



**Derby City Council**

**Derby City Local Plan**

**Part 1: *The Core***

***Strategy***

**Sustainability Appraisal**

**(SA)**



**SA Report  
Non Technical  
Summary**

**August 2015**

## 1. Background

Sustainability Appraisal is a process for considering and communicating the likely effects of plans, with a view to avoiding and mitigating negative effects and maximising the positives. SA of the Local Plan Core Strategy is a legal requirement stemming from the EU 'Strategic Environmental Assessment' (SEA) Directive.

This report presents a brief summary of the SA process that has been undertaken alongside the development of the Derby City Local Plan Part 1: *Core Strategy* (referred to as the Core Strategy in this Non-Technical Summary).

The different stages of SA that have been undertaken so far are as follows:

- **Scoping** – This involved collecting information about the environment to ensure that the SA is focused upon the issues most relevant to the Plan.

An SA Scoping Report was published for consultation in July 2008. The SA scope was reviewed periodically to ensure that the appraisals undertaken at each stage of plan-making focused on the most relevant sustainability issues. Updated information has been presented in this SA report in sections 4-6 of the main SA report. No significant changes to the SA Framework were identified as part of any updates to the scope. The issues facing the City have remained fairly consistent throughout the Plan-making process.

- **Appraising alternative strategies** – This is a critical stage in the SA process, which requires an assessment of different approaches to achieving the objectives of the Core Strategy. As an interim plan-making / SA step, reasonable alternatives were considered for the following key plan issues which form the basis of the Local Plan growth strategy:
  - What scale of housing and employment growth is needed in the area?
  - What is the most appropriate distribution strategy and settlement pattern to meet that need, taking into account the capacity and deliverability?
  - What strategic sites are available, viable and suitable that can meet both the needs of the area while being consistent with the most appropriate pattern of distribution?

Reasonable alternatives were also considered for a number of thematic issues, including:

- Housing Mix and Density
  - Affordable Housing
  - Shopping Floor Space
  - Town Centre Uses/Roles
  - Out of Centre Retail
  - Transport
  - Parking
  - Sustainable Buildings
  - Open Space.
- **Appraisal of the Core Strategy** - The SA report published at this stage documents the appraisal of the Plan 'as a whole'.

## 2. Scoping - What are the key sustainability issues in Derby?

The Scoping Stage of the SA involved collecting information about the environmental, economic and social 'baseline' throughout Derby. It also involved a review of relevant plans, programmes and policies at an international, national, regional and local level. This was to identify the relevant policy context, including any environmental protection objectives.

By collecting this information, a list of key sustainability issues was established. These issues help to shape the SA to ensure that it is focused on the most relevant factors. The key issues for Derby are listed in the following table.

*Table 1: Key sustainability issues*

Sustainability Topic	Key sustainability issues
<b>Population</b>	<ul style="list-style-type: none"> <li>- The ageing profile of the City creates particular pressures on housing, education, health and other services.</li> <li>- There are significant numbers of people from minority ethnic groups, including recent arrivals from Eastern Europe. Minorities are focused in a few wards, mainly in the central and southern parts of the City. These groups have specific housing and social needs.</li> </ul>
<b>Housing</b>	<ul style="list-style-type: none"> <li>- The number of households is growing creating a need for additional houses. Only some of Derby's housing needs can be met within its boundaries, so there is a need for close coordination with neighbouring local authorities on Core Strategy preparation.</li> <li>- Evidence demonstrates a substantial need for more affordable housing in the form of both 1 and 2 bedroom properties and properties to provide for the needs of larger households, including those of Pakistani and Indian origin.</li> <li>- The existing housing stock shows relatively high levels of vacancy and the proportion of existing dwellings not meeting the decency standard is also higher than regional or national averages.</li> <li>- There are mixed views about the viability of the City centre housing market, particularly for high density development, related to concerns about the significant number of vacant flat and apartment buildings in and around the City centre.</li> <li>- As a result of recession, housing delivery and viability has become a significant issue. This has implications both in terms of general housing delivery (and meeting basic demographic needs) but also the provision of affordable housing.</li> </ul>
<b>Crime</b>	<ul style="list-style-type: none"> <li>- Addressing crime and anti-social behaviour are national and local priorities. Some forms of serious crime are experienced at higher rates in Derby than the national average. Parts of the City, especially the City Centre, experience significantly higher levels of crime than others.</li> </ul>
<b>Health and Physical Activity</b>	<ul style="list-style-type: none"> <li>- Increasing physical activity as a means of improving people's health is a national and local priority. In the more deprived areas of Derby there are reduced opportunities for sport and recreation, which is reflected in lower activity rates.</li> <li>- Improving health and reducing premature mortality are national and local priorities. Life expectancy rates in Derby as a whole are slightly below national averages, but are significantly lower in its deprived areas.</li> </ul>

Sustainability Topic	Key sustainability issues
<b>Deprivation</b>	<ul style="list-style-type: none"> <li>- The Index of Multiple Deprivation identifies Derby as the 69th most deprived Authority in England. Deprivation levels vary significantly across Derby, the worst incidences occurring in parts of Alvaston, Normanton, Sinfyn, Derwent and Abbey wards (Mostly 'inner areas').</li> </ul>
<b>Biodiversity and green space</b>	<ul style="list-style-type: none"> <li>- Derby has limited but significant areas of bio and geo-diversity which are under pressure from competing land uses.</li> <li>- Derby has an important green infrastructure network ranging from Green Belt and Green Wedges to local corridors which are under pressure from competing land uses.</li> </ul>
<b>Cultural Heritage</b>	<ul style="list-style-type: none"> <li>- Derby has an important built heritage, including the World Heritage Site and Buffer, which is under pressure from development.</li> <li>- Derby has a number of 'buildings at risk'.</li> </ul>
<b>Natural Resources, Water and Soil</b>	<ul style="list-style-type: none"> <li>- There is a pressing environmental need to minimise the production of waste. There are challenging targets for recycling in order to support this.</li> <li>- Air quality is not an issue for the majority of residential areas in the City. However, large sections of the inner and outer ring roads (<i>including public space and residential areas</i>) have been designated as AQMAs.</li> <li>- Significant parts of the City, including parts of the City Centre, are at increased risk from flooding. The North Riverside and Castelward areas are at risk from surface water and fluvial flooding. There is some risk in the Derwent Triangle area from fluvial flooding.</li> </ul>
<b>Climate Change and flooding</b>	<ul style="list-style-type: none"> <li>- Derby City is the highest energy consuming authority in the HMA area, reflecting the high density of commercial and industrial activities as well as the large number of dwellings. In high-density City centre sites, 70% on-site carbon-compliance, required for the zero carbon standards will be challenging for logistical reasons, and this highlights the need for developing zero carbon district heating schemes where possible.</li> <li>- Water resources in the East Midlands are constrained. Climate change is expected to reduce resource availability further.</li> </ul>
<b>Economic Development</b>	<ul style="list-style-type: none"> <li>- The proportion of manufacturing jobs is notably higher than the national average, while the proportion in the financial sector is lower.</li> <li>- The City has seen sustained and rapid growth in new jobs, but long term unemployment is still higher than regionally or nationally.</li> <li>- A substantial proportion of the workforce commutes some distance from outside of the City. Commuters earn more on average than people who live and work in Derby.</li> <li>- There is a high proportion of working age residents without any qualifications.</li> <li>- There is a skills gap between jobs in the City and the educational attainment of its residents.</li> <li>- There is pressure on capacities at some schools across the City.</li> </ul>

