

STATEMENT OF COMMON GROUND

DERBY HOUSING MARKET AREA (HMA)

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

Update

This Statement of Common Ground (SoCG) has been mainly prepared during the Autumn of 2025 to update the position in relation to the publication of the NPPF in mid-December 2024 to provide the latest position between the Derby HMA authorities in regard to developments in respect of the Amber Valley Borough Council's (AVBC) emerging Local Plan, the Local Plan for Derby City and the Regulation 19 publication of the South Derbyshire Local Plan Part 1 review. It should be read in conjunction with the Statement of Common Ground Prepared in March 2020 and the Statement of Common Ground produced in early December 2024 (Appendix 1).

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

The table below shows the annual needs for each Council, and the total combined HMA need, calculated using both the 2023 and December 2024 (using May 2025 inputs) Standard Methods over a standard time period (2022-2039) for comparison purposes.

Table A: Standard Method Housing Need Comparison

Table A: Standard Method (SM) Housing Need Comparison Calculation based on the 2023 and 2024 Standard Method (using May 2025 inputs)

	Annual SM Need (2023 Standard Method)	Need 2022- 2039 (2023 Standard Method)	Annual SM Need (<u>Dec. 2024</u> Standard Method)	Need 2022- 2039 (<u>Dec. 2024</u> Standard Method)
AVBC	351	5,967	643	10931
DCC	1,244	21,148	917	15589
SDDC	507	8,619	592	10064
Total	2,102	35,734	2152	36,584

It is agreed by the HMA authorities that even allowing for variations in relation to affordability and population projections/baseline housing stock, use of the 2024 SM results in a relatively small increase in HMA need over that calculated using the 2023 SM. There remains a close alignment between HMA figures based on 2023 or 2024 SM calculations.

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.

DCiC commit to delivering a minimum of 12,500 homes over the period 2023-2043.

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.

It is agreed that whilst each authority contributes to the HMA's housing needs through committed and planned developments; each authority will maintain their own five-year housing land supply for the purposes of planning decisions in accordance with national policy.

Each authority's five-year housing land supply will be calculated based on their own requirement figure, wholly from development occurring or proposed within the authority boundary in which it is to be built.

A revised NPPF was published on 12 December 2024 and contains transition arrangements at paragraph 234 in relation to plan making. This paragraph confirms that the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply:

- a. The plan has reached regulation 19 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need,
- b. The plan has been submitted for examination under Regulation 22 on or before 12 March 2025.

The implications of this for each Council are given in more detail below.

Amber Valley

Amber Valley submitted their plan well before 12 March and the transition arrangements apply to them. They are proposing an 18 year plan period to run to 2040 and the Amber Valley Inspectors have published a letter (dated 7th January 2025) confirming the Amber Valley Housing Requirement for their local plan is 424 dwellings per annum and 7,632 homes over the 18 year plan period, of which 1,320 is to assist in meeting unmet HMA housing need. Due to ownership issues impacting availability Mackworth is not included as

contributing to housing delivery during the plan period and instead is identified as a Future Location for Growth. A final report is due early in 2026 and the Council expects to adopt the Plan by the end of March 2026.

Amber Valley has published an LDS that anticipates commencing work on a new Local Plan under the new planning system in 2026.

Derby City

Derby has published an amended LDS to specify a Local Plan adoption date of 2028 giving a 15-year post adoption period to run to 2043.

Derby is preparing its local plan in line with the 2024 NPPF. Taking this extended plan period into account and applying the 12,500 capacity figures and their plan start date of 2023 and the 2024 standard method with May 2025 inputs, their updated unmet need is 5,840 ($18,340 - 12,500$). This rolls forward the 2024 Standard Method with May 2025 inputs by 4 years but does not factor in any additional supply for these 4 years as there is no updated evidence of additional capacity beyond the 12,500 already identified.

SDDC

The Local Plan was published on 10 March 2025, SDDC as with Amber Valley will now have the Local Plan examined under the 2023 NPPF figures as the draft housing requirement exceeds (by a very significant distance) 80% of local housing need. This is an annual need of 507. The plan contains an annual housing requirement of 763 dwellings which is 131% of the updated annual need figures of 580 from the 2024 housing need figures.

