

Derby City Local Plan Part 1: Core Strategy

Statement of Consultation Volume 2

In accordance with, and to fulfil, Regulation 22(1)(c) of
The Town and Country Planning (Local Development)
(England) regulations 2012

December 2015



Derby City Council

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1. Introduction

This Consultation Statement has been produced to fulfil the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012. It has been published to accord with regulation 22(c) which requires a statement setting out:

- i. which bodies and persons the local planning authority invited to make representations under regulation 18,
- ii. how those bodies and persons were invited to make representations under regulation 18,
- iii. a summary of the main issues raised by the representations made pursuant to regulation 18,
- iv. how any representations made pursuant to regulation 18 have been taken into account;
- v. if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
- vi. if no representations were made in regulation 20, that no such representations were made;

Regulation 18 specifies the consultation Local Planning Authorities must undertake in the preparation of the Local Plan before it can proceed to the publication of the pre-submission Local Plan. It states:

(1) A local planning authority must:

- (a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and
- (b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are:

- (a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;
- (b) such of the general consultation bodies as the local planning authority consider appropriate; and
- (c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).

Regulation 20 relates to the representations regarding the Pre-Submission Local Plan consultation; it states:

- 1) Any person may make representations to a local planning authority about a local plan which the local planning authority propose to submit to the Secretary of State.
- 2) Any such representations must be received by the local planning authority by the date specified in the statement of the representations procedure.
- 3) Nothing in this regulation applies to representations taken to have been made as mentioned in section 24(7) of the Act.

When work commenced on the Local Plan, the relevant regulations were those produced in 2004 followed by updates in 2008 and 2009. These regulations were then replaced entirely by those published in the Town and Country Planning (Local Planning) (England) regulations 2012.

This report of consultation is split into three volumes:

- Volume 1 deals with the Pre-Submission consultation
- Volume 2 deals with the remaining consultation exercises starting with the Issues and Ideas consultation and ending with the consultation on the Draft Core Strategy.
- Volume 3 is a compendium of publicity material supporting the consultations contained in Volume 2.

2. Local Plan Consultation Stages

A number of consultations were undertaken as part of the Local Plan process. The following table indicates the key stages in the development of the Council's Local Plan.

Date	Consultation Stage	Outline of content
Wednesday 26 August to Friday 23 October 2015 <i>Duration: 8 weeks</i>	Derby City Local Plan - Part 1 Core Strategy: Pre-Submission	Undertaken in-line with the requirements of Regulation 19 and sought people's view on the legality and soundness of the Local Plan
Friday 25 October 2013 to Friday 20 December 2013 <i>Duration: 8 weeks</i>	Derby City Local Plan Part 1: Draft Core Strategy	This consultation sought people's views on the draft Core Strategy
1 October to 21 December 2012 <i>Duration: 12 weeks</i>	Preferred Growth Strategy	The consultation set out the aligned approach for the delivery of housing across the Derby Urban Area.
12 July to 30 September 2011	Options for Housing Growth	The consultation document provided a number of scenarios for location of development across the Housing

Date	Consultation Stage	Outline of content
<i>Duration: 11 weeks</i>		Market Area and various population projections.
Friday 24 February to Monday 26 March 2012 <i>Duration: 5 weeks</i>	The Three Topic Consultation	Presented a number of options which would help in the development of three topic areas – Retailing, City Centre parking and the provision of open space.
16 February to 31 May 2011 <i>Duration: 15 weeks</i>	Your Neighbourhood	Prompted people to think about their neighbourhood and sought comments on Neighbourhood Overview Summaries and the Townscape Character Assessments.
15 January to 28 May 2010 <i>Duration: 20 weeks</i>	Core Strategy Options Paper	The public's views were sought on the following subjects: <ul style="list-style-type: none"> • The Spatial Portrait of Derby • The key challenges and issues for the Core Strategy • The emerging Housing Market Area spatial vision • The emerging spatial vision for Derby City • Options for where new development could go • Topic based options
2 March to 31 May 2009 <i>Duration: 13 weeks</i>	Issues and Ideas	The document set out our thoughts on the issues that the Core Strategy needed to address. Sought comments on these issues, welcomed any new ones and welcomed people's ideas on how they might be addressed.

The accompanying Compendium of Publicity Material published in conjunction with this document contains evidence of the publicity material produced to support each consultation.

3. Statement of Community Involvement

The Council's Statement of Community Involvement¹ (SCI) was adopted in January 2007. It sets out how the Council will engage with the community and stakeholders

¹

<http://www.derby.gov.uk/media/derbycitycouncil/contentassets/documents/reports/localdevelopmentframework/DerbyCityCouncil-Statement-of-community-involvement-adopted.pdf>

in the preparation of the Local Plan and as part of the Development Management process.

The SCI proposes a number of consultation approaches to ensure that as many people as possible are involved in the preparation of the Local Plan and the Council has ensured that each consultation meets the SCI; in some cases the consultation undertaken exceeded the requirements of the SCI.

Appendix 2 contains a series of matrices which indicate how each consultation has met the requirements of the Council's Statement of Community involvement.

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**Summary of representations made
pursuant to regulation 18 of The Town and
Country Planning (Local Planning)
(England) Regulations 2012**

How was the consultation carried out?

The City Council produced the following documents as part of the Regulation 18 consultation that ran for eight weeks, starting on Friday 25 October 2013 and ending on Friday 20 December 2013.

- The Derby City Local Plan Part 1: Draft Core Strategy
- Draft Sustainability Appraisal and Technical Appendix
- Draft Infrastructure Delivery Plan
- Habitat Regulations Assessment



The Local Plan Part 1 Pre-Submission Core Strategy sets out the strategic planning policies for the City along with the preferred locations for strategic growth sites and indicates which of the adopted Local Plan (2006) policies will be saved and incorporated into Part 2 of the new Local Plan.

The Sustainability Appraisal (SA) is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives. An SA of Local Plan Part 1 - The Core Strategy is a legal requirement.

The Infrastructure Delivery Plan is a key supporting document for the Local Plan Part 1: The Core Strategy. It sets out the transport, physical, social and green infrastructure required to support the Borough's future growth up to 2028.

In total 185 respondents made 726 comments about the Local Plan and the supporting documents.

The bodies and persons who were invited to make representations can be found below. These include all bodies and persons who have previously made representations in respect of previous consultation exercises and/or those whose details were collected when previous public consultation exercises took place by entering their details on attendance sheets.

All of these bodies and persons were contacted individually by email. Those who do not have an email address were sent a letter in the post.

The following is a brief description of the methods used to engage with interested parties during the Derby City Local Plan Part 1: Draft Core Strategy consultation.

- Correspondence to interested parties
Before the consultation started a letter or email to everyone on our LDF consultation database. The database contains the contact details of the

specific consultation bodies, businesses and members of the local community.

The consultation was also publicised by utilising the City Council's Neighbourhood Partnership and the Council's Diversity Forums. Currently the Partnership has a distribution list of around 1,606 people which includes residents, local businesses, faith groups, Councillors and Officers.

The consultation was publicised through the Council's 'Your City, Your Say'.

- Internal Publicity

Emails were sent to Chief Officers and Councillors informing them that the consultation had started.

The consultation was publicised through the City Council's "In-Touch" magazine. An article publicising the consultation was included in the e-shot on the 28 October 2013, 25 November 2013, 2 December 2013 and the 9 December 2013.

The internal AV screens were used for the duration of the consultation, reminding staff that the consultation was underway and that the Core Strategy may have an impact on the delivery of their service

- Press releases and articles

A press release was issued prior to the start of the consultation on the 25 October 2013 and a further one was issued half way through the consultation on the 29 November 2013.

The press releases and articles are contained in the Compendium of Publicity Material.

- Posters

Posters were put up in local libraries and sent to the Neighbourhood Partnership Managers who distributed them through their network. A copy of the poster is contained in the Compendium of Publicity Material.

The external facing AV screens were used for the duration of the consultation.

- Deposit documents

The consultation documents were made available on the Council's website, in local libraries and at the Council House Reception

Documents were also sent to the Neighbourhood Managers.

- Website

The Council's homepage (www.derby.gov.uk) contained a link to the LDF webpage for the duration of the consultation. In addition to the documents mentioned above, the webpage contained:

- An electronic form allowing people to submit comments on-line

- Electronic copies of the display boards used in each drop-in event

The Council posted tweets a week prior to a drop-in event and the evening before an event.

- Drop-in events

A number of drop-in events were held throughout the consultation period. This approach ensured that members of the local community could discuss the proposals with officers from the Council.

Date	Time	Location
Tuesday 12 November	3:00pm to 8:00pm	Littleover Methodist Church, Constable Drive, Littleover
Wednesday 13 November	3:00pm to 8:00pm	Memorial Hall, Chaddesden Lane, Chaddesden
Thursday 14 November	3:30pm to 8:00pm	Landau Forte Academy Moorhead, Brackens Lane School
Monday 18 November	3:30pm to 7:00pm	Sinfin Library, District Centre, Arleston Lane, Sinfin
Wednesday 20 November	3:30pm to 8:00pm	Chellaston Academy, Swarkestone Road, Chellaston
Thursday 21 November	4.30pm to 7:00pm	Mickleover Library, Holly End Road, Mickleover
Wednesday 27 November	4.30pm to 7:00pm	Pear Tree Library, Pear Tree Road
Wednesday 4 December	9:30am to 5:00pm	Council House Foyer

- Presentations

An officer from the Spatial Planning Team attended a meeting of the Council's Conservation Area Advisory Committee (CAAC) and, after making a brief presentation, invited comments from the committee.

Summary of Responses

The following chapter contains a brief summary of the points raised through the consultation either through the submission of comments or verbally at either drop-in events or presentations. A Council response follows each comment and a list of all the changes in the 'Action' box is at the end of each section.

Please note that these are 'actions' relating to the response to comments only. All potential modifications to the Draft Plan can be found in a separate document (for example, changes made for clarity, to bring the document up to date, or to reflect on new evidence or assumptions may not be covered here if not raised by a respondent).

In some cases, comments have been made which make specific changes to either a policy or the supporting text. Where this has occurred, the deleted text has been crossed through (for example, ~~crossed through~~) and the new, suggested text has been underlined (for example, underlined).

To accord with the Council's consultation policy, comments made by Statutory Bodies, partner organisations, developers and planning agents have been attributed; responses made by members of the public are not attributed to any one individual.

It should be noted that in evaluating the responses to this consultation, the Council has carefully considered the arguments put forward in support of, or against, any particular part of the Local Plan, rather than reaching a view based on the absolute number for or against.

The Consultation Strategy

Comment

One person objected to our strategy of holding drop-in events in certain areas of the City and omitting Mackworth, Darley, Allestree, New Zealand, Morley or Chester Green. In addition, they highlighted that there was no event planned in the City Centre.

Response

The consultation was designed to ensure that those communities affected by the development proposals in the Core Strategy had an opportunity to give their views to Officers. The consultation strategy itself was widely publicised in advance of the consultation starting through a variety of methods, giving people the opportunity to attend the nearest event.

Following on from comments raised at during the Preferred Growth Strategy consultation, an additional drop-in event was organised at the Council House.

Comment

One member of the public questioned the success of the consultation process as they considered that very few people know about the Core Strategy and its implications.

Response

A variety of methods have been used over the past five years to inform and engage with the public to ensure that as many people as possible know what is happening. This has been supplemented in recent consultations via use of Neighbourhood Managers (who are able to provide information directly to local people) and such methods as social media. There has been a wide amount of publicity and media attention on the plan and the Council has received a large number of comments from the public and organisations throughout its preparation. As such, it is considered that the Council has done everything it can reasonably do to make people aware of the Plan.

Action

- It is envisaged that the consultation strategy for the remainder of the Part 1 Core Strategy and the proposed Part 2 document will evolve to take account of the lessons learnt from previous consultations.

Document Format

Comment

One person considered that the use of separate headings gave the impression that everything is independent.

Response

The Core Strategy is a comprehensive, strategic document which covers a wide-range of subjects. To produce a document which is not split up into specific topics would be unwieldy and difficult for people to read. No change to the format of the document will be made.

Comment

The City Council's Conservation Area Advisory Committee suggested that captions are needed under each of the photos to explain what each one is showing and that green wedges need adding to the key of various maps throughout the document.

Response

Agree with the comment. The final document will contain captions.

Comment

The City Council's Conservation Area Advisory Committee suggested that the document needs a glossary of terms adding.

Response

Agree with the comment. A glossary will be included in the final Core Strategy.

Comment

The City Council's Conservation Area Advisory Committee raised concerns about the use of the word 'vibrant' and 'vibrancy' throughout the document. It was suggested that it means very little and should be removed, or alternatively an explanation of what it means should be added to the glossary.

Response

Vibrant and vibrancy are terms commonly used in planning documents. The concerns of the Conservation Area Advisory Committee are noted and both terms will be included in the glossary.

Comment

The City Council's Conservation Area Advisory Committee considered that that the document as a whole is more of an 'advert' for Derby rather than a serious planning document.

Response

The comment is not accepted. The document has been written in a 'positive' way, trying to identify and describe the outcomes that we are seeking to deliver, rather than simply listing types of acceptable use. It is accepted that this is a significant departure from the current Local Plan, but equally it should make the document more usable and useful in the long term. It is also not considered to be a 'negative' for the document to be positive about Derby and highlight the qualities that make the City successful in order to make it more attractive as a place to live or invest.

Comment

The City Council's Conservation Area Advisory Committee considered that document as a whole should seek to promote examples of good practice, particularly examples of successful adaptive re-use.

Response

The comment is noted.

Action

- The final version of the document will contain captions for the photographs.
- The final version of the document will contain a glossary.
- "Vibrant and vibrancy" will be included in the glossary.

Key Diagram

Comment

Derbyshire Wildlife Trust requested that the key diagram includes the Site of Special Scientific Interest (SSSI) at Boulton Moor and all Nature Reserves.

Response

It is agreed that the SSSI should be shown on the Key Diagram due to its national importance. There are currently 10 Local Nature Reserves within the City. Whilst the Plan acknowledges the importance of these sites, showing them on the Key Diagram would make the diagram overcrowded and difficult to understand. Ultimately, the Key Diagram is a visual representation of the key components of the Strategy and is not a Proposals Map.

Comment

A Councillor considered that the Key Diagram indicates that the route from Sinfin to Chellaston appears to follow Sinfin Moor Lane which is only a farm track.

Response

The Council agrees with this and the key diagram will be amended accordingly by removing Sinfin Moor Lane.

Comment

A member of the public considered that the use of two shades of brown for

development in and on the edge of the City was misleading.

Response

The aim of using two types of shading was to indicate development in the City and in Amber Valley and South Derbyshire. The Council considers that it is still appropriate to show the scale of cross-boundary development in this way and will continue with using two shades.

Comment

A member of the public objected as the boundaries shown on the inset map are not to scale.

Response

It clearly states, at the beginning of the Core Strategy, that all maps and diagrams in the document are indicative and have not been produced to a standard scale. The Council considers that, for the purposes of this document that this practice should not change.

Comment

The City Council's Conservation Area Advisory Committee suggested that the Green Wedges need adding to the key on the majority of maps in the document.

Response

Agreed.

Comment

A member of the public considered that the Park and Ride at Chellaston is too vague and needs to be shown better.

Response

The key diagram is a diagrammatic representation of the City and the Council considers that the current notation is appropriate.

Action

- The Site of Special Scientific Interest (SSSI) will be shown on the key diagram.
- Sinfin Moor Lane will be removed from the diagram.
- Notation for the City's Green Wedges will be included, where appropriate, on the key diagrams.

1. Introduction

Comment

The Home Builders Federation and Gladman Developments Ltd stated that the City Council will have to demonstrate that it has met the Duty to Co-operate when the plan is submitted for examination. They consider that, although the three HMA

authorities have worked closely together, the Council has failed to meet the Duty to Co-operate as it hasn't worked collaboratively with neighbouring Housing Market Areas, primarily the Greater Nottingham HMA and the Peak Sub Region HMA.

Response

This comment is not accepted. The Council feels it has done everything it is required to do under the Duty to Co-operate. This will be demonstrated through the 'Duty to Cooperate' Statement that will be published alongside the Regulation 19 consultation document.

No change required.

Comment

Derbyshire County Council considered that the plan period to be an appropriate timeframe, assuming that it is adopted in 2014. They considered that it is broadly in accordance with the NPPF.

The Pegasus Group, Signet Planning, Nathaniel Lichfield and Partners and the Planning and Design Group considered that, by the time the plan is adopted it will have less than 15 years to run and, consequently, is contrary to the NPPF.

Response

Comments from the County Council are noted and welcomed.

It is important to note that the NPPF does not *require* plans to cover a 15 year period. Rather, it states that it is a *preference*. It is accepted that by the time the plan is adopted, the period it covers will be less than the 15 year horizon. However, it is not considered that this undermines the requirement of the NPPF to "*take account of longer term requirements*" (paragraph 157).

It should also be noted that this issue was raised in respect of Amber Valley's Core Strategy at their Examination (April/May 2014). The Inspector has not, at this stage, indicated any concern about a 2028 end date. He has, however, indicated that he thinks a revised *start* date should be adopted of 2011. While this requires a revision of housing and employment targets, the change would be purely technical and not result in an *actual* change to the number of dwellings needed between now and 2028. It is felt that this change could be made to Derby's plan to be considered in the next round of consultation.

No change required on basis of comments. It is, however, recommended that the plan period is amended to 2011 to 2028 in light of Amber Valley's Examination.

Comment

With regard to paragraphs 1.6 and 1.31, Derbyshire County Council fully supported the recognition that new development will need to be accompanied by infrastructure and services.

Response

Comments noted and welcomed. No change required.

Comment

CABE highlighted that a good spatial plan is essential to achieving high quality places and good design. They set out three key messages which should be taken account of during the process (highlight the qualities of a place, set out its aspirations and make it understandable).

Response

It is considered that the policies of the plan meet CABE's requirements. No change required.

Comment

David Locke Associates, commenting on behalf of Rolls-Royce, generally supported the policies contained in the Part 1 document as they are broadly in-line with the NPPF, paragraphs 19 to 22.

Response

Comments noted and welcomed. No change required.

Comment

RPS Planning and Development Ltd, representing St Modwen Developments, supported the strategy for delivering growth in Derby. They also supported the plan's intention to deliver 199 hectares (gross) of employment land over the plan period.

Response

Comments noted and welcomed. No change required.

Comment

Turley Associates supported the efforts made to satisfy the Duty to Co-operate.

Response

Comments noted and welcomed. No change required.

Comment

The City Council's Conservation Area Advisory Committee (CAAC) considered that 90% of the document is excellent and "ticks all the right boxes". However, the big test is whether the new policies would have prevented the building of Jury's Inn and Westfield.

Response

Support noted and welcomed. From the comments, it is clear that CAAC feel that the two proposals mentioned are unacceptable or inappropriate developments. However, it must be remembered that those proposals were considered against the design policies set out in the CDLPR and were considered to meet those requirements. As such, they were consistent with the Development Plan and thus must have been considered 'appropriate and acceptable'.

No change required.

Comment

One member of the public objected as the Core Strategy does not address the issues experienced in Normanton, including parking, housing etc.

Response

Policy CP5 does indicate that the Rosehill/Peartree area and other parts of Derby's established urban areas will be considered a priority for regeneration. In some cases, it would not be appropriate or possible for the plan to identify specific issues effecting parts of a community. Problems associated with localised on-street parking, for example, are both extremely detailed and relate more to traffic management than the spatial development plan (other than when considered in relation to a planning application).

It is considered, however, that the plan does provide the necessary policies and framework which will support other initiatives that may serve to address the objectors concerns.

No change is required.

Action

- Change plan period from 2008 to 2028 to 2011 to 2028. Make consequential changes in 'Introduction'; add explanatory text within the 'Introduction' to explain the reasons for this; make consequential changes throughout the document.
- Amend all references to 12,500 to read 11,000 to reflect above change.

2. Derby in Context

Comment

The National Trust noted and supported the Key Issues for climate change.

Response

Comments are noted and welcomed. No change required.

Comment

Sustrans suggested that the Key Issues should also include climate change, traffic accidents and safety and links between transport and health and well-being/quality of life.

Response

It is considered that sufficient reference to 'climate change' is made already under 'Key Issues'. This section of the plan is primarily designed to draw out the conclusions of the evidence base and context for the City. While there is no doubt that there is a link between transport and health, this would be better stated as a policy objective and addressed within policy. Also, while road safety is an extremely important issue (and is addressed in Policy CP23), it is also not something which is necessarily something which the Local Plan needs to be highlighted here as a 'key

issue' for the Plan.

No change recommended.

Comment

English Heritage welcomes the points made under 'History and Heritage' as well as references in other sections to the contribution the City's heritage makes to local identity.

Response

Comments are noted and welcomed. No change required.

Comment

Both English Heritage and the National Trust are concerned that reference is only made to 'built' heritage in the Key Issues section. They highlight that the local historic environment is made up of different forms. The historic landscape and archaeological features are not necessarily 'built'. They suggest that the heading of this section is amended to '*Natural, Built and Historic Environment*'.

Response

This is a minor change that can be easily made and accepted.

It is recommended that the heading is changed.

Comment

With regard to the 'Natural and Built Environment' section of the Key Issues (page 7), English Heritage and the National Trust suggested that 'built' is deleted from the third criterion and add 'resource' so it should now read 'Derby has an important heritage resource, including the World Heritage Site and Buffer, which is under pressure from development'.

Response

Agree with the comments and the relevant paragraph will be amended accordingly.

Comment

English Heritage stated that Derby has a number of heritage assets identified as being 'at-risk' and suggest that this should be included as a key issue.

Response

This is a reasonable point. A reference to 'buildings at risk' will be included as a 'key issue'.

An additional reference to 'buildings at risk' will be made, with regard to both the possible threats relating to growth but also the opportunities that may exist through the plan to improve the current situation.

Comment

The National Trust raised concerns about the first and fourth points and considers

that there is scope for wider thinking about the quality of new development. They suggest the following wording for both points:

For the first criterion: *The need for new housing will place additional pressures on greenfield land in and around the edge of the city, but will also provide opportunities to resource the creation, improvement and long term management of Derby's green infrastructure network.*

For the fourth criterion: *In meeting the need for new housing, and other development, there is a challenge to ensure that local distinctiveness is reflected in the quality of new built development and that heritage assets and their settings are protected and enhanced. The need for new housing will also provide opportunities for heritage-led regeneration that brings such assets back into beneficial use.*

Response

While relatively minor points, these seem to be reasonable points that can be included in the text. Recommend that the changes suggested are made.

Comment

Bellway Homes supported our recognition that Derby is not able to meet all of its projected needs within its administrative boundary. However, Gladman Developments Ltd questioned whether neighbouring authorities such as Amber Valley or Erewash should also be accommodating this additional growth, particularly considering the Council's objection to 'reserve sites' in South Derbyshire.

Response

Comments of support noted and welcomed.

The issue relating to the strategy for dealing with housing growth is addressed elsewhere, where similar comments have been made. In any event, the Council did not 'object' to the reserve sites in South Derbyshire. Rather, it indicated that it did not support reserve sites on the edge of the City and if a reserve site was considered necessary, it should be the site identified near Hilton. It also does not constitute a 'duty to cooperate' issue, as the reserve sites were not necessarily intended to be meeting Derby's needs in particular or in isolation.

The second point is not accepted, therefore, and no changes are recommended.

Comment

One member of the public supported the statements made in this section.

Response

Comments noted and welcomed. No change required.

Comment

One member of the public objected to the last paragraph in the Population and Housing Key Issues. They considered that it indicates that supply currently outstrips current demand. In addition, they considered that the number of approved developments which haven't commenced is a further indicator that there is a low

demand for housing.

Response

The existence of vacant dwellings is not a sign that the supply of housing exceeds demand. The number of vacant dwellings in the City is far lower than the objectively assessed needs of the City. The lack of delivery of new housing is also not an indicator of low demand. This is indicative of the economic downturn and the reduced availability of finance to build and buy dwellings. The Government's policy of 'boosting significantly the supply of housing' is a direct response to the pent up demand that exists as a result of the recession. The Council has carried out extensive research to identify its 'objectively assessed needs' (OAN) and this work clearly demonstrates a considerable demand for new housing over the plan period. To suggest otherwise is incorrect.

This point is not accepted, therefore, and no change to the Plan is necessary.

Comment

A Councillor considered that the chapter fails to recognise that there are no good radial routes between Littleover and Chellaston. It was considered that this is significant given the proposed development to the south of the City.

Response

It is considered that this point would generally be addressed by the reference to congestion on major radial routes. It is not considered that a specific reference to a route *between* Chellaston and Littleover would add anything to this. As such, no change is recommended.

Action

- Make amendments suggested by the Environment Agency, English Heritage and National Trust.

3. What will Derby be like by 2028?

Comment

Natural England generally supported the Spatial Vision, particularly the intention that Derby will be more resilient to climate change and that new development will contribute to reducing carbon emissions and energy use.

Natural England generally supported the Spatial Objectives, particularly 7, 8 and 14.

Response

Comments are noted and welcomed. No change required.

Comment

English Heritage welcomed reference in the vision to the historic environment being protected, enhanced and valued in paragraphs 3.13 and 3.14.

Response

Comments are noted and welcomed. No change required.

Comment

English Heritage suggested that paragraph 3.17 is amended to make reference to the protection and enhancement of Kedleston Hall, Radbourne Hall, the Locko Estate and Elvaston Castle Country Park, as well as their 'recognition for their own sake'.

Response

This comment really relates more to a policy requirement, rather than something which would need to form part of the 'Spatial Vision'. *Not* including 'protection' or 'enhancement' in the Vision would have no effect on the Council's intentions or aspirations for the City. No change recommended.

Comment

Both English Heritage and the National Trust welcomed Spatial Objective 10. However, English Heritage considered that the word 'built' should be deleted to reflect all aspects of the local historic environment. Whilst the National Trust considered that it is simpler to refer to "heritage" rather than "built heritage".

Response

The comment is accepted. Removing 'built' will increase the scope of the objective.

It is recommended that reference to 'built' should be removed.

Comment

Derbyshire County Council welcomed the inclusion of Spatial Objective 4 which refers the need to deliver new communications infrastructure to strengthen Derby's economy.

Derbyshire County Council welcomed the inclusion of Spatial Objectives 7, 8 and 9 which, together, seek to develop a network of high quality, safe and accessible Green Infrastructure network.

Derbyshire County Council welcomed and supported the inclusion of Spatial Objective 12.

Response

Comments are noted and welcomed. No change required.

Comment

Derbyshire Wildlife Trust supported the recognition of biodiversity in this section but suggested a number of modifications to both the policy and the supporting text for example, to make the policy NPPF compliant and to recognise the impact of development on both brownfield and greenfield sites. They also asked for greater recognition of the biodiversity contribution the river makes and that the plan should be seeking to improve water quality as part of the Water Framework Directive.

Response

Support for the objectives is noted and welcomed. It is considered that minor amendments can be made to the relevant objectives to satisfy the DWT's concerns.

Comment

The Environment Agency supported the reference to the Our City Our River flood alleviation scheme in Spatial Objective 14 but suggested the following text to bring it in-line with current thinking:

"To enhance the River Derwent corridor as the City's key environmental, cultural and historic asset, creating a more attractive and welcoming riverside area for derby residents and visitors and working in partnership with the Environment Agency to implement the Our City, Our River masterplan to improve overall flood protection to surrounding areas".

Response

Comments are noted. The change to the objective will bring the text up to date, but will not alter its fundamental aims. The change suggested will be included (subject to the inclusion of relevant references to biodiversity and water quality as requested by the DWT).

Comment

Sport England supported the inclusion of Spatial Objectives 9 and 12.

Response

Comments are noted and welcomed. No change required.

Comment

The Planning Design Group, representing JGP Properties Ltd, and Bellway Homes supported our statement in paragraph 3.4 that 12,500 new homes will have to be built throughout the City. While Turley Associated supported the recognition for the need to significantly boost the supply of housing in Derby which, they considered was consistent with the NPPF, paragraph 50.

Response

Comments are noted and welcomed. No change required.

Comment

Bellway Homes supported all of the plan's 17 Spatial Objectives but indicated their strong support for Objective 6 which focussed on the development of balanced communities.

Response

Comments are noted and welcomed. No change required.

Comment

Bellway Homes supported our statement in paragraph 3.19 regarding the provision of new schools or extending existing facilities. They did however, stress that the

Council needs to identify a strategy for providing a school without delaying the much needed delivery of housing in the City in the short-term.

Response

The support for plan is noted and welcomed. It is not considered that the delivery of a secondary school will have an impact on short term housing delivery and that the policies in both Derby and South Derbyshire's plans will enable a new school to be delivered as and when required.

No change required.

Comment

The Planning Design Group, representing Hallam Land Management Ltd generally supported the Spatial Objectives, in particular the need to provide significant numbers of quality homes.

Response

Comments are noted and welcomed. No change required.

Comment

The Planning Design Group, representing JGP Properties Ltd, also supported our recognition of the important role Green Wedges play but stressed that their continuing role needs to be balanced with other needs.

The Planning Design Group, representing JGP Properties Ltd, welcomed the recognition in paragraph 3.12 that some Green Wedges will become narrower to allow some housing to be accommodated. They state however, that this must be supported by sound arguments based on issues such as ecology, urban design, landscape benefit/impact, accessibility, function and recreational benefit.

Response

Comments noted. Policies relating to Green Wedges (and the evidence used to support allocations made in this plan) are considered robust. In defining new Green Wedge boundaries, the Council will have regard to a range of factors, though equally, it must be remembered that their primary function does not relate to ecology, landscape, recreation or access (though they often provide that role indirectly). Rather, their role is to define and enhance the urban structure of the city as a whole, in particular by reinforcing local identity by maintaining areas of open land between neighbourhoods. Therefore, some of these comments are not relevant or valid to the question of Green Wedge review.

Notwithstanding this, it is felt that in relation to the plan's preparation as a whole, the need to balance Green Wedges with other issues has been balanced with other needs. This has resulted in the identification of a number of existing Green Wedges as locations for residential development. As such, those 'wedges' that remain are considered to be of particular importance in maintaining an important policy principle. This will be material in the future.

In any event, no change is required to this part of the document.

Comment

Catesby Property group welcomed the cross-boundary work undertaken by the Council and stated that this was a legal obligation under the Duty to Co-Operate.

Response

The comments are noted and welcomed.

Comment

Sustrans supported the Spatial Objectives and offered further suggestion on how they could be achieved. For example, creating stronger, safer and cohesive communities (point 2) can be facilitated through 20mph traffic areas and traffic calming; the impact of climate change (point 3) can be reduced through a modal shift from cars to public transport, walking and cycling. The respondent also strongly supported points 15 and 17.