Sustainability Topic	Key sustainability issues
<b>Transport and Accessibility</b>	<ul style="list-style-type: none"> <li>- There is traffic congestion on major radial and cross City routes at peak times. Traffic growth in Derby has recently exceeded that in Nottingham and Leicester.</li> <li>- Access to services and facilities is generally good. However, there are some specific issues. Parts of the City are more than 30 minutes from a hospital by public transport.</li> </ul>

An SA framework consisting of thirteen SA objectives and supporting assessment criteria was then developed using these key issues as a starting point. The effects of the Plan and any reasonable alternatives were assessed against this SA framework.

The table below sets out the SA Objectives that have been established for this Sustainability Appraisal, grouped by the SA Topics that formed the basis for scoping.

*Table 2: SA Topics and Objectives*

SA topics	Sustainability objectives
Climate Change and flooding	1. To reduce Derby's contribution to Climate Change and manage its effects, including flooding.
Transport and Accessibility	2. To minimise traffic and the length of journeys travelled by people and goods.
Natural Resources, Water and Soil	3. To minimise pollution.
Natural Resources, Water and Soil	4. To manage and conserve natural resources and minimise the production of waste.
Deprivation and Population	5. To reduce deprivation and inequalities.
Crime	6. To reduce crime and promote safer and more cohesive communities.
Housing and Population	7. To ensure that the existing and future housing supply meets the needs of the City.
Economic Development	8. To improve levels of education and skills and reduce education inequalities.
Health and Physical Activity	9. To improve health, reduce health inequalities and increase levels of physical activity.
Cultural heritage	10. To protect and enhance Derby's cultural heritage including its townscape and archaeology.
Economic Development and Population	11. To create and maintain a prosperous and economically vibrant City that meets the varying needs of its residents

SA topics	Sustainability objectives
Transport and accessibility	12. To maximise people's accessibility to services and facilities.
Biodiversity and greenspace	13. To protect and enhance green infrastructure, biodiversity, geodiversity and the natural environment.

### 3. Appraisal of reasonable alternatives

The Regulations<sup>1</sup> state that an SA Report should present an appraisal of the 'plan and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme'.

The most critical issue to address in terms of reasonable alternatives is the level and distribution of housing and employment growth.

#### Housing Growth and Distribution

##### *The 'Reasonable Alternatives'*

A range of strategic options for housing growth in the City have been subjected to sustainability appraisal. These reflect an amalgamation of various different scale and distribution options that have been considered and consulted on up to this point.

The alternatives considered for housing growth and distribution along with an indication of what each entails, is set out below:

- Option H1: Brownfield & Existing Commitments Only (10,000 dwellings, 500 dwellings per annum (dpa))
- Option H2: 'Partial Greenfield Release' (12,000, 625 dpa)
- Option H3: Regional Spatial Strategy (14,400, 720 dpa)
- Option H4: Housing Requirement Study / Meeting Demographic Needs in City (15,600-17,90, 780 - 895dpa)
- Option H5: SNPP/ONS Projection (24,320, 1,216 dpa)

##### *Why has the preferred approach been selected?*

The selection of the strategy was based on the consideration of a combination of factors. This has culminated in the following approach to housing:

- In determining the strategy for Derby, consideration needed to be given to the capacity of the City to accommodate its full objectively assessed need. After working with Amber Valley and South Derbyshire, it was agreed that the maximum amount of housing that could be sustainably delivered in Derby would be 11,000 new homes between 2011 and 2028. The unmet needs would be met in South Derbyshire and Amber Valley.
- 11, 000 new homes is the realistic maximum number of new homes that can be delivered within the City boundary between 2011 and 2028. This target will be delivered on a number of strategic sites and locations across the City (some of which will be delivered as part of a future Local Plan Part 2 'Site Allocations Document' or as 'windfalls').

<sup>1</sup> Environmental Assessment of Plans and Programmes Regulations 2004

- Regeneration and brownfield development a priority, but recognition of a need to release Greenfield sites, including some in Green Wedges, to meet projected needs. The principle of Green Wedge can be maintained under this approach.
- Promotion of the City Centre to substantially increase its role as a residential neighbourhood through the development of around 2200 new dwellings.
- Resisting sites which would have an unacceptable impact on the role and function of Green Wedges and Green Belt or have other 'sustainability' or 'delivery' problems that cannot be satisfactorily mitigated through policy. Sites which have no realistic prospect of delivery within the Plan period have also not been identified in the Plan.
- The strategy assumes the remaining unmet 'need' is to be identified within South Derbyshire and Amber Valley through the 'Duty to Cooperate'. A proportion of this will be in the form of urban extensions to the City.

The preferred approach is broadly in-line with alternative H2. This **reflects the findings of the SA**, which suggests the most favourable growth option for the City is for partial Greenfield release. It is considered that this approach would achieve the best balance between environmental protection and the delivery of housing need. It also reflects a joint approach between the three HMA authorities.

