1_D2	D2 Urban Concentration and Urban Fringe – Derby City administrative area and Urban Fringe. Option D2 is divided into five sub-options A-E. Derby’s unmet need of 9,022 split as follow: <ul style="list-style-type: none"> • 5,576 unmet need in Derby city administrative area. This is the “35% uplift quantity”. • 3,446 unmet need in AVBC/SDDC Urban Fringe areas as follows:
S1_D2A	AVBC/SDDC 100:0 split on unmet need
S1_D2B	AVBC/SDDC 75:25 split on unmet need
S1_D2C	AVBC/SDDC 50:50 split on unmet need
S1_D2D	AVBC/SDDC 25:75 split on unmet need
S1_D2E	AVBC/SDDC 0:100 split on unmet need
S1_D3	D3 Dispersed – Urban Fringe, Towns & Key Service Villages etc. Option D3 is divided into five sub-options A-E. <ul style="list-style-type: none"> • 5,576 unmet need in AVBC/SDDC Urban Fringe. This is the 35% uplift quantity”. • 3,446 unmet need in AVBC/SDDC apportioned within each area outside of the Urban Fringe, as follows:
S1_D3A	AVBC/SDDC 100:0 split on unmet need
S1_D3B	AVBC/SDDC 75:25 split on unmet need
S1_D3C	AVBC/SDDC 50:50 split on unmet need
S1_D3D	AVBC/SDDC 25:75 split on unmet need
S1_D3E	AVBC/SDDC 0:100 split on unmet need
S1_D4	D4 Urban Fringe Focus - Urban Fringe. All unmet need including the 35% uplift is delivered within Urban Fringe in AVBC and SDDC. 9,022 unmet need in AVBC/SDDC Urban Fringe apportioned as follows:
S1_D4A	AVBC/SDDC 100:0 split on unmet need
S1_D4B	AVBC/SDDC 75:25 split on unmet need

Distribution	Apportionment
S1_D4C	AVBC/SDDC 50:50 split on unmet need
S1_D4D	AVBC/SDDC 25:75 split on unmet need
S1_D4E	AVBC/SDDC 0:100 split on unmet need
Scale 2- 31,008 new homes	
S2_D1	D1 Urban Concentration – City focus (all of Derby’s unmet need of 3,446 homes delivered within the Derby City administrative area)
S2_D2	D2 Urban Fringe Focus – Urban Fringe. All unmet need is delivered within Urban Fringe in AVBC and SDDC. 3,446 unmet need in AVBC/SDDC Urban Fringe apportioned as follows:
S2_D2A	AVBC/SDDC 100:0 split on unmet need
S2_D2B	AVBC/SDDC 75:25 split on unmet need
S2_D2C	AVBC/SDDC 50:50 split on unmet need
S2_D2D	AVBC/SDDC 25:75 split on unmet need
S2_D2E	AVBC/SDDC 0:100 split on unmet need
S2_D3	D3 Dispersed – Urban Fringe, Towns & Key Service Villages etc. Option D3 is divided into five sub-options A-E. 3,446 unmet need in AVBC/SDDC apportioned within each area within the Urban Fringe, Towns and Key Service Villages.
S2_D3A	AVBC/SDDC 100:0 split on unmet need
S2_D3B	AVBC/SDDC 75:25 split on unmet need
S2_D3C	AVBC/SDDC 50:50 split on unmet need
S2_D3D	AVBC/SDDC 25:75 split on unmet need
S2_D3E	AVBC/SDDC 0:100 split on unmet need
Scale 3- 32,606 new homes	
S3_D1	D1 Urban Concentration – City focus (all of Derby’s unmet need of 5,044 homes delivered within the Derby City administrative area)
S3_D2	D2 Urban Concentration and Urban Fringe – Derby City administrative area and Urban Fringe. Option D2 is divided into five sub-options A-E. Derby’s unmet need of 5,044 split as follows: 1,598 unmet need in Derby city administrative area. This is the “10% uplift quantity and

Distribution	Apportionment
	3,446 unmet need in AVBC/SDDC Urban Fringe areas as follows:
S3_D2A	AVBC/SDDC 100:0 split on unmet need
S3_D2B	AVBC/SDDC 75:25 split on unmet need
S3_D2C	AVBC/SDDC 50:50 split on unmet need
S3_D2D	AVBC/SDDC 25:75 split on unmet need
S3_D2E	AVBC/SDDC 0:100 split on unmet need
S3_D3	D3 Dispersed – Urban Fringe, Towns & Key Service Villages etc. Option D3 is divided into five sub-options A-E. 5,044 unmet need apportioned between AVBC and SDDC as follows in Urban Fringe, Towns & Key Service Villages, as follows:
S3_D3A	AVBC/SDDC 100:0 split on unmet need
S3_D3B	AVBC/SDDC 75:25 split on unmet need
S3_D3C	AVBC/SDDC 50:50 split on unmet need
S3_D3D	AVBC/SDDC 25:75 split on unmet need
S3_D3E	AVBC/SDDC 0:100 split on unmet need
S3_D4	D4 Urban Fringe Focus - All unmet need including the 10% uplift is delivered within Urban Fringe in AVBC and SDDC. 5,044 unmet need in AVBC/SDDC Urban Fringe apportioned as follows:
S3_D4A	AVBC/SDDC 100:0 split on unmet need
S3_D4B	AVBC/SDDC 75:25 split on unmet need
S3_D4C	AVBC/SDDC 50:50 split on unmet need
S3_D4D	AVBC/SDDC 25:75 split on unmet need
S3_D4E	AVBC/SDDC 0:100 split on unmet need

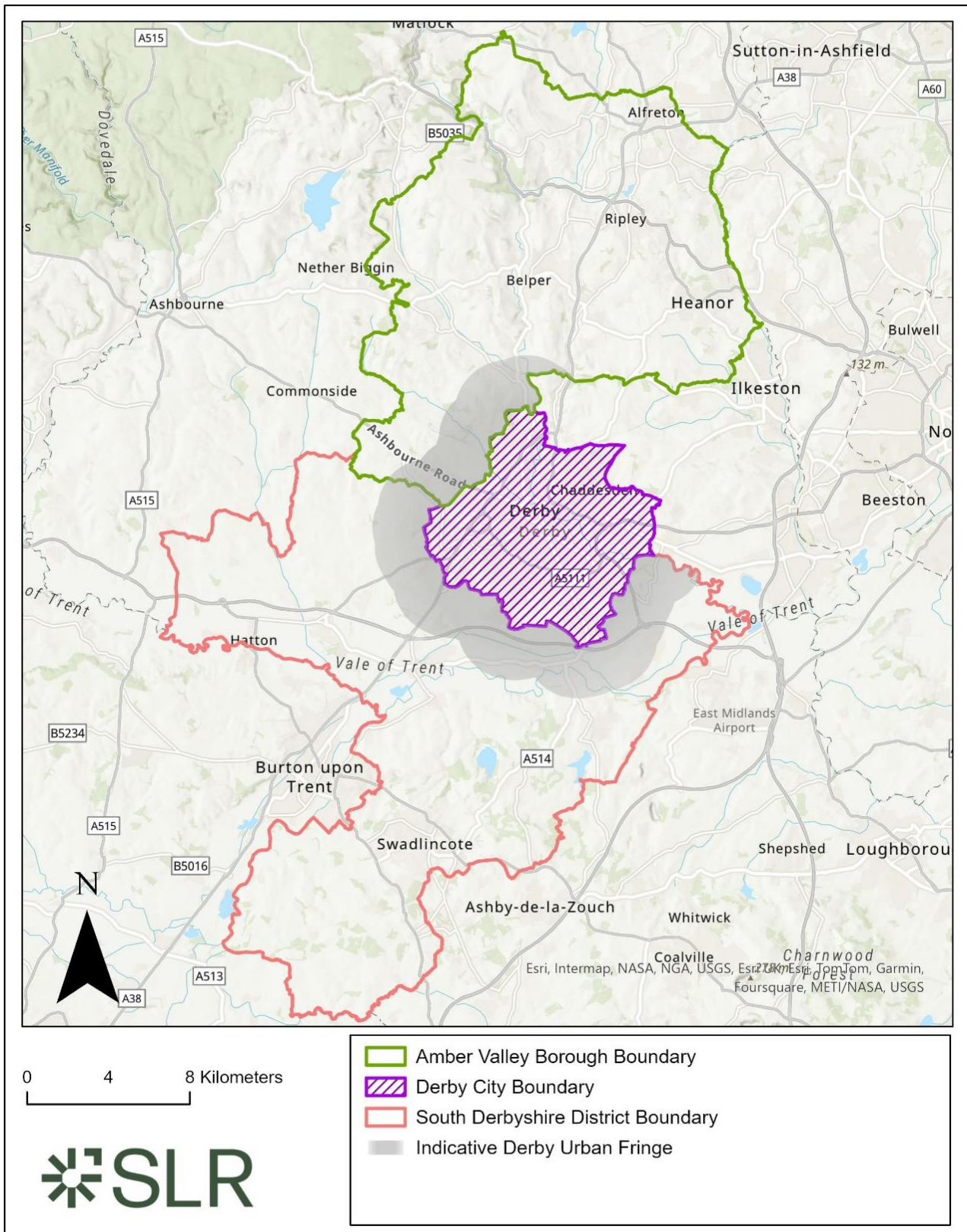


Figure 2: Arbitrary Urban Fringe around Derby Administrative area

For each option, details of the numbers of new homes which would be directed to the Derby City administrative area, the Urban Fringe in either AVBC or SDDC, and/or to the towns and key villages of AVBC and SDDC have been considered. The number of homes to be delivered in each option as a result of Derby City’s unmet need is presented in Table 2.2.