Response

Comments are noted and support for the objectives welcomed. It is not appropriate or necessary for the high level objectives to refer to how they will be implemented. This is the role of the policies themselves. Issues relating to 20mph zones and modal shift are addressed in other parts of this report.

No change required.

Comment

Sustrans stated that the development of the Innovation and Technology Park should be based around innovative transport and access options such as video conferencing hubs and maximise permeability for pedestrians.

Response

It is considered that the policies relating to Infinity Park (and indeed, all other strategic allocations) provide sufficient scope for the measures desired. The plan cannot make specific provision for 'video conferencing hubs' as this would be too detailed for this plan and not necessarily related to 'planning'. While it may be an appropriate use for the site, and one which we may wish to encourage, it could not be a *requirement* of any policy. In addition, Policy CP23 makes specific reference to supporting infrastructure, including the use of IT, to support alternatives to the car. In addition, in all cases, the plan requires proposals to be accessible by pedestrians.

No change required.

Comment

Sustrans supported paragraph 3.8.

With regard to paragraph 3.12, Sustrans considered that any development should consider transport connections at an early stage and be designed for pedestrians and cyclists.

Response

Support for paragraph 3.8 is noted and welcomed.

It is considered that the policies of the plan make the requirement for cyclists and pedestrians to be considered in any proposals clear throughout and thus no change is required as a result of this comment.

Comment

One person agreed with the statements made in this section and supported the statements made in paragraphs 3.12 to 3.17 which relate to the Plan's environmental aspirations.

Response

Support is noted and welcomed. No change required.

Comment

A member of the public generally supported the Spatial Vision but considered that the statement contained in paragraph 3.2 may be put at risk by a migration trend which is not driven by the needs of the economy.

Response

Support noted and welcomed. No change required.

Comment

One person noted that the SHMA update contained an economy led projection which is lower than the projection in the Core Strategy. It is assumed that the economy led projection doesn't actually reflect the aspiration in paragraph 3.2 but it might be more acceptable to Derby's residents. They concluded that the level of growth chosen is the one which the Council feels can be defended to the Government.

Response

The housing target is based on the conclusions and recommendations of the SHMA. While this may have illustrated the results of different scenarios, the housing target was based on the considered recommendations of the consultants. It is not felt that the alternative scenarios identified within the SHMA would be appropriate reflections of the HMA's actual needs.

A lower overall HMA housing requirement would not necessarily impact on the level of housing within the City itself. The City target is 12,500 dwellings, which is less than the 'need' of 16,125 identified by the SHMA. As such, some of Derby's 'need' has been 'decanted' to South Derbyshire and Amber Valley. Therefore, even if the HMA figure were lower, this may not have resulted in a lower housing target within the City.

The respondent is correct, however, that the Council must put forward a strategy that meets the requirements of the NPPF and thus can be 'defended' as a robust and 'sound' plan at Examination. As such, it must set out a strategy that fully meets its 'objectively assessed' housing needs and which serves to 'boost significantly' the supply of housing, in a sustainable and deliverable manner. The overall HMA

strategy achieves these aims.

No change required.

Comment

A member of the public questioned the statement made in paragraph 3.12 which will, with regard to Derby's outer suburbs, recognise, protect and enhance their distinctive character. Can this be achieved, especially in relation to Mickleover, with the amount of growth proposed; they highlighted that recent experience puts this into question.

Response

The comments are noted. It is recognised that all development and growth will have some form of impact on existing neighbourhoods in the City. However, policies in the plan are designed to help ensure that new development integrates within existing neighbourhoods as well as possible and/or that impacts can be mitigated. 'Growing' places can still maintain a 'distinctive character'.

Important principles mentioned in this paragraph, such as Green Wedges, are maintained – though they have to be amended in some areas to accommodate the growth that the City needs.

No change required.

Comment

A Councillor stated that the compactness of Derby is something its residents have regularly highlighted through consultation; this view has not been taken into account in the Spatial Vision and as a result Derby is continuing to expand.

Response

As noted elsewhere, the Local Plan must meet its objectively assessed housing needs. Owing to various constraints discussed both in the plan itself, and in supporting evidence, the City cannot meet all of those needs within its boundaries. As such, some of the City's needs must be met elsewhere. It is considered that the most sustainable and deliverable option open to the HMA authorities is sustainable urban extensions to the City. Seeking to meet all of the City's needs within its boundaries in an attempt to maintain an idea of 'compactness' of the City would result in far greater negative impacts than what is being promoted in this plan.

No change recommended.

Action

- Remove 'built' from between 'character' and 'heritage' from Objective 10
- Amend Objective 14 to read:

"To enhance the River Derwent corridor as the City's key environmental, cultural and historic asset, creating a more attractive and welcoming riverside area for Derby residents and visitors, recognising and enhancing the biodiversity value of the River to the City and working in partnership with the

Environment Agency to implement the 'Our City, Our River' programme to improve overall flood protection to surrounding areas".

4. The Strategy for Derby

Comment

The Environment Agency was pleased to see a strategic approach to brownfield redevelopment. They highlighted that the use of brownfield land contributes to the reduction in levels of pollution in ground and surface water.

Response

Support for the strategy is noted and welcomed. No change required.

Comment

The Environment Agency stated that the protection and enhancement of controlled waters via the planning regime is a key consideration. They highlighted that the protection of groundwater resources is key to improving the water environment and protecting water resources in the future. They stressed that this approach is important for the City as some of the brownfield sites identified for redevelopment are located on Secondary Aquifers.

Response

Comment noted. It is felt that this issue is addressed fully within the plan's policies and national guidance. No change to policy required.

Comment

The National Trust noted and supported our comments on the strategy regarding the area to the north west of the City (paragraph 4.25) and reiterated the importance of Kedleston Hall and its surroundings.

Response

Support for the strategy is noted and welcomed. No change required.

Comment

Derbyshire County Council, Nottingham City Council and Erewash Borough Council welcomed the fact that the City Council is meeting its objectively assessed housing and commercial needs over the plan period. The County Council continued in their response by stating that the Strategy continued the long-established principle set out in the former East Midlands Regional Plan.

Response

Support for the strategy is noted and welcomed. No change required.

Comment

Erewash Borough Council acknowledged that the City's allocation of 12,500 dwellings reflects evidence of a finite capacity for the City to meet its own needs within its administrative boundary and that additional growth will be met through

urban extensions.

Response

Comments noted. Erewash's recognition of Derby's constraints is welcomed. No change required.

Comment

Erewash Borough Council welcomed the fact that the existing Green Belt will be maintained. They also highlighted that work has been undertaken to assess the Nottingham/Derby Green Belt. The work has confirmed that the Green Belt on the edge of Derby continues to fulfil its purpose and should not be looked at for release, except as a very last resort.

Response

Support for the strategy is noted and welcomed. No change required.

Comment

Derbyshire Wildlife Trust highlighted that the Spatial Portrait does not include any mention of the biodiversity resource present in the City. To rectify this they requested that Green Infrastructure and Green Wedges should be highlighted in the Spatial Portrait.

Response

The comment is noted. However, it is felt that the Spatial Portrait and Spatial Vision and Objectives for the City do contain a number of references to green infrastructure, environmental assets and green wedges. The policies of the plan also give a high priority to these issues.

As such, it is not considered that additional text is required at this stage.

Comment

The Inland Waterway Association considered that the Lowes Farm site should be changed from a reserve site to a preferred growth site as they considered, along with the Derby and Sandiacre Canal Trust, its development would help finance the restoration of the canal as the land is owned by the Trust.

Response

The Lowes Farm site is located within South Derbyshire and thus any decision on allocation rests with them. However, it should be noted that the City Council does not support the identification of 'reserve sites' with South Derbyshire's Local Plan, nor does it think that Lowes Farm is an appropriate development site at this time.

Note that since consultation on Derby's Draft Plan, South Derbyshire District Council have published their 'Publication' Plan which removed references to 'reserve sites' and did not seek to include Lowes Farm as an allocation.

No change required

Comment

CPRE Derbyshire appreciated the need to plan for growth but stated that they would not “*want to see firm starts or permissions on all proposed sites as the requirements could change over the years*”. In addition, it was considered that greenfield sites should only be committed until there was a proven rather than perceived need.

Response

It is considered that there is a ‘proven’ need for residential development within the City. A considerable amount of robust evidence has been produced which clearly demonstrates this to be the case. In terms of greenfield development, the NPPF clearly states that we must meet our ‘objectively assessed housing needs’ and ensure that there is a ‘5 year supply’ of deliverable housing sites. While the Council will continue to give priority to brownfield regeneration, it would be unrealistic to assume that there are sufficient sites to be deliverable or viable to meet our objectively assessed needs or provide a 5 year supply. As such, greenfield development has to be committed to cover long term needs.

No change recommended.

Comment

The Theatres Trust were disappointed that Derby’s theatres were not mentioned in paragraphs 4.33 and 4.34. They highlighted that theatres are a vital part of the community and a beacon for the evening economy and should be supported.

Response

The point is taken. However, those paragraphs deal more with the strategy for delivering new venues, rather than reflecting on existing facilities. In response to comments made elsewhere, specific reference has now been added to the ‘Tourism and Culture’ policy to specifically highlight the importance of ‘theatres’ to the City and the Council’s support for new facilities should they come forward.

No change required.

Comment

David Locke Associates, commenting on behalf of Rolls-Royce, supported that opportunities presented in the plan to create quality environments and quality housing which are key to ensuring that Derby’s competitive economy is maintained.

Response

Support for the strategy is noted and welcomed. No change required.

Comment

With regard to paragraphs 4.4 and 4.5, Turley Associated supported the identification of Brook Farm as a strategic site.

Response

Support for the strategy is noted and welcomed. It should be noted that since the

publication of the Draft Plan, a planning application for this site has been refused. However, it is considered that the issues of concern were not in terms of the principle of development on the site, but on the specific details of the application. As such, it is considered that the site can remain in the plan and that the draft policy is able to address the concerns.

An appeal has been lodged relating to this application which, at time of writing, has not been determined.

No change required.

Comment

Bellway Homes strongly supported the plan's strategy for delivering 12,500 new homes over the plan period. They also supported the allocation of Boulton and Chellaston as strategic locations suitable for growth. Finally, they stated their support for the creation of sustainable urban extensions which they stated was in accordance with the NPPF.

Response

Support for the strategy is noted and welcomed. No change required.

Comment

Nathaniel Lichfield & Partners agreed with the statements made in paragraphs 4.23 and 4.25 and supported the strategy of creating sustainable urban extensions to the south and west of the City.

Response

Support for the strategy is noted and welcomed. No change required.

Comment

Planning Design Group, representing Hallam Land Management Ltd supported the inclusion of Sinfin as a strategic location for growth.

Response

Support for the strategy is noted and welcomed. No change required.

Comment

The Planning Design Group, representing Hallam Land Management Ltd welcomed the recognition to develop cross boundary sites to help meet the needs of the City and the identification of Wragley Way.

Response

Support for the strategy is noted and welcomed. No change required.

Comment

The Planning Design Group, representing JGP Properties Ltd, supported the identification of Oakwood as a strategic location for growth.

Response

Support for the strategy is noted and welcomed. No change required.

Comment

The Planning Design Group, representing JGP Properties Ltd, objected as they considered that there are insufficient numbers to achieve a 15 year broad housing land supply. They also state that this situation is exacerbated by not making the best of obvious development sites in the City, such as at Oakwood.

Response

This comment is not accepted. The plan sets out a clear and robust strategy for meeting the target of 12,500 dwellings over the lifetime of the Plan. This includes the identification of strategic housing sites in the Part 1 Plan, but also recognises that there will be a need for further allocations in Part 2 and delivery through windfalls. The Council is confident that there are sufficient opportunities outside of the 'strategic' sites to address the housing need.

Specific issues relating to the site referred to are picked up in more detail elsewhere in this document. However, in coming to a robust strategy, there has had to be a balance between delivery and other policy objectives. Maintaining the principle of Green Wedges is a key objective of the Plan. The release of sites within the current Green Wedge has only been considered where it is felt that a functioning green wedge would still remain in place, or where the land in question did not already perform a 'green wedge' function. This was done in the context of the 'Green Wedge Study' which considered all green wedge and the potential for release.

It was considered that the proposals suggested for the site in Oakwood, would result in a situation where a functional green wedge would no longer exist. This impact was, as a result, considered unacceptable. It is, however, considered that the allocation in the draft plan represents a sensible compromise, which allows development to go ahead while maintaining the green wedge function in this area.

No change required.

Comment

Oxalis Planning, representing Bloor Homes, supported the strategy. They also considered that the combination of brownfield and greenfield sites strikes an appropriate balance to meet the needs of the City.

Response

Support for the strategy is noted and welcomed. No change required.

Comment

The Derby Cycling Group stated their general support on the Plan's emphasis on moderate development within the City and the maintenance of Derby's Green Wedges. They also considered that the desire to keep Derby a compact city would provide the greatest potential for the growth in cycling as everyday transport.

Response

Support for the strategy is noted and welcomed. No change required.

Comment

Sustrans supported the Transport section. However, they considered that the statement in paragraph 4.37 (*...priority will be given to reducing demand for travel, promoting 'active travel' and making efficiency improvements to the existing network...*) does not seem to be borne out in through the rest of the plan.

Response

This comment is not accepted. Reference to promoting alternative modes of travel to the car and investing in infrastructure are made throughout the document. It may be that the respondent is making assumptions about the implementation of policies and sites prematurely. However, it is considered that the plan's approach to sustainable travel is robust.

No change recommended.

Comment

A Councillor considered that the South Derby Integrated Transport Link will not solve the problem of poor radial links into the City from the Stenson Fields area.

Response

Comment noted. The South Derby Integrated Transport Link will provide additional capacity and choice on the network and will help to mitigate some of the impact resulting from growth. However, it is recognised that the link will not mitigate 100% of the impact, neither will it completely solve existing issues in the City (nor is that its purpose).

The Council will continue to consider ways in which the transport network in the City can be made more efficient outside the Local Plan process. However, it is accepted that there will be negative impacts associated with this level of growth, but that they are broadly acceptable in the context of the level of growth required. The strategy promoted is considered to be the most efficient and most sustainable option available.

No change recommended.

Comment

A Councillor supported the main thread of paragraphs 4.35 to 4.37 but considered that there is not enough emphasis on active travel and public transport. It was considered that, based on experience, good reliable public transport will be well used.

Response

Support for the 'thread' of the above paragraphs is welcomed. It is not, however, accepted that there is not enough emphasis on active travel and public transport within the document. The promotion of sustainable patterns of development that will facilitate such modes, plus specific policies and planning obligation requirements run throughout the plan.

The Council will continue to consider ways in which the transport network in the City can be made more efficient outside the Local Plan process. This type of activity continues long after the plan is adopted. The Plan does, however, provide sufficient scope for proposals to be implemented and give a strong steer as to the Council's intentions.

No change recommended.

Comment

A member of the public stated that the provision of 12,500 dwellings should be the absolute maximum and even this number would have some detrimental effects on the City.

Response

It is recognised that there may be some negative impacts as a result of the growth required in the City (although there will also be a number of positive impacts as well). The plan will do as much as it can, however, to mitigate these impacts, or locate development in areas where the impacts are smaller.

It is not appropriate for the plan to stipulate that the figure of 12,500 is a maximum – particularly where the City is already decanting some of its objectively assessed needs to other locations. The NPPF requires local authorities to meet their objectively assessed needs, but also to “boost significantly the supply of housing”. In circumstances where the target of 12,500 had been met, but residential development was proposed on an appropriate ‘windfall’ site, there would be no reason for the Council to refuse it.

No change required.

Comment

A member of the public considered that most people recognise that there is a need for more homes. People also recognise that more homes will mean more traffic – and this is an area where Derby needs to do better. Traffic growth and pressure on community services like schools and doctors, are the biggest concerns that people have about housing development in general.

Response

The comments are noted and it is accepted that the growth required will lead to increased pressure on infrastructure. The Plan contains policies which are designed to try to mitigate this pressure by requiring developers to provide facilities, or improvements, through planning obligations. In many cases, this will not be viable and so the Council and its partners will continue to identify funding mechanisms and opportunities to bring forward new infrastructure and new facilities.

It also has to be recognised, that while the economy is improving, viability and deliverability are still issues that will be material to this.

What is important is that the Plan sets out what the Council feels it needs to support

new development and provides a mechanism to try to achieve these aims. This will not necessarily lead to a situation where all impacts are mitigated, but should alleviate some of the concerns raised over the long term.

No change required.

Comment

Four residents supported the strategy of focussing growth to the south of the City as it makes sense to place new housing near major planned employment. Also they agree with our statement that: “cross boundary development that delivers growth alongside the appropriate infrastructure to create vibrant new and extended communities”.

Response

Support for the strategy is noted and welcomed. No change required.

Comment

Three people considered that the strategy of urban extensions to the south of the City was flawed. One individual considered that they were ‘parasitic’ which would burden existing communities. Two considered that there are not the employment opportunities available to cater for the rise in population. They also considered that South Derbyshire could accommodate the housing elsewhere in their administrative area rather than focussing on the City’s boundary.

Response

It is accepted that urban extensions have the potential to put pressure on Derby’s services and infrastructure. However, much of the development proposed is designed to meet the needs of the City and thus it makes sense for those dwellings to be located in areas well related to the City itself. This is a more sustainable option in terms of access to jobs, for example.

In more general terms, it is often more sustainable to locate new housing in close proximity to the City as it is the main area of employment in the housing market area. Derby is also the main retail and leisure location (for example) within the HMA and thus is a significant attractor of visitors from outside the City already. Promoting residential development on the edge of the City, therefore increases opportunities for people to make journeys they would make anyway either by alternative modes of travel to the car, or reduce journey lengths. This has inherent wider benefits.

In terms of job creation, there is a considerable amount of land identified for new job growth in the City. Some of this, such as Infinity Park, is well related to large proposed housing sites (for example, Wragley Way).

Comment

One person attending a drop-in raised concerns about the impact of the urban extensions and questioned whether the Council Tax would be paid to South Derbyshire District Council given that the residents would be using the City’s facilities.

Response

The issue of Council Tax is not a planning matter. No change required.

Comment

One person considered that the plans aspiration to 'reduce the need for travel and to encourage necessary travel to be by sustainable modes of transport' is a hollow statement.

Response

See comments above. Again, this comment may relate more to assumptions about how policies will be implemented more than the merit of the policy itself.

It is unrealistic for any plan to ignore the needs of car users or assume that people will not use their cars in the future. The plan does, however, make it clear that promoting alternatives to the car, promoting cycling and walking and public transport are key objectives. Policies relating to individual sites and those relating to planning obligations all make it clear that sustainable transport are priorities.

No change required.

Comment

Three people considered that our strategy of providing more houses and roads would result in more congestion and more pollution.

Response

It is accepted that the growth required in the City is likely to have impacts on traffic and congestion. However, as referred to throughout, the Council is required to "meet its objectively assessed housing need" and we feel we have tried to achieve this requirement in the best way possible to minimise the impact. However, some impact is inevitable.

No change required.

Comment

One person highlighted that the document is centred around the continuing growth of the City and this will have an environmental impact.

Response

See above.

Comment

One person considered that more attempts should be made to improve Derby's cultural offer rather than continuing to cater for the more 'low-brow' members of society.

Response

The Plan's policies allow for the full range of 'cultural' developments to come forward. Policies relating to the City Centre and Culture all point to a need to diversify the City's cultural offer, though it is not clear what is meant when the

respondent talks about “low brow members of society”. In any event, this point is not accepted.

No change required.

Comment

One person considered that we should think about addressing existing problems in the City rather than ‘gazing too far into the future’.

Response

The Council is required to prepare a plan that looks at how growth is going to be delivered in the future. This does not preclude dealing with existing issues (indeed, a number of proposals within the Plan and the IDP are designed to do just that). It could also be argued that as the plan deals with meeting short and long term housing and employment needs, it *is* addressing existing problems.

No change required.

Comment

Ten respondents demanded that all brownfield sites in the City are developed before greenfield sites are developed.

Response

Delivering brownfield regeneration continues to be a priority. However, the Council is also required to have a 5 year supply of ‘deliverable’ housing land. It is not currently realistic to assume that the level of ‘deliverable’ brownfield land in City is capable of meeting this requirement. As such, it is not appropriate for the plan to include a phasing policy that would achieve the respondent’s request.

In effect, this would leave the Council without a 5 year supply which would only mean that it would be easier for developers to get planning permission on greenfield sites. By having a plan in place, the Council can have more control over what greenfield land is released and try to ensure that it is delivered in an appropriate and sustainable manner.

No change required.

Comment

Three people suggested building on Friar Gate Goods Yard as an alternative to building in Micklegate.

Response

The housing target of 12,500 already assumes that development at Friar Gate Goods Yard will be going ahead. As such, it would not constitute an alternative to developing in Micklegate or elsewhere in the City.

This is indicative of the scale of ‘need’ identified for the City.

No change required.

Comment

One person objected to the building on greenfield sites in South Derbyshire while brownfield sites are left unused or undeveloped in the City. While seven people considered that the development of brownfield sites should be a priority.

Response

See comments above. There is insufficient deliverable or developable brownfield land in the City to meet all of the needs identified. As such, greenfield release is a necessity. The Council feels that it has identified as much brownfield land as possible and will continue to see its regeneration as a priority.

No change required.

Comment

The loss of agricultural land was also a concern for a number of objectors. It was highlighted that agricultural land will be needed in the future to meet the demands of a growing population.

Response

See above. While it is accepted that agricultural land is an important resource, the level of housing need required demands that some release is necessary. As with all planning matters, there is a balance to be considered and while there are some negative impacts associated with development, meeting housing needs is a key national objective. This has to be given considerable weight.

No change required.

Comment

A member of the public strongly supported the retention of the Green Belt.

Response

Comment noted and support welcomed.

Comment

A member of the public supported the statement in paragraph 4.33 that there will be no additional out-of-centre retail development.

Response

Paragraph 4.33 does not specifically state that there will be 'no' out-of-centre retail development. National policy and the Council's evidence base on such matters would not permit a complete moratorium on such development. However, focussing retail development into centres will be the Council's priorities. The respondent's support for this principle is welcomed, however.

No change required.

Comment

A member of the public supported paragraphs 4.36 and 4.37.

Response

Support noted and welcomed.

Comment

A Councillor supported the assertions made in paragraphs 4.11 to 4.13. It was felt that energy efficiency, renewable energy generation and active travel needs to be given high priority.

Response

It is considered that these issues are given high priority. However, as noted below, issues of deliverability and viability also have to be given weight. This is likely to lead to a change in policy to allow greater flexibility.

Comment

A member of the public was concerned that the Plan will be implemented to the detriment of existing communities.

Response

See above. There are likely to be impacts as a result of growth. However, the Council has a responsibility to meet the needs of future residents as well as existing communities. Policies in the plan will continue, however, to try to keep impacts to a minimum while meeting the Council's obligations in terms of meeting housing and employment needs.

No change required.

Comment

An agent acting on behalf of Celanese Acetate Ltd submitted representations supporting the Spatial Objectives 5 and 6. They also supported the Council's recognition that the site is a priority for regeneration.

Response

Support noted and welcomed.

Comment

Nathaniel Lichfield & Partners asserted that they had previously made comments to South Derbyshire District Council regarding Newhouse Farm. Through our consultation, they reiterated their comments by stating that Newhouse Farm should be identified as a Strategic site rather than a reserve site and that Derby City Council should support the allocation. They also requested that the Council should set out their reasons for not supporting Newhouse Farm.

Gladman Developments Ltd considered that the Council's resolution to 'object' to South Derbyshire's Strategic Reserve Sites called into question as to whether there is co-operation between the two Councils.

Ten respondents, including the Mickleover Neighbourhood Board, supported our stance with regard to not supporting South Derbyshire's reserve site at Newhouse

Farm.

Response

The allocation of the Newhouse Farm site is a matter for South Derbyshire District Council to consider; though the City Council made it clear that it did not support either the identification of reserve sites and has concerns over the specific implications of this site. No evidence submitted has altered this view.

It should be noted that, since publication of the Draft Plan, South Derbyshire have published their 'Publication Plan' which does not include the reserve sites, nor does it include Newhouse Farm as a preferred site.

The City Council's view on the reserve sites does not call into the question the Duty to Cooperate (DtC) in any way. It is not a 'duty to agree'. Furthermore, key issue (i.e. the meeting of the HMA's objectively assessed housing need) has been addressed in the full agreement of the three HMA authorities. This clearly meets the DtC requirements. As such, this comment is not considered valid.

The support for the Council's position on the site is noted and welcomed.

Comment

A member of the public considered that the key priorities for development highlighted in the old PPG13 still hold good. Integration of land uses to minimise the need for travel should remain a priority. At present Derby has mixed results in doing this. The green wedge policy has successfully provided open space access close to many people's homes, but the distribution of housing and employment sites is tending to polarise the city, adding to transport demand.

Response

The broad principles of PPG13 are still held within the NPPF and have been carried through to the draft Local Plan. Growth will lead to additional demand for travel but it is hoped that it will either be located in areas with good access to facilities/public transport, or in areas where facilities can be provided and improved access created. Policies are in place to address this.

Part of the above comment probably relates more to the implementation of the policy rather than the merits of the policy itself, which it is assumed the respondent agrees with.

No change required.

Comment

Conversion of non-residential land and buildings over recent years, such as the redevelopment of the Mackworth College site, has reduced integration in recent years. More mixed sites should be created, like that at Manor Kingsway. It appears that the business interest in new sites often follows the residential development, and the city needs to keep its nerve and not reallocate business land for residential, as it did at Rykneld Road.

Response

The reallocation of Rykneld Road for residential was based on considerable robust evidence that the site was not suitable for commercial use and that other commercial sites were more likely to come forward in the medium to long term. There was also a need to identify sites to meet long term housing needs and it was felt that it would be more beneficial to alter the allocation. This was considered by an Inspector at the CDLPR Public Inquiry and accepted.

Attempts have been made in the past to try and provide an element of commercial development within or adjacent to large housing sites. So far, this has had limited success. However, the allocations for both Rykneld Road and Manor Kingsway still maintain this 'vision' in the draft plan.

Furthermore, Derby is a relatively compact city with a reasonable spread of accessible employment opportunities. As such, even without 'mixed use' development on sites themselves, development in some locations will add to the existing mix and opportunities available. Development of new residential development in the City Centre would be a good example of this.

Action

- No changes to section based on above comments.

CP1: Presumption in Favour of Sustainable Development and Cross Boundary Growth

Comment

The Highways Agency welcomed the Council's adherence to the NPPF which is reflected by ambitious growth targets and a willingness to engage with neighbouring authorities.

Response

The comments are welcomed and noted.

Comment

Derbyshire County Council expressed their support for the policy, particularly criteria (a), (d1) and (d7) which sets out the Council's commitment to work with applicants, adjoining authorities, statutory partners and service providers.

Derbyshire County Council did however consider that the policy could be strengthened by clarifying the role of the Community Infrastructure Levy (CIL) by including in the supporting text what the Council will seek to deliver through CIL and what will be delivered through Section 106 Planning Obligations.

Response

Support noted and welcomed. It is considered that criterion 7 provides sufficient guidance and flexibility on this matter. At time of writing, none of the authorities in the HMA have committed to carrying out CIL and thus a specific reference may be

misleading.

No change required.

Comment

Erewash Borough Council supported the Council's intention to create vibrant new and extended communities.

Response

Support noted and welcomed.

Comment

English Heritage noted that some of the cross-boundary sites included in the policy may impact on the historic environment, for example designated heritage assets and their setting. They suggested that, under criterion (d4), reference should be made to the need to protect and enhance heritage assets and their setting.

Response

It is considered that this issue is adequately addressed by other policies in the Plan and that d(4) adequately addresses the issue. No change required.

Comment

Derbyshire Wildlife Trust recommended that the policy should respect the ecological framework in neighbouring local authorities and ensure that the principles of halting biodiversity loss are respected in cross-boundary developments. They suggested that an additional criterion is added.

Response

Comments noted. It is accepted that this is an important point which is missing from this policy. While the issues addressed by it would be picked up elsewhere in the plan, it may be appropriate to add a 'hook' in this policy relating to biodiversity and 'green infrastructure' to highlight their importance. This could go alongside the 'water management' issue.

Comment

The Planning Design Group, representing both Hallam Land Management Ltd and Miller Homes and Bellway Homes stated their support for the policy. The Planning Design Group, representing Hallam Land Management Ltd, The Pegasus Group, representing Miller Homes and Bellway Homes stated their support for criterion (a) which confirms that the Council will work with applicants, adjoining authorities, statutory partners and service providers. However, the Pegasus Group requested that criterion (d) is deleted as they consider that it is covered by policies elsewhere in the document.

Response

Support noted and welcomed.

The guidance highlighted under criterion (d) is important in the context of there being considerable cross boundary development within the Plan that is crucial to the

delivery of the Council's housing needs. While this guidance may be reflected in other policies, it is only here where it is highlighted in the context of cross boundary development. There should, therefore, be included for the avoidance of any doubt and to ensure continued cross boundary support and collaboration.

It is felt, however, that this element of the policy would sit better on its own rather than as part of a combined policy with elements a-c. As such, it is proposed to split the two policies up to create CP1a and CP1b (this numbering will be temporary to ensure consistency for consultation purposes).

Comment

A member of the public supported the commitment to sustainable development.

Response

Support noted and welcomed.

Comment

One member of the public agreed with the statement made in paragraph 5.3.7 that development around the edge of Derby must be considered in a comprehensive and holistic manner.

Response

Support noted and welcomed.

Action

- Split policy into two constituent parts relating to 'Sustainable Development' and 'Cross Boundary Development' for clarity.
- Add 'green infrastructure and biodiversity' to criterion 3.

Policy CP2: Responding to Climate Change

Comment

The National Trust generally welcomed the content of the policy but objected to certain aspects, particularly criterion (i) and suggested alternative wording. In addition, they consider that there should be specific reference to the impacts upon heritage resources and in particular non-built heritage and the policy should reflect the NPPF, paragraphs 133 and 134.

The National Trust considered that the supporting text should include detailed advice on renewable technologies appropriate in the City.

Response

Comments on criterion (i) are accepted and it is recommended that the policy be amended slightly to refer to 'public' benefits and to refer to the natural, built and historic environments as requested.

This policy is a strategic policy which covers a range of issues in terms of responding

to mitigating for and adapting to the effects of climate change. Other policies of the Plan cover heritage matters. The Plan should be read as a whole and it is felt that the matters are covered.

