



## **STATEMENT OF COMMON GROUND**

### **DERBY HOUSING MARKET AREA (HMA)**

Amber Valley Borough Council, Derby City Council, Derbyshire County Council and  
South Derbyshire District Council

#### **Executive summary**

This Statement of Common Ground (SoCG) has been produced to confirm the current position in respect of Amber Valley Borough Council's (AVBC) emerging Local Plan, which is now at Examination in Public. It should be read in conjunction with the Statement of Common Ground Prepared in March 2020 (Examination Library Ref. CD06).

Amber Valley Borough Council, Derby City Council (DCiC) and South Derbyshire District Council (SDDC) form the constituent members of the Derby Housing Market Area (HMA). As a key stakeholder in the delivery of supporting infrastructure Derbyshire County Council (DCoC) are also party to this Statement and are included within the definition of the HMA authorities.

#### **Areas of Common Ground**

For the purposes of this SoCG the annual need figures for the three HMA authorities have been updated for 2024 using the most recent standard method data inputs. The HMA authorities agree that the current Housing need and Housing supply position of each of the three authorities is as set out in Table A below, subject to confirmation through examination.

**Table A: Standard Method Housing Need Calculation and Land Supply Position at November 2024 based on the Derby Capacity Study and the emerging Amber Valley and South Derbyshire Local Plans:**

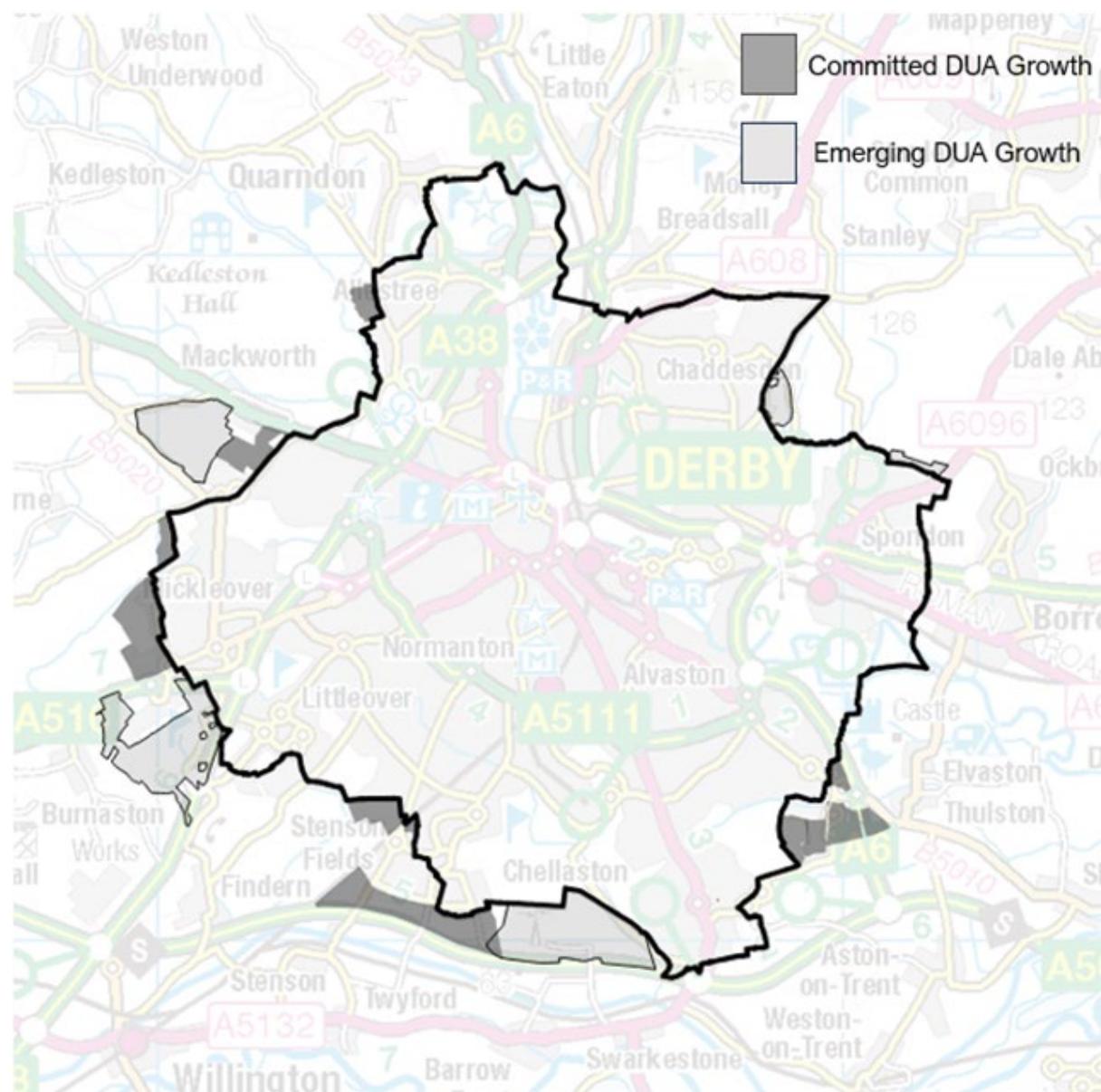
	<b>Annual SM Need</b>	<b>Need 2022- 2039</b>	<b>Plan Supply* 2022-2039</b>	<b>Deviation from SM</b>
<b>AVBC</b>	351	5,967	10,242	4,275
<b>DCC</b>	1,244	21,148	12,500	-8,648
<b>SDDC</b>	507	8,619	14,483	5,864
<b>Total</b>	<b>2,102</b>	<b>35,734</b>	<b>37,225</b>	<b>1,491</b>