Table 2-2: Derby Unmet Need Numbers per Option

Option Ref	Derby unmet need	“Unmet need” in Derby City	Unmet need in AVBC Urban Fringe	Unmet need in SDDC Urban Fringe	Unmet need in AVBC Towns, and Key Villages	Unmet need in SDDC Towns, and Key Villages
Scale 1 (standard method + 35% uplift)						
S1_D1	9,022	9,022	0	0	0	0
S1_D2A	9,022	5,576	3,446	0	0	0
S1_D2B	9,022	5,576	2,585	861	0	0
S1_D2C	9,022	5,576	1,723	1,723	0	0
S1_D2D	9,022	5,576	861	2,585	0	0
S1_D2E	9,022	5,576	0	3,446	0	0
S1_D3A	9,022	0	5,576	0	3,446	0
S1_D3B	9,022	0	4,182	1,394	2,585	861
S1_D3C	9,022	0	2,788	2,788	1,723	1,723
S1_D3D	9,022	0	1,394	4,182	861	2,585
S1_D3E	9,022	0	0	5,576	0	3,446
S1_D4A	9,022	0	9,022	0	0	0
S1_D4B	9,022	0	6,767	2,255	0	0
S1_D4C	9,022	0	4,511	4,511	0	0
S1_D4D	9,022	0	2,255	6,767	0	0
S1_D4E	9,022	0	0	9,022	0	0
Scale 2 (standard method no uplift)						
S2_D1	3,446	3,446	0	0	0	0
S2_D2A	3,446	0	3,446	0	0	0

Option Ref	Derby unmet need	“Unmet need” in Derby City	Unmet need in AVBC Urban Fringe	Unmet need in SDDC Urban Fringe	Unmet need in AVBC Towns, and Key Villages	Unmet need in SDDC Towns, and Key Villages
S2_D2B	3,446	0	2,585	861	0	0
S2_D2C	3,446	0	1,723	1,723	0	0
S2_D2D	3,446	0	861	2,585	0	0
S2_D2E	3,446	0	0	3,446	0	0
S2_D3A	3,446	0	517	2,929	0	0
S2_D3B	3,446	0	388	466	2,197	396
S2_D3C	3,446	0	259	931	1,464	7,92
S2_D3D	3,446	0	130	1,396	732	1,188
S2_D3E	3,446	0	0	1,861	0	1,585
Scale 3 (standard method + 10% uplift)						
S3_D1	5,044	5,044	0	0	0	0
S3_D2A	5,044	1,598	3,446	0	0	0
S3_D2B	5,044	1,598	2,585	861	0	0
S3_D2C	5,044	1,598	1,723	1,723	0	0
S3_D2D	5,044	1,598	861	2,585	0	0
S3_D2E	5,044	1,598	0	3,446	0	0
S3_D3A	5,044	0	1,598	0	3,446	0
S3_D3B	5,044	0	1,198	399	2,585	861
S3_D3C	5,044	0	799	799	1,723	1,723
S3_D3D	5,044	0	399	1,198	861	2,585
S3_D3E	5,044	0	0	1,598	0	3,446
S3_D4A	5,044	0	5,044	0	0	0
S3_D4B	5,044	0	3,783	1,261	0	0

Option Ref	Derby unmet need	“Unmet need” in Derby City	Unmet need in AVBC Urban Fringe	Unmet need in SDDC Urban Fringe	Unmet need in AVBC Towns, and Key Villages	Unmet need in SDDC Towns, and Key Villages
S3_D4C	5,044	0	2,522	2,522	0	0
S3_D4D	5,044	0	1,261	3,783	0	0
S3_D4E	5,044	0	0	5,044	0	0

Please note that all options being considered are being tested through the SA process to help support decision making. Several options including Option S1_D1, S1_D2A-D2E, S2_D1, S3_D1 and S3_D2A-E could be difficult to deliver because they direct more housing development to the Derby City administrative area than the identified sites capacity. Likewise, options that concentrate unmet needs In Amber Valley or in South Derbyshire in totality could be difficult to deliver because of the lack of suitable sites with capacity. Further details of the assessment methodology are available in Section 3.1.

3.0 Approach to the SA

3.1 Methodology

The assessment has been informed by the Derby Growth Options Study undertaken by AECOM in August 2021 which was prepared on behalf of the Derby HMA. The study identified a number of strategic opportunities for sustainable new housing growth within the Derby HMA; these areas are referred to as Broad Areas of Search (BAoS) (Figure 3) and are located throughout Amber Valley and South Derbyshire. The BAoS were determined based on a number of sustainability constraints, including:

- Environmental constraints;
- Geo-environmental considerations;
- Transport and accessibility;
- Infrastructure capacity and potential;
- Landscape and topography;
- Heritage considerations;
- Housing demand;
- Regeneration and economic development potential; and
- Spatial constraints and opportunities

The study was conducted with a 'policy off' approach with regards to Green Belt designation, (e.g.: Green Belt does not render a location unsuitable for strategic development).

Four BAoS were identified as 'suitable area for strategic growth' within the Derby Growth Options Study. **Table 3-1** summaries the identified 'suitable areas'.

Table 3-1: Suitable Areas for Strategic Growth

BAoS	Location	Local Authority	Typology Option
C1	Land to the West of Derby Urban Area	DCC / AVBC / SDDC	Urban extension(s) / Garden Village. Co-dependent settlement / Autonomous settlement
D1	Hilton Northern Expansion	SDDC	Urban Extension / Village Expansion
D3	Derby A50 Corridor South Extension	DDC / SDDC	Urban Extension(s)
E4	North-east Swadlincote	SDDC	Urban Extension

Site C1 is located within the Urban Fringe mainly within SDDC but partly within AVBC and corresponds with the following options:

- S1_D2 Urban Concentration and Urban Fringe A-E;
- S1_D3 Dispersed A-E;
- S1_D4 Urban Fringe Focus A-E;
- S2_D2 Urban Concentration and Urban Fringe A-E;
- S2_D3 Dispersed A-E;
- S3_D2 Urban Concentration and Urban Fringe A-E;
- S3_D3 Dispersed A-E; and

- S3_D4 Urban Fringe Focus A-E.

Site D3 is located within the SDDC Urban Fringe and corresponds with the following options:

- S1_D2 Urban Concentration and Urban Fringe B-E;
- S1_D3 Dispersed B-E;
- S1_D4 Urban Fringe Focus B-E;
- S2_D2 Urban Concentration and Urban Fringe B-E;
- S2_D3 Dispersed B-E;
- S3_D2 Urban Concentration and Urban Fringe B-E;
- S3_D3 Dispersed B-E; and
- S3_D4 Urban Fringe Focus B-E.

Sites D1 and E4 are located within SDDC and correspond with the following options:

- S1_D3 Dispersed B-E;
- S2_D3 Dispersed B-E; and
- S3_D3 Dispersed B-E.

Within this SA assessment, the BAoS have been compared with sites submitted to the Strategic Housing and Economic Land Availability Assessment (SHELAA) processes undertaken by AVBC and SDDC in order to provide more information on the likelihood of available development sites within the BAoS, and to provide an indication of site capacity for residential development. Only the SHELAA sites which have been identified as suitable, available and achievable within the SHELAA processes have been considered. The total housing capacity of each SHELAA site has been considered within the assessments but it should be noted that AVBC, being at the Regulation 19 stage of their Local Plan development process and therefore more advanced than SDDC and DCC, has not necessarily proposed that total housing capacity at all sites would be delivered within their Local Plan period. Further assumptions made in the assessment are detailed in Section 3.2.