It is not felt that a strategic policy should contain detailed policies on types of renewable technologies appropriate. The evidence base contains relevant information and the policy states that the Council will produce a Design SPD which covers sustainable design and construction guidance including this type of issue.

Comment

Natural England welcomed the inclusion of this policy and noted that the policy recognises the role of Green Infrastructure and increasing biodiversity.

Natural England supported the promotion of alternative forms of transport.

Response

The support is welcomed

Comment

The Environment Agency requested a change to the supporting text to refer to Sustainable Drainage Systems (SuDS) best practice documents.

Response

This is accepted. It is recommended that the supporting text be amended to refer to the best practice documents.

Comment

The Environment Agency requested inclusion of the need to 'protect water resources' in policy.

Response

This point is accepted. It is recommended that a reference to the protection of resources' be included in the policy.

Comment

The Environment Agency welcomed the expectation set out in criterion (h) that all new residential dwellings will achieve a minimum of Code Level 4 for Sustainable Homes by 2016. They stressed however that this is voluntary for privately built housing. They continued by requesting that the plan goes further than the Building Regulations and suggested that the following text is included "*any new homes built before 2016 should achieve the water efficiency component of Level 4 of the Code for Sustainable Homes (as a minimum)*". For non-residential buildings, the Environment Agency recommended that developers demonstrate that they have considered water efficiency and conservation in the design and maintenance of the buildings.

Response

In considering all representations as a whole, taking account of the NPPF's guidance on plans being 'deliverable' and recent evidence prepared looking at plan-wide

viability, it has been decided that it would be inappropriate to require developers to go beyond building regulations.

Therefore, it is recommended that the policy be amended to encourage developers to achieve the best sustainable design possible, rather than impose targets that may not always be viable. This will remove specific reference to meeting 'Code Level 4'.

The policy will, however, include reference to the EU Water Framework Directive and the Water Hierarchy.

Comment

With regard to criterion (e), the Environment Agency sought clarification over the term 'water hierarchy' and suggested a diagram; similar to the Energy Hierarchy is included.

Response

Similarly to the Energy Hierarchy which is referenced in the policy, the Water Hierarchy seeks a hierarchical approach to water use and management. It is accepted that a 'water framework diagram' would help in the interpretation of the policy.

Comment

The Environment Agency requested that the following text is added to the end of criterion (p): "*Appropriate levels of treatment shall be provided to protect the receiving water environment from pollution and preference will be given to above ground techniques that also deliver amenity and biodiversity benefits*".

The Environment Agency also requested that paragraph 5.2.22 is amended to refer to the best practice documents.

Response

Changes have been made to this policy in response to the EA's comments but the policy is an overarching strategic policy on climate change. It is felt that the current sections on flooding and drainage and a new criterion which has been included at the request of the EA about meeting Water Framework Directive objectives is sufficient to make the policy robust.

Comment

The Environment Agency considered that the Core Strategy can complement the emerging Derby and Derbyshire Waste Plan by promoting the waste hierarchy by ensuring that sustainable waste management is a key consideration for all types of development. They requested that sustainable waste management is integrated with Policy CP2 and suggested additional wording to achieve this.

Response

It is felt that waste management is more relevant to the Waste Plan and is therefore not included.

Comment

The Environment Agency noted that Policy E13: Contaminated Land of the CDLPR is to be retained and reviewed for the Part 2 Local Plan. They consider that there is still merit in including a strategic approach to brownfield development and suggest that the following is inserted into CP2:

The Council will:

- *Prioritise the use of brownfield land for development*
- *Require the submission of appropriate investigations, including necessary remediation measures, where development is proposed on land that is known or suspected to be contaminated from previous uses*

Response

These matters are not really specific to the strategic policy to respond to Climate Change. The Strategy is based on prioritising brownfield development as one of its main objectives.

Comment

Derbyshire Wildlife Trust welcomed and supported the recognition of biodiversity and the natural environment in the policy. They suggested that criteria (o) and (p) include the roles that both Our City Our River and Sustainable Urban Drainage Systems (SuDS) play in providing biodiversity enhancements. Derbyshire Wildlife Trust also highlight that the policy does not mention the de-culverting of watercourses.

English Heritage noted the content of this policy but was concerned that it didn't reflect the NPPF (paragraphs 132, 133 and 134). They suggested that criterion (i) should be amended to state '*encourage the use of renewable forms of energy provided that adverse impact on the natural, built or historic environment are avoided, or the public benefits of implementing the renewable energy outweigh and adverse impacts*'.

Response

The strategic policy now has a criterion about the EU Water Framework Directive which includes de-culverting of watercourses. There is reference to OCOR and a separate policy in the Plan and SuDs are also included in the strategic policy.

In terms of the English Heritage comment, the policy has been amended to try to better reflect the points which they have raised.

Comment

Safer Derbyshire stated that the carbon costs related to crime could be included in this policy.

Response

The point is noted but the aim of the policy is to mitigate for and adapt to Climate Change. Crime related issues are possible implications of Climate Change but are difficult to identify/quantify and are not the reason for the policy. If the policy helps to

reduce crime in the process the benefits will be welcomed but it is not considered relevant enough for inclusion in a strategic policy.

Comment

Indigo (representing Sainsbury's Supermarkets Ltd) considered that criterion (h) is not sufficiently flexible to respond to potential constraints and does not correspond to the 'zero carbon' element of the policy. They suggest that the criterion is re-worded to read "*...all new commercial properties will be expected to meet as a minimum BREEAM Good Standard by 2016 and Very Good Standard by 2019, subject to viability and technical feasibility*".

Response

This area of policy has been amended to reflect the NPPF and several similar representations made. It is considered that the new wording is more flexible while seeking that developers do as much as possible to achieve zero carbon development.

Comment

Both the Home Builders Federation and Boyer Planning requested that the policy should be reviewed in light of a Written Ministerial Statement on changes to requirements under Part L of the Building Regulations (conservation of fuel and power) issued on 30th July 2013, the DCLG two consultations on "*Housing Standards Review*" and "*Next Steps to Zero Carbon Homes – Allowable Solutions*" and the Government's criticism of locally imposed standards. Notwithstanding this Boyer Planning considered that there was a contradiction in criterion (h) as it requires new dwellings to be both Code Level 4 and 'zero carbon' (Code Level 6) by 2016. They also highlighted a similar contradiction in the requirements for commercial buildings.

The Pegasus Group, representing Miller Homes, stated that the policy goes beyond building performance required in Building Regulations. They stated therefore that, unless evidence is provided, criteria (h) and (k) should be deleted.

Response

The reference to the various documents and the various points made are noted and the policy has been amended to make it more flexible for developers to deliver new developments while seeking the best forms of sustainable design and construction.

Comment

Although Bellway Homes welcomed the Council's support for tackling climate change they considered parts of the policy to be unsound. In their response they cited the NPPF, paragraph 96, which states that any local requirement for a building's sustainability should be consistent with the Government's zero carbon buildings policy. They continued by highlighting that the recent Housing Standards Review has signalled that the government intends to "wind down the Code for Sustainable Homes with a view to fully integrate relevant sustainability standards into future Building Regulations".

Response

The response is noted and the policy has been amended accordingly.

Comment

The Planning Design Group, representing Hallam Land Management Ltd supported the policy and highlighted that Wragley Way meets the requirements of criteria (a) and (b).

Response

The support is welcomed.

Comment

The Derby Cycling Group welcomed the statement in criterion (b) but stated that it doesn't define how reducing the reliance on travel by private car will be realised.

Response

When read as a whole, the policy and Plan seek to achieve the most sustainable forms of development including the location of new development. The criterion mentions encouraging alternative means of travel to the car.

Comment

Although Sustrans supported the policy, especially criterion (b), they provided comments on the supporting text. With regard to paragraph 5.2.5, they considered that it was unclear what long-term measures are in place to continue the work undertaken by the Connected initiative.

Response

It is considered that these issues are covered in the transport section of the Plan. The CP2 policy is a strategic policy which seeks to mitigate for and adapt to the causes and effects of climate change.

Comment

With regard to paragraph 5.2.15, Sustrans stated that an important part of sustainable design and construction is to ensure that the site is accessible by sustainable transport links.

Response

The Plan and policy should be read as a whole and this principle is embedded elsewhere.

Comment

Friends of the Earth highlighted that most of the street drains in Pear Tree, Osmaston, Normanton and St Lukes are blocked when the Derwent's tributaries flood which poses a risk to the local population and puts a strain on the emergency services.

Response

This is not really a matter for the Local Plan. Sewer maintenance is the responsibility of the relevant water company. However a new criterion has been included into the policy to seek to meet the objectives of the Water Framework Directive which deals with unblocking and de-culverting watercourses.

Comment

A member of the public supported the policy.

Response

The support is welcomed.

Comment

In response to paragraph 5.2.5, a member of the public considered that the Council had no proposals or ideas to encourage car sharing.

Response

This is a strategic Plan/Policy. Criterion (b) explains that the Council will respond to Climate Change by encouraging people to car share. The encouragement is therefore explicit in the document itself.

Comment

A member of the public objected to this policy replacing the current local plan policy GD3. It was considered that the way the policy was written clearly indicated that criterion (a) to (k) outweighed the criterion relating to flooding (l) to (p); this was considered to be unacceptable.

Response

The comment is noted but the Plan should be read as a whole and all of the criteria in policy CP2 are relevant. There is no weighting attributed to policies.

Comment

A member of the public suggested that the policy was biased against the car and this should be changed as the car plays an important role in people's lives.

Response

The focus of this policy is to respond to climate change and in that context it seeks to minimise car travel and promote sustainable travel. However the Plan as a whole recognises the importance of all forms of travel in the range of transport modes and this particularly covered in policy CP23.

Action

- Amend policy and supporting text relating to Code for Sustainable Homes and BREEAM targets. Policy amended to remove targets but promote best practice.
- Add criterion and supporting text relating to 'water framework directive'
- Add reference to the protection of water resources.
- Amend text relating to renewable energy, including reference to considering

the impact on the built or historic environment.

Policy CP3: Placemaking Principles

Comment

Natural England welcomed the positive approach this policy takes, particularly criterion (g).

Response

Comments are noted and welcomed.

Comment

English Heritage welcomed the contents of the policy, specifically criteria (b), (f), (g) and (i). However, Derbyshire Wildlife Trust requested that criterion (g) could be expanded to include the 'avoidance, mitigation and as a last resort' compensation principles.

Response

CP3 includes broad-brush principles on 'placemaking' and design. The additional wording suggested by DWT is too detailed for this policy. The principles being suggested are also already covered as part of Policy CP19, relating to biodiversity.

No change recommended.

Comment

English Heritage requested that reference to the 'Tall Buildings Strategy' is made and suggested that the Council consider adopting it as a Supplementary Planning Document. The National Trust also generally support the policy but thought that more work is required to consider the impact of tall structures on the City and its skyline. They suggest that we should set out our approach to tall structures and indicate where further guidance can be found.

Response

Proposals for tall buildings are most likely to come forward in the city centre. Therefore the issue is addressed in the City Centre chapter of the Core Strategy. Policy AC5 as currently drafted acknowledges that the Council will support the construction of tall buildings in appropriate gateway locations. The Council agree that this statement needs to be clarified and therefore additional text will be added to the Policy to qualify that support will only be given where the design is of a high quality and where proposals would not adversely affect the setting of heritage assets and the character of the city centre. Some minor amendments to the supporting text are suggested, therefore.

The Tall Buildings Strategy will be used to inform the production of a design guidance document which will provide further guidance to supplement Policy CP3 and AC5.

Comment

Sustrans supported criteria (f) and (h) but considered that cycle parking should be included as a priority.

Response

Agreed. Reference to cycle parking will be added to the Policy.

Comment

Derbyshire Wildlife Trust requested that an addition criteria is included to meet that ANGSt (Accessible Natural Greenspace Standards) are met. With regard to the supporting text, Derbyshire Wildlife Trust supported the use of pre-application discussions and the production of a Sustainable Urban Design Guide; finally they suggest that there is a link between Table 1, point (g) to the design of spaces within a well-designed development.

Response

Standards for public green space are included in Policy CP17 but will be considered in more detail in Part 2 of the plan. CP3 only includes broad-brush principles. The additional criterion, suggested by DWT, is too detailed for this policy and is addressed elsewhere in the plan.

As a result of other comments made on the Draft Plan (see below), it is recommended that reference to 'Building for Life 12' is to be removed from the policy wording of CP3. Therefore Table 1 will also be removed, negating the need for the suggested amendment.

Comment

Sport England broadly welcomed the inclusion of this policy but requested that reference to the principles within Sport England's Active Design Guidance is considered.

Response

Agreed. Sport England's 'Active Design Guide' to be added to the supporting text as an example of best practice guidance.

Comment

Derbyshire County Council welcomed and supported this policy but stated that the key issue is to ensure that development can, and does, deliver high quality design along with the appropriate landscape mitigation.

Response

Landscape mitigation will be vitally important to ensure that development sites are developed in such a way to ensure that they integrate into their surroundings. This is particularly relevant where a site abuts open countryside around the edge of the city and within Green Wedges.

Consideration of the urban rural interface is already a key component of criterion (g) within Policy CP3. If a site failed to provide appropriate landscape mitigation it would

fail to appropriately respond to the criteria and could be resisted.

Comment

WYG Group, acting on behalf of Celanese Acetate Ltd, stated that the policy sets out a robust framework for developers to deliver high quality schemes but questioned why the reasoned justification refers to the Building for Life principles. They consider that any requirements should be realistic and not place an undue burden on developments.

Gladman Developments Ltd also raised concerns that the requirements set out in the policy will be over-burdensome and acts as a barrier to the delivery of housing development.

Bellway Homes supported the policy and the 12 principles of Building for Life. They also highlighted in particular their support for criterion (j) which recognises that it is not always possible to satisfy each of the principles.

Response

It is agreed that there is some repetition between the 'Placemaking Principles' and Building for Life 12 (BfL12). It is now considered that the Council's suggested Placemaking Principles will be sufficient to cover all of the issues covered as part of the BfL12 framework. Removal of the requirement to demonstrate compliance with BfL12 principles may help to remove some of the perceived burden on developers.

BfL12 is a developer led scheme and therefore developers will still be encouraged to utilise BfL12 as best practice guidance and as a tool for framing discussions, however reference to this is better located in the supporting text of the Policy rather than as a Policy requirement.

An amendment to criterion j to remove reference to BfL12 will, therefore, be made.

Comment

McCarthy & Stone retirement Lifestyles Ltd commented on criterion (j) and the requirement for a proportion of homes which should be built to the Building for Life Standard. They highlighted that the standard is sufficiently flexible for residents in old age and similar to the Lifetime Homes Standard which is included in Policy CP7. They considered that it is unnecessary for the Council to expect developers to meet two sets of standards which ultimately have the same objective and it would be more practical for the Council to stipulate a requirement for a proportion of housing to meet one of the two standards.

Response

Reference to BfL12 will be removed from the Policy, therefore reducing the number of standards that developers will need to have regard to.

Comment

A comment from BRE Global noted that the plan refers to Building for Life 12 and suggested that, bearing in mind the Council's own experience that reference should be made to BREEAM Communities in the policy. The response highlighted that the

objectives of BREEAM are closely related to those of the NPPF. Councils who have included BREEAM in their policies were highlighted in the response.

Response

It is agreed that the BREEAM Sustainable Communities Framework provides an excellent way of assessing the overall sustainability of a major development. The BREEAM Framework was successfully used by the developers of the Castleward area of the city centre and was a useful tool in demonstrating the sustainability credentials of the site. Reference to the BREEAM Sustainable Communities Framework will be added into Policy CP2, relating to the Council's response to tackling climate change.

Comment

Gladman Developments Ltd considered that there was some repetition between this policy and Policy CP4 and the necessity of having two policies covering building form, density and landscape character. They suggested that both policies are combined.

Response

Members of the public have regularly raised concerns about the way in which new developments integrate into their context, particularly in areas of sensitive local character such as some of the former village suburbs.

It is acknowledged that Policy CP3 already sets out the principle of ensuring that developments are well integrated into their setting. However, Policy CP4 seeks to provide developers with further policy guidance on this issue in order to clarify the Council's general approach in relation to character and context. Policy CP4 provides an opportunity to highlight the areas of the city where context is particularly important and the types of development have the highest potential for negative impacts.

Whilst there is some repetition in terms of principle, it is felt that the additional policy wording set out in CP4 is important to provide developers with clarity about how proposals will be assessed and to highlight where particular scrutiny will be applied.

No change recommended.

Comment

Derbyshire Fire and Rescue have suggested that domestic sprinklers are installed in new domestic properties.

Response

The Core Strategy cannot require the provision of sprinkler systems within domestic properties as it is not necessarily a planning issue and would be better addressed through Building Regulations. The Council is also conscious of the requirements of the NPPF in terms of placing burdens on developers that may impact on delivery of schemes. This would be an additional cost to a developer that may have implications for the delivery of necessary infrastructure, such as schools or road improvements or on the delivery of affordable homes.

However, the Council is keen to work with developers and encourage them to incorporate sprinkler systems wherever feasible and viable to do so in order to ensure that new houses provide adequate safety for occupants throughout their lifetimes. Therefore, an additional criterion will be added to Policy CP3 to encourage residential developers to include sprinkler systems.

Comment

The Planning Design Group, representing both Hallam Land Management Ltd and JGP Properties Ltd and David Locke Associates, commenting on behalf of Rolls-Royce, supported the policy.

Response

Comments are noted and welcomed.

Comment

The City Council's Conservation Area Advisory Committee raised concerns about the use of the word 'optimise' in criterion (a). It was suggested that more explanation is needed about how the word should be interpreted. However, two members of the committee agreed that the word 'optimise' is correct as it provides developers with flexibility to appropriately respond to the individual context of a development site.

Response

Optimisation of development densities in the context of this Policy is about making the best use of valuable land on development sites, taking all issues into account. It is felt that the word 'optimise' is appropriate as it seeks to balance the need to maximise development on sites within the city, in order to avoid more peripheral growth, against the need to protect the context and character of surrounding areas.

No alternative wording has been suggested and it is felt that the policy as drafted is appropriate.

Comment

The City Council's Conservation Area Advisory Committee considered that more thought needs to be given to the broader context in which proposals are sited in order to avoid more developments such as Jurys Inn and Westfield cinema. The draft policies should also be tested against real life applications to test how fit for purpose they are.

Response

Development proposals will be required to demonstrate compliance with Placemaking Principle (b), which seeks to ensure that proposals are well integrated into their setting and exhibit locally inspired or distinctive character.

Policy CP4 provides further guidance on how proposals will be assessed in terms of character and context. A specific policy relating to this issue highlights the importance of it.

No change recommended.

Comment

The City Council's Conservation Area Advisory Committee suggested that further explanation of criterion (j) is needed to explain about how Building for Life principles can be satisfied even if requirements cannot be met.

Response

See above. Reference to BfL12 is to be removed from the Policy. Therefore, additional explanatory text is no longer needed.

Comment

The City Council's Conservation Area Advisory Committee suggested that paragraph 5.3.6 should be amended to also refer to the importance of delivering high quality design where proposals may impact upon heritage assets, particularly Conservation Areas and the World Heritage Site.

Response

Agreed. Text of paragraph 5.3.6 will be amended to reflect the comment from CAAC.

Comment

A member of the public supported the policy.

Response

Comment noted and welcomed.

Comment

A member of the public objected to the provision of public art (paragraph 5.318) as they considered that it is of dubious quality and, pound for pound, greening is better value for mental health and wildlife.

Response

Public art can take many forms including proposals that involve the greening of buildings and spaces. Each case will be judged on its merits.

No change recommended.

Comment

The WYG Group, acting on behalf of Celanese Acetate Ltd, also sought clarification as to whether public art is a requirement or an aspiration in the draft policy.

Response

It is acknowledged that the wording of the policy in relation to this issue needs to be made clearer. The Policy will be comprehensively reworded so that it is clear that the provision of public art is a requirement where developments meet specific quantitative thresholds, but it will be encouraged in other locations.

There is a link here with Policy MH1 which also sets out the types of contributions developers will be required to make through planning obligations.

Comment

Safer Derbyshire provided a number of suggestions to ensure there are some checks and balances in the development process. It was suggested that a Supplementary Planning Document is produced which could steer developers at the outset. It was suggested that a previous draft SPD is revisited.

Response

Policy CP3 includes Placemaking Principle (c) which requires developers to provide good standards of privacy and security in order to create pleasant, safe and secure environment. The issue of safety would be better highlighted by adding the word 'safety' into the criterion.

In terms of additional guidance, the Council intend to produce a design guidance document that will provide further information and guidance relating to each of the Placemaking Principles set out in Policy CP3. This will provide an opportunity to provide further guidance on how safety considerations can be factored into the design of new developments.

Comment

Safer Derbyshire provided a number of suggestions to ensure there are some checks and balances in the development process. It was suggested that a Supplementary Planning Document is produced which could steer developers at the outset. It was suggested that a previous draft SPD is revisited.

Response

Comments noted. It is considered that this issue is adequately addressed by policies CP3 and CP4. A design guidance document is intended to be produced to complement the Local Plan and this could provide further information on the issue. No change to policy is required, however.

Action

- Reference to safety added to criterion (c).
- Added reference to vehicle and cycle parking in criterion (h)
- Criterion (j) – 'expected' changed for 'required'
- Criterion (j) - the text relating to BfL12 is deleted.
- Criteria (k) relating to public art comprehensively reworded to make it clearer where the Council will encourage public and where it will be a requirement. The revised policy wording introduces the concept of prominent locations where public art will be particularly encouraged.
- Additional criterion added to encourage developers of residential proposals to install sprinkler systems.
- Paragraph 5.3.2 – Reference to health benefits and community safety added.
- Paragraph 5.3.6 – additional reference to tall buildings inserted
- Paragraph 5.3.6 – reference to city centre being important as is also home to

much of Derby's heritage.

- Paragraph 5.3.14 – Reference to best practice guidance added, including MfS2, 6C's design guide and Sport England Active Design. Text relating to BfL12 amended.
- Paragraph 5.3.15 – Additional text explaining why not all principles may need to be met.
- Paragraphs 5.3.18 and 5.3.19 comprehensively reworded. Supporting text defines the term 'prominent locations' and reduces the commercial floorspace trigger from 1,000sqm to 2,500sqm.
- Table 1 removed.
- Additional paragraph added to supporting text to explain the new criterion relating to encouraging the provision of sprinkler systems.

Policy CP4: Character and Context

Comment

The National Trust supported the approach set out in the policy and welcomed the Council's intention to provide design guidance.

English Heritage strongly supported the inclusion of this policy. They consider that it will strongly support new development within the context of a historic City Centre, the surrounding areas and suburbs and welcomed the reference to heritage assets in paragraph 5.4.5.

Response

Comments are noted and welcomed.

Comment

The National Trust suggested that advice is provided on the impact of tall buildings and how impacts will be assessed.

English Heritage requested that reference to the Tall Buildings Strategy is made and suggested that the Council consider adopting it as a Supplementary Planning Document.

The City Council's Conservation Area Advisory Committee stated that the Policy should make a cross reference to the Tall Buildings Strategy.

Response

Policy AC5 provides policy guidance on the Council's approach to tall buildings in the city centre. Further guidance will be provided in a design guidance document that will be produced by the Council. The guidance document will utilise the findings of the Tall Buildings Strategy.

Reference to tall buildings will be added to Policy CP4 in relation to the need to give

proposals for tall buildings particular scrutiny.

Comment

Derbyshire Wildlife Trust stated that the supporting text does not acknowledge the role that the Victorian planned open spaces contribute to Derby's suburbs.

Response

There are many different assets that contribute towards the character of our suburbs. Unfortunately, the supporting text of the Policy cannot make reference to every element or asset that makes a contribution, as it would become unwieldy.

No change recommended.

Comment

The Planning Design Group, representing Hallam Land Management Ltd, supported the policy.

Response

Comments are noted and welcomed.

Comment

The Planning Design Group, representing, JGP Properties Ltd supported the policy as, when applied to the land south of Mansfield Road (AC26), demonstrates the ability of the proposal to achieve a high standard of development.

Response

Comments are noted and welcomed.

Comment

The City Council's Conservation Area Advisory Committee suggested that paragraph 5.4.3 should also refer to Kuper sandstone.

Response

Agreed, paragraph 5.4.3 will be amended accordingly.

Comment

The City Council's Conservation Area Advisory Committee suggested that the photo used under 5.4.4 should be changed as it does not represent the materials mentioned in the paragraph above.

Response

Agreed. The photo will be changed.

Comment

A member of the public supported the policy and stated that the City's mature neighbourhoods needed safeguarding urgently.

Response

Comments noted.

Action

- Reference to Kuper sandstone has been added to 5.4.3.
- Reference to tall buildings should be added to Policy CP4 in relation to the need to give proposals for tall buildings particular scrutiny.
- Photo used under paragraph 5.4.4 needs to be changed.

Policy CP5: Regeneration Priorities

Comment

English Heritage noted the content of the policy but consider that heritage-led regeneration initiatives (such as the City Centre PSICA) scheme should be referenced in the supporting text.

Response

Such sites would generally be covered by the 'City Centre' priority area or other specific policies. As such, a specific reference is not needed here. Indeed, this comment highlights the potential repetition within this policy and other site specific policies in the plan. It is felt that this might distract or dilute the importance that should be placed on the City's older urban areas and outer estates, which are of equal importance.

It is suggested, therefore, that this policy should be redrafted to focus on the 'Regeneration of Communities'. This would give priority to more area-wide initiatives that can help improve the quality of for residents in these areas. This does not mean that large brownfield sites such as Celanese are not important; rather that they are covered elsewhere in the Plan whereas 'Rosehill/Pear Tree' does not have a robust policy 'hook'.

Comment

English Heritage considered that the remaining sites associated with Connecting Derby should be highlighted as regeneration priorities.

Response

See above.

Such sites would generally be covered by the 'City Centre' priority area and specific reference is not needed. In addition, any relevant sites are likely to be too small to be considered strategic in their own right. In such cases, it is possible that they could be identified within Part 2 of the plan (where specific guidance is needed).

Comment

An agent acting on behalf of Celanese Acetate Ltd supported the inclusion of the site in the policy.

Response

Support for the policy noted and welcomed. However, please note comments above about the change in focus of the policy. While this will remove reference to Celanese, it is not considered that this suggests any less importance is given to the regeneration of the site in the long term.

Comment

RPS Planning and Development Ltd, representing St Modwen Developments, supported the Council's approach in this policy and highlighted that the Derwent Triangle can assist in the Plan's aspirations.

Response

Support for the policy noted and welcomed. However, please note comments above about the change in focus of the policy. While this will remove reference to Derwent Triangle, it is not considered that this suggests any less importance is given to the regeneration of the site in the long term.

Comment

Barton Willmore, representing Goodman UK, supported the intention of the policy to encourage sustainable regeneration by giving priority to appropriate development in identified areas, including Strategic Employment locations.

Response

Support for the policy noted and welcomed. However, please note comments above about the change in focus of the policy. While this will remove reference to Derwent Triangle, it is not considered that this suggests any less importance is given to the regeneration of employment site in the long term.

Comment

Gladman Developments Ltd sought clarification over what the term 'prioritising' means. They suggested that it would imply that if an alternative site was able to be developed, it wouldn't be able to unless an assessment was carried out considering why the designated site can't come forward first. They considered that specifying a particular site is contrary to the NPPF. They continued by questioning the need for this policy as they considered that the Council would not be to refuse a planning application if a suitable site came forward which wasn't designated under this policy. They concluded that the policy should be re-written to encourage development or removed from the plan altogether.

Response

The purpose of Policy CP5 is to provide an overarching policy framework under which site specific policies (where necessary) can address more detailed issues. Its intention is also to highlight the areas of the City where the Council may focus its regeneration activities in the short to medium term. This gives a clear indication of the Council's aspirations over the lifetime of the plan.

The objector is correct, however, in that it is not an exhaustive list of where development is likely to be acceptable. Nor, as drafted, was it intended that it should be used to refuse otherwise acceptable development in areas not listed.

However, it could be used to consider the implications of development that may prejudice the Council's strategy for area-wide regeneration or renewal. In such situations, it could be deemed that the proposal would be contrary to the CP5. It is accepted that some additional wording would be needed to make this clear.

Comment

Aldi Stores Ltd supported the policy as it identified the Defined District Shopping Centres as priorities for regeneration.

Response

Support for the policy noted and welcomed.

Action

- Redraft policy and supporting text to be more focussed on 'communities', as opposed to the identification of all 'regeneration' priorities.
- Amend policy to add following after list of priorities:
"Proposals that prejudice or undermine the regeneration and renaissance of the above locations will be resisted"

Policy CP6: Housing Delivery

Comment

The National Trust supported, in principle, the HMA's housing strategy and acknowledged that some of Derby's housing needs will need to be met beyond its boundary.

Response

The Council welcomes and notes the support of the National Trust.

Comment

Derbyshire County Council noted and supported the overall scale and distribution of housing in the City and as urban extensions.

Derbyshire County Council welcomed and supported the intention of the policy to bring empty and vacant properties back in to use.

Response

The Council welcomes and notes the County Council's support.

Comment

Signet Planning considered that the identified need doesn't take adequate account of the likely level on in-migration to Derby and, as such, reduces the housing requirement set out in the Plan below the actual requirement.

Response

The Council considers that the evidence base on housing need is robust. The

Housing Requirements Study and the SHMA Update both take into account migration matters.

Since the consultation took place, this issue has also been discussed at length at Amber Valley's Core Strategy Examination. The Inspector requested sensitivity testing to be carried out on the data in the SHMA Update based on recent evidence. Following the Examination Hearings, he concluded that the Derby HMA housing requirement figure should increase by 1,474 dwellings.

Both South Derbyshire and Amber Valley councils have accepted that Derby is capacity constrained and needs to 'export' some of its required growth into their areas. If it can be sustainably met elsewhere, an increase in the HMA figure does not, therefore, necessarily translate to an increased need for housing within the City.

As such, the Council feels that its existing target and strategy is robust and appropriate for the City.

No change required.

Comment

Signet Planning and Gladman Developments Ltd also questioned the HMAs decision not to use data provided by the Office of National Statistics. They are also concerned that GL Hearn's projections are based on a period of poor economic performance and they consider that these trends are not expected to continue. Gladman suggested that the plan did not meet the objectively assessed housing need.