### Strategic Employment Land

#### *The 'Reasonable Alternatives'*

A range of alternatives have been considered for the scale and distribution of employment development in Derby. The alternatives considered are as follows:

- Option E1. Plan for Higher Growth within the City
- Option E2. Plan to Meet Trends / Maintain Existing Supply
- Option E3. Plan for a Reduction in Employment Land

#### *Why has the preferred approach been selected?*

The selection of the preferred approach has been based on the consideration of a combination of factors. This has culminated in the following approach to employment:

- Regeneration and brownfield development a priority.
- Promotion of the City Centre as the primary location for new retail, leisure and office development.
- Focus on the implementation of Infinity Park, Derby Commercial Park, the 'Derwent Triangle' commercial development and implementation of City Centre office schemes.
- Permissive policies relating to the redevelopment of existing employment land for new employment uses, in order to recycle and refresh the industrial stock

This approach would provide some 199 hectares gross (circa 128ha net) of new employment land, complemented by the delivery of new office space in the City centre. This will also be complemented by the identification of a 'strategic location' in South Derbyshire. This area could, subject to certain criteria, act as a long term extension to the strategic allocation on land south of Wilmore Road (Infinity Park and its environs).

This strategy broadly reflects the 'maintain existing supply/meet trends' option E2.

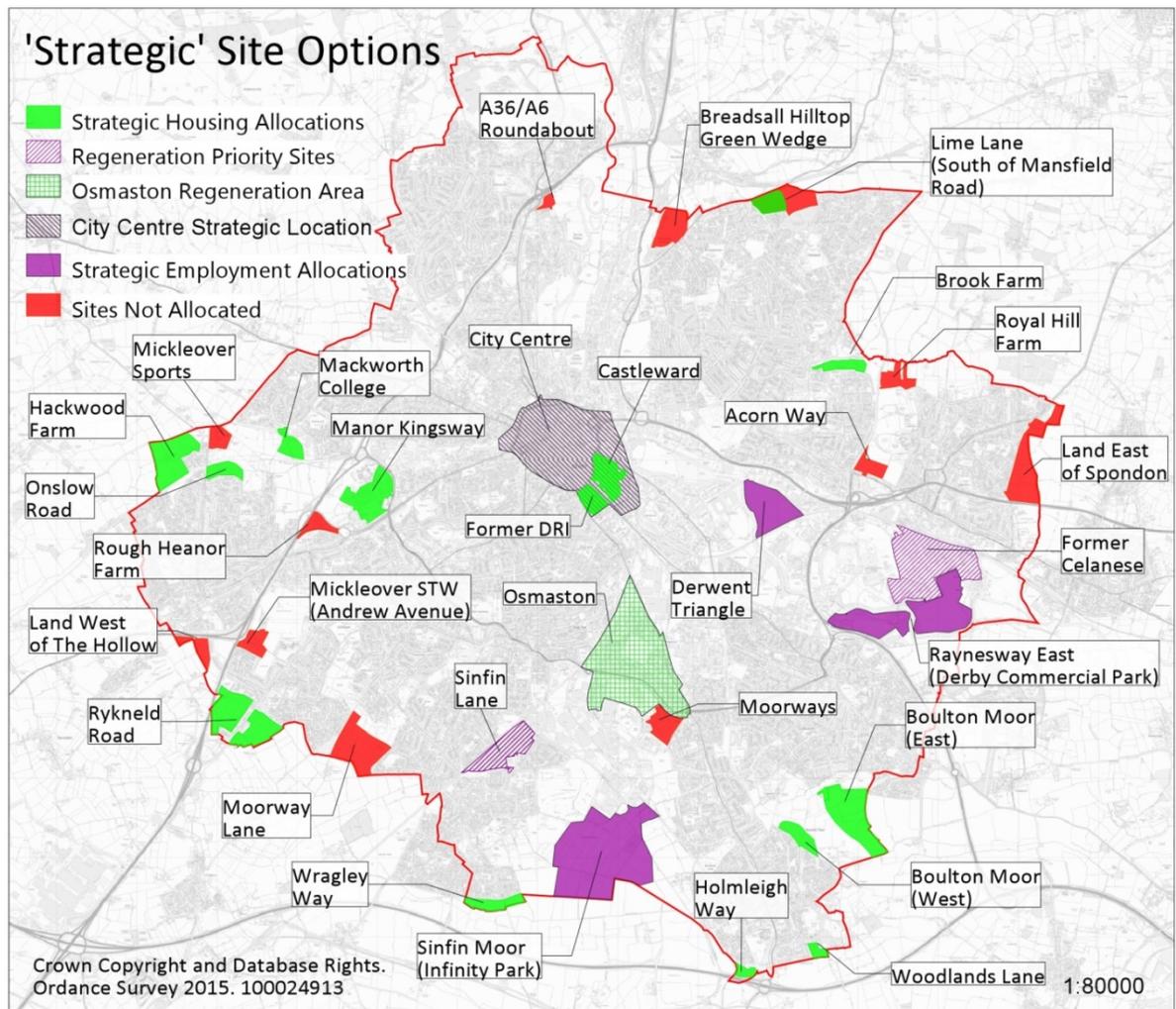
This approach broadly **reflects the SA findings**, which suggest that maintaining existing supply/meeting trends would help to deliver a more suitable level of employment without

putting undue pressure on housing, environmental quality or the economies of neighbouring authorities.

### Site Allocations

To help inform the housing and economic strategy for the Plan, a range of strategic site options were assessed through the SA to identify their sustainability credentials and inform the decisions about site allocations. The map below identifies all site options that were considered for housing and employment, illustrating those which have been discarded, and those that have been allocated in the Draft Plan.

The full SA Report presents the assessment findings for each site option, and the rationale for its inclusion or exclusion from the Local Plan.



### Why has the preferred preferred approach been selected?

Housing sites within the City essentially fall into three broad categories: sustainable brownfield regeneration sites; smaller deliverable greenfield releases and large cross-boundary strategic allocations. These extensions will not only help to meet Derby's needs, but will also help top secure the sustainably delivery of sites within the City.

In all three categories, the Council has considered the sustainability of the site – in particular whether it is well related to existing services and facilities, employment facilities and whether

it can be easily accessed by public transport, cycling or walking. Where this currently is not the case, such as in some of the peripheral sites, creating a critical mass of development with neighbouring sites in South Derbyshire will ensure that such facilities and accessibility can be created on-site. Sites where these issues are unlikely to be able to be mitigated have not been selected.

In addition to this, the Council has considered whether sites would undermine current policy objectives such as the protection of defensible Green Wedges and Green Belt and whether their development would create, or exacerbate, local transport or environmental problems – including impacts on important environmental and heritage assets. Again, where these cannot be fully addressed, it has selected sites where some level of mitigation is deliverable (such as ensuring that development would not encroach into the green wedge to an unacceptable degree). Where an issue cannot be mitigated (for example, if a site has poor access to the City's single hospital) then the Council has weighed the significance of the impact against any positives the site can provide and the NPPF requirement to meet objectively assessed housing and employment needs. In all cases, the Council has had regard to the likely deliverability of the site, in line with the requirements of the NPPF.