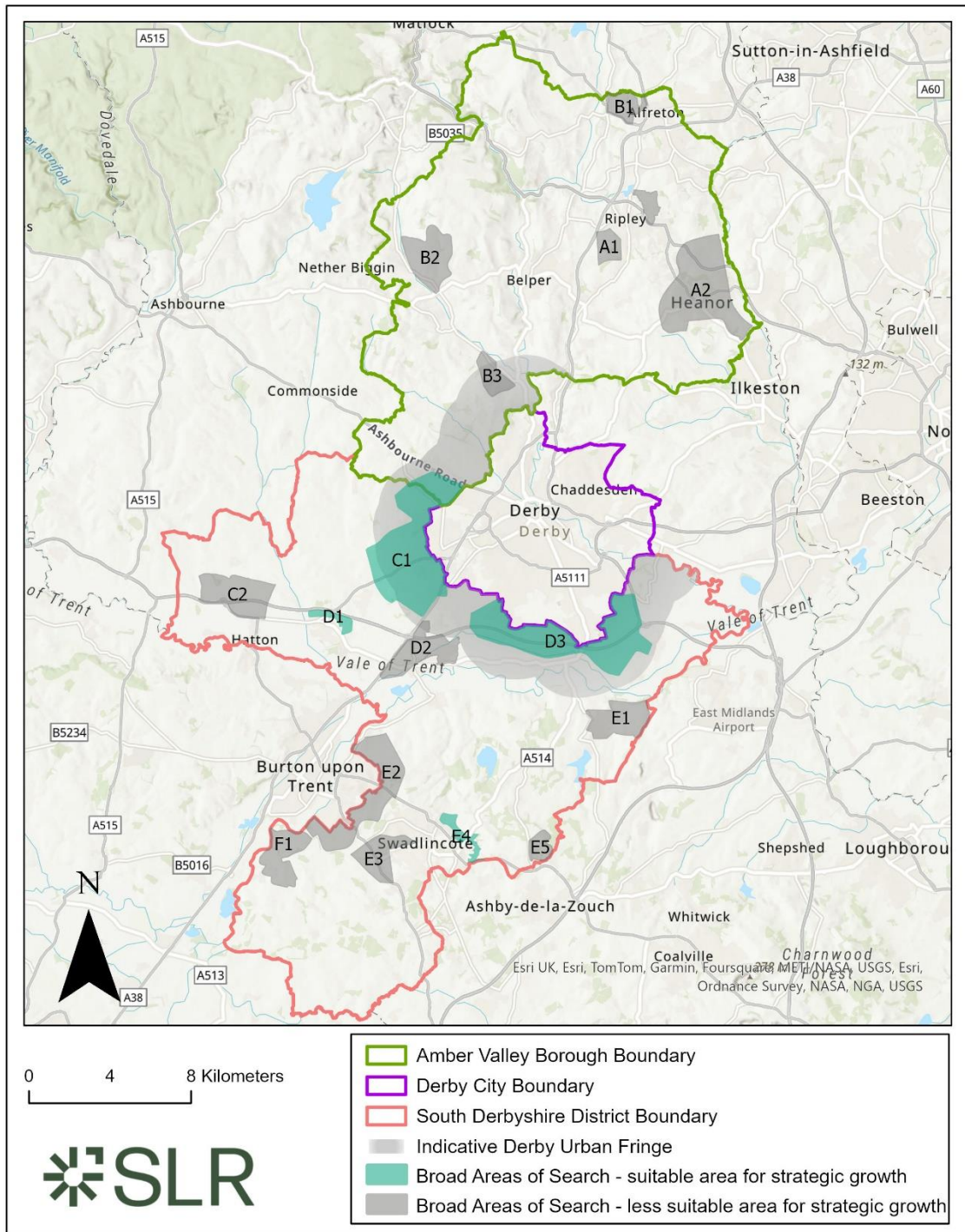


Figure 3: Broad Areas of Search within the Derby HMA

All options have been subject to assessment against the SA Framework (**Table 3-2**). Assessments have been undertaken using detailed assessment matrices in Excel format. One matrix has been completed per option.

Table 3-2: SA Framework

SA Topic	Objectives	Sub-objectives
Economy & Employment	SO1 Economy To deliver economic growth and support the creation of new and retention of existing businesses.	Protect existing employment areas and encourage existing businesses to grow. Support and encourage the clean growth of the local economy including in rural areas. Support the enhancement of the tourism and cultural offer. Provide new employment opportunities, accessible to people living in areas of high unemployment Encourage inward investment.
	SO2 Employment To create greater employment opportunities and higher value jobs.	Reduce unemployment rates and reduce existing disparities.
	SO3 City, Town and Village Centres To ensure that city, town and key service village centres are vibrant and viable.	Improve the attractiveness of Derby City centre to inward investors and visitors. Protect and enhance the vitality and viability of existing city, town and key service village centres through supporting economic activity (retail, hospitality, post offices, visitor attractions etc).
Population & Health	SO4 Accessibility To improve local accessibility to healthcare, education, employment, retail facilities and recreational resources (including open spaces and sports facilities) and enhance wellbeing and promote healthy and sustainable lifestyles.	Ensure all residents have equitable access to health services, considering the needs of an aging population and to reduce health inequalities and contribute to healthy lifestyles. Ensure new housing is well related to a range of services such as shops, schools and employment opportunities. Ensure all residents have equitable access to high quality education, learning and training opportunities, employment, community services and facilities. Improve opportunities for active travel including walking and cycling. Ensure everyone has access to high quality open space and recreation facilities to help promote healthy, active lifestyles and positive mental health among residents.
	SO5 Quality of Life To create safe and attractive places which contribute towards quality of life and community cohesion.	Ensure an integrated approach to delivery of housing, employment opportunities and community facilities.

SA Topic	Objectives	Sub-objectives
	SO6 Inequalities To reduce inequalities associated with deprivation.	Support reduction in deprivation and the inequality gap between the richest and the poorest. Protect community facilities and improve access to important local services for the most deprived
Housing	SO7 Housing To ensure everyone has access to sustainable housing, which is affordable, and meets the needs of all residents including the elderly and other vulnerable groups.	Increase the numbers of housing and deliver housing in line with identified needs. Provide affordable homes to meet housing needs.
Transport & Accessibility	SO8 Sustainable Travel To reduce the need to travel and promote sustainable travel habits including walking, <u>wheeling</u> and public transport (bus and rail) usage.	Reduce the need to travel and reduce journey lengths. Provide modal choice (walking, wheeling, low carbon, safe, reliable and convenient public transport) to access key services including employment, education facilities and doctor's surgeries, by means other than the car. Reduce congestion on the strategic and local road network through the delivery of new or enhanced transport infrastructure. Encourage the expansion of electronic communications networks.
Air, Noise & Light	SO9 Air, Light and Noise Pollution To minimise air, light and noise pollution and ensure that future growth does not lead to the further deterioration of environmental conditions.	Ensure new and existing communities are not adversely affected by poor quality air and noise pollution, either through their location or through causing a further deterioration because of new development. Improve Air Quality in existing Air Quality Management Areas (AQMAs). Avoid exacerbating light pollution by keeping external lighting to the minimum required for safety and security.
Climatic Factors	SO10 Contributions to Climate Change To reduce the contribution towards the emission of climate change gases.	Reduce energy consumption and support the delivery of renewable and decentralised energy capacity (including small scale or community energy projects). Support the shift towards low carbon technologies and the usage of electric and ultralow emissions vehicles and appropriate infrastructure to support these. Provide opportunities to access local services and facilities by low carbon public transport, walking or wheeling. Promote a low carbon local economy.

SA Topic	Objectives	Sub-objectives
	SO11 Adaptation to Climate Change Adapt to the effects of climate change including flood risk and reduced water availability.	Minimise flood risk and reduce fluvial and surface water flood risk in the area and elsewhere. Protect water quality in watercourses and groundwater.
Biodiversity, Geodiversity, Flora & Fauna	SO12 Biodiversity To safeguard and enhance biodiversity (including BAP Habitats and Species) and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Conserve and enhance natural semi natural habitats including internationally, nationally and locally designated wildlife sites. Contribute to creating a network of new wildlife habitats. Provide new or improved access to greenspaces. Protect and enhance a well-connected network of green infrastructure. Protect sites of geological importance. Protect existing woodland.
Cultural Heritage	SO13 Townscape and Historic Environment. To conserve and enhance the townscape, historic environment, heritage assets (including known and unknown archaeological sites) and their settings and where appropriate improve the quality of the built environment and maintain and enhance access to cultural heritage for enjoyment and educational purposes.	Protect and enhance the setting of historic, cultural, architectural, and archaeological features. Respect and protect existing townscape character. Enhance public realm and create quality new townscapes
Landscape	SO14 Landscape To conserve and enhance landscape character.	Respect and protect existing landscape and townscape character. Protect sensitive landscapes including those within the World Heritage Site or its buffer or Special Landscape Areas. Safeguard landscape features such as hedgerows and woodland.
Soils & Water	SO15 Soils and Water To minimise water and soil pollution and ensure protection of natural resources	Utilise previously developed land and seek to improve or remediate contaminated land or reuse previously developed land which has not been restored. Protect soil quality and avoid soil pollution.