Response

The HMA authorities appointed consultants G.L. Hearn to carry out an objective assessment of the housing needs of the Housing Market Area as required by the National Planning Policy Framework. This comprehensive assessment is detailed in the evidence base including the 2012 HMA Housing requirements Study and the 2013 Strategic Housing Market Assessment. These documents explain the methodology for the assessment. Early work also considered ONS projections as a starting point for the work but evidence suggested that the ONS projections did not account for detailed local circumstances and factors and that the Hearn work provides a much more detailed and bespoke analysis. The Hearn work also breaks down the assessment of need to the component authorities of the Derby HMA. The evidence base includes consideration of economic projections.

The Inspector at Amber Valley's Examination (who used the same data as for the City) did not raise any fundamental objections to the methodology or data used. Indeed, apart from the results of sensitivity testing referred to elsewhere, his conclusions appear to be that the work of GL Hearn has been robust.

The Council will set out clarification on how the evidence base has informed policy in a Housing Position Paper to be Submitted alongside the Plan in due course.

No change required.

Comment

Signet also expressed their confusion over the Council's 5-year supply of deliverable housing sites. They stated that recent committee reports indicate that we do not have a 5-year supply and that a 20% "buffer" should be employed in addition to the use of the "Sedgefield" method to ensure that past under delivery is recovered by an adequate supply over the next five years.

Response

At the Draft Plan stage the council did not identify a housing trajectory within the Plan although Tables were included in Policy CP6 (Housing Delivery) to explain how the Council would meet its objectively assessed housing needs between 2008 and 2028 and including the component parts of the housing supply. A trajectory will be included in the Pre-Submission Plan. At the time of the Committee reports which are referred to by Signet Planning, the Council could not demonstrate a 5 year supply of deliverable sites partly because it could not include sites in the Draft Plan as it was premature to do so. However the Council is identifying a range of sites to be allocated for housing development in the Local Plan including releasing greenfield sites in Green Wedges, most of which are in the control of developers who want to develop them in the short term.

This will provide enough short terms deliverable land to demonstrate a five year supply for the City. The term 'persistent under delivery' is not specifically defined in the NPPF and the Council considers that it should include persistence of a period of economic and market peaks and troughs. Immediately prior to the recession the City was delivering well beyond its housing requirement and therefore the Council feels that a 5% buffer is appropriate. Similarly the Council feels that the shortfall in delivery between 2008 and present is the result of wider economic issues and that the NPPF seeks to boost significantly the supply of housing in response to this. The Strategy of the Council is to do exactly this but feels it is inappropriate and unreasonable to try to make up for the economic downturn in the immediate short term whilst already providing a buffer brought forward from the end of the Plan period.

Comment

The Home Builders Federation stated that it was unclear if the Council has a five year supply of deliverable housing sites. They also highlighted that Table 2 is incorrect as it includes a windfall allowance. They state that the NPPF and NPPG advised that windfalls can only be included in a 5 year housing land supply.

Response

See response to Signet Planning above re: 5 year supply.

The Council feels that it is entirely appropriate to include a windfall allowance in the trajectory and within the 5 year supply. At Para 48, the NPPF states that "Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply".

This is the case. However there is no part of the NPPF which says that Windfalls cannot be counted for AFTER the first 5 years. The recently published National

Planning Practice Guidance makes it clear that windfalls can occur after the first 5 years. This is particularly more likely in an urban area like Derby and we are confident that there is sufficient evidence to demonstrate that a windfall assumption is robust and appropriate.

No change required.

Comment

The Home Builders Federation, Catesby Property Group and Signet Planning (who are representing William Davis Ltd) questioned the methodology used in the Derby HMA Housing Requirements Study and how the findings have been used to justify the reduction of dwellings over the plan period. They also referred to “*Choice of Assumptions in Forecasting Housing Requirements Methodology Notes*” by CCHPR which discusses the issues relating to household formation rates and, based on its findings, the HBF consider that the Council needs to provide a robust justification on its decision to adjust its household formation rates.

Response

See response to Signet Planning above re: The Objectively Assessed Housing Needs for the City.

In terms of household formulation, the Council stands by the work provided by G.L. Hearn in the Housing requirements Study and the SHMA. However at the request of the Inspector looking into the Amber Valley Local Plan, G.L. Hearn provided supplementary work considering migration and household formation in the form of some ‘sensitivity testing’. This work demonstrates that the Housing Requirements Study and SHMA are robust. The sensitivity testing indicates that the Hearn work on migration is robust and accurate and that depending upon many ways of assessing household formation there could possibly be methodologies which might give rise to different requirement outcomes.

However, there is no completely accurate way of knowing or projecting how households will form and Hearn feels that they have adequately justified their assessment.

Comment

The Home Builders Federation, Nathaniel Lichfield and Partners and the Pegasus Group commented on the three population projections used to inform the HMA’s growth strategy and how the findings have been used to reduce the overall housing requirement down to the target set out in the plan of 35,354 dwellings. They also stressed that it was impossible to distinguish between the individual housing needs of each authority.

Response

See response to Signet Planning above re: objectively assessed housing needs.

The Council feels that the Housing requirements Study and the 2013 SHMA update robustly and objectively assess the needs of the HMA in line with the requirements of the NPPF. The evidence base does identify and distinguish between the needs of

the three HMA authorities. See Figure 2 on page 12 of the Derby HMA SHMA Update 2013. The objectively assessed housing requirement for Derby City (2008 to 2028) is 16,125 dwellings.

This distinction is also made in the updated evidence provided to the Amber Valley Examination and the Inspector's conclusions on this.

Comment

Catesby Property Group requested that the number of dwellings to be accommodated in adjoining authorities in order to meet Derby's assessed housing needs should be clearly set out in the document.

Response

To help clarify how Derby's objectively assessed needs will be met the supporting text now explains that Derby's objectively assessed need for the period 2011 to 2028 is 16,388 dwellings. This is a revised need figure after sensitivity testing. The Housing Delivery Policy states that a minimum of 11,000 new homes will be provided in the City between 2011 and 2028. It has been slightly amended to state that "land will be identified and allocated for residential development in the City and also as sustainable locations in the neighbouring HMA authority areas. This will include cross boundary development and urban extensions wholly in the neighbouring districts which will contribute to meeting Derby's housing needs." Given that at time of writing this document both other HMA district's Plans are going through their examinations and their plans have not been adopted it is considered that the policy and supporting text in the local plan demonstrate how Derby's needs are being met strategically and there is no need for further detail.

Comment

Derbyshire Fire and Rescue indicated that, from an operational point of view, the location of some development will affect attendance times. Looking at some of the proposed locations, these properties will probably fall outside the attendance time for a first appliance. They do note however, that new properties will probably be a lower risk. In conclusion, they suggested that domestic sprinklers are installed in new properties.

Response

Derbyshire Fire and Rescue have not identified any specific sites or locations that might be outside their response times. However, we note their comment that new buildings are at lower risk. The issue of sprinklers in residential properties will be included and covered in policies elsewhere in the Plan. The Council acknowledged the benefits of residential sprinkler systems, though also recognise its obligations relating to the NPPF and ensuring development is viable and deliverable.

Comment

The 'What Homes Where?' toolkit was identified by two objectors who considered that the Local Plan (and the Derby Housing Market Area) does not provide enough housing. The toolkit identifies a household growth across the HMA of 46,121 of which 23,231 is directed towards Derby. The objectors consider that this is substantially higher than the 12,500 contained in the plan. They considered that the

plan does not set out any mitigating circumstances to justify this reduction.

Response

See the response to Signet Planning above RE meeting the City's objectively assessed needs for housing. The 'What Homes Where?' toolkit is a very simple national dataset based on Office for National Statistics data. The Councils own evidence base on housing needs includes far more detailed analysis at a local level. The 'What Homes Where?' toolkit was made available after the HMA authorities had produced the bulk of their housing requirements evidence.

The NPPF requires local authorities to identify and meet their needs but does not suggest that it should use the toolkit. The toolkit can only ever be one source of evidence and it is considered that our own evidence base is more robust and detailed.

Indeed, the Inspector at the Amber Valley Examination (using the same evidence) raised no concerns over this issue.

Comment

McCarthy & Stone Retirement Lifestyles Ltd also used the 'What Homes Where?' toolkit to highlight that Derby's demographic profile is expected to age over the plan period with the proportion of the population aged 60 and over rising from 20.7% to 24.7%. In light of this, they considered that this trend will have an impact on housing demand as the Council will need to provide the necessary quantity of housing to meet the needs of an aging population.

Response

The needs of the aging population are an area of specialist housing requirement and not part of the broad strategic housing delivery policy CP6. Reference is made to the housing needs of the aging population in Policy CP7: Affordable and Specialist Housing.

No change required to CP6.

Comment

Gladman Developments Ltd thought that there was an error in the 2013 SHMA as the shortfall of 390 dwellings wasn't included.

Response

In terms of assessing housing needs, shortfall was considered in the process of identifying objectively assessed needs. Figure 128 (page 161) identified the HMA shortfall from 2006 to 2011 and this shortfall is included when calculating the HMA housing requirement.

No change required.

Comment

Gladman Developments Ltd believed that the Core Strategy is unsound due to the failure to account for past shortfalls in housing delivery.

Response

See response above.

Comment

Boyer Planning considered that it should be established at the outset that the HMA's objectively assessed housing needs have been met. It is implied within the policy that the full needs have not been assessed, in which case further work is required and the wording should be amended to reflect this.

Response

The evidence base sets out what the housing needs for the City and the HMA are. The Strategy sets out policies to meet those needs and does not necessarily have to explicitly identify them. However a new paragraph will be added to Section 4 of the Plan 'Delivering Growth', to explain how the growth needs have been identified.

Comment

Boyer Planning stated that Table 3 does not state that it is based on an up-to-date and robust evidence base. They state that the table should be moved to the start of the supporting text and made explicitly clear.

Response

See response to Boyer Planning's previous point above.

Although not included in the housing delivery policy, the fact that the Plan is based on a sound and credible evidence base is set out in paragraph 1.35 (Draft Plan) and will follow through into the Pre-Submission Plan. Some of the key parts of the evidence base are specifically listed.

Comment

Boyer Planning considered that Table 2 should not include the draft allocations. It should include the completions from 2008 and the deliverable planning permissions. They considered that separating out the total requirement, completions and existing commitments, there residual requirement to be met through local plan allocations will be identified and expressed in a clearer and easier to understand way.

Response

The purpose of Table 2 is to explain how the housing requirement for Derby will be met through the components of the housing supply. These include past completions, extant developable permissions and sites allocated in the Plan. It is important that the Plan clearly explains how the full housing target for Derby will be met. The table is therefore considered to be appropriate and correct.

Comment

Boyer Planning considered that the Housing Distribution section should contain the remaining components of Table 2 (the draft allocations).

Response

See response above. The distribution of housing is explained elsewhere in the Plan. Derby's objectively assessed needs will be met through an agreed distribution

including sites in neighbouring HMA authorities. However this policy is about the components of the supply which will meet Derby's housing target within the City.

Comment

Boyer Planning stated that reference should be made to when the sites included in Table 4 are expected to be delivered. This would ensure that the policy could be monitored. They suggested an additional table is included.

Response

The delivery of housing is set out in the housing trajectory. This policy simply identifies the numbers of dwellings to be delivered. No change required.

Comment

The Pegasus Group, representing Miller Homes, supported the specific allocation of sites in the Part 1 Core Strategy but they considered that the Council will need to ensure that its supply of deliverable planning permissions in Table 2 is actually deliverable. They consider that it may be necessary to allocate sites in the Part 2 document.

Response

The support of specific allocations in the Part 1 document is welcomed. The Council will identify a deliverable supply of housing sites in its housing trajectory. Further sites will be allocated in Part 2 to meet the City's target and to ensure that a 5 year supply is maintained.

Comment

The Pegasus Group, representing Miller Homes, also supported the Council's strategy of meeting its housing requirements through the allocation of urban extensions.

Response

The support is welcomed.

Comment

Bellway Homes supported our intention to work collaboratively with our HMA partners to deliver cross-boundary development. They also strongly supported criterion (a) which establishes the intention to deliver 12,500 new homes; however, they consider that this should be expressed as a minimum figure. They suggested the following text to address their objection:

“enable the delivery of at least 12,500 new mixed tenure, high quality homes in the City between 2008 and 2028 by allocating land in its Local Plans (Parts 1 and 2) and by setting out a development framework which facilitates the delivery of housing on appropriate sites”.

Response

This point is accepted. The policy will be amended to express the target as a minimum.

Comment

Nathaniel Lichfield & Partners highlighted that the Strategic Housing Market Assessment made some assumptions on the level of value attributed to different areas within the HMA. They highlighted that the lowest values were attributed to sites to the south of the City and questioned whether this would affect viability, particularly when significant infrastructure is required. They also highlight that the SHMA indicates that the highest values are found to the west of the City and therefore, development of Newhouse Farm would bring forward the necessary infrastructure.

Response

Derby City Council considers that the Strategy for the City to deliver a minimum of 12,500 new homes between 2008 and 2028 is achievable and realistic. The Newhouse Farm site which they have referred to is in South Derbyshire District Council and although that authority has agreed to help to meet the housing needs of the City in their district, it is for them to identify and allocate the sites to do so. The City Council feels that South Derbyshire's identified strategy is realistic and achievable in terms of the urban extension sites.

Comment

The Planning Design Group, representing Hallam Land Management Ltd, supported the Council's objective to meet the City objectively assessed needs.

Response

The support is welcomed.

Comment

Signet Planning, representing William Davis Ltd, also highlighted that nearly a third of Derby's housing need is expected to be delivered on sites of 700+ dwellings. This reliance, they considered, was contrary to advice given in the Derby HMA Strategic Viability Assessment which cautioned about relying in the delivery of Sustainable Urban Extensions early in the plan period.

Response

The City Council has identified a strategy which includes a wide variety of site types in a range of geographical and market locations. These include strategic brownfield and greenfield sites, smaller sites and windfalls. The Council feels that this approach will allow the maximum potential delivery to be achieved.

Comment

Oxalis Planning, representing Bloor Homes, strongly supported the policy as it identified the Onslow Road site.

Response

The support for the policy is welcomed.

Comment

Sustrans noted that many of the developments on the periphery of the City Centre

and highlighted that if sustainable transport options are not properly promoted, traffic will increase in arterial roads into the City. They suggested that it would be helpful to have an additional railway station between Willington and Pear Tree.

Response

The possibility of identifying a site to the south west of Derby for a new railway station was considered and was felt to have viability and feasibility issues that question its delivery in this plan period. It has not, however, been completely ruled out as a future option.

The comment from Sustrans is noted and it is accepted that traffic levels are likely to increase given the growth which will be delivered. The Council and South Derbyshire District Council feel that an appropriate balance is being struck in the Plans between meeting needs and mitigating and adapting to traffic impacts.

Comment

One person supported our assertion that Spondon is an inappropriate location for major housing development.

Response

The support is welcomed.

Comment

A member of the public questioned the assumptions made in the SHMA update. They stated that the assumptions are based on simple extrapolations based on political models and presumptions with no reference to any actual evidence of validity.

Response

The Council feels that the housing delivery strategy is based on a robust and credible evidence base including an assessment of objectively assessed housing needs. The work included in the Housing Requirements Study and the SHMA Update comprehensively looks at all of the relevant issues which affect housing requirements.

Comment

A member of the public highlighted that, in three recent developments in the City, there was a persistent omission of bungalows. The objector provided evidence which suggested that people would like to live in bungalows and the Planning Minister wants more bungalows in order to encourage older people to move out of bigger homes to make way for younger families. The response concluded with a request for the Core Strategy to require the provision of bungalows in all new residential developments.

Response

The Plan emphasises the importance of providing a mix of housing. It considers the needs of an ageing population and for people with impaired/restricted mobility in Policy CP7 (Affordable and Specialist Housing). The Plan seeks to make the best and efficient use of land to meet housing needs and we have to release green

wedges to meet those needs in the City.

No change required.

Comment

One person supported the removal of the Acorn Way allocation from the Core Strategy.

Response

The support is welcomed – though it should be noted that Acorn Way has at no point been part of the Plan (thus it has not been ‘removed’ as such).

Comment

One member of the public stated that student numbers overall are likely to stabilise with national changes to higher/further education policy meanwhile the city is continuing to see building of high density student living accommodation. As a result it was considered that homes currently used for student housing should be released back into the general housing market.

Response

Student needs and accommodation were considered in assessing the objectively assessed needs for the City/HMA. The Council cannot require homes in private ownership and rented to students to be released into the non-student housing rental market.

Comment

One member of the public considered that changes to housing benefit eligibility is highlighting a shortage of smaller units of housing, and this may be reflected in the mix of new properties to be built resulting in an increase in numbers on allocated sites.

Response

This comment is more related to the number of bedrooms than the number of dwellings. It also relates to affordable housing more than market housing but the Council acknowledges the point. The SHMA identified a broad house size split for both market and affordable housing and should be taken into account in considering residential planning applications. This is made clear in the policy.

No change required.

Comment

A member of the public said that the aim, both nationally and locally, to reduce the number of vacant properties should pay dividends by increasing the availability of housing.

Response

One of the spatial objectives of the Plan is to bring empty properties back into use. The issue of empty homes has been considered in determining the objectively assessed needs for housing and the Council is aware that there is always a

percentage of properties which will be vacant. However it supports actions to bring empty properties back into use and the City Centre policy (AC3) particularly support this. Criterion 'e' of the Housing Delivery Policy (CP6) encourages the re-use of empty properties for residential uses.

No change required.

Comment

At a drop-in event one person was concerned about the number of permissions being granted but developers aren't building them. The same person recognised that there is a need for housing so that young people can get on the housing ladder.

Response

Evidence suggests that house building declined significantly as a result of the recession but is beginning to now pick up again. Many planning permissions for residential uses were granted some time ago and were not built due to economic viability. However evidence suggests that house building is now beginning to increase again. The Council is confident that the sites allocated in the Plan will be delivered.

Action

- Bring policy and supporting text up to date in terms of housing numbers (rebasng the plan from 2011 to 2028) – including amending target to 11,000
- Add information relating 5 year supply and trajectory graph
- Amend policy and supporting text to indicate that the Council will expect developers to provide the level of housing
- Provide further clarification about the role of the SHLAA.

Policy CP7: Affordable and Specialist Housing

Comment

Derbyshire County Council welcomed the policy's desire to deliver Lifetime Homes and extra care developments.

Response

The support is welcomed.

Comment

Derbyshire County Council considered that it would be helpful if the supporting text explicitly recognised the potential impact affordable and specialist housing could have on the level of funding available for infrastructure which is critical to support the strategy.

Response

The response is noted. It is considered that paragraph 5.7.6 of the supporting text already explains the approach and explains that the Council seek to deliver

affordable housing without constraining wider development and the delivery of infrastructure.

No change required.

Comment

Derbyshire County Council also considered that it would be helpful if the policy acknowledged that the development of affordable housing generates additional requirements for service provision and impacts on infrastructure delivery just as open market residential development does.

Response

It is not considered necessary to specifically acknowledge this is policy. There is no evidence to suggest that any additional requirements for such things from affordable housing are any different from that from market housing generally and the affordable housing requirements are included within general housing figures.

No change required.

Comment

Oxalis Planning, representing Bloor Homes, raised concerns about the practical implications of implementing the policy. While they welcomed the overall tone of the policy but thought that the aspiration of both 30% affordable housing and 20% lifetime homes needs to be properly considered. The provision of lifetime homes often has a larger footprint which often has implications for the number of dwellings provided on-site and clarification is sought on whether the provision of lifetime homes is as flexible as that for affordable housing.

Response

The response is noted and the policy has been subject to some amendment. The policy has deliberately been constructed in a flexible way to allow negotiation with developers and to have regard to feasibility and viability. It seeks to strike a balance between meeting specialist housing needs and not constraining overall delivery. The 30% target is based on broad viability testing but is still framed as a flexible target.

Some amendments will be suggested in the policy which will clarify the relationship between the two targets.

Comment

Oxalis Planning, representing Bloor Homes, raised concerns about the cumulative impact of paragraphs 5.7.16 and 5.7.19, specifically the desire to deliver a proportion of wheelchair accessible dwellings and smaller sized market dwellings.

Response

See response to Oxalis Planning above. The part of the policy which deals with wheelchair accessible homes has been amended to ensure that feasibility and viability are considered. It seeks to meet needs in a realistic manner without constraining overall housing delivery. The viability testing of housing delivery has assessed cumulative impacts.

Comment

McCarthy & Stone Retirement Lifestyles Ltd are in broad agreement with the policy but made a number of comments regarding some details of the policy itself. They considered that there is some misunderstanding of what the Lifetime Homes standard can actually provide. They state that the standard enables elderly residents to stay in their homes for longer but it does not constitute specialist accommodation for the elderly. With regard to criterion (c), they supported the delivery of extra care accommodation but recommend that a variety of specialist accommodation for the elderly is encouraged and suggested the following amendment to the start of the criterion: “*support the delivery of specialist accommodation of the elderly, and in particular Extra Care accommodation, in areas where there is an identified need...*”

Response

The response is noted. The NPPF (Paragraph 50) requires local authorities to plan to meet current and future demographic trends and the needs of different groups including that of older people. It is therefore appropriate to consider these as specialist needs. It is acknowledged that the Draft plan did not fully recognise the wider needs of the aging population and the policy has been amended to remedy this. Extra Care is still identified as one mechanism of meeting these needs.

Comment

McCarthy & Stone Retirement Lifestyles Ltd drew our attention to the Housing in Later Life: Planning Ahead for Specialist Housing for Older People Toolkit which encourages a joined-up approach to planning, housing and social care policy both in the collection of evidence and the development of specialist accommodation for the elderly. They provided an example of a policy which could be included in the plan:

The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.

The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the ‘Lifetime Homes’ standard so that they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home.

The Council will, through the identification of sites, allowing for windfall developments, and/or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities.

Response

Note the comment and agree that the housing needs of the aging population have been identified as an important consideration in planning for new homes. Policy CP7 now includes new wording to make it refer to the wider housing needs of an aging population and to encourage developers to design and build new homes to meet those needs. The policy already supports and welcomes Extra Care accommodation

being provided in the appropriate locations where need has been identified and the appropriate scale of development and infrastructure are delivered.

Comment

Boyer Planning supported the policy but suggested an amendment to the policy to now read “80% of the affordable provision should be for affordable rent or social rent and 20% for intermediate housing unless evidence is...”

Response

The support is welcomed. The tenure split part of the policy has been amended to consider flexibility and ensure viability. It now allows more consideration of site specifics and is not prescriptive on the split.

Comment

The agent acting on behalf of Celanese Acetate Ltd supported the Council’s recognition acknowledges the issues in the policy but considered that the policy needs to be more flexible to ensure that it responds to changing market conditions. They considered that the requirement for Lifetime Homes will add an additional burden for some developers.

Response

The comment is noted. The affordable and specialist housing policy generally is based on broad viability assessment but is framed flexibly to allow negotiation. Its aim is to meet identified needs without constraining wider housing delivery. The provision of Lifetime Homes is an important Council objective, however, and should remain a key part of the policy.

No change required.

Comment

Bellway Homes strongly supported the policy and, in particular, the Council’s assertion that a flexible approach to the delivery of affordable housing is required. They concluded by stating that the Council should apply a flexible approach to the overall level and type of affordable housing being provided and take account of the viability of housing development.

Response

The support is welcomed. The policy has been amended slightly to make it more flexible, particularly in terms of the affordable tenure split.

Comment

The Pegasus Group, representing Miller Homes, noted that South Derbyshire has a higher affordable housing target in their plan and they are unsure on what the approach will be on cross-boundary sites.

Response

South Derbyshire District Council has since published its Pre-Submission Plan with a 30% affordable housing target which is consistent with the target in the Derby Plan.

No change required.

Comment

The Pegasus Group, representing Miller Homes, stated that affordable housing targets should be viability tested. They noted that the policy recognises that viability is a consideration but it does not make clear whether the wider cumulative burden of all policy requirements have been considered in reaching the 30% target.

Response

The response is noted. Plan wide viability testing has been carried out to inform the policy since the regulation 18 consultation and this demonstrates that the 30% target is broadly a viable level for a long term plan. The policy is already flexible to allow for market and economic fluctuations. The point is noted and the Plan seeks to set a percentage figure that gives developers a firm starting point based on broad viability testing. If developers can demonstrate that site specific viability affects deliverability the policy allows for negotiation.

No change required.

Comment

A response from the National Self-Build Association highlighted that the Core Strategy should make provision for people who wish to build their own homes. Five options were suggested:

- Allocation of appropriate sites: allocating smaller sites with preference for those who self-build
- Targeted provision: a generic policy which requires a certain percentage of major housing development sites to be self-build
- Self-build as affordable housing: an approach that allows some of the quota of affordable housing required within a development to be met by affordable self-build plots.
- Infill development: an infill policy which could support self-build
- Edge of settlement sites: consider permitting small scale extensions around the edge of settlements.

Response

It is very difficult to evidence the demand for these types of housing. Anecdotal evidence suggests that there may be limited demand in the City for such projects. The Council would welcome appropriate schemes but there is not enough relevant evidence to allocate specific sites in the Core Strategy for self-build or community build projects. Instead, the Council has chosen to encourage such types of development. A criterion has been added into the CP7 Policy on Affordable and Specialist Housing to say that the Council will support self-build and community-build proposals which do not conflict with the other policies of the Plan.

Comment

A member of the public highlighted the growing issues relating to an ageing

population and the need to provide suitable housing (i.e. bungalows). They highlight that this type of housing would also be suitable for disabled people.

Response

The Policy has been amended with a criterion recognising the needs of an aging population generally as well as providing Extra Care housing. Bungalows of the right design would fall into meeting the requirements of this policy.

Comment

Two members of the public highlighted that the provision of affordable homes is an issue in the City. One of those respondents considered that developments of 15 or more dwellings provide the stated amount of affordable housing. The other respondent highlighted that houses are constantly being turned into flats which are suitable for students but what Derby needs is affordable family dwellings.

Response

The response is noted. The evidence base identifies a significant need for affordable homes and viability testing indicates that it will not be possible to deliver the full amount to meet these needs. The policy strikes a balance between meeting affordable and specialist needs as much as possible while not constraining overall housing delivery.

No change required.

Comment

Concerns were raised by three people over the level of affordable housing required in new developments and the impact it would have on developments and the character of the established community.

Response

The comment is noted. The Council is required to try to meet its objectively assessed needs for affordable housing. The policy seeks that new affordable homes are appropriately integrated with and complement market housing. Other parts of the Plan contain relevant policies on design and layout of developments.

No change required.

Action

- Amend policy and supporting text relating to the relationship between affordable housing and lifetime homes
- Amend text relating to wheelchair accessible homes to bring it under the affordable housing/lifetime homes threshold and relate provision to lifetime homes.
- Amend policy and supporting text about supporting housing for an aging population (including references to Extra Care)
- Amend policy and supporting text to include reference to 'self-build'.
- Amend text relating to housing type and split; new text to explain that the split

of affordable housing to be based on most up-to-date evidence, including the SHMA.

Policy CP8: Gypsies and Travellers

Comment

Derbyshire County Council noted and welcomed the recognition in paragraph 5.8.3 that the Gypsy and Traveller Accommodation Assessment currently being undertaken will be used by the City Council to determine future site and pitch requirements.

Response

The support is welcomed.

Comment

Derbyshire County Council concluded their comments by stating that the Policy's overall approach was consistent with the NPPF and particularly Planning Policy for Traveller Sites.

Response

The comment is noted.

Comment

Although the National Federation of Gypsy Liaison Groups supported the majority of the policy and supporting text, they objected to criterion (b). Whilst they considered that the phrase "subject to evidence of need, provide sites..." is acceptable in relation to the allocation of sites in a future plan, it is not acceptable in relation to the consideration of planning applications. They considered that this is contrary to the guidance in Planning Policy for Traveller Sites, which requires criteria to be set out to guide the consideration of applications even where no "need" has been identified.

Response

Criteria (a) and (b) relate to the overall strategy for meeting the needs of Gypsies and Travellers. The point identifies that those needs may be met or partly met through granting planning permissions. The second part of the policy contains the criteria to be used in the determination of planning applications and does not include any consideration of need.

No change required.

Comment

Boyer Planning, representing Bellway Homes and Clowes Development, stated that the policy and supporting text needs to take account of national policy in Planning Policy for Traveller Sites (March 2012). The accommodation needs of Gypsies, Travellers and Travelling Showpeople should be assessed for the whole plan period. They also note that the plan should ensure that there is a five year supply of sites is available.

The considered that, if evidence suggests that sufficient sites cannot be found, criteria in the policy needs to be more flexible and any needs which are not met within the City needs to be provided in adjoining authorities.

Response

The point is noted. The Council considers that it is currently meeting the identified needs of the most recent assessment. There is an on-going strategic level assessment of Gypsy and Traveller needs and it is felt that if any further needs are identified then sites can be allocated in the Part 2 Plan.

It would not be appropriate to hold up the Plan preparation process to wait for this evidence when sites can be allocated in Part 2 if necessary. In the meantime the draft plan includes a suitable criteria based policy to determine applications should they be submitted in the meantime.

All LPAs in Derbyshire, some of whom have recently adopted Local Plans, are in the same position as the City. As such, we do not feel that there is a soundness issue with the plan. Indeed, the issue was specifically raised at Amber Valley's recent Examination and the Inspector seemed content with the approach of deferring site allocations until Part 2 of the Plan.

No change required.

Action

- No amendments to the document are required.

Policy CP9: Delivering a Sustainable Economy

Comment

English Heritage welcomed the inclusion of points 8 and 10.

David Locke Associates, commenting on behalf of Rolls-Royce, welcomed the inclusion of point 2, criterion (c) and paragraph 5.92.

Response

Comments are noted and welcomed.

Comment

David Locke Associates, commenting on behalf of Rolls-Royce, stated that the provision of high quality education within the City is a key component in not only attracting employment and investment but in ensuring that the City's future is secured as a centre for global investment, high-tech industries and manufacturing. They welcome and support that recognition in Policy CP9, points 6 and 7.

Response

Comments are noted and welcomed.

Comment

RPS Planning and Development Ltd, representing St Modwen Developments, supported the policy and the supporting text as it helps the Council meet the aspirations of the Local Enterprise Partnership (D2N2). However, they continued by stating that the Council will need to ensure that its land allocation strategy is correct to ensure that the City can realise its economic growth strategy.

Response

Comments are noted. The Council is satisfied that its land allocation strategy is the correct one in order for Derby to have a strong city centre and for the city as a whole to realise its economic growth strategy.

No change required.

Comment

Sustrans highlighted recent research which has shown the importance of good pedestrian links for the retail economy. They considered that the emphasis should not be on keeping traffic moving but on creating attractive retail environments and quality living environments.

Response

Comments are noted. The Core Strategy contains a number of policies relating to retail and the city centre that seek to improve the overall retail environment in the city. This is particularly addressed in Policy CP23.