There are sites where either the individual or cumulative implications are too great, cannot be adequately mitigated and the impacts or the benefits of the site were not considered to outweigh the negatives. These sites have not been allocated in the Plan.

Two locations have been identified where the potential for regeneration has been identified – including the potential for new housing – but there is insufficient certainty at this time for them to be included in the housing land supply. These are the Former Celanese Site and the Sinfin Lane site. The Sinfin Lane site was identified as a strategic allocation in the Draft Plan, but changes to land ownership and the withdrawal and lapsing of planning applications on the site has significantly reduced the certainty of delivery. As such, the plan continues to recognise the potential of the site but does not rely on it to provide housing in the plan period..

In terms of strategic employment sites, the existing allocations in the CDLPR have been carried forward, complemented by the City Centre. There are few realistic choices to meet the City's long term needs and all three large sites either have permission already or applications are being considered. They have been demonstrated to be suitable for employment in the past and delivery now appears to be a realistic prospect. Continuation of the strategy is, therefore, appropriate. No other sites are needed.

### Thematic options

Options for the following plan issues were tested in the SA.

#### *Housing Mix*

Reasonable Alternatives	The Councils preferred approach	SA summary
Set a City wide policy establishing the proportions of different house types sought on large sites;	The NPPF states that local authorities should plan for a mix of housing based on current and future demographic trends. It requires local authorities to prepare and periodically update SHMA's. Guidance is that SHMA's should be updated regularly. This is logical because the housing market is affected by many different factors including the economy, employment,	The preferred approach partly reflects the SA findings, which suggests that setting bespoke targets for sites would help to deliver the most appropriate mix of housing to match need.
Set policies establishing the proportions of different house types to be sought on large sites; in different parts of the City;		

Do not set targets for different house types across the City. Rely on criteria-based policies.	house prices etc. Setting a specific mix policy for the long term is considered too rigid in the current and expected medium term economic and housing market climate. A rigid and restrictive policy could have the effect of affecting viability and delivery of housing.	However, a criteria-based approach (i.e. the preferred option) would not necessarily ensure that minimum standards were always achieved.
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### Housing Density

Reasonable Alternatives	The Councils preferred approach	SA summary
Establish a minimum density across the City/	Minimum densities were not considered appropriate for the Local Plan. This approach was considered too prescriptive for a strategic plan and that it would be far better to consider appropriate densities on a case-by-case basis. The danger in setting density targets – either City-wide or on smaller geographical areas – is that they can override other important factors such as the character of an area and may not always assist with the principle of 'place-making'.  The Plan will provide a framework which will ensure an appropriate density to be considered (which will be supplemented by design guidance to be published at a later date).	This approach partially reflects the SA findings, which suggest that applying different density standards would help to ensure that new development was sympathetic to the character of the surrounding areas. However, the lack of defined standards will lead to a degree of subjectivity and the possibility that appropriate standards are not met for some areas or sites. This may mean that land is not used as efficiently as possible. However, an emphasis on judging each case on its merits within a robust decision making framework will allow site specific issues to be addressed more appropriately. This might be particularly important in sensitive areas (for example, Conservation Areas or sites in close proximity to Listed Buildings). In such cases, the Council's approach could lead to more sympathetic design solutions.
Apply varying approaches to housing design, and density in different parts of the City, taking into account factors such as housing need, local character and accessibility.		

### Affordable housing

Reasonable Alternatives	The Councils preferred approach	SA summary
Focus on housing delivery by relaxing affordability targets (reducing the target to 20% and / or increasing the threshold to 25 dwellings).	Using an economic viability model the Council has considered the implications of different affordable housing targets on viability and deliverability; This suggests that providing anything above 30% on all but the highest value sites would be unlikely to be viable at this time.	The preferred approach broadly reflects the SA findings, which suggest that alternative 2 would be least likely to have significant negative effects and would have positive implications in terms of housing delivery. However, although alternative 4 is a more risky and difficult approach to deliver, it would have the potential to have a more significant positive effect in terms of meeting housing needs (quantity and affordability) across the City. The policy as drafted is also positive in relation to the delivery of Lifetime Homes and more accessible homes. While not a 'strategic'
Maintain a site threshold of 15 dwellings and 30% affordability requirement.	If the economic situation improves, or if landowners or developers were to take less of a return (in response to reduced risk, for example) then 30% may be more achievable in the longer term. It is recognised that it will not meet all of the needs identified but provides the most pragmatic option in ensuring some realistic delivery over the lifetime of the Plan.	
Focus on tackling affordability issues by increasing affordability targets up to 40% and / or decreasing the policy threshold below 15 dwellings.		
Apply a mix of targets to different scales of development. This could mean:  <i>Increasing the affordability target above 30% for Greenfield developments.</i>  <i>Maintaining a target of 30% and a threshold of 15 dwellings for brownfield and smaller scale</i>	The Council considers that a target of 30% offers a sensible balance between meeting the Government and Council's objectives on delivering affordable housing and the need to deliver housing more generally. It also provides a reasonable level of flexibility to account for improvement in the market. Opting for a lower target based on the 'lowest common denominator' identified by the evidence (i.e. the lowest level of affordable housing 'viable' across all parts of the City or on all development types)	

developments. <i>Reducing the policy threshold below 15 dwellings and / or applying a lower % target for smaller developments.</i>	would restrict the Council's ability to require higher levels on sites that can accommodate it, or take advantage of improved economic situation in the future. This is seen as contrary to the aims of the NPPF.	issue, these elements have positive implications for a number of SA objectives.
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### Shopping Floorspace

Reasonable Alternatives	The Councils preferred approach	SA summary
Lower Growth Option	<p>This approach reflects the number of recent permissions for retail which have soaked up a considerable amount of the strategic capacity. There is also evidence of a clear decline in the City Centre's vitality and viability which suggests that there is no urgent need or requirement to identify significant increases in floorspace provision outside that already committed. There are also a number of sites within the City Centre that are awaiting regeneration and which may be suitable for retail development. Any growth that may come forward could be directed to these sites. The Core Strategy does not, however, set any form of target as there is no evidence of an urgent need for significant additional floorspace that would justify a specific allocation.</p> <p>The failure of the large supermarkets to deliver their permissions within the City is seen as further evidence of there being no strategic 'need' for new retail allocations at this time. The Council considers its generic criteria policies promoting defined centres as the most appropriate location for new development, supported by its sequential test and impact policies, will be sufficient to address future needs.</p>	<p>The preferred approach is most similar to alternative 1, which reflects low levels of growth. All options will ensure the provision of key services and facilities for residents and all will facilitate job creation and economic activity. However, the approach partially conflicts with the SA findings, which suggest that alternative 2 would result in a significant positive effect in terms of supporting a vibrant city centre.</p>
Medium Growth Option		
High Growth Option.		