SA Topic	Objectives	Sub-objectives
	including greenfield land, soil, and minerals resources.	Protect Best and Most Versatile (BMV) Agricultural Land. Protect sites safeguarded for mineral workings Minimise contamination of watercourses and improve water quality in watercourses Utilise and enhance existing infrastructure

The assessments of options have been undertaken by skilled and experienced assessors, using their professional judgement and with reference to baseline data from across the Derby HMA. The assessments consider specific requirements of the SEA Regulations including whether a potential effect could be indirect/direct, permanent or temporary, replaceable/irreplaceable, and the potential magnitude and duration. **Table 3-3** explains how this is considered and how significance has been determined within the assessments by the assessors.

The options tested in this report are high level scale and spatial strategy options and the SA reflects their strategic nature; the testing of individual sites will come at a later stage in the preparation of each individual Local Plan. The assessment has made use of GIS to identify constraints and therefore potential negative effects. The purpose of the SA assessment is to consider the options for delivering the housing need identified for Derby, specifically the unmet need that Derby cannot accommodate within its administrative area.

The SA has taken a holistic approach, considering the potential effects across the HMA. Whilst there could be multiple impacts in the HMA in any one option, only the key, significant impacts have been reported within the assessment. For example, the D1 distribution options focus all the unmet housing need identified for Derby City within the Derby administrative area. The assessment of the D1 options has therefore focused on potential effects within the Derby administrative area only. The assessors have not been ignorant of the fact that at the same time, development will occur within the AVBC and SDDC areas (in order to meet the identified housing needs in these areas) and have considered some high level potential cumulative effects, however, the focus of the assessment of the D1 options has been on the Derby administrative area.

In order to avoid the assessments of the D2, D3 and D4 options becoming overly complicated and therefore not useful for decision-making, the assessments of these options have similarly focused on the key effects of each option. For example, a significant negative effect could occur within a particular location, such as the Urban Fringe. Other, more minor, potential effects might occur in other locations within the HMA simultaneously. The assessment has identified both significant and minor effects but the write up within this report has focussed on the significant effects in order to provide a focussed and useable output.

Mitigation measures have been put forward within the assessment tables to address potential significant negative and uncertain effects. These measures are intended to either offset a potential negative effect, reduce uncertainty or reduce the significance of a potential negative effect. Mitigation measures within a strategic assessment such as this are similarly high level. Detailed mitigation required to offset or minimise the potential effects of developments will be identified by each Local Authority through the SAs of their Local Plans.

Table 3-3: Significance definitions

Symbol	Definitions of Significance of Effects Against the SA Objectives	General assumptions on the nature of effects
++	Significant Positive Effect: the option supports the achievement of this objective; it addresses all relevant sub-objectives and could result in a potentially	Permanent Continual Magnitude: High 80%+ receptor or environmental capacity affected; or Medium 40-80% of receptor or environmental capacity of affected The effect could be to:

Symbol	Definitions of Significance of Effects Against the SA Objectives	General assumptions on the nature of effects
	significant beneficial effect e.g. improved access by walking and wheeling modes to a local or town centre	<ul style="list-style-type: none"> enhance and redefine a location in a positive manner, making a contribution at a national or international scale; enhance and redefine a location in a positive manner; repair or restore receptors badly damaged or degraded through previous uses; and/or improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific regional or national designation.
+	Minor Positive Effect: the option supports the achievement of this objective; it addresses some relevant sub-objectives, although it may have only a minor beneficial effect	Reversible Infrequent or intermittent Magnitude: Low 20-40% of receptor or capacity affected. The size, nature and location of development could: <ul style="list-style-type: none"> improve undesignated yet recognised receptor qualities; fit into or with the existing location and existing receptor qualities; affect a localised receptor; and/or enable the restoration of valued characteristic features partially lost through other land uses.
0	Neutral Effect: the option has no impact or effect and is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant	N/A
?	Uncertain Effect: Uncertain or insufficient information on which to determine the assessment at this stage	N/A
-	Minor Negative Effect: the option appears to conflict with the achievement of this objective; it does not address relevant sub-objectives and may result in minor adverse effects	Reversible Infrequent or intermittent Magnitude: Low 20-40% of receptor or capacity affected. The size, nature and location of development could: <ul style="list-style-type: none"> be out of scale with the location; affect a localised receptor; and/or leave an adverse impact on a receptor of recognised quality such as a specific district or county designation.
--	Significant Negative Effect: the option	Permanent Irreversible

Symbol	Definitions of Significance of Effects Against the SA Objectives	General assumptions on the nature of effects
	works against the achievement of this objective; it does not address relevant sub-objectives; it could exacerbate a negative situation and may result in a potentially significant adverse effect e.g. loss of all or part of a designated ecological site of national importance.	Continual Magnitude: High 80%+ receptor or environmental capacity affected; or Medium 40-80% of receptor or environmental capacity of affected The effect could be: <ul style="list-style-type: none"> • to permanently degrade, diminish or destroy the integrity of the receptor; • to cause a very high-quality receptor to be permanently changed and its quality diminished; • not fully mitigable and may cumulatively amount to a severe adverse effect; • at a considerable variance to the location, degrading the integrity of the receptor; and/or • substantially damaging to a high-quality receptor such as a specific regional or national designation.

3.2 Assessment Assumptions and Limitations

The assessment provides a strategic overview of the sustainability performance of options for scale, distribution and apportionment of unmet need within the HMA, particularly in AVBC and SDDC. The assessment is high level and informed by strategic data, some of which is inconsistent for the HMA as can be seen within the baseline review (Appendix A).

The assessment has been undertaken as a desk-based exercise using published GIS. No site visits have been undertaken specifically for the purposes of the SA.

Every effort has been made to predict effects accurately, however when there are uncertainties due to limited information available, assumptions have been made for the options.

The Derby Urban Fringe is not clearly defined, rather it is described as: “*land physically connected to the built up area of the City*”. Therefore, for the purposes of this assessment, the broad Urban Fringe boundary shown in Figure 3 has been used. This accounts for land already physically connected to the city to guide assessors. Whilst this might not be 100% accurate, it has provided a guiding principle for the purpose of the options assessment as some options direct housing to the Urban Fringe.

It has been assumed that infrastructure, such as public transport, walking and wheeling access, schools, GP surgeries, retail and community meeting places will be provided to meet the needs of development, including that it would be in close proximity to new housing development sites. In accordance with the Growth Options Study (AECOM, August 2021), it has been assumed that the minimum urban extension size which could provide some degree of self-sufficiency is 1,000 dwellings.

It has been assumed that 12,500 new homes can be delivered within the Derby City administrative area in accordance with capacity work and the emerging strategy prepared by DCC. Similarly, the SHELAA sites identified within the AVBC Urban Fringe have capacity for 3,000 new homes. It is assumed that options which allocate more than 3,000 new homes to the AVBC Urban Fringe would involve intense development of these sites plus, potentially, further development on unidentified sites within the AVBC Urban Fringe.

It has been assumed that potential development areas (i.e. within the BAoS and potential housing sites) which are located near to a main road routes connected to Derby are able to access a current bus service. It has not been possible to obtain detailed information about the frequency of public transport services within the Derby HMA.

It has been assumed that affordable housing will be provided in all locations in accordance with the relevant Local Plan policies of each Local Authority. It is noted that this is currently 30% in SDDC and Derby City, although these policies will be reviewed in preparing new Local Plans. In AVBC the proposed approach within the Regulation 19 Local Plan (February 2024) identified varying percentages of affordable housing provision depending on the location of a proposed development.

The capacity of housing which could be delivered on each SHELAA site has been provided to the consultants in the supporting SHELAA information from AVBC and SDDC. A general assumption has also been agreed regarding densities of housing developments which would be expected in each area as follows:

- 60 dwellings per hectare (dph) within Derby city centre and highly accessible locations within the Derby administrative area such as transport interchanges and district centres;
- 35 dph within other areas in the Derby administrative area;
- 35 dph within the AVBC and SDDC Urban Fringe; and
- 30 dph within other areas in AVBC and SDDC.

For some options where the amount of housing which would be directed to an area is more than the identified capacity of available sites, densities may need to be greater than these general assumptions and this has been reflected within the assessment.

4.0 Assessment Findings

4.1 Introduction

In this section, summarised findings of the options assessments are presented within tables followed by discussions of how the options perform in comparison with each other.

With such a large number of options it is difficult to compare options without breaking down the findings into focus points. In the discussion of the findings in Section 4.3, analysis of the options assessment findings is provided by Scale options, focusing on potential significant effects of the options and where the assessment has identified key differences between the scale, distribution and apportionment options.