(\*All of the figures relating to supply expressed as minimum.)

It is agreed by the HMA authorities that Derby City is constrained, with DCiC having undertaken work that estimates that their housing capacity supply over the period 2022-2039 is 12,500 (Examination Library Ref HS1.3 - the Derby City Capacity Study Position Paper at Appendix A of Derby City Statements). DCiC commit to delivering a minimum of 12,500 homes over the period 2022-2039. The evidence prepared jointly by the HMA authorities in the HMA Sustainability Appraisal identifies that the best and most sustainable locations within Amber Valley and South Derbyshire to meet unmet housing needs of Derby City are in locations on the edge of the city. There are enough committed and proposed sites/dwellings in broad locations on the edge of the city to ensure that Derby City's unmet needs can be provided in full, in sustainable locations, between 2022 and 2039 and that the overall HMA housing needs can be met across the three local authority areas. These locations are shown illustratively in Figure 1.

In order to provide clarity that DCiC's unmet housing needs can be accommodated on sites within these broad locations and within the period 2022-2039, AVBC will propose a further minor modification to the Plan to remove reference in Policy SS2 that the Housing Requirement provides flexibility. The plan therefore makes provision for a minimum of 10,465 additional homes in sustainable locations between 2022 and 2040. This meets a standard method housing requirement of 6,318 homes to 2040.

**Figure 1: Distribution of committed and emerging proposed growth in the Derby Urban Area (DUA)**



## **1. Introduction**

- 1.1. This Statement of Common Ground (SoCG) has been produced to confirm the work undertaken and current position in respect of emerging Local Plans of Amber Valley Borough Council (AVBC), Derby City Council (DCiC), and South Derbyshire District Council (SDDC). As a key stakeholder in the delivery of supporting infrastructure Derbyshire County Council (DCoC) are also party to this Statement.
- 1.2. Paragraph 27 of the National Planning Policy Framework seeks to ensure that Local Plans are deliverable over the plan period and based on effective joint working on strategic matters that have been dealt with rather than deferred, as evidenced by this Statement of Common Ground.
- 1.3. This Statement updates and should be read alongside the SoCG agreed between the four authorities in March 2020. This Statement focuses on strategic housing matters.
- 1.4. The principle of the Derby Housing Market Area (Derby HMA) was established through the preparation of the East Midlands Regional Plan. The Derby HMA comprises Amber Valley Borough, Derby City and South Derbyshire District. Prior to the 'duty to cooperate' formally coming into effect via the Localism Act in November 2011, the respective local planning authorities, together with Derbyshire County Council, worked together in developing up-to-date development plans within the Derby HMA and continue to do so under the formal duty.
- 1.5. The joint working arrangements within the Derby HMA have underpinned the preparation of separate but aligned plans for each local authority areas, over a common timeframe as far as possible. This joint working has included the following:-
  - sharing of officer expertise
  - joint commissioning of technical studies and other work to develop a comprehensive, shared evidence base
  - ensuring that planning policies for each authority area complement one another, to enable the long-term provision of housing and economic

growth over the plan period and for future development to be supported by appropriate services and infrastructure.