No change required.

Comment

Aldi Stores UK Ltd objected to the policy and suggested alternative wording to consider retail uses as part of the policy.

Response

It is considered that retail development is adequately dealt with elsewhere in the plan and a specific reference need not be included in this policy. This does not downplay the importance of retail jobs to the City's economy. However, there are other important considerations that must be taken into account when looking at retail development. Specific wording in this policy may create some inconsistency and make the Council's view of retail development less clear.

However, it is recognised that 'retail development' (amongst other things) can have a positive impact on the economy of centres. To that end, it is considered that criterion 11 should be amended to include support for development that contributes to vibrant 'District' Centres as well as the City Centre.

Action

- Add 'district' to criterion 11.

Policy CP10: Employment Locations

Comment

The Highways Agency noted that the proposed employment growth has been considered in the evidence but stated that as sites come forward, detailed impacts will have to be considered on the Strategic Road Network.

Response

Comments noted. The policies in the plan allow the impacts on the SRN to be considered alongside relevant planning applications.

No change required.

Comment

Derbyshire County Council supported the provision of new employment locations and the protection of existing employment land and sites. They considered that the policy was informed by a sound and robust evidence base.

Response

Comments are noted and welcomed.

Comment

RPS, representing St Modwen is of the opinion that the Council has rightly sought to increase and deliver more ambitious plans for economic growth through a Policy-ON approach, but in the Core Strategy it is restricting the very type of land supply that it needs to deliver the Policy-ON aspirations, as it is advised not to do in the 2013 ELR. The evidence of this is that the authority has sought to seek greater economic growth than forecast in key sectors that will require B1 office use on top of those B1 sectors already forecast to grow, and yet limits the delivery of further B1 office land to urban sites within the City Centre that have:

- historically not delivered; and
- can not in all match the locational and business needs of the economic sectors identified.

RPS go on to state that the Council's approach runs in part contrary to the Policy-ON approach that forms the foundations of the employment land requirements in the Core Strategy. Appropriate land allocations are therefore required to deliver key B1 business park style offices that cannot be delivered in the City Centre to meet the aspirations of the Council's Policy-ON stance.

Response

The response from RPS is predicated on the assumption that office development is restricted everywhere other than the Central Business District (CBD). This is not the case.

Policy CP11 accepts that not all forms of office development can be easily accommodated in the CBD. The Policy makes specific allowance for office development outside of the CBD, subject to various criteria being met, including the

consideration of sites within the CBD.

CP11 gives second preference to allocated employment sites such as the Derwent Triangle site. Therefore, the Derwent Triangle is deemed to be an appropriate location for certain forms of office development that cannot be accommodated in the CBD. The Council consider that Policy CP11 provides enough flexibility to ensure that enough land is provided for all anticipated growth sectors.

No change required.

Comment

David Locke Associates, commenting on behalf of Rolls-Royce, welcomed the protection of existing employment areas. They also welcomed that the Rolls-Royce Campus is identified on Diagram 6.

Response

Comments are noted.

Comment

A planning agent highlighted that the policy seeks to allocate 199 hectares of employment land but the supporting text states that the actual developable land supply is only 127 hectares. They continued by stating that, following the findings of the 2008 employment land supply, the amount of land should be increased and have suggested a site to the south of the City to meet this shortfall.

Response

It is acknowledged that the supply of developable land is in the region of 127 hectares. This is less than the forecasted level of need suggested by the labour supply DUA methodology. However, the Council is satisfied that the amount of land allocated in the Core Strategy will be sufficient for a number of reasons. Firstly, the labour supply forecast is optimistic and relies heavily on the replacement of all predicted losses and the provision of a buffer for flexibility. Therefore the level of actual need is well below the overall figure suggested by the forecast.

The Council also expect a proportion of future needs to be met through the redevelopment / intensification of existing employment sites, based on current trends. This will accommodate some of the projected needs during the Plan period, without eating into the supply of new land, thus reducing the pressure for new land.

In addition to these issues, South Derbyshire District Council (SDDC) has identified the land suggested by the respondent as a potential extension to the proposed employment land within the City, to the south of Sinfin Moor Lane. This additional land could be released through a review of the SDDC Local Plan if there are clear indications of demand and that road capacity issues can be overcome.

No change required.

Comment

Barton Wilmore, representing Goodman UK, supported the identification of the Derby

Commercial Park as a Strategic Employment location.

Response

Comments are noted.

Comment

Sustrans highlighted that, despite the Core Strategy's best intentions, a number of strategic employment locations are located in areas poorly served by public transport, namely Raynesway, Chaddesden and Sinfin. They concluded that these sites would benefit from properly integrated cycle paths and new or enhanced bus services.

Derbyshire and Peak District Campaign for Better Transport supported the allocation of the four sites, though they hope that they are accessible by public transport.

Response

The scale of the proposed strategic employment sites means that they are likely to be sufficient to justify new bus services or extension to existing routes.

Reference to providing high quality cycle and pedestrian links will be added as a requirement to Policy AC11 (Derwent Triangle) and Policy AC12 (Raynesway).

Policy AC15 (Infinity Park) already makes reference to the incorporation of multi-user routes.

Locations for strategic scale employment development are actually quite limited and thus there are no sensible alternatives in areas that may be well served by current public transport services. As noted above, however, the view of the respondent pre-supposes that improvements could not be made to provision as a result of increased activity or through other measures.

No change required.

Comment

Aldi Stores UK Ltd supported the general thrust of the policy as it reflects the requirements of the NPPF. In their submission they highlighted that the employment site at Harvey Road/Coleman Street is suitable for alternative uses and a proposal to bring it back for an alternative economic use should be encouraged.

Response

The Council no longer require the Coleman Street site to be retained as part of the employment land supply and have acknowledged this in response to Aldi's planning application for the Coleman Street site.

No change required.

Comment

Two members of the public stated that Derby had historically over allocated employment land and the current requirement is a continuation of this policy. It was suggested by one that, due to different working practices such as working from home, that this target should be reduced. It is also suggested that the regular

reviews are undertaken to ensure that any allocation is likely to be used for employment during the plan period.

Response

It is acknowledged that the gross supply suggests a significant oversupply. However, the amount of developable supply is estimated to be significantly less than the gross allocated area, as detailed in the draft Plan. Therefore, any oversupply is not thought to be significant. The supply of employment land will continue to be monitored as part of the plan, monitor and manage approach to land use planning.

No change required.

Comment

One member of the public considered that the Draka site could be released for residential development.

Response

Whilst the current occupier no longer operates from the site, the Council is not aware of any evidence that demonstrates that the site is no longer appropriate or needed for employment uses. The value of the site will need to be reassessed before it could be released. The site is currently on the market and there may be a desire from prospective land owners to maintain the site in employment use. This would be consistent with the current local plan and would be acceptable in principle.

The site is also currently subject to flood risk, although the Our City Our River (OCOR) programme has the potential to benefit the site. With this in mind, the potential of the site to deliver residential uses will be assessed in the Local Plan Part 2, alongside other potential development sites that benefit from OCOR.

Of course, this will in part be determined by the aspirations of any new land owner who may purchase the site prior to the plan being prepared.

Action

- No changes to the Policy are required based on representations.

Policy CP11: Office Development

Comment

RPS Planning and Development Ltd, representing St Modwen Developments, generally supported the policy but considered that a greater degree of clarity is needed between Policies CP11 and AC11. They considered that CP11 is seeking to restrict office development in other areas of the City in favour of the Central Business District or strategic allocations. They feel that this is in conflict with the NPPF, paragraph 23.

Response

Policy CP11 acknowledges that not all forms of office development can be easily accommodated in the Central Business District (CBD). The Policy makes specific

allowance for office development outside of the CBD, subject to various criteria being met, including the consideration of sites within the CBD.

CP11 gives second preference to allocated employment sites such as the Derwent Triangle site. Therefore, the Derwent Triangle is deemed to be an appropriate location for certain forms of office development that cannot be accommodated in the CBD or which would not have an unacceptable impact on investment. The Council do not consider this approach to be overly restrictive or to be in conflict with the NPPF.

Action

- No major changes to Policy required as a result of comments. However, the word 'only' should be removed to make the Policy more positively worded in relation to office development outside of the Central Business District.

Policy CP12: Centres

Comment

Sustrans highlighted the importance of good public transport links, pedestrian links and cycle facilities. They suggested that initiatives such as Pocket Places for People which are piloting low cost pop-up interventions can improve the street appearance.

Response

Noted. Any innovative proposals to improve the appearance of District Centres will be supported. However, it is not necessary to make specific reference to such initiatives within the policy. No changed recommended.

Comment

Burnett Planning, representing Henderson UK Retail Warehouse Fund, considered that paragraph 5.12.1 was inconsistent with the NPPF and suggested that "*best*" is deleted from the first sentence; and "*will remain the 'sequentially preferable' location*" is deleted from the last sentence.

Response

It is not considered that such reference within the supporting text is inconsistent with the NPPF. The NPPF continues to promote a town centre first approach and continues to require a sequential approach to site selection. The plan also sets out the detailed requirements of the sequential approach and thus makes it clear there will be some types of retail that may not be able to be accommodated within centres. It is not considered that a change to the policy is needed in this instance.

It is accepted that "preferred" may be a more precise word than "best" and so this change will be made.

Comment

The Pegasus Group, representing Miller Homes, supported the policy's requirement for a neighbourhood centre as part of the Hackwood Farm development.

Response

Support for the policy is noted and welcomed. No change to the policy is required.

Comment

Two people supported the Council's stance on the role of district and neighbourhood centres.

Two people also supported our assertion that new neighbourhood centres are a necessary part of new developments.

Response

Support for the policy is noted and welcomed. No change to the policy is required.

Comment

One person was disappointed that the policy didn't offer more support for the enhancement of these centres. The individual considered that there was too much focus on the City Centre and the importance of the district and neighbourhood centres was overlooked.

Response

This point is accepted. It is recommended that an amendment is made to the policy to make it clear that the improvement of District Centres is a Council priority. More detail on how and where improvements will be promoted by the Council may, however, be addressed in Part 2 of the plan.

Comment

One person objected to the reservation of sites for commercial use and cited the Tesco site at Allenton and the Morrisons site on the DRI. The objector considered that there were alternative empty spaces in the City to accommodate expansion. In addition they considered that the growth in internet shopping is changing the type of stores retailers are providing i.e. smaller local shops rather than superstores.

Response

It is recognised that the nature of retailing is changing and that this will have an impact on the role of centres and the scale and type of shops and facilities within them. However, there is no suggestion that the policies of the plan cannot accommodate or react to these changes. In most cases, it will be the market that will drive retail development and it is not appropriate for the plan to dictate what form this should take. For example, it would not be appropriate to stipulate that stores of a certain size would not be allowed. This would be assessed by consideration of a store's 'impact' on a centre as set out in criteria 1-6. Therefore, the policy is robust.

It is accepted, however, that at present the Plan does make specific reference to 'small shops' outside centres. These can often provide important facilities without undermining the viability of Centres. It is considered that a reference to this could be made more explicit in Policy CP13.

The Local Plan also does not make specific reference to retail development being acceptable on the DRI site. This site has planning permission for retail, but it is felt

that should this scheme not be implemented, it would be more appropriate to consider any new applications against the policy CP13 and the NPPF. The changing nature of the retail market and economy means that it cannot be pre-supposed that retail development will always be acceptable on this site should the permitted scheme not come forward. This is also the case with proposed schemes at Allenton and Friar Gate Goods Yard.

Comment

A member of the public would like to see more prominence given to the development of markets in the Core Strategy, both in the City and District Centres.

Response

Only Allenton District Centre has an operational market, which currently only operators on a Friday and Saturday. The general policies relating to vitality and viability of District Centres can address any proposals relating to this market. It may be that as part of the strategy for District Centres referred to elsewhere, that the Part 2 plan will be able to make specific reference to Allenton and set out specific measures if need be. In addition, this policy would be able to consider any applications for new markets should they be forthcoming.

There isn't really any scope for the plan to identify the potential for other permanent markets within other District Centres (either in terms of land availability or evidence of demand for such facilities). Therefore, there is no merit in amending the policy.

No change recommended.

Comment

A member of the public wanted to know what is happening to the land at the Normanton Road Technical College. The property is owned by a company who insists on a low budget supermarket which is against the Council's plans.

Response

The land at the former Mackworth College site at the northern end of Normanton Road is part of the Normanton Road Linear Centre, which forms part of the retail hierarchy. Policy guidance relating to development within identified centres such as this is set out in Policy CP12 of the draft Plan. CP12 allows for the development of new shopping facilities, including low cost supermarkets within identified centres where they would sustain and enhance the centre's vitality, viability and competitiveness. Whilst such a proposal would be generally in line with the existing and draft policies covering the site, the Council has not received a planning application of this nature to date.

Action

- Amend policy to include following under 'District Centres':
"The City Council will develop a strategy to help District Centres address the changing nature of the high street and the demands of customers and identify schemes that will help sustain and enhance their vitality and viability in the long term".

- Make consequential changes to supporting text
- Amend supporting text to refer to defined centres being “preferable” rather than “best”

Policy CP13: Retail and Leisure Outside Defined Centres

Comment

Derbyshire County Council stated that any large-scale retail and leisure developments within the City could have the potential to have wider trading impacts on the vitality and viability of nearby town centres outside of the City and elsewhere in Derbyshire. In this context the County Council welcomed and supported the policy and considered that the approach is consistent with the NPPF.

Response

Support for the policy is noted and welcomed. No change to the policy is required.

Comment

Derbyshire County Council was concerned with the impact of criterion (d) as it assumes that the effects will be confined to centres within the City. The following text is suggested “...*would not, individually or cumulatively, have an unacceptable impact on the vitality, viability or competitiveness of any centre in the hierarchy within the City or in an adjoining local authority area, or on local consumer choice and competition*”.

Response

This point is accepted. It is recommended that the suggested change to policy is made.

Comment

Derbyshire Wildlife Trust requested that an additional criterion is added to the policy stating “*where proposals do not conflict with other objectives in the City*”.

Response

Technically, this is not needed as it is accepted that the plan should be read as a whole and is already addressed by criterion (d). It is not considered that a change here is necessary.

Comment

Indigo, representing Sainsbury’s Supermarkets Ltd, submitted comments relating to three of the criteria. They considered that the scope of criterion (a) is too wide and does not acknowledge the parameters of the sequential test in terms of establishing a catchment area.

They also considered that, although the wording of the policy is compliant with the NPPF, it is overcomplicated and should be consolidated. Therefore, they suggest that criterion (a) should read “...*there are no sequentially preferable sites or units that could accommodate the proposal within its catchment area*”. Also they suggest

that criterion (b), (c) and (d) is consolidated into the following “...*applicants will be required to demonstrate that: the proposal would not have a significant adverse impact, individually or cumulatively on the vitality, viability or competitiveness of any centre in the hierarchy, on local customer choice and competition, or planned investment within defined centres or other development proposed by the Strategy*”.

Reflecting their comments on the policy itself, Indigo, suggested that paragraph 5.13.6 should be amended to “*It is important, therefore, to ensure that any additional out-of-centre proposals would not have significant cumulative impact on any centre*”.

Response

The point made about no reference to a defined catchment area is accepted. This can be included without undermining the policy. However, it will be important to establish a methodology for defining the catchment within the supporting text.

It is accepted that criterion (a) is more detailed than the ‘sequential approach’ as set out in the NPPF. It establishes a broad preference for the consolidation of existing retail floorspace outside of defined centres before permission is granted for additional space.

This reflects the fact that Derby is a compact City with limited land available for development and a relatively high level of ‘out-of-centre’ floorspace. It seems wholly appropriate in the context of promoting ‘sustainable development’ that the Council should be able to consider whether there is a more efficient approach available, rather than unnecessarily increasing the amount of floorspace already in existence. This is particularly the case where there may be vacant or underused retail units already available which would not be considered within this policy. This would seem an entirely sensible approach in the bid to make sure we are making the best use of land and resources.

The NPPF already allows some scope for comparing out-of-centre locations in terms of town centre accessibility. This approach takes that a logical step further in terms of promoting the effective and efficient use of land.

In relation to criteria (b), (c), and (d) – I note there is no objection to their principle, rather the way they are presented. Often when considering retail applications there is a focus purely on trade diversion from centres and other issues do not receive the same attention. Setting out the policy in this way gives everything equal standing. It is accepted that criterion (c) should refer to ‘planned private or public’ investment and not ‘potential’ investment. ‘Potential’ is unclear and open to interpretation.

Comment

The Derby Cycling Group agreed with the principle of focussing retail and service businesses in the City and District Centres as they considered that this would give the creation of a cycle network more focus and make journeys by bicycle possible.

Response

Comments noted and welcomed. No change to the policy required.

Comment

Burnett Planning, representing Henderson UK Retail Warehouse Fund, objected to the policy itself and suggested the following amendments to ensure consistency with the NPPF, paragraphs 24, 26 and 27:

- (a) there are no sequentially preferable sites or units that are suitable, available and viable to could accommodate the application proposal. First preference should be for appropriate centres in the hierarchy, followed by edge-of-centre sites and then existing out-of-centre retail parks or premises. The consolidation or utilisation of available and suitable existing sites and premises outside the hierarchy should always be fully considered before new floorspace is created.
- (b) the proposal would not, individually or cumulatively, have an unacceptable significant adverse impact on: the vitality, viability or competitiveness of any centre in the hierarchy or on local consumer choice and competition.
 - (i) existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal;
 - (ii) on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area.
- ~~(c) the proposal would not prejudice potential investment within defined centres or other development proposed by this Strategy.~~
- ~~(d) the proposal does not undermine the strategy~~
- ~~(e) is located where there is a choice of travel options~~

When considering impact, the Council will have regard to whether the proposal is meeting an identified need or local deficiency. All retail proposals over 1000 square metres gross will be required to submit a detailed retail impact assessment.

In considering the area of search for the sequential test, regard should be had to the scale of development and the need role and intended purpose of the proposal is seeking to meet. The Council will have regard to any special needs of leisure activities.

The Council will seek where necessary (and with regard to the tests for planning conditions under Circular 11/95) to mitigate the impact of development and ensure that the role of out-of-centre shopping remains complementary to defined centres by imposing appropriate conditions on the scale of development and the goods that can be sold from any retail outlet. Applications to vary conditions will be subject to the above policies.

Burnett Planning also suggested the following amendment to paragraph 5.13.2 and 5.13.7 to ensure consistency with the NPPF:

5.13.2 It is important, however, that where proposals do come forward outside

centres they do not have unacceptable negative significant adverse impacts on the matters defined in Policy CP13.

- 5.13.7 Where permission is granted, restrictions may be necessary to control will ~~continue to be needed on~~ the range of goods that can sold from these stores to ensure that the overall retail strategy is not undermined. ~~Goods which the Council feels are critical to the vitality, viability and long term prospects of the traditional centres, or where it considers an out-of-centre location is unnecessary, will be subject to conditions restricting their sale.~~ Such conditions will take two forms; either the complete prevention of some types of goods and/or limiting the amount of floorspace from which certain goods can be sold in order to ensure they remain ancillary or complementary. In all cases, the conditions where necessary will be designed to ensure the protection of the vitality and viability of existing centres and ensure that out-of-centre locations remain complementary to existing centres. Each case will be judged on its particular merits.

Response

It is not considered that the policy is inconsistent with the requirements of the NPPF.

The objector suggests that the sequential test element of the policy should make specific reference to sites/units being 'suitable, viable and available' for the use applied for. While I accept that this is what constitutes a 'preferable site' it probably does not need referring to in the policy itself. Rather, this could be referenced within the supporting text. This could be included within additional text recommended elsewhere.

One change suggested is the removal of the phrase "unacceptable impact" and replacement with "significant adverse impact". On one hand, this could be considered semantics. If the impact was "unacceptable" then by definition it would be "significantly adverse" as this is test in the NPPF. Continued use of "unacceptable" would mean that any changes to the wording of national policy would continue to be reflected in the Local Plan.

However, it is accepted that some could consider "unacceptable" to be open to interpretation and what is "unacceptable" to one is not to another. On reflection, therefore, it is probably acceptable to make the amendment suggested (though criterion (c) should remain as is).

There is no justification given for the suggested removal of criterion (e). Locating retail or leisure proposals in accessible locations would seem to be an important policy objective. While it could be argued that this is addressed elsewhere, these uses can be considerable trip generators and thus it is appropriate to highlight it specifically within this policy. No change is recommended here.

The objector's comments on conditions seem to miss the point that the Council is making. It has been a long standing policy objective of the Council to maintain a complementary role between centres in the hierarchy and out-of-centre locations. It is recognised that the line between the two types of shopping is increasingly blurred by the ever changing business models of retailers, the changing nature of the goods

sold and consumer expectations. Unlike the CDLPR, which established a blanket restriction on any 'high street' type goods, the Draft Policy seeks a more flexible and pragmatic approach. This still seeks to maintain the distinction for the benefit of centres, but allows some recognition of the current retail context. All of this, however, will be limited by the policy's 'impact' tests and controlled by condition. It is considered very important to spell out in the Policy why and what conditions will be imposed. They are not just about simple issues of trade diversion (which the suggest text would limit them to) but about promoting and protecting a more fundamental strategic objective. This is in line with the intentions of the NPPF.

Reference to Government Circulars is also superfluous with regard to a planning policy. All conditions must adhere to this and there is nothing to suggest the nature of conditions proposed is contrary to the provisions of this Circular.

It is recommended that additional text is added to the supporting text to this policy to try and make its intentions clearer. This will include a list of the goods the Council feels are important to the vitality and viability of centres.

Comment

Aldi Stores UK Ltd supported the wording of the policy's second paragraph.

Response

Comments noted and welcomed. No change to the policy required.

Comment

Aldi Stores UK Ltd supported in principle criterion (a) but requested that "*consolidation*" is deleted as this is contrary to national policy.

Response

There may be an element of confusion here. The reference to 'consolidation' mainly refers to a preference for new development to be accommodated on one of the existing retail parks or, at worst, in locations such as Ascot Drive which have a long history of retail development. This may have some sustainability benefits in terms of linked trips (albeit this would not be the Council's first choice). There is no suggestion that we would expect businesses to disaggregate or change their business models unreasonably.

On reflection, the supporting text for Policy CP13 does not provide a substantial amount of guidance for the sequential test elements of the policy. As such, it is recommended that some additional justification and explanation should be included before Paragraph 5.13.1.

Comment

Aldi Stores UK Ltd objected to the policy's requirement to submit a retail impact assessment for all proposals over 1,000sqm gross. They state that there is no reasoned justification in the Derby Retail and Leisure Report to default from the threshold of 2,500sqm in the NPPF, paragraph 26.

Response

The Retail and Leisure Capacity Study (2009) is just one element of the evidence for this policy. Since its publication, there has been a considerable shift in the retail market and the retail context of the City.

Since the publication of the Derby Retail and Leisure Study was published, the Council has been faced with a number of applications for in-centre, and out-of-centre, supermarkets covering a range of sizes from 1,200 sqm gross to 12,000 sqm gross. There is, therefore, a considerable amount of undeveloped retail floorspace within the development pipeline that is still to come forward. This could have a considerable impact on shopping patterns and on centres in the hierarchy. Having the ability to fully consider the impact of any substantial level of floorspace on centres is extremely important, therefore.

The Council is aware that there is still strong interest in further expansion of out-of-centre stores in the 1,000 – 1,500sqm category. Such stores have the ability to turnover some £4-5m per annum. As such, the cumulative impact could be quite considerable within what is a generally compact catchment area. A threshold of 2,500sqm would allow expansion to continue with no consideration of the cumulative impact being able to take place. This would seem to be an unacceptable position to be in and could lead to a considerable impact over the lifetime of the plan.

Even with stores of this size, the evidence provided can be 'proportionate'. Therefore, a proposal for 1,000 sqm would not be expected to provide the level of information as would be required for a larger store. This threshold simply provides the Council with the ability to properly consider everything sensibly.

No change to the plan is recommended.

Comment

Aldi Stores UK Ltd objected to paragraph 5.13.3 and requested its deletion. They highlight that Aldi does not attempt to sell a full range of products and their customers have to use other stores to meet their shopping needs. They conclude that Aldi complements existing provision typically found in shopping centres.

Response

Aldi are not mentioned specifically within paragraph 5.13.3. In any event, the *current* trading practices of companies are not relevant to a 15 year plan which needs to consider all eventualities. The policy needs to be able to take account of changing circumstances. As such, it is considered that the paragraph should remain as is.

Comment

A member of the public supported the policy. It was considered that there is too much provision in the City since the completion of the Westfield Centre and further out-of-centre development will be disastrous for existing centres.

Response

Comments noted and welcomed. No change to the policy required.

Action

- Amend policy and supporting text relating to the scope and implementation of the sequential test
- Amend text relating to the 'impact' test (inclusion of 'planned public or private')
- Amend supporting text relating to the scope and implementation of the conditions that may be imposed on any permissions – particularly relating to the types of goods that may be considered important to town centre viability

Policy CP14: Tourism, Culture and Leisure**Comment**

The National Trust noted, and supported, the content of the policy but suggest that specific reference should be made to the important role that heritage plays in Derby's tourism offer and recognise that improved tourist facilities within the City will have wider benefits beyond its boundaries.

Response

The comment is accepted. A reference to the importance of heritage to the tourist economy is an important omission (though reference is made to this in the supporting text).

Comment

English Heritage welcomed the content of paragraph 5.14.8 but considered that this should be reinforced through an explicit reference within the policy itself.

Response

Support welcomed. See above comment on amendment to the policy.

Comment

Derbyshire Wildlife Trust highlighted that there is no acknowledgement in the policy regarding the importance of informal recreation or parks and green spaces. They also suggested that, in the policy and supporting text, new facilities and extensions should be consistent with other policies in the plan.

Response

It is felt that Policy CP17 adequately highlights the importance of parks and green spaces. Equally, criterion (c) highlights 'sport and play'. However, for completeness, it is felt that a reference to parks and green spaces – in the context of leisure – would not be harmful.

With reference to 'other objectives', it should be noted that the plan should be read as a whole and thus a specific reference is not needed here to other parts of the plan. All proposals are subject to all policies and it is for the decision maker to balance different issues at the appropriate time. While not harmful to include this reference it can often be superfluous.

Comment

Sport England supported the inclusion of the policy but highlighted that it is important that it is underpinned with a robust and up-to-date evidence base although they highlighted that, at the time of the consultation, studies such as the Playing Pitch Strategy were still being undertaken.

Response

Support for the policy is welcomed.

It is not possible for the plan to 'wait' for the findings of every strategy or piece of research being carried out across the Council. The Playing Pitch Strategy is not, for example, being prepared to support the Local Plan. While it will be important evidence to help implement the Plan (or be used for Part 2), it is not necessary to be able to draft a broad overarching strategic policy. As such, it is considered that there is sufficient evidence in place to support this – and other – policies in the plan.

Comment

The Theatres Trust supported the policy. Although they were disappointed that Derby's theatres were not mentioned in criterion (c). They highlighted that theatres are a vital part of the community and a beacon for the evening economy and should be supported.

Response

It was considered that "venues for the arts" would clearly convey support for theatres. However, a reference to theatres can be added to criterion c with no detriment.

It is recommended, therefore, that 'theatres' are added to criterion (c).

Comment

David Locke Associates, commenting on behalf of Rolls-Royce, supported the policy.

Response

Support for the policy is welcomed. No change to policy is required.

Comment

Sustrans indicated that better links between the railway station and the City Centre would help tourism as would enhance the river corridor north to Cromford.

Response

While this point is accepted, it is probably a more general point about how improved accessibility across the City can be of benefit to tourism. This is probably better addressed in other policies in the Plan as the benefits derived are more of an indirect nature. No change is necessary, though the comment is noted and welcomed.

Comment

Sustrans stated that better access and promotion of cycle routes along the river to key tourist attractions should be a priority.

Response

This point is also accepted. It may be appropriate to include a specific reference to the River and its importance to tourism. This will then tie into specific policies for the River itself. Unlike the above point, it is considered that the river is a destination in and of itself and thus the benefits derived are direct in nature.

Recommended that a reference to the River is included.

Action

- Add 'theatres', 'parks and green spaces' to criterion 'c':
- Add new criteria between 'e' and 'f' to read:

"support and deliver proposals that take advantage of the tourism benefits of the River Derwent, the World Heritage Site and Derby's industrial heritage"

Policy CP15: Food, Drink and the Evening Economy

Comment

Sustrans noted that one of the best ways to promote cafe culture is to pedestrianise areas. Reclaiming space from roads and car parks for communal community space can increase the vitality and attractiveness of retail/dining areas. They stress that engaging with the community on how they want spaces to be used is key.

Response

Comments are noted. It is considered that this issue would be better addressed in specific policies on the public realm or, in particular, the City Centre or District Centres. Indeed, this may be too detailed an issue for the Part 1 document to get into (as it will not be appropriate in all locations) and may be something that is addressed in either the Part 2 document or in specific action plans for centres (should they be produced). It is not considered that any change to policy is needed in response to this issue.

Action

- No change to the plan is required as a result of consultation responses.

Policy CP16: Green Infrastructure

Comment

The National Trust generally supported the policy and acknowledged the desire to improve links to heritage assets. However, they highlighted that there is some confusion in the supporting text, particularly paragraphs 5.16.3 and 5.16.4 and suggest alternative text to rectify this.

Response

Paragraph 5.16.4 will be amended by replacing 'Green corridors' with 'Green infrastructure' to remove the conflict.

Comment

Natural England strongly supported the policy and particularly welcomed the inclusion of criterion (b).

Natural England considered that the policy satisfactorily covers the multi-functional role that green infrastructure plays including water management, climate change adaptation and recreational provision.

Response

The Council welcomes the comments by Natural England.

Comment

Natural England suggested that it would be clearer if the Green Belt policy wording was set out separately from the Green Infrastructure policy as the Green Belt has a different and specific purpose.

Response

The Council recognises the important role Green Belt plays and this is reflected in the policy and it is also acknowledged that it forms part of the wider Green Infrastructure network. Any policy will merely reiterate national policy therefore the Council consider that it is acceptable to identify the importance of Green Belt in the policy, briefly set out what is considered to be acceptable development in the supporting text and direct readers to the NPPF. Therefore, no change to the policy will be made.

Comment

English Heritage noted the content of the policy and highlighted the historical and cultural value of Green Infrastructure. They indicated their disappointment that this is not evident in the policy; English Heritage noted that the value of Green Infrastructure in relation to biodiversity, health and climate change and request that the cultural and historic environment is included.