Following the findings discussion by Scale option, an additional discussion is provided which expands on the assessment findings for the following Sustainability Objectives, which highlight some differentiation between options:

- SO1 (Economy);
- SO2 (Employment);
- SO3 (Town and Village Centres);
- SO4 (Accessibility);
- SO7 (Housing);
- SO8 (Sustainable Travel);
- SO11 (Climate Change Mitigation);
- SO12 (Biodiversity and Geodiversity);
- SO13 (Historic Environment);
- SO14 (Landscape and Townscape); and
- SO15 (Soils and Water).

4.2 Summary Findings

Table 4-1: Scale 1 Options (36,584 new homes)

Option	SA Objectives														
	Economy	Employment	Town and Village Centres	Accessibility	Quality of Life	Inequalities	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Contribution	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape	Soils and Water
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15
S1_D1	--	--	+	+	++	++	+	++	-	++	-	-	-	-	+
S1_D2A	-	-	++	++	++	++	+	+	-	++	-	-	-	-	-
S1_D2B	-	-	++	++	++	++	+	+	-	++	-	-	-	-	-
S1_D2C	-	-	++	++	++	++	+	+	-	++	-	-	-	-	-
S1_D2D	-	-	++	++	++	++	+	++	-	++	-	-	-	-	-
S1_D2E	-	-	++	++	++	++	+	++	-	++	-	-	-	-	-
S1_D3A	++	++	++	+	+	++	+	-	-	-	-	-	-	-	-
S1_D3B	++	++	++	+	+	++	+	-	-	-	-	-	-	-	-
S1_D3C	++	++	++	+	+	++	++	-	-	-	-	-	-	-	-
S1_D3D	++	++	++	+	+	++	++	-	-	-	-	-	-	-	-

Option	SA Objectives														
S1_D3E	++	++	++	+	+	++	++	--	--	--	--	-	-	--	--
S1_D4A	++	++	++	++	++	+	+	+	--	++	--	-	+	--	--
S1_D4B	++	++	++	++	++	+	+	+	--	++	--	-	+	--	--
S1_D4C	++	++	++	++	++	+	+	+	--	++	--	-	+	--	--
S1_D4D	++	++	++	++	++	+	++	++	--	++	-	-	+	--	--
S1_D4E	++	++	++	++	++	+	++	++	--	++	-	-	+	--	--

Table 4-2: Scale 2 Options (31,008 new homes)

Option	SA Objectives														
	Economy	Employment	Town and Village Centres	Accessibility	Quality of Life	Inequalities	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Contribution	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape	Soils and Water
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15
S2_D1	--	--	+	+	+	++	+	++	--	++	--	--	--	--	+
S2_D2A	+	+	++	++	+	+	+	+	-	++	-	-	+	--	--
S2_D2B	+	+	++	+	+	+	++	+	-	++	-	-	+	-	-
S2_D2C	+	+	++	+	+	+	++	+	-	++	-	-	+	-	-

Option	SA Objectives														
S2_D2D	++	++	++	+	+	+	++	++	-	++	-	-	+	-	-
S2_D2E	++	++	++	++	+	+	++	++	-	++	-	-	+	-	--
S2_D3A	++	++	++	+	+	+	++	--	-	-	-	--	-	-	--
S2_D3B	++	++	++	+	+	++	++	-	-	-	-	--	-	-	--
S2_D3C	++	++	++	+	+	++	++	-	-	-	-	-	-	-	--
S2_D3D	++	++	++	+	+	++	++	-	-	-	-	+	+	-	--
S2_D3E	++	++	++	+	+	++	++	-	-	-	-	+	+	-	-

Table 4-3: Scale 3 Options (32,606 new homes)

Option	SA Objectives														
	Economy	Employment	Town and Village Centres	Accessibility	Quality of Life	Inequalities	Housing	Sustainable Travel	Air, Light and Noise Pollution	Climate Change Contribution	Climate Change Mitigation	Biodiversity and Geodiversity	Historic Environment	Landscape	Soils and Water
	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8	SO9	SO10	SO11	SO12	SO13	SO14	SO15
S3_D1	--	--	+	+	++	++	+	++	--	++	--	--	--	--	+
S3_D2A	-	-	++	++	+	+	+	+	--	++	--	--	--	--	--
S3_D2B	-	-	++	++	+	+	+	+	-	++	--	-	--	--	-

Option	SA Objectives														
S3_D2C	-	-	++	+	+	+	+	+	-	++	--	-	--	--	-
S3_D2D	-	-	++	+	+	+	+	++	-	++	--	-	--	--	-
S3_D2E	-	-	++	++	+	+	+	++	--	++	--	-	--	--	--
S3_D3A	++	++	++	+	+	++	++	--	--	--	-	--	--	--	--
S3_D3B	++	++	++	+	+	++	++	-	-	-	-	-	-	-	--
S3_D3C	++	++	++	+	+	++	++	-	-	-	-	-	-	-	--
S3_D3D	++	++	++	+	+	++	++	-	-	-	-	+	+	-	--
S3_D3E	++	++	++	+	+	++	++	--	--	--	-	+	+	-	--
S3_D4A	++	++	++	++	++	+	+	+	--	++	--	-	+	--	--
S3_D4B	++	++	++	++	++	+	+	+	-	++	--	-	+	--	--
S3_D4C	++	++	++	++	++	+	++	+	-	++	-	-	+	-	-
S3_D4D	++	++	++	++	++	+	++	++	-	++	-	-	+	-	--
S3_D4E	++	++	++	++	++	+	++	++	--	++	-	-	+	--	--

4.3 Discussion of Assessment Findings

4.3.1 Discussion of Scale of Growth Options

Three different scale options have been subject to SA as follows:

- Scale 1: Standard method in full (including 35%); 36,584 dwellings across the HMA;
- Scale 2: Standard method (no 35% uplift); 31,008 dwellings across the HMA; and
- Scale 3: Standard method 1-3 (no 35% uplift) + 10%; 34,109 dwellings across the HMA.

Scales 2 and 3 are alternatives to Scale 1 which is the housing requirement identified using the national standard method and applying the 35% required by central Government. The assessment has identified that there are distribution options which perform more favourably than others under Scale 1.

Set out below is a discussion of the assessment results according to each Scale option.

4.3.1.1 Scale 1

Under Scale 1, the distribution options which concentrate Derby's housing need into the Derby administrative area and allocate more than the 12,500 capacity of new homes into the Derby administrative area, perform negatively with regards to the economy and employment (Sustainability Objective 1 and Sustainability Objective 2). This is due to the implications of developing employment sites within the Derby administrative area in order to achieve the high levels of housing within the city required in these options. Option S1_D1 performs most negatively, with potential significant negative effects identified for Sustainability Objective 1 and Sustainability Objective 2.

In contrast, distribution options under Scale 1 which direct the 12,500 capacity of new homes to the Derby administrative area perform very positively with regards to economy and employment and potential significant positive effects have been identified for Sustainability Objective 1 and Sustainability Objective 2. Development should support the economy, provide housing for employees and access to employment opportunities for new residents.

The majority of the options at this scale perform very positively with regards to supporting centres (Sustainability Objective 3), which are mainly identified as Derby City itself as well as some of the towns within Amber Valley and South Derbyshire.

All of the options under Scale 1 also perform positively with regards to access to facilities and services (Sustainability Objective 4) although the options for which potential significant positive effects are identified are those which concentrate development within the DUA. It should be noted that the assessment identifies that access to open space is likely to be reduced in the Distribution 1 option under Scale 1 as it could require development of open space within the Derby administrative area due to the volume of housing delivery required.

All of the options across all of the scales perform positively with regards to housing delivery (HO7) but only potential minor positive effects have been identified for the options which direct more than the 12,500 capacity of new homes into the Derby administrative area. This is because there is uncertainty surrounding the amount of affordable housing that will be provided, as well as the range of different types and mixes of housing which could be delivered, if development is concentrated in densely developed sites.

Under Scale 1, the distribution options which concentrate Derby's housing need into the DUA (Derby administrative area plus the Urban Fringe) perform positively with regards to



sustainable travel (Sustainability Objective 8), particularly those which either concentrate all development into the Derby administrative area or those which concentrate housing development into the South Derbyshire Urban Fringe, which according to the Growth Options Study (AECOM, August 2021), contains good potential for sustainable transport access within the BAoS C1. Conversely, the distribution options which distribute the housing growth more widespread across Amber Valley and South Derbyshire do not perform well and potential significant negative effects have been identified for Sustainability Objective 8 in relation to sustainable transport. This is also reflected in potential significant negative effects identified for the Distribution 3 options under Scale 1 for Sustainability Objective 10 climate change contributions.

Potential flood risk could affect all of the potential development areas. Potential significant negative effects rather than potential minor negative effects have been identified in the assessment of the distribution options which concentrate housing development into the DUA (Derby administrative area plus the Urban Fringe).