When extending the plan period to 2041 the full plan need is 9,633 (507×19) prior to applying the appropriate contribution to HMA unmet need. For SDDC the plan supply (not including the two strategic allocations at STRA1 and STRA2) taking into account existing allocations, sites with planning permission and limited allowances for windfalls is close to 11,000. The two strategic allocations comprise 4,500 in the total supply of which 3,450 are now expected to be built out over the plan period to 2041 (1800 at IGV and 1650 at South of Mickleover). When adding these two sites with a combined total of 3,450 homes in the plan period this gives a total housing supply of

very close to the recommended plan requirement figure of 14,500. This gives an updated figure of 4,867 to assist in contributing towards HMA unmet need.

The HMA position as it currently stands is given in the table below.

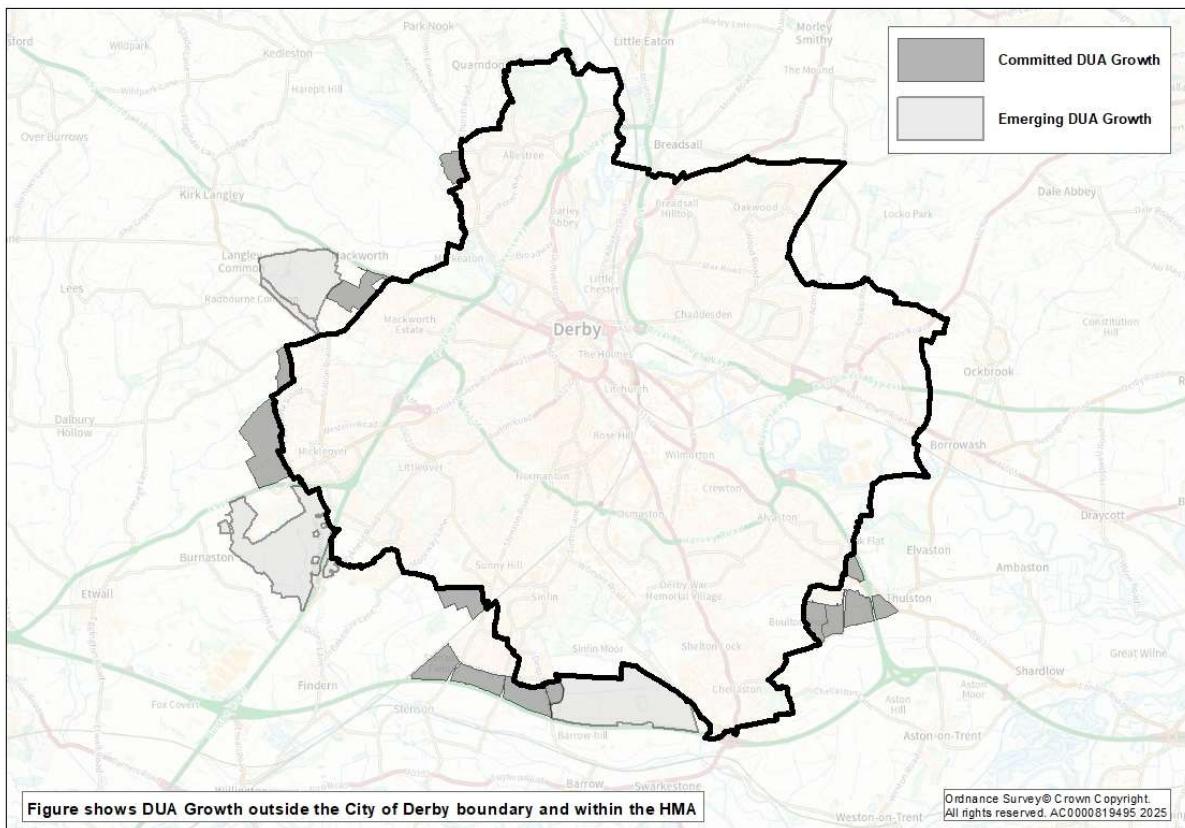
Table B. HMA position in emerging local plans taking into account plan periods and NPPF Transition Arrangements where applicable.

	Annual target	Expected Plan provision for each Councils end date	NPPF total plan requirement based on 2023 SM for AVBC and SDDC and 2024 SM for DCC following each Council's plan end date.	Total over or under-provision based on 2023 SM for AVBC and SDDC and 2024 SM for DCC
Amber Valley	424	8,714	6,318	+2,396
Derby	917	12,500 (Capacity Cap)	18,340	-5840
SDDC	763	14,500	9,633	+4,867
		35,714	34,291	+1,423

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, and that the overall HMA housing needs can be met across the three local authority areas. Furthermore, there is a planned oversupply of housing across the HMA that provides flexibility. These locations are shown illustratively in Figure 1.