### Town centre uses/roles

Reasonable Alternatives	The Councils preferred approach	SA summary
Meet the needs for major comparison/non-food retail floorspace, leisure, office and cultural development in the City centre;	<p>This preferred approach is consistent with the requirements of the NPPF, which continues to support a 'town centre first' approach to retail development. However, the NPPF also provides scope for Local Plans to allocate sites outside defined centres where a 'need' exists. In recent years the Council has resolved to grant permission for a number of 'out-of-centre' and 'edge-of-centre' supermarket proposals. These have soaked up a significant amount of the short to medium term capacity identified by the 2009 Retail Capacity Report. This, coupled with a clear general decline in the retail market and the observed impact that this has had on the vitality and viability of the City Centre, suggests that there is no urgent 'need' to identify land for large scale out-of-centre retail development at this stage.</p> <p>Making provision for significant retail floorspace outside the City Centre where a 'need' may not currently exist could also lead to unnecessary car-borne trips and the associated sustainability implications of this. It could also have a general negative impact on encouraging growth into the City Centre which has significant sustainability benefits in terms of encouraging development in the most accessible location in the City, helping to promote 'linked trips' by alternatives to the car and encouraging sustainable economic growth.</p>	<p>This reflects the SA findings which suggest that only alternative 1 would have significant positive effects against any of the sustainability objectives.</p> <p>The implementation of this alternative would help to enhance the vitality of the City Centre and enhance the quality and quantity of offices within this area.</p>
If needs cannot be met in the City centre, then consider the dispersal of some of this growth into the district centres; and		
If need cannot be met in the City centre or in improved/enlarged District Centres, then accept more development in out-of-centre locations.		

	The policies for such uses will still allow the consideration of planning applications for out-of-centre development where the sequential and impact tests can be met.	
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*Out of centre retail*

Reasonable Alternatives	The Councils preferred approach	SA summary
No change to existing policy	<p>While the constantly changing nature of the retail market, and the fluid nature of many retailers' 'business models' has reduced the distinction between 'high street' and 'out-of-town' retailing, the Council still considers there to be a need to be able to control the nature of out-of-centre retailing. This is primarily still to protect the vitality and viability of defined centres, though it has other benefits in terms ensuring genuine 'bulky goods' operators can still find representation within the City.</p> <p>The Council does recognise that its current policy is becoming increasingly difficult to implement in current market conditions. As noted above, changing business models often need/desire the sale of goods that would be 'contrary' to policy but at such small levels that it would be difficult to demonstrate a true 'impact on centres (not least as the NPPF has made the test of 'impact' arguably more difficult to apply).</p> <p>An approach which allows the implementation of conditions, but which also gives flexibility in its implementation, is seen as the most appropriate way to address this issue. The approach proposed will allow the Council to judge each case on its merits and apply the most appropriate condition it can to ensure there will not be an unacceptable impact on centres and that a complementary role is maintained as much as possible between centres and out-of-centre locations.</p> <p>The reasoned justification for the policy suggests that the approach taken to conditions will be dependent on the merits of each case. In some circumstances, therefore, the existing policy will be maintained though in others a more flexible approach will be taken that reflects the particular characteristics or impact of a proposal.</p>	<p>The preferred approach is broadly a mix of alternatives 1 and 2. This reflects the findings of the SA, which suggests that alternative 1 would best help to ensure that the vitality and viability of the City centre and district centres are protected over the plan period. Although a degree of flexibility would support economic objectives, it is not as positive in terms of ensuring sustainable patterns of travel and the vitality of centres.</p>
Allow increased flexibility		
No restrictions on out-of-centre		

*Transport*

Reasonable Alternatives	The Councils preferred approach	SA summary
Maintenance of the existing Transport Asset: Make no provision to accommodate, or to influence mode of travel, for trips generated by new or existing development.	<p>The Council considers that while maintenance will continue to be an important factor, clearly not trying to manage demand, increase choice or create additional capacity where necessary would not be a sustainable option to pursue.</p>	<p>The preferred approach therefore represents a combination of alternatives 2-4. This broadly reflects the findings of the SA, which suggest that there could be significant positive effects on SA objective 2 by reducing the need to travel. Where analysis of a site has</p>
Demand Management: Accommodate travel demand generated by new and existing development by focussing on measures to reduce reliance on motorised travel, especially travel by		

car;	The plan, therefore, proposes a mixture of transport measures, from significant new infrastructure provision through to promoting public transport, walking and cycling. It is considered that this mix of approaches will best mitigate the impact of growth, while helping to promote more sustainable travel patterns from existing residents.	suggested specific accessibility or transport issues, then the site specific policies have sought to mitigate the problems where possible and practical to do so. This is in-keeping with the general strategic objectives of the policy.
Measures to increase use of alternatives to the car: Accommodate travel demand generated by new and existing development by focusing on public transport and improvements for pedestrians and cyclists; and		
Major works: accommodate travel generated by new and existing development by focussing on improved road infrastructure		