Potential negative effects have been identified for all distribution options under Scale 1 regards to biodiversity and geodiversity (Sustainability Objective 12) with potential significant negative effects identified where development is distributed across Amber Valley. A large number of nature conservation sites (e.g.: LWS, SSSI, RIGs etc.) fall within potential areas of development identified within Amber Valley's key towns and villages, such as around Heanor. South Derbyshire contains less biodiversity areas that interact with identified areas of development. The options which distribute the unmet need to the Urban Fringe areas of South Derbyshire and Amber Valley and which avoid allocating the unmet need more widely in Amber Valley (i.e. Options S1_D3D, S1_D3E, S1_D4A-S1_D4E) could result in minor potential negative effects on biodiversity and geodiversity and may present greater opportunities for mitigation and Biodiversity Net Gain (BNG).

Similar to Sustainability Objective 12, with regards to heritage assets, potential significant negative effects have been identified with the distribution options which direct the unmet need into the Derby administrative area and into the Urban Fringe areas. Under Scale 1, Distributions options 1 and 2, development of dense housing developments and tall buildings within Derby City is likely to impact townscape. Dense housing development in the Amber Valley Urban Fringe may also place pressure on nearby heritage assets, such as Kedleston Hall (Grade I Listed). Additionally, areas of development within Derby City are covered by the DVMWHS designation and its associated buffer zone, which is likely to be impacted by development. Although the Amber Valley Urban Fringe is also covered by the buffer, no identified areas of potential development correspond with it. The South Derbyshire Urban Fringe is not covered by the DVMWHS or its buffer.

Derby City, the Amber Valley Urban Fringe and the South Derbyshire Urban Fringe contain conservation areas and listed buildings. The distribution options which concentrate the unmet need into the Urban Fringe areas perform best with regards to heritage assets.

Potential significant negative effects have been identified for all of the distribution options under Scale 1 in relation to landscape due to the need to develop greenfield land and the level of change this scale of growth would lead to.

The distribution options which concentrate the unmet need in the Urban Fringe and more widely across Amber Valley and South Derbyshire are predicted to result in potential significant effects in relation to the efficient use of soil and water. Agricultural land could be affected in the potential development areas. Potential minor negative effects are identified in relation to the options which allocate the unmet need to the Urban Fringe in 25:75 and 50:50 ratios. A potential minor positive effect is identified for Option S1_D1 as it concentrates all of



Derby's housing needs into the Derby administrative area and would not result in the loss of the best and most versatile agricultural land.

Options S1_D4D and S1_D4E are associated with the most potential significant positive effects and the least significant negative effects of all of the distribution options for this scale. These options direct 75% or 100% of the Derby unmet need to the South Derbyshire Urban Fringe and would benefit from good potential for accessibility to services and facilities through achieving a degree of self-sufficiency within large urban extensions and through access into Derby by sustainable transport.

4.3.1.2 Scale 2

There are fewer potential significant negative effects identified in the assessment of the Scale 2 options. The worst performing options are S2_D1, which concentrates all of Derby's housing need into Derby administrative area, and options which distribute the unmet need more widely across Amber Valley and South Derbyshire. After Option S2_D1, Options S2_D3A and S2_D3E perform least well. These options distribute 100% of the unmet need across either Amber Valley or South Derbyshire.

Other than Option S2_D1, none of the options direct more than the 12,500 capacity for new housing development to the Derby administrative area. The distribution options which direct the unmet need to the DUA perform most positively with regards to climate change contributions (Sustainability Objective 10). The options which direct 100% of the unmet need to either the Amber Valley or the South Derbyshire Urban Fringe perform more positively with regards to accessibility to facilities and services (Sustainability Objective 4) and supporting the vitality and vibrancy of Derby (Sustainability Objective 3).

The best performing options are those which distribute the Derby unmet need to the Urban Fringe, particularly Option S2_D2D which directs 75% of the unmet need in South Derbyshire and 25% in Amber Valley. The highest number of potential significant positive effects is identified for Option S2_D2E but the assessment also identifies a potential significant negative effect in relation to soils and water (Sustainability Objective 15).

4.3.1.3 Scale 3

Scale 3 distribution options have a similar performance to the Scale 1 options, although with fewer potential positive and negative significant effects. The distribution options which concentrate Derby's housing need into the Derby administrative area and direct more than the 12,500 capacity of new homes there, perform negatively with regards to the economy and employment (Sustainability Objective 1 and Sustainability Objective 2) for the same reasons as the Scale 1 options.

Options S3_D1, S3_D2A, S3_D2E, S3_D3A, and S3_D3E could result in the most significant negative effects. Apart from Option S3_D1 (Derby administrative area concentration) all of these options listed distribute the Derby unmet need 100% to either Amber Valley or South Derbyshire. These potential negative effects relate to the locations of potential development, as indicated through the SHELAA sites which would be developed in each different option.

Similar to Scales 1 and 2, the distribution options under Scale 3 which perform most positively are those which distribute the Derby unmet need to the Urban Fringe areas. These distribution options perform more positively at Scale 3 than at Scale 1 however.



4.3.2 Discussion of Distribution Options Performance by Selected SA Objective

4.3.2.1 Housing

There are a number of options which would direct more than the identified total capacity of 12,500 new homes to the Derby administrative area, and more than the identified SHELAA capacity of 3,000 new homes in the Amber Valley Urban Fringe. The assessments of options S1_D1; S1_D2A-E; S1_D3A-B; S1_D4A-C; S2_D1; S2_D2A; S3_D1; S3_D2A-E; and S3_D3A-B all identified potential minor positive effects against Sustainability Objective 7. This is due to the fact that in order to deliver the housing in these options over the identified capacity of sites, high density housing would need to be built, which is therefore unlikely to meet identified needs in respect of the type and mix of homes. For all other options potential significant positive effects were identified.

The options which are supported by evidence that there is capacity to deliver identified unmet housing needs, all identified potential significant positive effects against Sustainability Objective 7.

4.3.2.2 Sustainable Travel and Accessibility

One of the key assumptions of the assessments has been that the necessary infrastructure required to meet the needs of the new residents would be provided with the new homes. As highlighted in Table 4-4, this is particularly the case within the BAoS C1 and D3 within the Urban Fringe, where the relevant Local Authorities have planned for, or recently developed the following schools, in order to facilitate population growth.

Table 4-4: School Facilities Provision (New and Planned) within Urban Fringe BAoS

BAoS C1	BAoS D3
<p>Primary School Provision:</p> <p>Hackwood Farm (DCC new school open)</p> <p>Newhouse (SDDC new primary planned; expected opening Sept 2025)</p> <p>Highfields (SDDC new school open)</p> <p>Rykneld Rd (DCC planned)</p> <p>Brun Lane (AVBC new primary planned)</p>	<p>Primary School Provision:</p> <p>Boulton Moor (DCC new school open)</p> <p>Boulton Moor (SDDC new primary planned & permitted; expected opening September 2024)</p> <p>Chellaston Fields (SDDC new school open)</p> <p>Wragley Way (SDDC new primary planned)</p>
<p>Secondary School Provision:</p> <p>Brun Lane (AVBC land safeguarded in LP for a new secondary)</p>	<p>Secondary School Provision:</p> <p>Southern Derby Growth Zone (SDDC land allocated in LP for a new secondary (Policy INF12))</p>

Assumptions regarding the provision of necessary infrastructure means that all of the options perform positively with regards to the Accessibility Sustainability Objective 4, although it is recognised that the scale of development at BAoS sites C1 and D3 are of a scale that may require their own on site mitigation, in terms of school provision.

However, when considering travel and access by sustainable travel modes (Sustainability Objective 8), the options which are more urban focused have performed more positively than those which allocate Derby's unmet need in a more dispersed manner to AVBC and SDDC (Distribution 3), which could place a lot of pressure on existing transport infrastructure to / from Derby. The assessments identified that directing high amounts of development within the



Amber Valley Urban Fringe is less sustainable as there is only one main route into Derby in this location (the A52) and no Park and Ride facility. Options S1_D3A-E; S2_D3A and E, and S3_D3A and E were therefore identified as having potential significant negative effects.

Options which place some or all of unmet need into the Urban Fringe perform positively, with those that place more unmet need within South Derbyshire's Urban Fringe performing the most positively, due to the presence of several existing routes into Derby and potential to improve sustainable transport infrastructure, as identified within the Growth Options Study (AECOM, August 2021). The A516 and A38 run through BAoS C1, which will provide bus links into Derby City. Cycle facilities are also in place along sections of the A38.

4.3.2.3 Economy and Employment

The assessment has identified significant potential positive effects in relation to the economy (Sustainability Objective 1) and employment (Sustainability Objective 2) in relation to all D3 and D4 options, as well as S2_D2D-E. These options distribute Derby's unmet need to a combination of the Urban Fringe, Towns and Key Service Villages.