English Heritage welcomed references to specific heritage assets in criterion (j) however, they considered that the benefits in historic environment terms are not explicit or within the supporting text and asked for this to be rectified.

Response

The comments from English Heritage are noted. Paragraph 5.16.4 will refer to '...the setting of both our cultural assets and the historic environment'.

Comment

Although supporting the inclusion of the policy, the Environment Agency considered that it should be amended to reflect the NPPF. They suggested that criterion (a) is amended to "*minimise and mitigate impacts and overall decline on biodiversity...*" and to include an additional criterion which states that the council will "*resist the non-essential culverting of watercourses and encourage existing culverts to be removed and natural watercourses reinstated, thereby contributing to the expansion of the City's Green Infrastructure and delivering Water Framework objectives*".

Response

Agree with both comments. Criterion (a) will be amended to reflect national planning policy and a new criterion has been added to ensure that the policy assists in meeting the requirements of the Water Framework Directive.

Comment

Derbyshire County Council broadly supported the policy but was concerned that there was little recognition of Derby's importance as a cycling city. Derby was selected by the Department of Transport as a Cycling Demonstration Town in 2009. There is passing reference to the national cycling network on Page 61 but the County Council considered this to be insufficient.

Derbyshire County Council was concerned that the Local Plan does not identify the strategic network of off-road paths and trails that cross the City and link to the rest of the County. They conclude that it would be helpful if a map identifying both existing and proposed off-road cycleways and multi-user routes and how they interact with the road and public transport system is included in the plan.

Response

Policy CP23 recognises Derby's importance as a cycling city. It should be noted that the plan should be read as a whole rather than individual policies. Therefore, no change is required to the policy.

Comment

Derbyshire County Council supported the approach to protecting the Green Belt as set out in criterion (c).

Response

The Council welcomes the comments by Derbyshire County Council.

Comment

Derbyshire County Council considered that criterion (j) should be amended to include "appropriate in the second sentence; the text should state *"Improved appropriate links to Kedleston Hall, Elvaston Castle and ..."*

Response

The comments from the County Council are noted and criterion (j) will be amended accordingly.

Comment

Derbyshire County Council suggested that the Local Plan needs to consider the wider context for the River Derwent and countryside to the south and east of the urban fringe and embrace the Trent Valley Vision and Strategy. They suggested the following policy, taken from South Derbyshire's Local Plan (Policy 17: Green Infrastructure), could be used:

Within the Trent Valley the District Council will support and help deliver the landscape scale change as promoted by the Lowland Derbyshire and

Nottinghamshire Local Nature Partnership. Any development within the area defined by the Trent Valley Vision will be expected to contribute towards and assist in delivering the vision in accordance with the strategy. Such contributions may be in the form of appropriate design, suitable form and function, the delivery of Green Infrastructure, landscape and habitat enhancement, financial contributions or other mechanisms as appropriate, to deliver an overall benefit within the Trent Valley Vision area.

Response

While the Council supports the Local Nature Partnership it notes that, at the time of writing the Core Strategy, the Trent Valley Vision is still an aspiration of the LNP. Therefore, it would not be appropriate at this time to make reference to the strategy. However, appropriate text will be added to both the policy and the supporting text outlining the Council's support of the Local Nature Partnership and its strategies.

Comment

CPRE Derbyshire agreed with the Plan's recognition of the importance parks and green wedges and green spaces play in Derby but stated that any reduction would have a negative impact.

Response

The Council welcomes the comments by CPRE Derbyshire. Issues relating to the loss of green space are addressed through relevant policies in the Plan and the NPPF. These allow each case to be considered on its merits.

No change required.

Comment

Derbyshire Wildlife Trust supported this policy and reiterated their previous comments to ensure that it is NPPF compliant by stating that the City has a commitment to developing an ecological network. They also requested that Diagram 9 identifies Local Nature Reserves, SSSIs and Local Wildlife Sites. Finally, they stated that the policy should make it clear that the Council will seek financial contributions to ensure that Green Infrastructure is maintained and managed.

Response

The Council considers that the policy is consistent with the NPPF and confirms its commitment to developing an ecological network.

The aim of Diagram 9 is to highlight the larger elements of the Green Infrastructure Network rather than show specific sites. Given the scale of the map, and the size of some sites, it would be impractical to include Local Nature Reserves and Wildlife Sites. These will still be identified on the formal Proposals Map, as is currently the case.

Comment

Sport England supported the principle of maintaining, enhancing and managing sports facilities as part of the green infrastructure network but they stress that it is vital that policy is supported by an up-to-date evidence base. With regard to criterion

(l), Sport England consider that it is important to ensure that investment is guided by a robust and up-to-date understanding of what is required and where, taking into account existing provision and increased demand. However, they also consider that this criterion is not consistent with the NPPF, paragraph 74.

Response

Policy CP16 sets out the overarching principle for the protection and enhancement of Derby's Green Infrastructure network and considers that it is compliant with the NPPF. It should be noted that subsequent policies add more detail to this and therefore should be read in conjunction with Policy CP17, particularly criterion (d) which is consistent with national planning policy.

It is acknowledged that the policy needs to be supported by an up-to-date assessment and the Council is, at the time of writing this response, is in the process of concluding an Outdoor Sports Strategy. This has been undertaken in-line with national guidance and with the input from Sport England. This strategy is likely to assist in the implementation of the policy, but it is considered that the policy itself is robust.

Comment

Network Rail objected to the list of acceptable development provided in paragraph 5.16.7. They considered that it does not reflect the NPPF, paragraph 90. Therefore, the list should contain "local transport infrastructure".

Response

This is accepted. An additional paragraph is suggested to be added mirroring paragraph 90 of the NPPF.

Comment

The Planning Design Group, representing both Hallam Land Management Ltd and JGP Properties Ltd, supported the policy. The former highlighting that Wragley Way could bring forward significant areas of green infrastructure. The latter supported the role Green Wedges, along with other elements of Green Infrastructure play in ensuring high quality residential development.

Response

The Council welcomes the comments by the Planning Design Group and notes the comments about Wragley Way.

Comment

One person noted that the first element of Green Infrastructure is the local countryside, which they suggest, is the first to go when greenfield sites are developed.

Response

The individual's comments are noted. The Council maintains a policy of prioritising brownfield development and regeneration. However, as expressed elsewhere in this document, it will not be possible to meet the requirements of the NPPF without the release of some greenfield sites. It is accepted that this will have some impact on

the quantitative provision of 'green infrastructure'. However, the Council also has an obligation to "meet its objectively assessed housing needs". In doing so, there is a clear objective of ensuring the provision of new open space within development or requiring qualitative improvements to existing spaces.

The policies in the plan do maintain a high level of protection for green spaces/infrastructure that is identified as public open space, wildlife sites, remaining green wedges and green belt.

Comment

Friends of the Earth stated that the plan's assertion to protect and enhance Green Infrastructure does not tally with planning decisions which takes away public open space and thus reduces the overall standards of provision.

Response

The comments have been noted. However, it is not considered that there is an inconsistency in either the plans policies or decisions made using similar policies in the past.

The NPPF itself contains criteria against which development of open space can be considered. As such, the Core Strategy cannot have a complete moratorium on any form of development on open space, as that would go too far beyond national policy. In some cases, it is also the case that a quantitative 'loss' can lead to considerable 'qualitative' improvements. This is not necessarily reflected in the respondents view, but must be something the Council has to take into account. It must also balance other 'needs' and the benefits of development against any losses. This is why an assessment of the open space is required.

The policies in the plan also maintain a high level of protection for green spaces/infrastructure that is identified as public open space, wildlife sites, remaining green wedges and green belt.

No change to the policy or supporting text is required.

Comment

The Inland Waterway Association and two members of the public supported the restoration of the Derby and Sandiacre Canal. It was highlighted the numerous benefits its restoration would bring not only to Derby, but to the wider area. The Derby and Sandiacre Canal Trust highlighted that the restored canal will provide opportunities for the expansion of the GI network.

Two members of the public considered that the Council should do more to support the restoration of the canal; one of those people highlighted that Birmingham has turned run-down waterside areas, making the canals a popular City Centre destination. The other member of the public considered that there was no real commitment to do this.

Response

The comments supporting the Derby and Sandiacre Canal are welcomed and have

been noted.

The Council is committed to support the restoration of the canal. This commitment was backed up by the approval in 2011 of a planning application submitted to the Council's for the restoration of the canal within the City boundary. It is also felt that other policies in the Core Strategy (and Saved Plan) are sufficient to protect the route.

Policies in the Core Strategy do not give any indication of a lack of support for the scheme. No change required.

Comment

Two people supported the assertion in paragraph 5.16.5 that “workers with access to Green Infrastructure tend to be healthier and more productive”

Response

The comments are welcomed and noted.

Comment

One person supported our intention to protect the Green Belt from all inappropriate development.

Response

The comment is welcomed and noted.

Comment

A member of the public supported the policy but suggested that it clearly states how the loss of green infrastructure will be compensated for.

Response

The support for the policy is welcomed and noted. With regard to the loss of Green Infrastructure, the mitigation measures involved will differ from site to site and therefore it would be inappropriate to set out in the policy what measures may be required.

Comment

One person objected as the plan does not comment on the future of the Spondon Green Belt. The same person objected to any development on the Green Belt and highlighted the role it plays in flood prevention, preventing urban sprawl, habitat protection and reducing CO².

Response

The Spondon Green Belt is not specifically mentioned in the policy. However, criterion (c) and paragraph 5.16.6 highlights the importance, and success, of the Nottingham/Derby Green Belt which includes Spondon.

No change to the policy required.

Comment

A member of the public suggested that the policy needs to highlight brownfield sites as they are often areas of semi-natural vegetation with a diversity of flora and fauna. It was stated that Open Mosaic Habitats (previously developed land) is now a UK BAP Priority Habitat.

Response

The importance of previously developed land and buildings is referred to in Policy CP19: Biodiversity and the supporting text. Policy CP19: Biodiversity refers to, in criterion (e), the creation, extension, protection and better management of Biodiversity Action Plan priority habitats which Open Mosaic Habitats are part of. Reference to these habitats will be specifically made in paragraph 5.19.7.

No change required.

Action

- Criterion (a) now reads “minimise and mitigate impacts and overall decline of biodiversity and, where possible, provide net gains”.
- New criterion added which states “resist the non-essential culverting of watercourses and encourage existing culverts to be removed and natural watercourses reinstated, thereby contributing to the expansion of the City’s Green Infrastructure and delivering Water Framework objectives”
- The policy will state its support for the aims and objectives of the Local Nature Partnership.
- Paragraph 5.16.4 amended to read ‘Green infrastructure’.
- Paragraph 5.16.4 now refers to ‘...the setting of both our cultural assets and the historic environment’.
- An additional paragraph has been added mirroring paragraph 90 of the NPPF which sets out is considered to be appropriate in the Green Belt.
- Policy CP19: Biodiversity refers to, in criterion (e), the creation, extension, protection and better management of Biodiversity Action Plan priority habitats which Open Mosaic Habitats are part of. Reference to these habitats will be specifically made in paragraph 5.19.7.

Policy CP17: Public Green Space

Comment

Natural England supported the policy and welcomed the inclusion of criterion (b) which encourages the linking of new green spaces to the wider green infrastructure network.

Response

The comments from Natural England are welcomed and noted.

Comment

English Heritage considered that criterion (d) should be amended to recognise the historic interest of open space (an open space in a conservation area) and requests that an additional criteria; this would consider the loss of open space in terms of its environmental value.

Response

The Council recognises the historic role open space plays in the City but considers that the policy reflects the NPPF and should be read in conjunction with Policy CP20. Therefore, no change is required.

Comment

Derbyshire Wildlife Trust stated that it wasn't clear if the Council are adopting the ANGSt approach which is recommended by Natural England. The Wildlife Trust continue by objecting to the assertion in the supporting text that Public Green Space may be surplus to requirements; they highlighted that Public Green Space can be improved for biodiversity, even if it is not directly used by the public and there is no criteria setting out how 'surplus' land will be defined. They also suggested that the content of paragraph 5.17.12 is included in the policy.

Response

Policy CP17: Public Green Space already contains an overarching standard of 3.8 hectares per 1000 people and accessibility standards which are contained in Appendix C of the Plan.

It is the intention of the Council to undertake a review of the Open Space Study and this will result in more detailed standards for the various types of open space (including natural green space) which will be included in the Part 2 Local Plan.

The Council notes the concern of the Wildlife Trust with regard to dealing with public green space which is surplus to requirement.

Paragraph 5.17.8 sets out the criteria by which 'surplus to requirement' is assessed.

Comment

Sport England supported the inclusion of this policy but highlighted the need for a robust and up-to-date evidence base to support it. They continued by supporting criterion (c) in which cross-boundary working is referred to. Sport England considered that criterion (d) is broadly consistent with the NPPF, paragraph 74, but feel that it is undermined by paragraphs 5.17.8 and 5.17.9.

Response

The Council acknowledges that the policy needs to be supported by an up-to-date assessment and the Council is, at the time of writing this response, in the process of concluding an Outdoor Sports Strategy. This has been undertaken in-line with national guidance and with the input from Sport England.

The comment regarding paragraphs 5.17.8 and 5.17.9 have been noted no change will be made.

Comment

The Planning Design Group, representing both Hallam Land Management Ltd and JGP Properties Ltd, supported the policy.

Response

The comments from both agents are welcomed and noted.

Comment

The Derby Cycling Group stated that a further policy is required which seeks to extend open spaces wherever possible with the aim of creating strategic green corridors and using them as cycle routes. They concluded that these open spaces could be used to create longer, attractive routes which give access to district centres, areas of employment and housing. They continued by asserting that the policy needs to define how access to open spaces can be improved and requested that access development plan is incorporated into the Core Strategy.

Response

Policy CP16: Green Infrastructure sets out the Plan's overarching strategy for GI in the City which includes enhancing linkages and improving the GI network as a result of new development. It is considered that this should be adequate to assist in meeting the aspirations of the respondent.

No change required.

Comment

Response

The comment is noted but the Council considers that this is not a subject which should – or could - be included in the Local Plan. Therefore, no change is required.

Comment

A member of the public objected to the policy as they considered that it should clearly state how the 3.8 hectares per 1000 people will be achieved and it should state what the current position is. It was also stated that the plan includes targets for housing and employment but not for open space; this should be rectified.

Response

The Part 2 Local Plan will set out in more detail the provision of all public green space; considering three standards – quality, quantity and accessibility. It is through these standards that the Council will set out the targets for the provision of open space in the City and any allocations it might make for the provision of new open space. However, paragraph 5.17.1 clearly states what elements contribute to public green space.

No change required.

Comment

A member of the public suggested that as part of the strategic review for open space, it should determine a target for providing allotments. In addition a local

Councillor also considered that the Part 2 Core Strategy should contain a standard for the provision of allotments.

Response

The Part 2 Local Plan will consider the provision of all types of open space, including allotments, through the setting of standards for quality, quantity and accessibility.

Comment

A member of the public considered that paragraph 5.17.12 needs strengthening as the population growth will likely result in an increase in people using outdoor sports facilities.

Response

The comments have been noted and additional text has been added to the paragraph, highlighting that the Council is undertaking an Outdoor Sports Strategy which will inform how the Council will address demand for pitches.

No change required.

Comment

A member of the public stated that the deficiency in many types of green space, indicated in paragraph 5.17.5, needs to be addressed as a matter of urgency.

Response

The comments are noted. The Part 2 Local Plan will set out in more detail the provision of all public green space; considering three standards – quality, quantity and accessibility. It is through these standards that the Council will set out the targets for the provision of open space in the City and any allocations it might make for the provision of new open space.

Comment

A Councillor considered that the existing allocation of a City Park off Moorway Lane is essential given the amount of development proposed in Heatherton, Stenson and Sinfen.

Response

The comment has been noted. The City Park allocation still forms part of the 'Saved' Policies in the CDLPR. The Local Plan Part 1 does not suggest its removal.

Following a review of open space, the Part 2 Local Plan will set out in more detail the provision of all public green space; considering three standards – quality, quantity and accessibility. It is through these standards that the Council will set out the targets for the provision of open space in the City and any allocations it might make for the provision of new open space. This is where the 'City Park' issue will be considered.

No change required.

Action

- Add supporting text to state that the Council is undertaking an Outdoor Sports Strategy and this will be used to inform future planning decisions.

Policy CP18: Green Wedges

Comment

The National Trust, Derbyshire Wildlife Trust and two members of the public supported the retention of Derby's Green Wedges. Derbyshire Wildlife Trust stated that the Green Wedge Strategy may not be up-to-date and a revised version may need producing in due course, maybe as a wider green infrastructure/ecological network document.

Response

The comments supporting the policy are welcomed and noted.

Any updates to the Green Wedge Study will be carried out in due course when considered necessary to support the production of the Council's Development Plan. It is considered, however, that the existing study is a robust piece of evidence.

No change required.

Comment

Natural England welcomed the recognition that Green Wedges are part of the wider Green Infrastructure network and play an important part in climate change adaptation.

Response

The comments supporting the policy by Natural England are welcomed and noted.

Comment

Derbyshire County Council re-affirmed their support of the Council's designation and protection of Green Wedges.

Response

The comments supporting the policy by the County Council are welcomed and noted.

Comment

Sport England welcomes outdoor sport being included as a potential form of development.

Response

The comments supporting the policy by Sport England are welcomed and noted.

Comment

Network Rail noted that the appropriate uses in the policy are consistent with the appropriate uses in the Green Belt. Therefore, they suggested that the appropriate

uses should reflect the NPPF, paragraph 90, and include “Statutory Undertakers”. They considered that this is important for both Network Rail and train operating companies in relation to future uses of Chaddesden Sidings.

Response

The Green Wedge policy is based on the previous policy in the City of Derby Local Plan Review and carries forward the acceptable uses. Although the Green Wedge has similarities with Green Belt policy it is not a direct ‘local’ version of it. As such, it is not considered that a change should be made to the current policy.

Comment

Network Rail also requested that a review of the Green Wedge boundary is undertaken in the Chaddesden Sidings area following the restoration of the sand and gravel workings. They note paragraph 5.18.2 which mentions that Green Wedges do not have a degree of permanence which, they consider, indicates there should be some flexibility introduced into the policy.

Response

Green Wedge boundaries have only been amended in the Part 1 Plan where a consequential change would be required to allocate a strategic housing site. The issue raised by Network Rail will be addressed in Part 2.

No change required.

Comment

Turley Associates supported the inclusion of the policy but stated that there is an argument to de-allocate the Brook Farm site as it makes little contribution to separating the distinct neighbourhoods.

Response

The Council will consider whether or not the remainder of the ‘wedge’ in this location should be maintained in Part 2 of the Plan. This will allow the issue to be considered in the round.

No change required at this stage.

Comment

The Planning Design Group, representing JGP Properties Ltd, supported the policy, and especially criterion (a), but suggested that it should have regard to the need to balance competing considerations such as developing in green wedges. For example, the potential advantages offered by retaining Green Wedges (or part of) could be outweighed by the benefits of locating development in sustainable locations.

Response

The Local Plan will set out the policies for and define Green Wedges through the plan making process. Where a ‘wedge’ is retained this will be because it has particular importance to the function of the wedge. Logically only development that meets the criteria of this policy would be considered ‘acceptable’. Development not

in these categories may, by definition, undermine the function of the wedge and thus may not be able to demonstrate that their benefits outweigh the costs.

Green wedges should remain open and undeveloped in order to carry out their function and the policy will not permit unacceptable development within them.

No change to policy required.

Comment

The Derby Cycling Group considered as space becomes even more restricted in the City, a strong policy which protects the Green Wedges from encroachment is needed. They continued by asserting that the policy needs to define how access to green wedges can be improved and requested that a access development plan is incorporated into the Core Strategy.

Response

It is considered that the current Green Wedge policy is robust and will continue to protect the wedges from inappropriate development. An 'access development plan' for green wedges would be too detailed an issue for the Core Strategy.

No change required.

Comment

A member of the public agreed that retaining Green Wedges is vital to reduce the impression of urban sprawl but raised particular concerns about the encroachment on the Green Wedge dividing Mackworth College and Onslow Road.

Response

The inclusion of this policy reaffirms the Council's intention to retain the City's Green Wedges. However, as Chapter 4 states, the proposed level of growth in the Core Strategy requires that some sites currently in the Green Wedge will have to be released. This strategy has been informed by the Green Wedge Study (Derby City Council, 2012) to ensure that, where development occurs, a functional green wedge will be maintained. The draft policies for these sites also highlight the potential to improve green wedges (either in terms of access and / or environmental quality).

No change to policy required.

Comment

A member of the public recognised the importance of the City's Green Wedges and considered that, as Derby expands, people will live further away from the countryside. It is suggested that for every metre of development that occurs, the penetration into the City Centre of the relevant Green Wedge should be increased; even at the expense of demolishing some buildings.

Response

Given the built-up nature of the City, it would be impractical to extend Green Wedges further into the City Centre or enter into a programme of demolition to increase their size. This would be particularly counter-productive if it led to a need for further

housing development elsewhere.

No change required.

Comment

A member of the public objected to criterion 4. They considered it was too vague and would likely result in inappropriate, speculative applications.

Response

Comment accepted. Criterion 4 will be deleted and criterion will be amended to state “Nature conservation, including improvements which provide multiple benefits to Derby’s green infrastructure or link the Green Wedge to the wider GI network”.

Comment

A member of the public supported the policy but they highlighted that land suitable for a cemetery has yet to be identified.

Response

The comment supporting the policy is welcomed and has been noted. It is the Council’s intention to consider the location of a new cemetery in the Part 2 Local Plan.

Comment

A member of the public highlighted the important role Green Wedges play, especially as the City grows. It was stated that the inner ends of green wedges need to have special protection as people living in these areas are furthest from the countryside proper, and to prevent incremental loss of open opportunity. They will also provide greatest benefit for urban cooling in a world of climate change.

Response

The Council recognises multiple benefits Green Wedges bring to the City. It is considered that the draft policy offers significant protection and that additional protection for the inner edges of each wedge would be inappropriate. The policy already adequately addresses proposals that may have a negative impact on the role and function of the wedge.

No change required.

Action

- Criterion 3 amended to read “Nature conservation, including improvements which provide multiple benefits to Derby’s green infrastructure or which link the Green Wedge to the wider GI network”.
- Criterion 4 deleted.

Policy CP19: Biodiversity

Comment

The National Trust recognised that a strong policy is required and considers that the current wording is appropriate.

Response

The comments from the National Trust are welcomed and noted.

Comment

Natural England strongly supports the policy as it follows the advice set out in the NPPF by planning positively for the creation, protection, enhancement and management of biodiversity.

Natural England also welcomed the aspiration to achieve a net gain in biodiversity and to establish coherent ecological networks.

Response

The comments from the Natural England are welcomed and noted.

Comment

The Environment Agency welcomed the linkages between this and the climate change policy but recommended that criterion (d) is deleted because species will generally take care of themselves, as long as they are not disturbed and given time and space to do so. They also state that criterion (g) should refer to 'ground water bodies', which must also achieve environmental standards, set by the Water Framework Directive. Finally, they suggested the following amendments to paragraph 5.19.9:

“Surveys must be taken at appropriate times of the year for the relevant habitats, species, flora and fauna by a suitably qualified ecologist. Where proposals could affect Sites of Special Scientific Interest (SSSI), these will be subject to special scrutiny including consultation with English–Nature Natural England. In addition, developments likely to impact upon a watercourse, either directly or indirectly, may also require the submission of a Water Framework Directive Assessment”.

Response

Criterion (d) will be deleted for clarity following the comments made by both the Environment Agency and Derbyshire Wildlife Trust.

Criterion (g) will refer to “...all surface and ground water bodies...”

The Council agrees with the comments made by the Environment Agency regarding paragraph 5.19.9 and now states that a survey of habitats, species, flora and fauna must be undertaken by a suitably qualified ecologist. In addition, a new sentence recognises of the Water Framework Directive.

Comment

Derbyshire Wildlife Trust stated that criterion (a) should be in line with the NPPF, paragraph 118 by ensuring that the first principle should be to “*avoid and minimise impacts*” before mitigation is considered. With regard to criterion (d) they requested that clarification is provided as to what ‘supporting species to adapt to climate change’ means and that priority species are also included in the policy. DWT also highlight that the number of Local Nature Reserves in the City has increased to 11; that paragraph 5.19.3 needs amending to accord with the NPPF, paragraph 118 and, finally, requested that the supporting text recognises that the number of Local Nature Reserves may change over the plan period.

Response

Agree with the comments made by the Wildlife Trust.

Criterion (a) now begins “seek to avoid, minimise and mitigate...”

Criterion (d) has been deleted for clarity following the comments made by both the Environment Agency and Derbyshire Wildlife Trust.

Criterion (e) has been re-written to include priority species.

Paragraph 5.19.2 has been amended to include the correct number of wildlife sites in the City and now states that over the plan period the number of Local Wildlife Sites may alter.

Paragraph 5.19.3 has been amended to accord with the NPPF by setting out that compensatory measures should be seen as a last resort.

Comment

An agent acting on behalf of Celanese Acetate Ltd recognised that the Council would wish to ensure that there are no adverse direct or indirect effects on designated ecological and habitat assets. However, they considered that the current draft policy means that developers who may only fail one of the tests would automatically be refused planning permission. They felt that criterion 2 and 3 should be amended by replacing “and” with “or”.

Response

The Council has noted the comments made by the respondent but considers that the policy should not be changed as it currently requires developers to consider alternative sites, ascertain if the benefits of development outweighs the impact and to mitigate the impact in-line with the requirements of the NPPF.

Comment

The Planning Design Group, representing both Hallam Land Management Ltd and JGP Properties Ltd, supported the policy.

Response

The comments are welcomed and noted.

Comment

A member of the public suggested that the policy needs to highlight brownfield sites as they are often areas of semi-natural vegetation with a diversity of flora and fauna. It was stated that Open Mosaic Habitats (previously developed land) is now a UK BAP Priority Habitat.

Response

Paragraph 5.19.7 recognises that brownfield sites can make a positive contribution to biodiversity. However, additional text has been added to recognise that Open Mosaic Habitats are a UK BAP priority habitat.

Action

- Criterion (a) now begins “seek to avoid, minimise and mitigate...”
- Criterion (d) deleted
- Criterion (e) deleted and replaced by alternative text which reads “support and contribute to the targets set out in the Lowland Derbyshire Biodiversity Action Plan for priority habitats and species”
- Criterion (g) now refers to “...all surface and ground water bodies...”
- Paragraph 5.19.2 now states the correct number of Local Nature Reserves and notes that the number of wildlife sites may change over the plan period.
- Paragraph 5.19.3 has been amended by including “as a last resort” in the final sentence.
- Paragraph 5.19.7 recognises that Open Mosaic Habitats are a UK BAP priority habitat.
- Paragraph 5.19.9 now states that “Surveys must be taken at appropriate times of year for the relevant habitats, species, flora and fauna by a suitably qualified ecologist”
- English Nature is replaced by Natural England in paragraph 5.19.9.
- Paragraph 5.19.9 concludes with the following “. In addition, developments likely to impact upon a watercourse, either directly or indirectly, may also require the submission of a Water Framework Directive Assessment.

Policy CP20: Historic Environment

Comment

The National Trust strongly supported the comprehensive approach set out in this policy. However, they suggest that criterion (d) should reflect the NPPF and refer to “public benefits” rather than “benefits”.

Response

Comments are noted. Criterion (d) will be reworded in line with comments from English Heritage so that it refers to appropriate recording being required where necessary. The criterion will no longer refer to justifying loss through the benefits of a

proposal.

Comment

The City Council's Conservation Area Advisory Committee welcomed the opening statement of CP20, however it was noted that the policy and associated text should seek to highlight the public welfare benefits of heritage.

Response

Agreed.

Comment

A member of the public considered that the Council should do more to protect its historic buildings.

Response

The Council recognises the historic environment as one of Derby's greatest resources and will protect it through the preservation, enhancement, restoration and repair of heritage assets in line with local and national policies and best practice guidance. The Core Strategy contains a number of policies that seek to meet these aims and objectives whilst also encouraging opportunities to enhance the tourism potential of heritage assets and promote their positive integration into regeneration proposals.

No change required.

Action

- Reference to public welfare benefits associated with the historic environment should be added to paragraph 5.20.2 of the supporting text.

Policy CP21: Community Facilities

Comment

Sport England supported the inclusion of the policy in the Core Strategy but stressed that it needs to be supported by a robust and up-to-date evidence base.

Response

Sport England' support for the policy is welcomed and noted.

It is acknowledged that the policy needs to be supported by an up-to-date assessment and the Council is, at the time of writing this response, in the process of concluding an Outdoor Sports Strategy. This has been undertaken in-line with national guidance and with the input from Sport England.

Comment

Derbyshire County Council strongly supported the approach of the policy.

Response

Derbyshire County Council's support for the policy is welcomed and noted.

Comment

The Theatres Trust supported the policy.

Response

The Theatres Trust support for the policy is welcomed and noted.

Comment

Bellway Homes stated their support for the policy, especially criterion (c) and the identification that new school are required in the City or South Derbyshire. The concluded their response by encouraging the Council to work with key stakeholders to ensure that new housing is delivered and supported by the necessary infrastructure.

Response

The comments are welcomed and noted.

Comment

Oxalis Planning, representing Bloor Homes, stated their acceptance of the plan's solution to meet the education needs of the community, they highlighted that there is some confusion with paragraph 6.22.9 and the Infrastructure Delivery Plan which refers to a new secondary school being provided in response to growth to the south and east of the City.

Response

Paragraph 6.22.9 relates solely to Policy AC22: Mickleover and Mackworth while the relevant paragraph in the Infrastructure Delivery Plan provides a brief overview of the underlying demand for education across the entire City. The Council considers that there is no confusion and therefore, no change will be made to either documents.

Comment

Two members of the public supported the policy.

Response

The comments are welcomed and noted.

Comment

One person questioned who was going to pay for the new schools needed and the same person questioned who was going to provide health facilities.

Response

New or improved education provision will be funded or part funded through individual negotiations from planning applications in terms of Section 106 or through the Community Infrastructure Levy.

In addition, there are a number of non-developer funding streams available such as

Basic Needs Application, Priority Schools Building Fund, Academy Sponsored Funding and Private Funding. All avenues of funding will be investigated and pursued to ensure adequate education provision is delivered.

Comment

One person questioned why there is no specific reference to the requirements of the private schooling sector?

Response

The provision of private schools is not under the remit of the local education authorities and cannot be 'required'. However, should new private education facilities be proposed, the policies in the plan – including CP22 – will provide an adequate way of dealing with them.