### Parking

Reasonable Alternatives	The Councils preferred approach	SA summary
Continue to use City of Derby Local Plan Review policies;	<p>The principle of maximum standards for parking for commercial development is maintained. Applicants will still be able to argue for more parking in certain circumstances, but it was considered that allowing unrestricted parking levels for new development would serve to undermine some general transport and sustainability objectives of the Core Strategy. The Council has, however, recognised the need for some balance and recognition of the needs of car drivers.</p> <p>The Council has adopted this approach in response to the results of consultation, which suggested that the restrictive approach used in the Local Plan was having a negative impact on economic growth and City Centre vitality. Removing what may have been seen as an artificial, or unfair, restriction in the City Centre should, therefore, have positive economic impacts. It is recognised that this may have some negative impacts in terms of potential traffic growth and the promotion of sustainable modes of transport. It is considered that the continued promotion of alternatives to the car, coupled with the accessibility of the city centre, should help to mitigate concerns. In addition, the cost of developing land for parking within the city centre may mean that the actual effect of the change in policy will be relatively small.</p> <p>Adopting specific standards for residential development across the City was also seen as being unhelpful in many cases, as need for residential parking is intrinsically linked to the specific nature of the housing development. Local characteristics, including current parking provision or transport difficulties will also be important. Applying strict standards sometimes reduces flexibility and can exacerbate local problems – particularly in terms of off-street parking.</p>	<p>The preferred approach partially reflects the SA findings, which suggest that a flexible approach to parking would provide the most favourable outcomes. The SA highlights that removing parking standards in the City centre could lead to significant negative effects on the baseline position for SA objective 2, though the situation outside the City Centre should be unchanged. The potential negative impact on SA objective 2 is also balanced against the anticipated improvements to the City Centre economy as a result of the change in policy.</p> <p>The removal of standards for residential parking could have some negative effects in terms of promoting more sustainable transport modes.</p>
Relax parking standards across the City;		
Relax parking standards in the City centre;		
Provide new public parking in the City centre		
Flexible approach to parking taking into account the needs of the development and/or nature of the area.		

## Sustainable buildings

Reasonable Alternatives	The Councils preferred approach	SA summary
Use the incremental increase in building regulations as local targets for sustainable construction	The Council's choice of Alternative 1 reflects the need to meet national targets but feels that to go any further could impact on growth and particularly the delivery of new homes. For this reason, the Draft Policy also recognises that meeting the national targets would also be subject to viability tests – thus recognising the importance the NPPF puts on delivery (though it is also recognised that this could, in some circumstances, reduce the effectiveness of the policy). There is also no evidence available to suggest any reason why any particular sites should have their own standards/requirements identified in policy (as in alternative 3). The generic policy is sufficient to facilitate site specific opportunities where they exist.	This approach partially reflects the SA findings which suggest that alternative 1 would have the least negative effect on housing delivery. However, the SA findings suggest that alternative 3 would have the most positive effect across the range of sustainability objectives. Alternative 3 would allow for higher standards to be achieved at strategic sites without affecting the viability of smaller scale development.
Set targets for sustainable construction in advance of the changes to Building Regulations		
Expect all new buildings to meet the standards set out in alternative 1 but also identify strategic sites where standards can be exceeded and environmental sustainability exemplified.		

## Open space

Reasonable Alternatives	The Councils preferred approach	SA summary
Continue to use the City of Derby Local Plan Review policies;	Carrying forward the current City of Derby Local Plan policy would result in a continuous increase in open space regardless of existing provision. In contrast, the approach set out in the new policy provides multiple benefits to the Council, the local community and the wider objectives of the Core Strategy. It will allow the provision of open space to be informed by current local provisions thus ensuring either new spaces or qualitative improvements to existing spaces; ensuring that local communities have adequate access to a diverse range of spaces. The policy would also assist to create or enhance connections between public green spaces and the wider GI network, providing access for the wider community, particularly in areas of deficiency, and increasing the biodiversity benefits of public green spaces. These linkages will also ensure that the public green space policy contributes to the plan's aspiration of promoting alternatives to the motor car.  When combined with the aspirations of the Green Infrastructure policy, the Public Green Space policy will assist with the Core Strategy's objective of mitigating against the impact of climate change. Finally, the policy recognises that the future of local provision, especially the potential loss of public green spaces, should be determined by sound and robust evidence to ensure that any decision would not have a detrimental effect on local provision.	This approach broadly reflects the SA findings, which suggest that alternative 1 would have the most positive effect on maintaining and enhancing the City's green infrastructure assets. It was concluded that a focus on alternatives 2 and 3 could have significant negative effects on SA objectives relating to biodiversity and the natural environment.
Allow greater flexibility for the development of existing public open space		
Reduce the overall amount of new open space identified as part of new development and at the same time seek more financial contribution to improving the quality of existing public open space.		

#### 4. Appraising the Derby City Local Plan Part 1: The Core Strategy

A robust sustainability appraisal of the Plan has been undertaken by independent consultants AECOM.

This appraisal identifies and evaluates the ‘*likely significant effects*’ of the Core Strategy viewed ‘as a whole’ and the findings have been presented in full within the SA Report. The table below summarises the effects of the Plan.

It is important to note that draft policies have been appraised as the Plan has been developing and the findings have been taken into account as the policies have been finalised.

Table 3: Summary of sustainability effects of the Local Plan

Sustainability Objectives	Summary of effects	Monitoring envisaged
<p>1. To reduce Derby's contribution to Climate Change and manage its effects, including flooding.</p>	<p>Overall, the plan is likely to have mixed effects on the baseline position.</p> <p>Carbon emissions are likely to increase from transport, although mitigation measures would help to reduce this effect somewhat.</p> <p>The drive to reduce carbon emissions from homes and businesses will also help to offset the potential for increased emissions from new development. However, it may be difficult to achieve zero carbon development in the City due to competing policy demands and a lack of energy strategies for areas of growth.</p> <p>On balance the plan contributes a <b>moderate negative effect</b> in terms of generating an increase in greenhouse gas emissions.</p> <p>Adaptation to climate change will be enhanced through the implementation of flood management schemes throughout the plan period. New development also presents an opportunity to improve surface water drainage, green infrastructure and resilience to heat. In combination there could be a <b>significant positive effect</b> in terms of adaptation to climate change.</p>	<ul style="list-style-type: none"> <li>- Renewable energy capacity installed by type.</li> <li>- Domestic emissions per capita (tonnes).</li> <li>- Number of strategic flood risk assessments undertaken</li> <li>- Applications granted contrary to Environment Agency advice.</li> <li>- Proportion of new homes achieving emissions reductions above building regulation requirements.</li> <li>- Net change in surface water run-off at key sites.</li> </ul>
<p>2. To minimise traffic and the length of journeys travelled by people and goods.</p>	<p>The level and distribution of residential and employment development is likely to lead to an increase in the number and distance of car trips. This will exacerbate the already constrained network. As the NPPF requires authorities to meet their OAN and job needs, this growth is likely to be happen. Equally, background trends point to increasing levels of car ownership</p> <p>Development on brownfield sites, particularly the City Centre, and providing local facilities, encouraging walking, cycling and improved public transport links will help to reduce the effects. A number of local road improvement schemes would also help to reduce congestion – in some places this could improve the baseline position. There is still likely to be an overall increase in the level of traffic and travel, which is considered to be a negative effect. However, this growth would be likely to occur in any event, so the plan ought to have a positive effect on minimising the anticipated growth in traffic.</p> <p>The effects are also likely to be less severe as a result of Derby's compact nature and generally good accessibility. The plan also opts for a lower growth option than may have been the case – thus helping to reduce <i>potential</i> impacts.</p>	<ul style="list-style-type: none"> <li>- Distance travelled to work.</li> <li>- Inbound traffic flows.</li> <li>- Public transport journeys originating in the LTP area.</li> <li>- Number of cyclists recorded at specific sites.</li> <li>- Number of businesses within the LTP area adopting travel plans.</li> <li>- Proportion of employment land within 400m of a bus stop.</li> <li>- Number of residents that travel to work by car / public transport / cycling /walking.</li> </ul>