Options that place a higher emphasis of development within South Derbyshire (e.g.: 50% or more) are scored as potential significant positive as development in these areas (particularly within Areas of Search C1 and D3) are likely to be more beneficial to the economy (Sustainability Objective 1) and employment (Sustainability Objective 2). This is due to the presence of existing businesses e.g. Toyota car factory and Dove Valley Park, which contains manufacturing companies JCB and Futaba. Development in these areas will also allow residents to easily travel into Derby City which is likely hold a large density of employment opportunities, such as the Infinity Park Enterprise, Rolls Royce and Pride Park. Development of the East Midlands Freeport – nearer to South Derbyshire than AVBC - is also likely to boost job opportunities in the Derby HMA, particularly in South Derbyshire.

The assessment has identified potential significant negative effects for S1_D1, S2_D1, and S3_D1 for economy (Sustainability Objective 1) and employment (Sustainability Objective 2) due to these options placing more than 12,500 new homes within the Derby City administrative area. As Derby City does not have enough sites to support the proposed distribution of housing within these options, development of housing on employment sites may be required in order to meet this need.

4.3.2.4 City, Town and Village Centres

Potential positive effects are identified for all options in relation to vibrant city, town and village Centres (Sustainability Objective 3). Potential significant positive effects are identified for the Distribution 2, Distribution 3, and Distribution 4 options for all scales, where Derby's unmet housing need is directed to the Urban Fringe, and towns and key villages of AVBC and SDDC.

4.3.2.5 Climate Change Mitigation and Biodiversity

The assessment against the Climate Change Mitigation (Sustainability Objective 11) and Biodiversity and Geodiversity objectives (Sustainability Objective 12) have generally performed negatively across the options. These objectives relate to ecology, biodiversity, protected nature conservation sites, functionality of greenspaces and flood risk.

The assessment identified that the two Growth Option Study BAoS within the Urban Fringe (BAoS C1 and BAoS D3) are located near to Derby City's Green Wedges and growth in these areas could have a potential negative effect without mitigation. BAoS C1 immediately adjoins two of Derby City's Green Wedges and BAoS D3 immediately adjoins three of Derby City's Green Wedges. Development in these BAoS could lead to the permanent and irreversible loss



of greenfield land which is often key biodiversity habitats within urban spaces and loss of connectivity between such spaces. Mitigation could potentially be put in place to maintain and improve connectivity. The BAoS correspond with the options which direct unmet need into the Urban Fringe (see Section 3.1 for the full list).

The assessment of the S1 highest scale of development option has identified potential significant negative effects for S1_D1, all S1_D2 apportionment options, and S1_D3A-C with the remaining options assessed as minor negative for Biodiversity and Geodiversity (Sustainability Objective 12).

For Scale 2, although potential negative effects are identified for Biodiversity and Geodiversity (Sustainability Objective 12) for the majority of options, it is only Option S2_D1 (Derby City focus) that potential significant negative effects are identified in relation to the ecology objective. Potential significant negative effects are also identified for S2_D3A-B in relation to Biodiversity and Geodiversity (Sustainability Objective 12).

For Scale 3, potential significant negative effects have been identified for S3_D1, S3_D2A and S3_D3A in relation to Biodiversity and Geodiversity (Sustainability Objective 12).

Areas of high flood risk are mostly identified within Derby City centre, the AVBC Urban Fringe, Belper and to the South of the SDDC Urban Fringe. BAoS C1, D1 and E4 should be minimally impacted by flood risk, as the areas are mostly within Flood Zone 1. There are small sections of Flood Zone 2 and 3 within BAoS C1 and D3, however, which may be impacted by the larger scale options for development.

The assessment of the S1 highest scale of development option has identified potential significant negative effects for all options except for S1_D4D-E for Climate Change Mitigation (Sustainability Objective 11).

Similar to the performance of the Scale 2 options against the ecology Sustainability Objective, potential negative effects are identified for Climate Change Mitigation (Sustainability Objective 11) for the majority of options, but a potential significant negative effect is identified in relation to Option S2_D1 (Derby City focus).

For Scale 3, potential significant negative effects have been identified for S3_D1, S3_D2A, S3_D2B-E and S3_D4A-B in relation to Climate Change Mitigation (Sustainability Objective 11).

4.3.2.6 Landscape

When considering landscape (Sustainability Objective 14), the assessment of options has identified potential negative effects for all options. Significant negative effects have been identified for the options that direct growth into the Derby Urban Area, particularly at a high scale, which includes Scale 1 Options S1_D1, S1_D2A-E, Scale 2 Option S2_D1, and Scale 3 Options S3_D1 and S3_D2A-E.

The assessment has identified that options which concentrate development within the SDDC Urban Fringe could potentially isolate 'green wedges' within Derby which has contributed to potential significant negative effects being identified. Mitigation measures could potentially be put in place to retain some landscape features and maintain connected green infrastructure. Green Belt designations in SDDC are at risk of development in the options which direct housing development into the Urban Fringe.

4.3.2.7 Historic Environment

The assessments in relation to historic environment (Sustainability Objective 13) have identified potential significant negative effects relating to historic asset constraints. Options



which direct unmet housing need into the Derby City administrative area (S1_D1, S1_D2A-E, S2_D1, S3_D1 and S3_D2A-E) are likely to require more, or more densely developed sites with tall buildings, particularly in the city centre, which is likely to impact townscape. The city centre is also largely covered by conservation areas, listed buildings and the DVMWHS buffer zone. It is therefore unclear how the scale and distribution of options in Derby City could be achieved, without causing harm to or adverse effects on the settings of historic assets in the city centre which led to potential significant negative effects being identified for S1_D3A-C and S3_D3A.

Options which direct unmet housing need into the Urban Fringe alone (e.g.: S1_D4A-E, S2_D2A-E and S3_D4A-E) perform the most positively, as the scale and distribution of these options makes it unlikely that development will encroach on heritage assets, due to their being less areas of potential development overlapping existing heritage assets. Dense housing development in the Amber Valley Urban Fringe may, however, place pressure on the setting of nearby heritage assets such as Kedleston Hall (Grade I Listed) and Radbourne Hall (Grade I Listed). Options which are more dispersed and direct the majority of development to South Derbyshire (75% or above), also perform positively (S2_D2D-E and S3_D3D-E) as South Derbyshire contains a smaller number of heritage assets that could be affected by development.

4.3.2.8 Water and Soils

The findings of the assessments have identified that the more dispersed options (distribution 3) could result in more potential significant negative effects with regards to the loss of the best and most versatile agricultural land (Sustainability Objective 15).

There is some variation between the options with regards to the different apportionments of these distribution options between SDDC and AVBC with more potential significant negative effects identified for those which distribute 100% of the unmet need across either Amber Valley or South Derbyshire (S1_D2A and E, S2_D2A and E, S3_D2A and E).

BAoS C1 mostly contains Grade 3 agricultural land. There are small sections of Grade 2 agricultural land, however this only overlaps Amber Valley's section of the BAoS. Therefore, landscape may potentially be significantly negatively impacted by options S1_D2A and E, S1_D3A-E, S1_D4A-E, S2_D2A and E, S2_D3A-E, S3_D2A and E, S3_D3A-E and S3_D4A, B, D and E.

This is similar for BAoS D3, where Grade 3 agricultural land makes up the majority of the area, interspersed with small areas of Grade 2 and Grade 4 land. Therefore, landscape may potentially be significantly negatively impacted by options S1_D2E, S1_D3C-E, S1_D4C-E, S2_D2E, S2_D3C-E, S3_D2E, S3_D3C-E and S3_D4D-E where above 50% of unmet need is directed into the South Derbyshire Urban Fringe.

4.3.3 Overarching Conclusions of Distribution Options Assessment

The SA has found that options which concentrate all or most of Derby's unmet housing need into the Derby administrative area perform poorly for economy (Sustainability Objective 1) and employment (Sustainability Objective 2) as a lack of identified housing sites in the city means that housing may have to be developed on economic/employment sites.

Options which concentrate all or most of the Derby unmet need into the Derby Urban Area (Derby administrative area plus Urban Fringe) perform most positively for accessibility (Sustainability Objective 4), quality of life (Sustainability Objective 5), inequalities (Sustainability Objective 6), sustainable transport (Sustainability Objective 8), climate change mitigation (Sustainability Objective 10).



Development in the SDDC Urban Fringe performs more positively than development in the AVBC Urban Fringe for sustainable transport (Sustainability Objective 8) as there is higher potential for transport infrastructure improvements and more existing routes into Derby.

Where an option directs housing into the Derby administrative area above the 12,500 capacity, housing delivery (Sustainability Objective 7) performs less positively in the SA, reflecting uncertainty over meeting needs for types and mix of housing in dense developments. Similarly, SHELAA sites within the AVBC Urban Fringe area demonstrate there is capacity for approximately 3,000 new homes albeit not all of these homes will be delivered by 2040; some of these homes are already consented and being constructed. Where an option directs housing into the Amber Valley Urban Fringe above the identified 3,000 new homes capacity, housing delivery performs less positively for the same reason.