Comment

Comments provided by the Lonsdale Swimming and Sports Trust highlighted their plans to expand Lonsdale Pool into a community leisure centre. They requested that amendments are made to criterion (d) and the supporting text.

Response

Part of the Leisure Strategy is a hub and spoke modelling framework and within the model it indicates that, on the west side of the City, there is a shortfall of swimming pool provision. Therefore exploring how we address this shortfall will be a priority for the City and in doing so it will include a range of partners.

No change required.

Action

- No change to the policy or supporting text is required.

CP22: Derby University and Further Education

Comment

Generally, the National Trust welcomed the intent of the policy. However, they stated that some developments at the University have impacted on the wider setting of Kedleston through their design, location or appearance and have suggested an amendment to the Policy's final paragraph to read:

“All proposals related to the University will be expected to respect the character, amenity and heritage of both the immediate area and its wider surroundings, and also be able to satisfactorily address any associated parking, traffic or access issues that may arise.”

Response

It could be argued that this paragraph is not required at all on the basis that such considerations are covered elsewhere in the plan. However, residents have raised particular concerns about the impact on the University on amenity and traffic in recent years. Thus it was considered important to highlight the *particular* care the

Council will take with regard to these issues with any University related proposal in order to give nearby residents comfort.

Any implications for the 'wider surroundings' would be adequately dealt with using other policies in the plan at the appropriate time. Not including the suggested references in the policy does not undermine or 'downgrade' the protection given to heritage features both within and outside the City.

Comment

A member of the public stated that expansion of the University needs to be resisted until measures to improve transport links and reduce congestion are in place.

Response

The policy makes it clear that any proposals associated with the University have to take impacts on traffic and parking into account. It would not, however, be productive to resist the growth of the University in principle, considering its importance to the City in terms of economy and education.

No change is needed to this policy.

Comment

At the Sinfin Library drop-in event a member of the public suggested that links with the University should be encouraged, particularly if the City is to encourage hi-tech development and jobs.

Response

Comments are noted and welcomed. It is considered that this issue is addressed adequately by the policy already.

Action

- No changes to the policy based on consultation responses.

Policy CP23: Delivering a Sustainable Transport Network

Comment

The Highways Agency welcomed the intention to deliver a sustainable transport network through improvements to pedestrian and cycle links, including the implementation of a new park and ride scheme. They suggest that in the introduction to the policy and Chapter 1 that reference is made to the overarching objective of managing down traffic impacts to support sustainable transport networks.

Response

The comment is noted and support welcomed. It is felt that the recommended reference could be under criterion a. as part of the overarching 'objectives' for transport proposals.

Comment

The Highways Agency also welcomed the Council's commitment to actively managing development to ensure that new development is located in highly accessible locations that are well served by sustainable modes of transport.

Response

The comments are noted and welcomed.

Comment

Derbyshire and Peak District Campaign for Better Transport generally supported the content of the policy.

Response

Comments noted and welcomed. No change to policy required.

Comment

Derbyshire Wildlife Trust indicated they would support the policy if criterion 8 included mitigation for biodiversity impacts.

Response

Policy CP23 specifically deals with the impact of development on traffic and transport related issues. As such, it may not be relevant to consider the biodiversity impact of development within this criterion. It is felt that these impacts are adequately dealt with elsewhere in the plan and do not need to be repeated here.

No change to policy recommended.

Comment

Network Rail considered that the policy should be revised slightly to take account of the long-term policy of both Network Rail and the Rail regulator to seek the elimination of level crossings wherever possible. To reinforce this commitment they suggested the addition of "and rail" between "road" and "safety" in criterion 2 and a specific reference to level crossings in criterion 11.

Response

Comments are noted. It is accepted that reference to 'rail' in the policy in relating to safety would be a useful addition to the policy (both in criterion 2 and 11).

It is recommended that references to rail safety and rail network are made to policy and consequential amendments made to the supporting text to reflect these changes, including reference to level crossings.

Comment

Although Boyer Planning indicated their support for the policy, they suggested a number of amendments (addressed in turn below). In general though, they considered that the policy should be consistent with the NPPF, paragraph 29.

Response

The broad support for the policy is welcomed. Specific suggested amendments are considered in turn below. It is, however, considered that the policy is consistent with the requirements of the NPPF.

Comment

In respect of criterion (a1), Boyer Planning considered that the current wording is unclear as how “greater” travel choice and equality can be measured as they feel that not all locations would necessarily need to demonstrate greater choice if existing provision is adequate.

Response

The point being made by the respondent is understood. The reference to ‘greater’ is clearly aspirational and aims to try and ensure ‘added value’ from all proposals (not all of which are necessarily developments; this policy would also apply to infrastructure projects, for example, which could lead to ‘greater’ choice). Perhaps a change from ‘provide’ to ‘promote’ would satisfy the concerns? Proposals already in areas of ‘adequate’ transport choice would, by definition, be supporting greater travel choice by being in such an area (as opposed to an area with inadequate choices). Proposals that genuinely were providing greater choice would be meeting the requirements of the policy. Proposals that were in areas of poor choice or equality and were not doing anything to mitigate the issue would fall foul of the ‘promotional’ element of the policy.

It is hoped that this simple change is sufficient.

Comment

Boyer Planning thought that criterion (a4) should avoid implying that the focus of travel should be just the City Centre as many key employment destinations are to the south and east of Derby.

Response

It is not felt that criterion a(4) does imply a focus on the City Centre. The criterion only mentions the ‘City’ in general terms. This could apply to the city centre, as well as to the south, east, north and west of the City.

No change required.

Comment

Boyer Planning suggested the following to bring criterion a(5) in-line with the principles of the NPPF “*ensure that investment in transport contributes to the enhancement of the urban and natural environment*”

Response

Comment accepted. This change can be made with no detriment to the policy.

Comment

Boyer Planning suggested that “highly” is removed from criterion (b6) and should

now read “*is located in accessible locations that are well served by frequent high quality bus services and which help to facilitate walking and cycling*”

Response

Comment accepted. The change can be made with no detriment to the policy.

Comment

Boyer Planning stated that criterion (b8) suggests that individual development proposals should mitigate against the cumulative impacts of other developments. They considered that schemes should be only to mitigate the impacts that they themselves generate. As a result, they suggest the following “*implements, and/or contributes to, appropriate on-site and off-site measures to mitigate the residual impact of the proposal*”.

Response

The point being made by the respondent is accepted. However, there are cases where contributions might be pooled from a number of developments to mitigate a true ‘cumulative’ impact (while it is also accepted that contributions would have to be proportionate to the impact of individual schemes). For this reason, use of the word ‘residual’ could be equally misleading. Therefore, it is proposed to amend this simply to remove the word ‘cumulative’. This leaves the issue open to be dealt with in the most appropriate way for the proposed development *and* the nature of the mitigation.

Comment

Boyer Planning considered, in respect of criterion (b10) that transport modelling could include simpler junction modelling or major strategic models such as DATM. They suggested the following wording (underlined below) as an addition to the criterion:

10. includes proportionate Transport Assessments and Travel Plans for all major applications and any proposal where transport issues are likely. Developers will be expected to agree appropriate transport modelling for use in their evidence with the Council which may include use of the City Council’s strategic models.

Response

It is felt that the criterion’s reference to agreeing appropriate transport modelling is adequate to deal with the respondent’s concerns.

No change necessary.

Comment

Finally, Boyer Planning commented on criterion (b12). They considered that the protection of former railway lines and canals seemed reasonable but they considered that the policy should not provide blanket protection.

Response

It is not felt that b(12) offers blanket protection. The criterion is clear that routes are only protected where they have the potential to be re-used.

No change required.

Comment

The Planning Design Group, representing Hallam Land Management Ltd, supported the policy.

Response

Comments noted and welcomed. No change to policy required.

Comment

David Locke Associates, commenting on behalf of Rolls-Royce, stated that developing a sustainable transport network is key to attracting and retaining staff. However, they considered that the vision still needs to be realised.

Response

Comments are noted. No change to policy required.

Comment

David Locke Associates, commenting on behalf of Rolls-Royce, also supported criterion 14.

Response

Comments are noted and welcomed. No change to policy required.

Comment

The Derby Cycling Group asserted that the Core Strategy does not define the mechanism through which the development of cycle transport within the City will be realised. They continued by stating that new development will not usually create hundreds of new cycle journeys; it is the access routes to new developments which will create the journeys and each planning application must consider these at an early stage.

Response

The mechanisms for delivering improved cycle transport through the City will be varied and will change over time. There is no need for the plan to be prescriptive about how this objective will be achieved through reference to specific schemes.

The point about access to new development is noted and it is felt that the draft policies provide sufficient guidance to ensure access to new development through cycling is an important consideration. No change to the policy is considered necessary here.

Comment

The Derby Cycling Group considered that the policy must state the need for a Strategic Cycle Development Plan to back up the aspirations of the plan. They also considered that the Core Strategy must state that cycling must always be a key feature in the transport plan for all new developments and in the City's transport

strategy.

Response

A 'strategic cycle development plan' is not necessarily a matter for the Core Strategy to address. The document already makes a lot of reference to the importance of cycling both in terms of providing facilities within new development *and* in terms of a wider strategic cycle network. It should also be remembered that the Core Strategy is not the only means by which such measures will be implemented. Work connected to the LTP continues to make great strides in promoting cycling and providing the necessary infrastructure.

It is felt that the policies in the plan are adequate to achieve what the respondent desires within the context of the Development Plan. No change required.

Comment

Sustrans supported criterion (b6) although they note that many of the new development sites, for example Raynesway and Infinity Park Derby, are not currently well served by public transport.

Response

Support noted and welcomed.

It is accepted that there are some deficiencies in terms of public transport on some proposed or existing employment sites (though reference to 'Infinity Park' is somewhat spurious as it currently does not exist). There may be occasions where development sites do not meet all policy objectives at their inception and the other benefits they bring are given priority in the short term. However, planning for such sites does not stop once permission is granted or the plan is adopted. Once a critical mass of development is in place, there is no reason why public transport accessibility to sites could not improve. The Council will continue to try to improve public transport accessibility to all sites over the lifetime of the plan.

No change to policy required.

Comment

Sustrans considered there a contradiction in paragraph 5.23.2. They suggested the wording of paragraph 5.23.2 is changed to "*the design and layout of development should prioritise the needs of pedestrians and cyclists*" as the current wording gives the impression their needs are an afterthought in the design process.

Response

This point is not accepted. The draft text in no way suggests that cyclists and pedestrians are an afterthought. In all cases, their needs should be taken into account (as should, in fairness, the needs of motorists). The current wording is balanced and in no way undermines the policy or objective.

No change recommended.

Comment

While Sustrans supported the protection of Rights of Way in paragraph 5.23.6, they consider that they are unlikely to provide a comprehensive network of pedestrian routes and suggested that a comprehensive assessment of pedestrian needs and a systematic programme of improvements to the existing network are undertaken.

Response

This is not a matter for the plan. The policy provides an adequate framework to consider the implications for, and the improvement of, public rights of way and pedestrian routes across the City.

No change recommended.

Comment

Paragraphs 5.23.8 and 5.23.9 outline the need and standards for parking but Sustrans highlighted that cycle parking is not mentioned. They considered that the Core Strategy provided a conservative approach to parking but supported not having maximum parking standards.

Response

Comments noted. Appendix B does include parking standards for cycles and so the objectors concerns should be satisfied by this. However, it is considered that a reference to the provision of cycle parking / facilities may be beneficial.

It is recommended a reference to 'cars, motor cycles and bicycles' is made within the relevant paragraph.

Comment

Finally Sustrans considered that, despite the responsibility for health within the Council, there is a lack of acknowledgement of the health benefits of active travel and possible synergies with the Council's health agenda.

Response

Comments are noted. However, criterion a(2) already makes a reference to 'health' in the context of 'promoting active travel'. This is considered sufficient.

No change required.

Comment

One person considered that as Derby grows in size and population the transport challenges increase. Large developments result in specific demand for new road capacity. Like other areas, Derby has generally sought to accommodate this increase in demand by building new roads and seeking additional capacity through the redesign of key junctions.

Another person supported the content of the policy but feels that paragraph 5.23.3 should be amended. The respondent considers that "likely" should be changed to "inevitable" given the amount of growth proposed in the plan.

Response

Support for the policy noted. However, it is not considered that any change is needed to paragraph 5.23.3. As supporting text, this wording is adequate.

No change to policy recommended.

Comment

A member of the public stated their support for the policy but continued by highlighting a difference in tone between the policy and the supporting text. They considered it is vital to carry out an audit to ascertain the changes to the transport network, assessing the impact on active travel and the results sent to all interested parties.

Response

Support for the policy noted and welcomed. As part of the evidence base for the plan a substantial amount of transport modelling has been carried out that has helped the Councils understand the impact on the transport network and the changes that will be needed. This information is publically available.

Furthermore, once the plan is adopted and development takes place, the impact on the transport network will be monitored and the effectiveness of the policies considered.

In addition, 'planning' for Derby does not stop once the plan is adopted. As and when necessary – or possible – the Council will identify transport related schemes that will help to improve the network or mitigate problems. Proposals for the A52 are an example of this type of activity.

No change to policy recommended.

Comment

A member of the public stated that now that the inner ring road has been completed and there are (almost) two outer ring roads, a new road layout should be considered. A system of ring roads connected with radial roads would provide the opportunity to create an efficient grid structure.

Response

The comments are noted. However, such a significant redesign of the City's road network would take too long to be considered within this plan and, considering the cost of any such scheme, there would be significant issues over its deliverability.

Work on how to improve the city's transport network will not, however, cease once this plan is adopted and it will provide a suitable decision making framework within which to consider new infrastructure projects as and when they are considered.

No change to policy recommended.

Comment

A member of the public considered that the Council needs to force people onto

public transport by reducing both the number of cars on the road and the number of parking spaces. One option suggested was to reduce the amount of car parking in the City by building houses on the car parks.

Response

Comment noted. Maintain a balance between the number of parking spaces in the City and congestion is important. It would not be practical to identify all car parks for housing development, not least as some would not be appropriate locations for housing. Equally, reducing spaces below a certain number would have negative impacts on the network as there would probably be an increase in 'illegal' on-street parking or car parks. The Council has, however, already identified a number of car parks within the City Centre for development (for example, Liversage Street and the Castleward Urban Village). So, in some circumstances, the respondent's suggestions are already being carried out.

No change to policy required.

Comment

One person suggested that all new developments should be designed to facilitate future bus routes.

Response

In terms of public transport, the ability of a site to be accessed by public transport – either now or in the future – is already a policy requirement. In some cases, clearly this has to be balanced against other factors. However, the policy is adequate to satisfy the respondents concerns.

No change to policy required.

Comment

One person considered it is necessary to address the inadequacy of the bus station which cannot accommodate all of the City's services. A local Councillor also suggested that developer contributions are used for the station's expansion.

Response

There is no evidence to suggest that the bus station is inadequate or that expansion is required. As such, it is not considered appropriate to include references to its expansion within policy. The policy does, however, already provide for the improvement of public transport services and infrastructure. Should any future requirements be identified, then these policies would be sufficient.

No change to policy recommended.

Comment

One person considered that the cross-city bus services are poorly conceived and implemented.

Response

Comments noted. It is not the place of the Local Plan to identify bus routes or

services. No change to the policy appears necessary.

Comment

A member of the public noted that Derby has been a Cycle Demonstration Town, and all school pupils continue to have access to quality cycle training. We are thus creating a new generation of young adults who have the skills and energy to make active travel their chosen means of avoiding queues to work. To maximise the use of these skills Derby needs to radically strengthen its network of cycle routes, both on road, and increasingly off-road too.

Response

Comments noted. It is considered that Policy CP23 and the plan as a whole are adequate in strengthening the cycle route network.

No change to policy recommended.

Comment

One person considered that reducing speed limits to 20mph will reduce noise and danger, and encourage people to choose to walk and cycle more. It was suggested that all new developments should be created for a maximum speed limit of 20mph – whether for residential or employment.

Response

The layout and design of new developments will be considered on a case by case basis and sweeping requirements such as the one suggested are often not necessary or welcome. The safety and amenity of residents is adequately addressed in Policy CP23 and those relating to design and place making. No change is needed to this, or other, policies to address the concerns of the objector.

Comment

One person considered that flexible integrated “park and ride” solutions should be explored further. Walk-bus- walk is the commonest integrated travel but even this can often be improved with better waiting facilities. Others include: car and cycle, cycle and bus, and other combinations need exploring creatively, including options for car-share pick-ups and drop-offs.

Response

All innovative forms of promoting more sustainable travel patterns will be considered by the Council but often may be better addressed on a case-by-case basis.

Again, the policies and objectives of the plan allow for such solutions to be implemented. However, without more research into the merits (or otherwise) of different approaches it would be inappropriate to be too prescriptive within the plan at this stage. Furthermore, it is not considered necessary to delay the plan’s preparation to consider such issues when the objectives of the objector can be achieved under the proposed policy.

No change to policy recommended.

Comment

One person stated that Sustainable Travel Demonstration Towns showed that personalised travel planning can lead to a significant number of people altering their travel modes for some journeys. As well as reducing the number of private single-occupancy vehicle movements, this can make bus services more financially viable and improve the health of populations. People are most likely to make changes to their travel when there are other changes happening in their lives, such as moving home or job.

Response

Comments noted. The plan cannot require 'personalised travel plans' but it can – and does – require commercial and residential travel plans for larger developments. It is not felt that any changes to the policy can be made here.

Action

- Replace 'provide' in a(1) with 'promote'
- Add new criterion under 'a' to read:
"include initiatives to manage down the traffic impact of proposals to support the promotion of sustainable transport and the development of accessible sites"
- Add 'rail' between 'road' and 'safety' to both criteria 2 and 11
- Add new paragraph to supporting text between 5.23.4 and 5.23.5 to read:
"5.23.4 In considering applications for new development, the Council will also consider the implications for rail safety and rail operations. In particular, it will consider the implications for level crossings in the City, taking into account Network Rail's objective of eliminating level crossings wherever possible throughout the network. Level crossings represent the biggest single risk to rail operations on the network. First preference for access across an existing railway line will be for bridging or diversion."
- Add "for cars, motor cycles and bicycles" to criterion b(14) in first sentence.

CP24: Strategic Implementation

Comment

The Highways Agency would like to see a reference to the need for improvements at the A50 junctions with the A514 and A38 which are required to support growth in both Derby and South Derbyshire (though they recognise these junctions are outside the City boundary).

Response

The point is accepted. Development within the City has the potential to impact on these junctions and, while the Plan itself cannot implement 'improvements', it can identify the wider requirement. This may be particularly pertinent in relation to the negotiation and agreement of planning obligations or conditions.

Comment

The Highways Agency considers reference to the A38 Grade Separation Scheme made in paragraph 5.24.4 to be a reasonable interpretation of the current position and welcomes the intention of the Council to ensure that any land needed to implement these schemes will be protected.

Response

Comments noted and are welcomed.

Comment

Derbyshire County Council noted the work undertaken by both highway authorities which has resulted in a “reasonable understanding” of the likely impact of future development. In conclusion, the County Council stated their support.

Response

Support for the policy noted and welcomed. No change to policy required.

Comment

The Derbyshire and Peak District Campaign for Better Transport generally support the policy but objects to the construction of the Southern Derby Integrated Transport Link. They consider that the link with the A38 and A50 will encourage residents to commute by car.

Response

Broad support for the policy is welcomed. The Southern Derby Integrated Transport Link (SDITL) is necessary to accommodate the levels of traffic that will be generated, not only from the proposed Wragely Way/Stenson Fields proposals but also from growth across the City. Inevitably, this will include people who wish to use their cars for commuting. However, this is likely to take place in any event and thus the additional capacity will serve only to relieve congestion and improve efficiency. The plan does, however, give a great deal of priority to encouraging and facilitating travel by alternative modes to the car. It is not considered that the implementation of the SDITL will undermine those efforts.

No change to policy recommended.

Comment

A planning agent suggested that the City Council’s policy for the Southern Derbyshire Integrated Transport Link should reflect South Derbyshire’s policy by identifying and protecting the land required.

Response

The specific land requirements of the road are not known at this time. The intention of the plan is to establish the strategic principle of the link. However, the exact alignment of the link will still need further work. This can be addressed in partnership with South Derbyshire District Council, the County Council and the relevant landowners and developers through Part 2 of the plan. Trying to identify the exact alignment at this stage is likely to lead to an unacceptable delay in the

adoption of the plan. It is unlikely that the road will be required in the first five years of the plan and so there is no reason why this cannot be addressed in the respective Part 2 documents (particularly as it is understood that all parties are broadly in support of the proposal).

No change to policy recommended.

Comment

A planning agent stated that the allocation of land for employment purposes to the south of the City would ensure that additional developer contributions would be secured to fund the Southern Derbyshire Integrated Transport Link (see CP10).

Response

This is an issue for South Derbyshire District Council to address within their Local Plan. The City Council's Local Plan already expresses some support for the long term expansion of the employment allocation into South Derbyshire (subject to certain criteria).

No change to policy recommended.

Comment

Nathaniel Lichfield & Partners recognised that that the South Derby Integrated Transport Link is required to help mitigate the impact of development to the south of Derby. They considered that more evidence is required, from a viability perspective, that such levels of new road infrastructure can be delivered. They also raised concerns over the timing of its delivery and what impact it will have on the delivery of other types of infrastructure.

Response

It is not anticipated that the SDITL will be required in the first five years of the plan and some development in the south of Derby can go ahead prior to its development. Furthermore, all relevant developers, land owners and transport authorities are in favour of its delivery as the preferred method of providing network wide transport mitigation. In addition, simply in order to provide access to and through allocated sites, parts of the link would have to be built anyway (thus would form a normal part of the development).

As such, there is some scope for the plan to be able to establish a strategic principle for the link and then for work on its implementation to continue after its adoption. This does not call into question the overall deliverability or viability of either Derby or South Derbyshire's plan.

While it is accepted that any significant infrastructure requirements will raise viability and deliverability issues, the Council is confident that the road can be delivered. While developer contributions will be required, the Council(s) will also seek to secure funding from other sources in order to fund delivery. The Council has an excellent record in securing funding for infrastructure schemes and there is no reason to think that it will not be able to bid successfully for funding for this important link at some point in the future. A number of potential sources exist for such funding; including

those from the LEP will be investigated and pursued.

No change is recommended to the plan.

Comment

The Planning Design Group, representing Hallam Land Management Ltd and David Locke Associates, commenting on behalf of Rolls-Royce, supported the policy.

Response

Support for the policy is noted and welcomed.

Comment

Derbyshire Wildlife Trust stated that the diagram should include Phase 2 of the South Derby Integrated Transport Link.

Response

Noted. This is not considered a fundamental issue for the City Council as the entirety of any Phase 2 would be within South Derbyshire. However, it is accepted that for completeness the diagram could show Phase 2 as an indicative proposal.

It is recommended that a change to the diagram should be made for the sake of clarity.

Comment

Sustrans stated that many of the 11 initiatives listed in Policy CP24 appear to be conventional road schemes and therefore the strategy still appears to be weighted in favour of car use and none includes investment in the walking infrastructure, other than to the Rights of Way.

Response

The list of initiatives in policy CP24 reflects a number of current proposals that are being given priority by the Council. It is not meant to be exhaustive, nor will it mean that new priorities or schemes that come to light after the plan is adopted will not be given priority.

In any event, only three of the 11 proposals relate to road schemes (four if the direct replacement of London Road Bridge is included, which will be removed from the document as the scheme is now underway). Of the three, only one scheme is related to new roads, while two are related to making substantial improvements to existing roads. The original comment, therefore, does not seem to be a fair one.

No change to policy recommended.

Comment

Sustrans supported criterion (h) which aspired to create a strategic cycle network.

Response

Support for the policy noted and welcomed. No change to the policy required.

Comment

Sustrans supported criterion (j) and the implementation of the Derby Canal scheme, although only if the existing NCN Route 6 is not compromised.

Response

Support for the policy noted and welcomed. No change to the policy required.

Comment

The Derby Cycling Group supported the South Derbyshire Integrated Transport Link and improvements to the A52 and A38 junctions. However, they considered that the Core Strategy should state its support for the integration of high quality cycling provision into all of the schemes.

Response

While it is considered that when read as a whole the plan makes it clear that the integration of cycling into new development or new transport infrastructure is a key requirement, it is proposed that an amendment is made to CP23/CP24 to reflect this more overtly.

Comment

A member of the public objected to the policy as criteria (a), (b) and (c) will generate traffic which cannot be considered to be environmentally sustainable and, as a consequence, contradicts Policy CP2, criterion (b).

Response

This point is not accepted. The traffic that schemes (a) and (c) are seeking to address already exists and the schemes are needed to mitigate existing problems. When complete, they may lead to an increase in traffic along those routes as existing trips on the network will be 'reassigned' from other routes. The schemes themselves, therefore, do not necessarily 'generate traffic', rather they provide better and more efficient ways for existing traffic to move through the City.

In addition, the SDITL will not necessarily 'generate' traffic. In the main, it is the residential and employment growth that the City *needs*, that will generate the traffic. This growth will lead to an associated increase in car use (even if we are successful in promoting alternative modes of travel). The SDITL is designed to try and mitigate the impact of this traffic growth by increasing capacity and choice on the network.

It is unrealistic to suggest that car use will not be the primary mode of travel for many people for the foreseeable future. As such, it is still important for the Council to provide a balanced and efficient transport network that considers the needs of car users while still seeking to reduce car use where possible and promote alternative modes of travel. A balanced approach is what is being suggested here.

No change to policy is recommended.

Comment

A member of the public considered that the plan should be more forward thinking by

making a clear commitment towards developing a transport plan that aims to improve the amenity to existing and planned residential development. The respondent highlighted the impact of the proposed T12 and suggested that an alternative is considered such as a direct link from the A50 and away from residential areas in Chellaston.

Response

The plan should always be read as a whole. Amenity is an important part of 'placemaking' and there is nothing in the plan that suggests this isn't an important factor when considering transport infrastructure.

In terms of the route of T12, this has long established in the CDLPR and now has planning permission. The route was already in place when the housing in Chellaston was built and the scheme took account of it. There is no reason for the route to be realigned.

No change to the plan required.

Comment

A member of the public stated that the old canal is now a wildlife site so why is there a need to cut through it with T12.

Response

Planning permission has now been granted for T12 and any impact on the canal and wildlife will have been taken into account as part of that process. It should be noted that T12 has formed part of successive Local Plans and is a long standing commitment. It is required to provide access to the Infinity Park strategic employment site and unlock the associated economic benefits for the City.

No change to the policy is recommended.

Comment

Three people supported the plans for the Strategic South Derby Integrated Transport Link Road.

Response

Support for the policy noted and welcomed. No change to the policy required.

Comment

One person considered that the schemes listed in the policy are not enough, and inadequate, to meet the aspirations of Policy CP23. They consider that the current network is struggling without the extra traffic generated by the proposed growth.

Response

It is recognised that mitigating the impact of growth on traffic across the City is a significant challenge and it is inevitable that levels of congestion will deteriorate in some places as a result.

The list of initiatives in policy CP24 reflects a number of current proposals that are

being given priority by the Council. It is not meant to be exhaustive, nor will it mean that new priorities or schemes that come to light after the plan is adopted will not be given priority. This is a 15 year plan and the process of trying to improve the City's transport network does not end with the adoption of the plan.

Importantly, the objector has not provided any indication of schemes they feel should be included in the Policy. As such, no change to the policy is recommended.

Comment

A Councillor felt that the South Derby Integrated Transport Link is trying to solve a radial route problem but this road will only serve Toyota and Rolls Royce. It was also thought that the cost of the road may result in developers not being able to fund other infrastructure and community needs.

Response

See comments elsewhere on the deliverability of the SDITL. It is recognised that viability will be an important consideration and the City and District Council will have to give careful consideration to what priority it will be able to give to the other requirements of the plan. This will be dependent on the timing of proposals and the extent to which funding from other sources is available. The link is, however, necessary to provide the required mitigation for both the Wragely Way/Stenson Fields development but also growth across the City.

It is not accepted that the route will only serve Toyota and Rolls Royce.

No change to policy is recommended.

Comment

A member of the public considered that the City Hospital Park and Ride is essential. It was also suggested that the continued use of the Markeaton Park car park for a student park and ride is considered.

Response

Policy CP24 continues to support the implementation of the Derby Royal Park and Ride.

The use of Markeaton Park car park as a student park and ride is outside the scope of the Local Plan. This would essentially be an operational matter that could be considered in parallel. It does not need a reference in the Core Strategy to be implemented, should it be considered an appropriate or viable scheme.

No change to policy recommended.

Comment

At a drop-in event, a member of the public questioned the usefulness of the Southern Derby Integrated Transport Link in dealing with the increased traffic while another person at the same event considered that a new road wasn't the correct solution and that alternative options should be explored (a regular bus service that operated throughout the day was suggested).

Response

The Southern Derby Integrated Transport Link has been identified as part of a range of measures for mitigating the impacts of growth. It has been established, however, that it will not mitigate *all* of the impacts of growth. This was never the intent.

Rather, it will provide increased capacity on the network and provide choices that don't currently exist. This will have benefits.

The existence of the SDITL does not preclude the operation of new/improved bus services. Indeed, it is expected that this will be the case.

No change required.

Comment

At a drop-in event, a member of the public thought that the A50 junction south of Wragley Way would be a better solution but that the Southern Derby Integrated Transport Link would be an acceptable solution to the traffic issues created by the strategic development site at Wragley Way. The person considered that dispersing traffic was a good idea but did raise concerns about when the road would be built and that it should be delivered before too much housing is developed.

Response

See above. These points probably apply more to South Derbyshire's Core Strategy than Derby's.

The Council have not ruled out a new junction on the A50 at some point, but considers that the SDITL provides greater benefits at this time. South Derbyshire's plan makes it clear that there will be a 'cap' on the number of dwellings that can be built before the road is delivered.

No change required.

Comment

At the Sinfin Library drop-in event a member of the public was concerned about the noise from South Derby Integrated Transport Link. It was highlighted that there was significant noise coming from A50 and this would make it worse.

Response

The SDITL's alignment has not yet been agreed. Impact on residential amenity will clearly be a factor in determining this. Equally, how noise can be mitigated through the design of the road and the housing scheme will be important considerations. It is simply too early to say that the levels of noise from the SDILT will be unacceptable.

No change required.

Actions

- Include reference to improvements being needed on the A50 junctions with the A38 and A514.
- Amend diagram to show Phase 2 of the Southern Derby Integrated Transport

Link.

- Remove London Road Bridge replacement scheme (criterion d) as it is now underway and will be complete by the time the plan is adopted.