Sustainability Objectives	Summary of effects	Monitoring envisaged
	<p>Consequently, the plan is predicted to have a <b>minor significant positive effect</b> on the baseline position.</p> <p>If strategic improvements to the A38 could be achieved there would be a greater positive effect on the baseline in terms of traffic and congestion reduction. However, this would be a Highways Agency led scheme that is outside the control of the Council (though recent announcements suggest that there is an increasing likelihood that this will now happen, potentially within the plan period).</p>	
3. To minimise pollution.	<p>There is the potential for water quality to be improved through the enhancement of green infrastructure, sustainable urban drainage schemes and the delivery of the Our City Our River Masterplan. However, increased development could also lead to an increased risk for pollution, particularly during construction phases. On balance the effects are considered to be <b>neutral</b>.</p> <p>The effect on air quality from growth has not been quantified but logic dictates that growth will bring additional traffic, which in turn will have a <b>significant negative effect</b> on existing areas of poor air quality – particularly in relation to the AQMAs. Measures to reduce reliance on the private car may help to reduce the significance of the effect to an extent but the nature and location of the growth will lead to an unavoidable negative effect.</p> <p>It should be noted that housing and employment growth would still occur in the absence of the local plan, so there could be a potential worsening of air quality anyway (particularly considering existing issues in the City and trends in car ownership etc.). Therefore, it is considered that the mitigation measures put forward in the plan will have a ‘positive’ impact on minimising the ‘natural’ increase in pollution.</p>	<ul style="list-style-type: none"> <li>- Water Framework Directive Status of River Derwent and Markeaton Brook.</li> <li>- Number of complaints received concerning construction sites.</li> <li>- Status and extent of Air Quality Management Areas.</li> <li>- Number of fly-tipping reports.</li> </ul>
4. To manage and conserve natural resources and minimise the production of waste.	<p>Due to the increased use of natural resources and generation of waste for construction, negative implications could be anticipated. However, the level of housing growth would be unlikely to be significantly different without a Local Plan (it may, indeed, be higher without the implementation of specific strategic allocations). There would therefore be insignificant effects in terms of the use of natural resources and generation of waste for construction.</p> <p>Whilst a number of greenfield sites would be lost to development, the plan also identifies brownfield development sites for housing and employment, and gives priority to the re-use of empty homes. This should help to maximise the use of previously developed land. This would have positive effects, as without a plan in place it is less likely that difficult brownfield sites would be delivered.</p>	<ul style="list-style-type: none"> <li>- Domestic consumption of water in litres per day</li> <li>- Percentage of development on previously developed land.</li> <li>- Percentage of household waste recycled/composted.</li> <li>- Household waste collected per head.</li> <li>- % of developments achieving a higher water efficiency rating than required by building regulations.</li> </ul>
5. To reduce deprivation and inequalities.	<p>By supporting the growth of employment and providing for housing need across the City, the Core Strategy is likely to have a <b>significant positive effect</b> in helping to reduce deprivation. A high proportion of development is focused on areas that are significantly or moderately deprived, in particular Sinfen, Osmaston and the City Centre, which will help to ensure that inequalities do not widen.</p>	<ul style="list-style-type: none"> <li>- Index of Multiple Deprivation.</li> <li>- Gaps in the level of deprivation between worst and best performing areas.</li> </ul>

Sustainability Objectives	Summary of effects	Monitoring envisaged
6. To reduce crime and promote safer and more cohesive communities.	<p>There is unlikely to be any significant effects on community safety in the short to medium term. However, in the longer term, improved access to housing, employment and more attractive environments could help to reduce levels of crime, anti-social behaviour and re-offending across the City. The Local Plan is therefore likely to have a <b>minor significant positive effect</b>.</p>	<ul style="list-style-type: none"> <li>- Crime rates per 1000 population.</li> <li>- Provision of infrastructure and community benefits in conjunction with new housing development.</li> <li>- Acquisitive crime rates at strategic developments.</li> <li>- Net loss/gain in community facilities.</li> </ul>
7. To ensure that the existing and future housing supply meets the needs of the City.	<p>The plan will help to deliver 11,000 homes across the City up to 2028. The majority of the wider need for the City area will be met on the edges of the City in South Derbyshire and Amber Valley at a number of strategic sites.</p> <p>This level of development would help to improve the availability of housing to meet the needs of different groups; having a <b>significant positive effect</b> on the baseline position.</p> <p>Although positive effects would be achieved in terms of regeneration, the level of affordable housing and properties that could benefit deprived communities may not address the full need.</p>	<ul style="list-style-type: none"> <li>- Gross affordable housing completions and breakdown for different dwelling types/sizes.</li> <li>- Affordable housing secured.</li> <li>- Net additional dwellings per year.</li> <li>- Net additional dwellings over the previous five year period.</li> <li>- Average Household Size.</li> </ul>
8. To improve levels of education and skills and reduce education inequalities.	<p>Overall, the plan is likely to have a <b>minor significant positive effect</b> on the baseline. New development will help to secure enhancements to existing education provision at a number of strategic sites. Creating the conditions for employment growth could also help to secure more jobs for local people and link to the development of skills and qualifications.</p> <p>The continued support for the University and Derby College's activities in the City could also help to reduce the skills gap that currently exists.</p>	<ul style="list-style-type: none"> <li>- Proportion of the population over 16 with basic qualifications.</li> <li>- Schools with a deficit/surplus of school places to serve their catchment area.</li> <li>- Proportion of working age population with no qualifications.</li> </ul>
9. To improve health, reduce health inequalities and increase levels of physical activity.	<p>Air quality could worsen in parts of the City, with a knock on effect on health for a small number of communities. This would have negative implications.</p> <p>However, measures to encourage greater levels of walking and cycling could help to improve health in the longer-term.</p> <p>By providing a greater choice of housing and supporting economic growth, the health and wellbeing of communities could be improved in the long term, but it would be dependent upon the most deprived communities accessing job opportunities and affordable homes. This will be of particular importance in the inner areas such as Arboretum and Normanton Wards.</p> <p>Although some enhancement of open space is likely to occur with development, there is likely to be a negligible effect on levels of physical activity (<i>though it does, at least, provide the opportunity for activity</i>).</p> <p>The plan makes provision to help support the implementation</p>	<ul style="list-style-type: none"> <li>- Healthy life expectancy.</li> <li>- Participation levels in sport.</li> <li>- Provision of public open space in conjunction with new housing.</li> </ul>