- 1.6. The joint working arrangements have been reinforced by the establishment of the Derby HMA Joint Advisory Board (consisting of an elected member representing each authority together with officer support), which is supported by the Derby HMA Co-ordination Group (involving relevant officers from each authority) and relevant officer sub groups / task and finish groups.
- 1.7. In 2020 the HMA authorities prepared a Statement of Common Ground which set out the key strategic issues across the HMA. The Councils agreed to prepare an informal joint strategy to help inform plan making. An early part of the work to support that strategy was the commission of the Derby Housing Market Area Growth Options Study which was completed in 2021. In 2024 further work was completed to consider the sustainability credentials of different options for delivery of development to meet Derby's unmet housing needs. Further work is underway to consider strategic transport requirements across the HMA in the long term, involving the establishment of a HMA Transport Sub Group comprising representatives of the Derbyshire and Derby City highway authorities, National Highways and planning officers from the HMA local authorities. The group has met and will form the basis through which transport modelling will be progressed.
- 1.8. In 2023 Derby City Council concluded work on maximising capacity in their administrative area. They advised that there was an estimated shortfall of around 9,000 homes. At a similar time Amber Valley was finalising its plan for consideration by Council to be consulted on under Regulation 19. There were no conclusions reached as to whether Amber Valley was required to plan for meeting any of Derby's unmet need and if so, how much and where, although it was considered very likely that some contribution would be required. Therefore, the Council decided to allocate a site of 2,000 homes (1,320 in the plan period) at Mackworth, close to the urban area of Derby, to meet its needs. The Reg 19 Plan also contained a review policy, so that once further joint work had taken place, if agreement had been reached on how that unmet need would be met then the Plan would be reviewed if needed.

1.9. When the Amber Valley Local Plan Regulation 19 consultation commenced, the housing needs for the HMA were as shown in the table below. The table also shows the supply for the period 2022-2039 in the submitted version of the AVBC Local Plan, the supply in the SDDC Reg 18 Draft Local Plan Part 1 and the anticipated supply in DCiC.

**Table 1**

	Annual Need using SM (Reg 19)	Total Need 2022-2039	Plan Supply 2022-2039*
AVBC	364	6,188	8,801
DCiC	1266	21,522	12,500
SDDC	522	8,874	14,483
<b>Total</b>	<b>2152</b>	<b>36,584</b>	<b>35,784</b>

(\*All of the figures relating to supply expressed as minimum.)

## **2. Areas of Common Ground**

- 2.1. The current housing needs for the HMA are calculated using the Standard Method (SM).
- 2.2. DCiC and SDDC are preparing plans covering the time period 2022-2039 based on their evidence base and AVBC have prepared a Plan for the time period 2022-2040. For the purposes of establishing the housing needs for the HMA on a consistent basis it is agreed to use the time period 2022-2039. For the purposes of this SoCG the annual need figures for the three HMA authorities have been updated for 2024 using the most recent standard method data inputs, which change year by year (annual average household growth and affordability), as shown in Table 2.

**Table 2**

	Annual Need using SM	Total Need 2022-2039
AVBC	351	5,967
DCiC	1,244	21,148
SDDC	507	8,619
<b>Total</b>	<b>2,102</b>	<b>35,734</b>

2.3. AVBC have submitted a plan for examination with a total supply over the period 2022-2039 of 8,801 (9,036 over the period 2022-2040) (Examination Library CD01) . Further work since submission has identified supply over the period 2022-2039 of 10,242 (10,465 over the plan period 2022-2040) and the Council has proposed modifications to the Plan to reflect this.

2.4. DCiC have undertaken work that estimates that their housing capacity supply over the period 2022-2039 is 12,500 (Examination Library Ref HS1.3 - the Derby City Capacity Study Position Paper at Appendix A of Derby City Statements). DCiC commit to delivering a minimum of 12,500 homes over the period 2022-2039.

2.5. SDDC have prepared a Local Plan for a Regulation 18 consultation that includes supply over the period 2022-2039 of 14,483.

2.6. Table 3 summarises the position taking account of the revised need figures for the three HMA authorities, as shown in Table 2, together with updated plan supply figures for Amber Valley, referred to in para 2.3:

**Table 3**

	Total Need 2022-2039	Plan Supply 2022-2039*	Deviation from SM
AVBC	5,967	10,242	+4,275
DCiC	21,148	12,500	-8,648
SDDC	8,619	14,483	+5,864
<b>Total</b>	<b>35,734</b>	<b>37,225</b>	<b>+1,491</b>

(\*All of the figures relating to supply expressed as minimum.)

