



South
Derbyshire
District Council
Community &
Planning Services



INVESTOR IN PEOPLE

Local Development Framework

SA

Sustainability Appraisal Addendum

Local Plan, Part 1

Non-Technical
Summary

August 2015



South Derbyshire Changing for the better

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1 The South Derbyshire Part 1 Local Plan

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

2 What is Sustainability Appraisal?

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

The Scope of the Appraisal

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

3 The Sustainability Appraisal Report Addendum

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

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

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

4 Approach to Sustainability Appraisal

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

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

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

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

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

5 Unmet Need and Options for Distributing It

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

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

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

Option 1 – Maximise Growth in South Derbyshire

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

Option 2 – Maximise Growth in Amber Valley

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

Option 3 – Split based on the proportion of growth

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

Option 4 – Split based on Commuting Flows

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

Options to be ruled out early on without detailed appraisals

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

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

6 What Did Our Appraisal Tell Us?

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

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

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

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

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

7 Mitigation

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

8 Next Steps

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

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

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

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

9 Monitoring

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

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