Options which distribute all of the Derby unmet need across AVBC and SDDC perform particularly poorly for sustainable transport (Sustainability Objective 8), climate change mitigation (Sustainability Objective 10) and natural resources (Sustainability Objective 15).

In summary, the distribution options which perform most positively are those which distribute the Derby unmet need to the Urban Fringe areas, with an apportionment between AVBC and SDDC.

Options which direct more of the Derby unmet need to the SDDC Urban Fringe would benefit from good potential for accessibility to services and facilities through achieving a degree of self-sufficiency within large urban extensions and through accessibility into Derby by sustainable transport.

For Scale 1, which is the identified housing need for the HMA using the Standard Method of calculation plus the 35% applied to Derby by central Government, Options S1_D4D and S1_D4E are associated with the most potential significant positive effects and the least significant negative effects of all the distribution options assessed.

In line with the Growth Options Study (AECOM, August 2021), development is most suitable in Areas of Search C1 and D3.



5.0 Summary of Potential Cumulative and Transboundary Effects

This section discusses a number of potential cumulative effects which have been identified within the assessments of options.

There is planned development relating to the East Midlands Freeport to the south of Derby City. One of the sites which is part of the East Midlands Freeport is located within the Derby HMA area. There is potential for the higher scale development options and those which direct more development in the Urban Fringe to the south of Derby to combine with additional traffic generated by the Freeport to create negative cumulative effects in relation to travel (Sustainability Objective 8) and air quality (Sustainability Objective 9).

There is an uncertain cumulative effect with relation to the East Midlands Freeport and any options which could provide both employment and housing together. Employment sites could support and benefit from the Freeport (Sustainability Objective 1) and contribute to improved employment opportunities (Sustainability Objective 2). This uncertain cumulative effect relates to options which concentrate development to the Derby administrative area and the Urban Fringe to the south.

North West Leicestershire District borders the south eastern boundary of South Derbyshire District Council. Growth is planned within North West Leicestershire which could potentially create transboundary positive and negative effects with residential development within South Derbyshire such as in relation infrastructure, schools provision and open space access.

The assessments of the distribution D3E options, which direct more housing development to SDDC, could lead to a potential negative cumulative effect in relation to landscape due to the risk of coalescence of Burton-on-Trent and Swadlincote where there are several potential development sites which may need to be developed in the higher scale options.



6.0 Mitigation Measures

The assessment significant scores have not incorporated mitigation. It is important to note that mitigation can be delivered for some potentially identified effects and not for others. For example, the loss of greenfield land or not delivering against housing need cannot be easily mitigated. Identified impacts related to biodiversity or landscape could be mitigated through delivering biodiversity net gain (BNG) or incorporating green wedges / green infrastructure into design.

It is assumed that mitigation for the potential negative and uncertain effects of housing development, once allocated, will be required through Local Plan policy wording and guidance for new development.

Suggested mitigation measures have been put forward within the assessment where potential significant negative effects have been identified in Appendix B. A summary of the mitigation is provided in Table 6-1:.

Table 6-1: Mitigation measures identified in the assessment of options

Sustainability Objective	Potential effect	Mitigation Measure Suggested
SO1: To deliver economic growth and support the creation of new and retention of existing businesses.	Significant negative	It may not be possible to mitigate all potential adverse effects on the economy whilst achieving the scale and distribution of this option.
SO2: To create greater employment opportunities and higher value jobs.	Significant negative	It may not be possible to mitigate all potential adverse effects on employment whilst achieving the scale and distribution of this option.
SO8: To reduce the need to travel and promote sustainable travel habits including walking, wheeling and public transport (bus and rail) usage.	Significant negative	The creation of public transport links on the outskirts of Derby, including park and rides, could assist in promoting the use of public transport access key services and facilities. The Derbyshire Cycle Plan may also assist in mitigating the potential effect by expanding the cycle network, although the exact locations of development and their relationship with these routes are currently unknown. Significant upgrades to the current public transport system are required in order to support the housing development outlined in this option.
SO9: To minimise air, light and noise pollution and ensure that future growth	Significant negative	Investment would be needed in convenient, reliable public transport and low carbon modes of transport



Sustainability Objective	Potential effect	Mitigation Measure Suggested
does not lead to the further deterioration of environmental conditions.		in order to address existing AQ issues and avoid further exacerbation. Specific noise and lighting design may be implemented in site designs, but this is unlikely to be able to mitigate all potential effects.
SO11: Adapt to the effects of climate change including flood risk and reduced water availability.	Significant negative	Detailed flood risk assessments and mitigation will be required prior to site development.
SO12: To safeguard and enhance biodiversity (including Biodiversity Action Plan Habitats and Species) and geodiversity and improve connectivity between, and access to, green spaces and functional habitats.	Significant negative	It may not be possible to prevent the loss of greenspace and land with biodiversity value whilst meeting the quantum of development in this option. Requirements for BNG in the Local Plans could be used to ensure there is no net loss on a site. The development constraints in the city may mean that off-site Biodiversity Net Gain (BNG) may have to be provided outside of the Derby City administrative area. Development design requirements in Local Plan policy should also be encouraged to maintain connectivity with adjacent wildlife sites, to create a network of habitats.
SO13: To conserve and enhance the townscape, historic environment, heritage assets (including known and unknown archaeological sites) and their settings and where appropriate improve the quality of the built environment and maintain and enhance access to cultural heritage for enjoyment and educational purposes.	Significant negative and an uncertain effect	It may not be possible to mitigate all potential adverse effects on the historic environment whilst achieving the higher quantum of growth. Site specific design choices should be implemented to ensure harm to the historic environment is minimised. Consider a distribution option which does not direct unmet housing need into the Derby City administrative area.



Sustainability Objective	Potential effect	Mitigation Measure Suggested
<p>SO14: To conserve and enhance landscape character.</p>	<p>Significant negative</p>	<p>The loss of greenfield land cannot be mitigated against.</p> <p>It may not be possible to preserve existing land/townscape throughout whilst meeting the scale and distribution associated with this option. However, careful design of sites could help to ensure development is sympathetic to the surrounding environment.</p> <p>It is recommended that the green wedges within Derby are extended out into the South Derbyshire Urban Fringe, in order to maintain a similar landscape pattern. Similarly, the creation of settlement gap designations around Swadlincote and Burton-on-Trent could help to prevent coalescence. However, it is unclear if these mitigation methods would be viable in combination with the high quantum of development within some options.</p>
<p>SO15: To minimise water and soil pollution and ensure protection of natural resources including greenfield land, soil, and minerals resources.</p>	<p>Significant negative</p>	<p>The loss of best and most versatile agricultural land cannot be mitigated against.</p> <p>Local Plan policies would need to provide guidance and requirements with regards to coal safeguarded zones and working out minerals prior to development within mineral safeguarding zones.</p>

It should be noted that if assumptions taken into account within assessments were to change, the outcome of assessments may subsequently also change. For example, it has been assumed that infrastructure, such as public transport, walking and wheeling access, schools, GP surgeries, retail and community meeting places will be provided to meet the needs of development, including that it would be in close proximity to new housing development sites. If this is not achieved, sites could perform more negatively for SO4 and SO8.



7.0 Conclusions and Recommendations

The study takes a consistent approach to assessing housing needs within the Derby HMA taking into consideration options for scale, distribution and the apportionment of Derby's unmet housing need between AVBC and SDDC. The purpose of the study has been to assist the Derby HMA on decision-making regarding Derby's unmet housing need and to also inform the three authority's Local Plan development processes and parallel SAs.

The study concludes that the distribution options which perform most positively are those which distribute the Derby unmet need to the Urban Fringe areas (S1_D4A-E, S2_D2A-E and S3_D4A-E), with an apportionment between AVBC and SDDC.

Options which direct more of the Derby unmet need to the SDDC Urban Fringe (S1_D4D-E, S2_D2D-E and S3_D4D-E) would benefit from good potential for accessibility to services and facilities through achieving a degree of self-sufficiency within large urban extensions and through accessibility into Derby by sustainable transport.

This assessment has assumed that necessary infrastructure will be provided to meet new residents' needs. The authorities will need to consider whether necessary infrastructure can be delivered for the options which have performed more positively in this assessment whilst making decisions between the options and identifying a chosen approach to the delivery of Derby's housing needs.



8.0 Next Steps

The Derby HMA will consider the findings set out within this report with their respective members in order to make decisions regarding the housing strategy for the HMA. This will assist with the development of a non-statutory strategy for the Derby HMA, setting out, amongst other things, the agreed position on the scale and distributions of housing growth across the HMA.

The HMA strategy will in turn inform each HMA authorities Local Plans which are currently under development. Each Local Plan will set out proposals for meeting identified housing needs including proposed housing allocation sites. Each Local Plan will be subject to a SA which will be informed by more detailed information about site characteristics and will therefore provide a more localised assessment of potential effects and mitigation than this study.