2.7. The supply in emerging local plans exceeds the identified housing needs of the HMA over the period 2022-2039.

2.8. DCiC are content that, taking account of the proposed modifications by AVBC, together with the proposed allocations in the SDDC Regulation 18 Draft Local Plan Part 1 and delivery in Derby City of at least 12,500 homes, there are sufficient sites allocated within the plan in proximity to Derby urban area, such as at Kedleston Road, Radbourne Lane and Brun Lane, to meet any unmet needs arising from Derby City at this point in time. This reflects Sustainability Appraisal work undertaken by the HMA authorities that this is a sustainable location for new homes to meet DCiCs unmet need. The submitted AVBC Local Plan contains a policy MR1 that sets out that the Council will monitor delivery of the policies in the plan and review the plan at least every five years. Where there are significant changes in circumstances the Council will commence an earlier review. In reviewing the plan the Council will have particular regard to housing needs, unmet needs arising in the HMA and progress in plan making of other authorities. This is a suitable mechanism to deal with changes in circumstances or issues related to housing delivery across the HMA.

2.9. The authorities have proposed, and are supportive of, modifications to the AVBC submitted Local Plan to remove reference to Derby unmet need and to remove references to attributing any unmet needs to particular sites, including Brun Lane, Mackworth.

### **3. Outstanding Matters**

3.1. SDDC consider that the AVBC submitted Plan is too conservative in relation to delivery of the Brun Lane (1320), Mackworth Strategic site. The Council consider that 2,000 homes can be delivered over the period 2022-2039. This is considered to be achievable given the high levels of annual delivery recorded on strategic scale sites elsewhere in the HMA in recent years, including at Highfields and Drakelow. Inclusion of the full capacity at Brun Lane would result in delivery as shown in Table 4.

**Table 4**

	Total Need 2022-2039	Plan Supply 2022-2039*	Deviation from SM
AVBC	5,967	11,042	+5,075
DCiC	21,148	12,500	-8,648
SDDC	8,619	14,483	+5,864
<b>Total</b>	<b>35,734</b>	<b>38,025</b>	<b>+2,291</b>

(\*All of the figures relating to supply expressed as minimum.)

3.2. DCiC also considers that the AVBC submitted Plan is too conservative in relation to delivery of the Brun Lane, Mackworth Strategic site. However, DCiC have not estimated how many more homes could be delivered in the plan period.

### **Potential Changes to Housing Requirements**

3.3. Whilst the provision identified at Table 4 results in an overall surplus of provision for the HMA, it should be noted that the proposed new standard method for calculating housing need, put forward in tandem with the recent Draft National Planning Policy Framework consultation, would have a significant impact. The need figures generated through its application, using the most recent data inputs, are set out in Table 5.

**Table 5**

	Annual Need	Need 2022-39
Amber Valley	682	11594
Derby City	1062	18054
SDDC	606	10302
<b>HMA Total</b>	<b>2350</b>	<b>39950</b>

3.4. It can be seen that need for the HMA as a whole grows considerably and that the majority of this increase arises within Amber Valley, the figures for which almost double. There would be a smaller increase for South Derbyshire and a reduction for Derby City. Although the standard method has yet to be changed

and there are likely to be transitional arrangements for plans at Examination, the potential extent of additional need underscores the importance of maximising housing delivery through the Amber Valley Local Plan at this stage. This will have the benefit of minimising the additional homes needed over the HMA in the event of Amber Valley needing to undertake an immediate review on adoption of their Local Plan.

### **Other Outstanding Matters**

3.5. DCiC have made representations on the Regulation 19 Plan in regard to affordable housing mechanisms, settlement hierarchy and SGS1 policy wording. These have not been considered as part of this SoCG and will be dealt with through the hearing statements and hearing sessions.

3.6. SDDC have made representations on the Regulation 19 Plan in regard to housing mix which has not been considered as part of this SoCG and will be dealt with through the hearing statements and hearing sessions.

## AGREEMENT

Signed on behalf of Amber Valley Borough Council



Name

Sarah Brooks

Date

6 December 2024

Signed on behalf of Derby City Council



Name

Paul Clarke

Date

6 December 2024

Signed on behalf of Derbyshire County Council



Name

Nigel Atkinson – Assistant  
Director

Date

6 December 2024

Signed on behalf of South Derbyshire District Council



Name

Steffan Saunders

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6 December 2024