Sustainability Objectives	Summary of effects	Monitoring envisaged
	<p>of new leisure facilities, including the new multi-event arena at Pride Park and new swimming facilities within the City. These would probably happen without the Core Strategy in place, however, so the effect of the plan in this respect is relatively minor.</p> <p>On balance, the Local Plan is likely to have a <b>minor significant positive effect</b> on the baseline.</p>	
<p>10. To protect and enhance Derby's cultural heritage including its townscape and archaeology.</p>	<p>In combination with sites in South Derbyshire, the delivery of strategic development sites in the City has the potential to have a <b>significant negative effect</b> on the character of settlements on the edge of the City. Measures to secure appropriate character-led design could help to minimise the effects and in some cases enhance landscape quality. However, a residual adverse effect on the townscape would be unavoidable.</p> <p>In the main the plan avoids development in the most sensitive areas and is proactive in protecting heritage assets. The specific policy protection for the World Heritage Site, Darley Abbey Mills and the focus on delivering high quality development in the City Centre, would suggest that the plan would have a <b>significant positive effect</b> on existing heritage features.</p> <p>In areas earmarked for regeneration, there is also the potential for development to help enhance heritage assets that could otherwise fall into disrepair. This could have a <b>significant positive effect</b> in the baseline.</p>	<ul style="list-style-type: none"> <li>- Change in the quality of landscape character at strategic sites.</li> <li>- Number of buildings 'at risk'</li> <li>- Investment in heritage assets.</li> <li>- Development granted contrary to heritage policies</li> <li>- % of people that think the character of their neighbourhood has improved / stayed the same / declined.</li> </ul>
<p>11. To create and maintain a prosperous and economically vibrant City that meets the varying needs of its residents</p>	<p>The delivery of new homes would support the construction industry, with knock-on benefits for local businesses. Allocation of additional higher quality employment land would also have a positive effect on the baseline position by increasing the range of sites available for inward investment. This may encourage diversification and the further development of the technology-based industries.</p> <p>If strategic infrastructure improvements are secured through development, this will further improve the performance of the local economy.</p> <p>The plan is likely to have a <b>significant positive effect</b> on the baseline position.</p>	<ul style="list-style-type: none"> <li>- Level of gross floor space completed, under construction or committed for A1 use in the City centre</li> <li>- Gross annual pay</li> <li>- Employment rate</li> <li>- Percentage change in VAT registrations</li> <li>- Hectares of new employment land completed</li> <li>- Total number of visitors and spend on tourism</li> </ul>
<p>12. To maximise people's accessibility to services and facilities.</p>	<p>A proportion of housing development would be located in peripheral locations, which in the main have poorer access to services and public transport links. However, a number of community facilities would be provided or enhanced as part of these strategic developments; which in some cases could improve access to local services for existing communities as well. This would have a <b>minor positive effect</b> on the baseline position.</p> <p>Increased growth in the City Centre will have a <b>minor positive effect</b> on the baseline. Currently, there is a very small residential population in the City Centre, but clearly these have very good access to facilities and services. The creation of a</p>	<ul style="list-style-type: none"> <li>- Number and frequency of new bus routes developed as part of new housing and employment development.</li> <li>- Length of new/improved cycleway and pedestrian routes.</li> <li>- Health of local shopping centres.</li> <li>- Average time taken to</li> </ul>

Sustainability Objectives	Summary of effects	Monitoring envisaged
	<p>new residential neighbourhood and promotion of 'City Living' will provide a greater number of new residents with these benefits.</p> <p>A number of infrastructure improvements would also be facilitated through new development; helping to improve access to services. However, this would continue to be mostly car-based travel.</p> <p>The level of growth required will also inevitably put pressure on existing facilities (though this would happen with or without the plan in place).</p> <p>On balance a <b>neutral effect</b> could be anticipated.</p>	<p>travel to school.</p>
<p>13. To protect and enhance green infrastructure, biodiversity, geodiversity and the natural environment.</p>	<p>Development on a strategic scale has the potential to have negative effects on wildlife and the connectivity of habitats. In particular, a number of strategic sites are in close proximity to local wildlife sites. As the city has a limited number of open spaces of wildlife value, they are particularly vulnerable to increased pressure from development; therefore a negative effect could be anticipated.</p> <p>However, application of policies in the plan would seek to ensure that development provided the opportunity for enhancement of open space and wildlife features. In particular, the objective to seek a '<i>net increase in biodiversity</i>' could have a <b>significant positive effect</b> on the baseline.</p> <p>At this stage there is a fair degree of uncertainty about these effects.</p>	<ul style="list-style-type: none"> <li>- Extent of greenbelt and green wedge.</li> <li>- Hectares of local nature reserve per 1000 population</li> <li>- Extent of ancient woodland, hedgerows and natural grassland.</li> <li>- Net loss / gain in biodiversity.</li> <li>- Biodiversity enhancement in new developments?</li> </ul>

## 5. Next steps

The Core Strategy has been 'published' for consultation so that final representations can be made. It is the intention that the Core Strategy will then be 'Submitted' for consideration by an Independent Planning Inspector at Examination. The Inspector will then judge whether or not the Plan is 'sound'.

Assuming that the Inspector does not request that further work be undertaken in order to achieve soundness, it is expected that the Plan will be formally adopted in 2016. At the time of adoption an SA 'Statement' must be published that sets out (amongst other things):

- How this SA findings and the views of consultees are reflected in the adopted Plan, i.e. bringing the story of 'plan-making / SA up to this point' up to date; and
- Measures decided concerning **monitoring**.