In response to the AVBC Local Plan Inspector's identifying difficulties in AVBC securing delivery of the Mackworth allocation during the plan period, AVBC have instead identified the site as a Strategic Location for Growth that will be brought forward in the longer term. To complement this SDDC have published a Local Plan under Regulation 19 that includes 250 additional homes as part of a comprehensive development with the larger parcel of land in AVBC and to provide a road frontage on the B5020 to assist in the delivery of a South Derby Integrated Transport Link.

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



The Way Forward

Amber Valley's currently emerging Local Plan sets out an annual requirement of 424 homes for the plan period 2022-2040. Whilst this meets Amber Valley's minimum housing need calculated using the previous version of the Standard Method, it falls substantially short of the equivalent annual figure, calculated using the December 2024 Standard Method with March 2025 inputs, of 636 homes. It has committed to commencing work on a new local plan once the current plan at examination is adopted.

Derby City's minimum annual need of 917, calculated using the December 2024 Standard Method with May 2025 inputs, means that for the proposed plan period 2023-2043 a minimum of 18,340 homes will be needed. The current identified capacity of 12,500 homes, would therefore mean a shortfall of 5,840 homes.

The South Derbyshire Local Plan requirement of 14,500 homes over the period 2022-2041 is sufficient to accommodate its own annual need using either the 2023 or 2024 Standard Method (507 and 592 respectively).

To ensure that these identified minimum needs can be met, the HMA local authorities will continue to work collaboratively under current joint working arrangements. As part of their evidence base all three authorities are jointly commissioning transport modelling work which is due to be published imminently.

The intentions of the individual authorities in regard to the preparation of further evidence and Local Plan production timescales are set out below. It should be noted that at the time of agreeing this SoCG, the Regulations for the new planning system have not yet been made and therefore timings in relation to plan making under the new system may change.

Amber Valley

The Council hopes to adopt the Plan in early 2026. In relation to a new plan under the new system, it intends to give notice to start plan making in July 2026, going through 'Gateway 1' in November 2026, 'Gateway 2' by December 2027 and adopting in July 2029. It will undertake evidence base collection between July 2025 and December 2027. Anticipated evidence includes joint work with the HMA authorities on transport, and other topic areas such as: Green Belt, Refreshed SHEELA and Open space.

Derby City

The Local Plan for Derby City is being produced as a single plan. It will update and replace the Derby City Local Plan Part 1 - 2017 and the remaining saved policies of the City of Derby Local Plan Review (2006). The Draft Plan (regulation 18) is at consultation now. The City Council intends to undertake submission plan consultation (regulation 19) in the summer of 2026 and to submit the plan by December 2026.

The Council is currently further developing its evidence base on the following topics: allocations and windfalls, urban capacity and trajectory, greenbelt / green wedge, City Centre parking, plan wide viability, public realm, sustainability appraisal for the Draft Plan and study of the City's retail sector. These will progress and further items will be added as the plan develops.

SDDC

The Local Plan is written in two parts and the timetables for the production of each of these are set out in the Council's Local Development Scheme. This identifies that the Local Plan Part 1 will be submitted to the Secretary of State (Regulation 22) in Spring 2026, with the commencement of hearing sessions expected to take place in Summer 2026 and adoption by the Council in Autumn 2026. The Local Plan Part 2 (Full Local Plan Review) preparation commenced in June 2025 with an expected Regulation 18 concluded in January 2026, a Proposed Submission Regulation 19 consultation in Summer 2026 and Submission to the Secretary of State (Regulation

22) before 31 December 2026. Hearing sessions would be expected to take place in Spring 2027 with adoption by the Council in Summer 2027.

Besides the joint transport evidence being commissioned by the MHA authorities, evidence to be prepared in advance of Local Plan Submission will include a District-wide viability study.

The Local Plan Part 2 (Full Local Plan Review) will provide the opportunity to make up any shortfall in the delivery of the District Council's housing requirement of 14,500 homes.

Signed on behalf of Amber Valley Borough
Council



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Date

Signed on behalf of Derby City Council



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Appendix 1: Derby HMA Statement of Common Ground, December 2024