Policy AC1: City Centre Strategy

Comment

English Heritage welcomed reference in the policy and supporting text to heritage assets and the fundamental role they play. However, they considered that enhancement to more than just 'key buildings' should be sought. They suggested that criterion (i) should be written in more general terms and suggested the following '*enhance heritage assets in order to generate a positive impact on the townscape character and vitality of the City Centre*'.

Response

English Heritage's comments are noted and welcomed. The suggested change will ensure that the policy is applied more generally across the City Centre. It is recommended that the amendment is made to the policy.

Comment

Two people commented on Friar Gate Station. One recognised that there is an approved application for a supermarket on the site but was concerned that nothing had happened; they thought that the site should be developed for housing rather than the current proposal. The other stated that it is owned by a local person who isn't prepared to build on the site.

Response

Comments are noted. It is recognised that the Friar Gate site is an important heritage asset and significant opportunity for regeneration. The Council will continue to work closely with the landowner and other relevant partner organisations to try to bring forward appropriate development.

The Part 1 policy is not specific about the type of development that will be permitted on the site. If required, any detailed policy will be produced in Part 2. The 'saved' CDLPR policy will continue to give detailed guidance until this point. This allows for residential development of the whole site (subject to built and natural environment issues being addressed).

It is not considered that any change to Policy AC1 is required as a result of these comments.

Comment

A Councillor considered that, as internet shopping increases, the retail character of the City Centre will change to a leisure and recreation provision and this should be reflected in the policy.

Response

It is recognised that town and city centres will have to change as a result of the recent economic downturn and increased competition from the internet and out-of-centre retailing. It is, however, considered that this is properly reflected in both this policy and others relating to the City Centre (in particular AC2 and AC3).

It is not considered that any change to Policy AC1 is required as a result of these comments.

Comment

A member of the public at the Sinfin Library drop-in event stated that the Green Lane area (city centre) needs revitalising as it brings the whole city centre down.

Response

Comments are noted. It is accepted that there are parts of the City Centre which are in need of attention. It is considered that Green Lane, and other more 'tertiary' shopping locations may have to find a new role and function over the coming years. While this may still incorporate a substantial retail element, it may also mean a more flexible approach is needed that will allow a more diverse range of uses into those areas. This will still help to create 'vitality' in the area which, in turn, will help to regenerate run-down buildings and create more activity.

Policy AC1 does not make specific reference to Green Lane. However, it is considered that it provides the broad framework to encourage the regeneration of this area. It is accepted, however, that more specific reference could be made to Green Lane in Policy AC2 or AC3.

Actions

- Amend criterion (i) to read:
 - (a) enhance heritage assets in order to generate a positive impact on the townscape character and vitality of the City Centre.

AC2: Delivering a City Centre Renaissance

Comment

English Heritage supported the policy.

Response

Comments are noted and welcomed. No change to policy required.

Comment

The Environment Agency recommended that part of the Markeaton Brook, known as Mill Fleam, is better integrated into Bass' Recreation Ground. They consider that the access to the Fleam could be re-opened which will involve re-profiling and selective tree and hedge clearances. This, they state, will improve people's access to the watercourse as well as having ecological benefits.

Response

The comments are noted. It is considered, however, that this is potentially too detailed an issue to consider within what is an essentially broad strategic policy. It is considered that this can be picked up in the detailed proposals relating to either the Castleward Regeneration or OCOR works.

No change to policy recommended.

Comment

Wilson Bowden developments Ltd supported the identification of the former Police Station site as a regeneration priority. In addition, they also endorsed the renaissance of the City Centre.

Response

Comments are noted and welcomed. No change to policy required.

Comment

In discussion with both The Cathedral Quarter and St Peters Quarter BID Companies, it was concluded that while they generally supported the policy, a number of amendments could be made that would better reflect the current context of the City Centre (in particular to the role and function of the two areas). In particular, it was felt that references to the St Peters Quarter as a 'key pedestrian link' didn't properly reflect the important shopping and leisure role that the area has. It was also highlighted that the policy could do more to reflect the different sub-roles the area has (for example, the fact that Green Lane operates differently to St Peters Street). They considered that the policy would benefit from more direct reference to how the Council may seek to address issues in these areas.

In addition, they considered that the Cathedral Quarter's prominent role in professional services and office uses should be more overtly referred to, potentially indicating that the Cathedral Quarter should become the priority for office uses within the City Centre. With regard to the Cathedral Quarter, they also considered that the policy should make reference to the difficulties the City faces in moving from the daytime to evening economy, both in terms of encouraging appropriate uses and trying to increase dwell times (i.e. getting people to stay in the city centre for longer into the early evening). Issues surrounding anti-social behaviour and the night time economy were also noted.

Finally, they considered that the document could make more reference to the general environmental quality, possibly alluding to encouraging businesses in the area to be more proactive about ensuring their shop fronts and adjacent areas are kept in good condition.

Response

Comments are noted and welcomed. Amendments will be incorporated which better reflect the roles of the different character areas and the Council's relationship with the BID companies.

Additional text will also be amended to include a reference to businesses taking

greater 'responsibility' for the quality of the environment around their businesses. It is recognised that this may sometimes fall outside the purview of planning, but such wording could still show the Council's intentions for the City Centre.

Action

- Add new text relating to the role and function of the different character areas, in particular the St Peters Quarter
- Add new text relating to the partnership role of the BID companies
- Add new text relating to 'environmental responsibility' within the 'Core Area' element of the policy

AC3: Frontages

Comment

English Heritage supported the policy.

Response

English Heritage's comments are welcomed and noted.

Comment

Representatives of the BID companies suggested some amendments to the policy to better reflect the role and function of the St Peters Quarter area. They also suggested that the policy should highlight that some parts of the City Centre – particularly some areas within the St Peter's Quarter area may benefit from a shift in focus over the period the plan covers; possibly having a more residential or office based economy. This would be as a result of changes to the wider economy.

Discussions at the Council's Conservation Area Advisory Committee raised similar issues about certain uses being acceptable.

Response

Comments are noted. Text relating to the St Peters Quarter will be amended to better reflect its role and function.

It will also be amended to include references to the possibility of residential or office development on the ground floor within the St Peters Quarter area where it would not impact on city centre viability. This is a shift from the Draft Policy (and the current Local Plan) which would not normally allow such uses on the ground floor within a centre. This policy is actually reasonably reflective of changes to 'permitted development rights' (which is also being considered again by the Government through a current public consultation). If temporary changes to PD rights that exist now (in particular the change of use of retail or office units to residential) then this new element may be redundant in time. However, it is probably appropriate to amend the text at this time in the event that changes at the national level do not take place.

Action:

- Amend text relating to role and function of St Peters Quarter
- Amend text relating to acceptable uses on ground floor in St Peters Quarter, to allow residential and office uses in certain circumstances
- Amend supporting text to highlight the potential for certain areas within the City Centre to change their role and function over time to reflect changes to the economy and retail market.

Policy AC4: City Centre Transport and Accessibility**Comment**

Derbyshire and Peak District Campaign for Better Transport supported this policy.

Response

Comments noted and welcomed. No change to policy required.

Comment

Two members of the public stated their support but one suggested that cycle routes through the City Centre are marked out in pedestrian streets.

Response

Comments are noted and welcomed. The marking out of cycle routes on pedestrian streets would not normally be something considered by the Development Plan.

No change to policy recommended.

Action

- No change to the policy is required.

AC5: City Centre Environment**Comment**

The National Trust raised concerns regarding the approach to tall buildings, gateway sites and to buildings more than 20 metres tall in the context of the existing character of the City's skyline. They considered that Criterion (h) is imprecise and does not indicate how it will be determined which gateway locations are appropriate.

Response

It is considered that the amendment to the policy suggested by English Heritage should provide comfort on this issue. It would not be practical to indicate which of the number of gateway locations are appropriate and those which are not as it will generally be considered on a case by case basis depending on the nature of the building proposed and the prevailing context at the time of application. The associated diagram indicating the location of gateway locations provides further guidance.

Comment

The National Trust was concerned with paragraph 6.5.8 which has only one caveat attached. They suggested that a more appropriate approach would be based on stating that *“buildings more than 20m tall would not normally be acceptable”* and include specific criteria relating to specific views, relationships with gateway sites and to heritage site and their setting.

Response

The suggested amendment to the policy would not be appropriate within supporting text as it would really be policy. Furthermore, while the policy indicates that buildings of 20m are considered ‘tall buildings’, there is no suggestion that buildings taller than this would not be acceptable. While this may be the case in some circumstances, in others such buildings may be appropriate. It is, therefore, considered that each case should be judged on its merits and that sufficient controls are provided within the policy to ensure inappropriate development can be resisted. In addition, it would not be the place of the Part 1 Plan/Core Strategy to provide detailed guidance on specific views and specific gateway sites. This would be far too detailed for this plan.

No change to policy recommended based on these comments.

Comment

Natural England supported the inclusion of criterion (f) which encourages development to integrate green infrastructure into development.

Response

Comment noted and welcomed.

Comment

English Heritage is concerned with criterion (h) in respect of supporting tall buildings in gateway locations. They highlight that part of Derby’s character is that is a low-rise City. They feel that there may be instances where tall buildings in gateway locations are harmful to the setting of a heritage asset and should, therefore, be resisted. They suggest that the criterion is re-worded in order to ensure that such applications will not be supported in all instances and suggests the following: *‘support the construction of tall buildings in appropriate gateway locations, where these are of high quality design, and do not adversely affect the setting of heritage assets and the character of the City Centre’*.

Response

Comments are noted. It is considered that the change suggested is sensible and will provide further comfort relating to any concerns about tall buildings.

Comment

English Heritage also suggested an amendment to criterion (b) and suggests the following: *‘expect development to integrate with and enhance the historic/existing street patter, where appropriate’*.

Response

Comments are noted. It is considered that the change suggested is sensible and will make the policy more robust.

Comment

English Heritage requested that reference to the Tall Buildings Strategy is made and suggest we consider adopting it as a Supplementary Planning Document.

Response

There are no plans to make the Tall Building Strategy SPD at this stage. Its recommendations have been included within the City Centre Regeneration Framework and the Part 1 plan. However, further guidance may be provided in the Design Guide that is planned to be published to complement the Local Plan.

No change to policy required.

Comment

Derbyshire Wildlife Trust highlighted that, in respect of Diagram 13, the River Derwent and the drain to the south of Bass' Recreation Ground are part of a Local Wildlife Site; they also supported paragraph 6.5.5.

Response

Comments noted and support welcomed. No change to policy required. Existing local wildlife site designations form part of 'saved' policies in the CDPLR.

Comment

A member of the public stated their support for the policy and considered that some greening of the City is required to make it more attractive place.

Response

Comments welcomed. No change to policy required.

Comment

A member of the public objected to criterion (h) as they stated, even 5-storey buildings can dominate their surroundings and therefore should be discouraged.

Response

It would be inappropriate for the plan to arbitrarily state that buildings of 5 storeys are more are inherently unacceptable. There is no evidence to suggest that tall building should not form part of the City Centre environment. However, it is recognised that there will be occasions where the concerns raised will be valid and, in such circumstances, the policy provides satisfactory controls.

No change to policy recommended.

Comment

A member of the public stated their support for paragraph 6.5.5, indicating that Green Infrastructure is urgently needed.

Response

Comments noted and welcomed. No change to policy required.

Action

- Amend criterion b to read: “expect development to integrate with and enhance the historic / existing street pattern”
- Amend criterion h to read: “support the construction of ‘tall buildings’ in appropriate gateway locations, where these are of high quality design and do not adversely affect the setting of heritage assets and the character of the city centre.

Policy AC6: Castleward and the Former Derbyshire Royal Infirmary

Comment

English Heritage welcomed the criterion requiring the protection and enhancement of designated and non-designated heritage assets.

Response

Comments noted and welcomed. No change to policy required.

Comment

A member of the public stated that a green link between the Arboretum and Bass’s Rec is an excellent proposal.

Response

Comments noted and welcomed. No change to policy required.

Action

- No change required.

Policy AC7: The River Derwent Corridor

Comment

The Environment Agency (EA) suggested that this policy should be merged with AC8. However, should the policies remain separate, they suggested that reference to the Water Framework Directive is incorporated into this policy plus amendments are made to paragraph 6.7.6.

Response

It is acknowledged that there is an element of repetition between policies AC7 and AC8. Clearly, many of the objectives of the OCOR project are objectives that the Council wish to achieve across the River Derwent Corridor as a whole. Therefore, Policy AC7 needs to be reformatted to set out the overall strategy for the River Derwent Corridor, including the aims and objectives of the OCOR project. Policy

AC8 also needs to be reformatted to make it a more focussed, development management policy that provides a mechanism for implementing the OCOR project. This will create a clearer distinction between the roles of each policy.

Reference to meeting Water Framework Directive objectives will be added to Policy CP2 as an overarching policy requirement on all development. Therefore specific reference within AC7 is not necessary.

The supporting text of AC7 will also need to be rewritten to reflect the changes to the Policy. The importance of protecting the natural environment will need to be referenced in the supporting text.

Comment

Natural England welcomed the intention to enhance green infrastructure both along the River Derwent and throughout the City. They particularly supported criterion (h) which incorporates the aspirations of the 6Cs Green Infrastructure Study.

Response

Comments are noted. In light of other comments, the Policy will be comprehensively rewritten and reformatted; however the principle set out in criterion (h) will be carried forward into the revised policy.

Comment

English Heritage welcomed the content of the policy and its recognition of the World Heritage Site and Darley Abbey Mills.

Response

Comments are noted. In light of other comments, the Policy will be comprehensively rewritten and reformatted; however the principle of protecting heritage assets including the World Heritage site will be carried forward into the new Policy.

Comment

Derbyshire Wildlife Trust welcomed the inclusion of criterion (h) but suggested that it includes biodiversity enhancement. They also requested that the policy should also indicate that developer contributions will be sought to enhance and maintain the river corridor.

Response

Comments are noted. In light of other comments, the Policy will be comprehensively rewritten and reformatted; however the principle of protecting and enhancing the river corridor as a key element of the City's green infrastructure, as part of a green network within and beyond the River Derwent Corridor, including its landscape character and biodiversity will be added to the Policy.

Comment

Derbyshire County Council considered that the policy could be strengthened by identifying the River Derwent Corridor as a potential sustainable transport corridor for walkers, cyclists, people with limited mobility and, in some cases, horse riders.

Response

Agreed. An additional criterion will be added to the Policy referring to the Council encouraging proposals that promote the river corridor as a sustainable transport route.

Comment

Derbyshire County Council considered that there is an inconsistency between this policy and AC11, criterion (f), AC12, criterion (c) and Policy AC13. It is considered that there needs to be a clear message to “*enhance the riverside landscape character of the land along the River Derwent*”. The County Council considered that the wording for each policy needed to be clear and consistent to ensure the wording not only deals with flood protection/flood amelioration but also:

- *A landscape buffer zone that enhances the character of the river*
- *Provides access to and connectivity along the river*
- *As well as satisfactory treatment of visual, recreational and natural history importance.*

Derbyshire County also considered that the policy should include an additional aim to “*Promote the landscape enhancement of the river corridor*”.

Response

The Policy will be comprehensively reworded and reformatted to take account of comments received. The reworded Policy will set out a number of objectives that development within the river corridor will need to demonstrate compliance with. Criteria will include ‘*protecting and enhancing the corridor as a key element of the City’s green infrastructure, as part of a green network within and beyond the River Derwent Corridor, including its landscape character and biodiversity*’ and ‘*promoting of the River Derwent Corridor as a sustainable transport route for walkers and cyclists, providing access and connectivity along the riverside*’.

Consistent references to requiring the satisfactory treatment of the area adjoining the River Derwent in terms of visual, recreational and natural history importance will be added to policies AC11, AC12 and AC13.

Consistent references to providing good quality cycle pedestrian links, including links to the riverside cycle route will also be added to policies AC11, AC12 and AC13, which should satisfy the County Council’s comments regarding access and connectivity.

Comment

An agent acting on behalf of Celanese Acetate Ltd stated that the regeneration of the site will make a positive contribution to the riverside environment.

Response

Comments are noted.

Action

- The Policy will to be comprehensively rewritten to address comments outlined above.

Policy AC8: Our City Our River

Comment

Natural England strongly supported this policy as it will result in significant benefits to biodiversity, open space provision and green infrastructure.

Response

Comments are noted. In light of other comments, the Policy will be comprehensively rewritten and reformatted; however the principle of providing environmental enhancements, including biodiversity enhancements will be retained in the newly worded Policy.

Comment

Derbyshire Wildlife Trust did not support the policy as it states that flood defences will be incorporated wherever possible.

With regard to criterion (b), DWT considered that it is imperative that flood defences are utilised and designed into developments at the outset, otherwise the OCOR project cannot be implemented.

Derbyshire Wildlife Trust supported criterion (f) however, they consider that the corridor is very narrow in places and does not have much scope for biodiversity enhancements, so it would be welcomed if the area outside the Our City Our River boundary is considered for enhancement/management.

Derbyshire Wildlife Trust states that Diagram 15 does not show the Darley and Nutwood Local Wildlife Site or the Darley Park Local Wildlife Site.

Derbyshire Wildlife Trust also request that the policy recognises that developer contributions are required to implement Our City Our River.

Response

Comments are noted. In light of other comments, the Policy will be comprehensively rewritten and reformatted. The newly worded Policy will provide an opportunity to set out the mechanisms the Council will use in order to implement the OCOR programme. Mechanisms will include requiring developers of sites within the OCOR area to not only design the new flood defences into their schemes, but also where appropriate provide the new defences. The reworded Policy will also introduce the principle of the Council investigating opportunities to recover some of the costs of the project from beneficiaries. This will need to be investigated through the Part 2.

The reworded policy will also require developers of sites within the OCOR area to provide appropriate environmental enhancements to help mitigate and / or compensate for the environmental impacts of new flood defences, where they are required to enable development. This could include compensation and mitigation for

biodiversity loss and could include the enhancement and management of land outside of the OCOR area if appropriate. However, without knowing the full extent and detailed design of the OCOR programme it is not yet known whether land outside of the OCOR area will be needed for this purpose. Therefore it not necessary to include reference to this in the Policy.

The purpose of Diagram 15 is to show the extent of the OCOR area and is not intended to indicate land uses or proposals associated with the OCOR programme. Therefore it is not appropriate to show wildlife sites on this diagram.

Comment

An agent acting on behalf of Celanese Acetate Ltd recognised that the Our City Our River masterplan can assist in unlocking opportunities for riverside regeneration.

Response

Comments are noted.

Comment

A member of the public objected to the policy as it contained little detail about what development is appropriate for Chester Green. It was stated that there was a need for larger family housing rather than flats. Also, it was considered that sports facilities in the area should be preserved.

Response

The Local Plan Part 1, Core Strategy sets out the principles and objectives that underpin the OCOR programme and provides the policy framework to enable the implementation of specific schemes that will deliver the project as a whole.

The Local Plan Part 2 will provide more detailed guidance relating to the use of development sites that are released by the OCOR programme, including sites such as the former Aida Bliss site located within the Chester Green area.

Action

- Comprehensive rewrite of policy and supporting text to bring into line with current OCOR approach.

Policy AC9: Derwent Valley Mills World Heritage Site

Comment

English Heritage greatly welcomed the inclusion of this policy in the Core Strategy and considers that it provides an excellent and appropriate detailed guidance on what will or will not be permitted.

Response

Comments are noted and support for the policy welcomed.

Comment

English Heritage however, raised concerns with criterion © which makes reference to proposals within the buffer zone. They considered that proposals outside of the buffer zone should also be referenced as there may be instances where development proposals outside of this can have an impact (amended text suggested).

Response

Agreed. Policy wording will be amended so that it applies to any site that has the potential to impact on the WHS, including sites within the buffer zone.

Comment

The Environment Agency supported the policy but requested that criterion (a4) is amended to read “*protect and prevent harm to the biodiversity of the area and where possible, enhance it.*”

Response

Agreed. Policy wording will be amended accordingly.

Comment

Derbyshire Wildlife Trust welcomed criterion (a) but suggests that explicit mention is given to the Darley & Nutwood Local Nature Reserve and the Darley Park Local Wildlife Site.

Response

The principle of protecting biodiversity is already picked up in the Policy, although reference to Local Nature Reserves will also be added to the supporting text.

Comment

Derbyshire County Council welcomed and supported the Plan’s recognition of the importance of the Derwent Valley Mills World Heritage Site. It was considered that the criteria for assessing development proposals within the World Heritage Site are appropriate.

Response

Comments are noted and support welcomed.

Action

- Criterion (c) amended to apply to all sites that have the potential to impact on the WHS, rather than just sites within the buffer
- Reference to Local Nature reserves added to supporting text
- Criterion a(4) amended in line with the Environment Agency’s comment.

Policy AC10: Darley Abbey Mills

Comment

English Heritage welcomes and supports the inclusion of the policy but suggested that reference should be made to the grade I, II* and II listed buildings in paragraph 6.10.1.

Response

Comments are noted. It is acknowledged that the supporting text should make reference to the range of listed buildings present at the Darley Abbey Mills Complex.

Action

- Reference to the grade I, II* and II listed buildings to be added to paragraph 6.10.1 of the supporting text.

Policy AC11: The Derwent Triangle, Chaddesden

Comment

Derbyshire and Peak District Campaign for Better Transport noted that the site is accessible by public transport.

Response

Comments are noted.

Comment

Natural England and Derbyshire Wildlife Trust highlighted that the site is immediately adjacent to the River Derwent, which is a Local Wildlife Site and the Sanctuary Local Nature Reserve is on the opposite bank. Although they note that this is recognised in paragraph 6.11.8, they reiterated the importance of protecting and enhancing Local Wildlife Sites and Local Nature Reserves.

Response

Comments are noted. Protection for local wildlife sites and nature reserves is addressed by other policies in the Plan. Criterion 'f' also makes it clear that any development on the site must have regard to the natural history importance of the River Derwent.

No change required.

Comment

The Environment Agency supported the policy but requested that criterion (e) is amended to be consistent with the Our City Our River Masterplan. They suggested "*require satisfactory flood and environmental mitigation consistent with the OCOR masterplan potentially...*"

Response

Agreed. The criterion will be amended accordingly.

Comment

Derbyshire Wildlife Trust suggested that criterion (e) makes it clear that the Council will be seeking contributions from developers for Our City Our River.

They also requested that paragraph 6.11.8 is expanded to identify that the Derwent Triangle supports a number of ecological assets (Schedule 1 breeding birds, BAP Priority birds and invertebrates).

Derbyshire Wildlife Trust also suggest that the policy should state that additional areas may be required to compensate for impacts and loss of biodiversity on Pride Park.

Response

Policy AC8 relating to OCOR will be amended to make it clear that the Council will require developers of sites within the OCOR area to make allowance for new defences to be designed into proposals and where appropriate implement the new defences. It will not be necessary to address it again in this policy.

Paragraph 6.11.8 of the supporting text will be amended to acknowledge the potential ecological value of the site and the need for ecological surveying.

It is assumed that the loss in biodiversity that the Trust refers to is in relation to land at the Sanctuary that would have been lost through the development of a closed circuit cycle track. Whilst the proposal was permitted by Planning Committee, it is understood that that proposal will be going ahead at this time. A change to the policy is not, therefore, appropriate or necessary at this time.

Comment

Derbyshire County Council considered that there is an inconsistency between criterion (f), Policy AC7, AC12, criterion (c) and Policy AC13. It is considered that there needs to be a clear message to “*enhance the riverside landscape character of the land along the River Derwent*”. The County Council considered that the wording for each policy needed to be clear and consistent to ensure the wording not only deals with flood protection/flood amelioration but also:

- *A landscape buffer zone that enhances the character of the river*
- *Provides access to and connectivity along the river*
- *As well as satisfactory treatment of visual, recreational and natural history importance.*

Response

Policy AC7 sets out the Council’s overall strategy for the River Derwent Corridor. AC7 will be comprehensively reworded and reformatted to take account of comments received and to remove repetition. The reworded Policy will set out a number of objectives that development within the river corridor will need to demonstrate compliance with. Objectives will include ‘*protecting and enhancing the corridor as a key element of the City’s green infrastructure, as part of a green network within and beyond the River Derwent Corridor, including its landscape*

character and biodiversity’ and ‘promoting of the River Derwent Corridor as a sustainable transport route for walkers and cyclists, providing access and connectivity along the riverside’.

Consistent references to requiring the satisfactory treatment of the area adjoining the River Derwent in terms of visual, recreational and natural history importance will be added to policies AC11, AC12 and AC13.

Consistent references to providing good quality cycle pedestrian links, including links to the riverside cycle route will also be added to policies AC11, AC12 and AC13, which should satisfy the County Council’s comments regarding access and connectivity.

Comment

The Inland Waterway Association considered that the land adjacent to the Derwent Triangle would be an ideal location for the Derby Boat Arm and a visitor centre.

Response

The supporting text of the Policy acknowledges that Pride Park is increasingly becoming a leisure destination and that the Derwent Triangle site may provide an opportunity to create a critical mass of leisure uses. However, the Policy cannot refer to specific projects, particularly where there is no certainty about viability or deliverability.

The policy does, however, continue to ensure that provision for the restoration of the Derby and Sandiacre Canal is maintained. Equally, the policies in the plan would not necessarily preclude such a facility if it became a viable proposition. However, it is not appropriate to make a specific allocation.

Comment

RPS Planning and Development Ltd, representing St Modwen Developments, supported the principle of the Plan’s four strategic employment land allocations but objected to the restriction of office uses to the City Centre. They state that, although a significant amount of floorspace has been committed, office development has not come forward in the City Centre. Therefore, they considered that, as a continuation of Pride Park, the Derwent Triangle could provide a location for office development.

RPS Planning and Development Ltd, representing St Modwen Developments, supported the Council’s approach and, in particular, the allocation of the Derwent Triangle. However, they raised concerns over how the evidence is translated into policy in respect of Policy AC11, particularly the restriction of office uses.

Response

Comments of support are noted. In relation to the comments on office uses, the Council accept that some forms of office development may be acceptable on this site. Policy AC11, as currently worded, allows for office development, subject to a number of criteria, including the consideration of city centre sites.

The Council accepts that some forms of office development, such as business park /

campus style developments, cannot easily be accommodated in the city centre and therefore Policy CP11, highlights strategic employment sites, including the Derwent Triangle as potentially appropriate alternative locations for such development.

The Council is satisfied that the approach set out in the Core Strategy is flexible enough in order to meet the demands of the anticipated growth sectors. However, the word 'only' has been removed from the policy to make it more positively worded.

Comment

The Derby and Sandiacre Canal Trust recognised the importance of the Derwent Triangle in helping to meet its objectives. They highlighted that the proximity of Pride Park would ensure the area would become a tourist destination.

Response

Comments are noted. The Policy requires developers to make provision for the potential restoration of the Derby and Sandiacre Canal.

Comment

A member of the public considered that the Derwent Triangle should be allocated primarily for housing. It was stated that the area has good transport links and is adjacent to the Wyvern Centre. The response concluded by stating that office development on this site would be contrary to other policies in the plan which seeks to encourage offices in the City Centre.

Response

The Derwent Triangle has been assessed as not being deliverable or developable for residential uses. It is not well related to other residential uses and is not large enough to create a standalone sustainable community. It would be extremely isolated.

The Core Strategy seeks to direct office development into the city centre, but acknowledges that not all forms of office development can be accommodated by the city centre environment. Policy CP11, allows office development outside of the city centre subject to a number of criteria being met. Therefore, certain forms of office development on the Derwent Triangle site would be in line with the Policy approach set out by the Core Strategy.

Action

- Reference to potential ecological value of Derwent Triangle added to 6.11.8
- Reference to riverside route added
- Criterion (e) - reference to environmental mitigation added
- Criterion (d) - removed the word 'only' and reference to ancillary office development.
- Criterion (i) removed, relating to decentralised energy production.

Policy AC12: Derby Commercial Park, Raynesway

Comment

Derbyshire and Peak District Campaign for Better Transport note that the site isn't accessible by public transport. Therefore, they would like to see a requirement for a bus service, even if it proves to be unviable after a period.

Response

Section 106 funds have been secured from the developer of this site to fund a bus service. In the interim, the number 73 service which currently serves the Severn Trent offices at the northern end of Raynesway will start calling at the site later in the year when the first tenant opens for business. This is a positive change in public transport provision and demonstrates that development can facilitate such improvements.

Policies CP23 and MH1 also addresses the issues of public transport improvements and S106 agreements. No change is necessary here.

Comment

Natural England noted that the site is located beside the River Derwent with the Acordis Effluent Beds Local Wildlife Site on the east bank. They are pleased with the inclusion of criterion (c) which requires a landscape buffer each side of the river.

Natural England also welcomed the inclusion of criterion (f) which protects Elvaston Castle and gardens. In addition, they note that the area contains the Elvaston Local Nature Reserve.

Response

Comments are noted and welcomed.

Comment

English Heritage supported the inclusion of criterion (f).

Response

Comments are noted and welcomed.

Comment

The Environment Agency supported the inclusion of the policy and welcomed criterion (c). However, they recommended that the text should be amended to *“require a landscaped buffer protection zone on each side of the River Derwent and the extension and enhancement of the green infrastructure network. Where practicable, the opportunity should be taken to remove weirs that act as a barrier to the movement of fish thereby contributing toward Water Framework Directive objectives.”*

Response

Comments are noted. Criterion (c) will be comprehensively reworded to provide consistency in the approach to areas around the edge of the river. The reworded

criterion will continue to identify the need for a landscaped buffer protection zone but will also refer to the extension and enhancement of the green infrastructure network, reflecting the comments from the EA.

An additional requirement will be added to Policy CP2 to ensure that development contributes towards the achievement of Water Framework Directive objectives, whilst specific reference to removal of barriers that inhibit the movement of wildlife will be added to Policy CP7, as it an objective that covers the river corridor as a whole.

Comment

The Environment Agency also considered that reference to comprehensive flood alleviation measures should be made in a separate criterion.

Response

Comments are noted. The criterion relating to flooding will be separated out and reworded to be consistent with the wording used for other development sites within the river corridor.

Comment

The Environment Agency requested an amendment to paragraph 6.12.4 to reflect the need to take account of the latest flood risk modelling. They suggest *“Comprehensive highways and flood alleviation works, including a new bridge over the River Derwent, have been completed to allow comprehensive development of the site”*.

Response

Comments are noted. Text will be amended in line with comment.

Comment

Derbyshire Wildlife Trust’s comments relate specifically to the supporting text. They considered that it is important, in paragraphs 6.12.3 and 6.12.4, that the existing flood alleviation scheme has been designed to enhance biodiversity and is to be managed by the Trust.

With regard to paragraph 6.12.4 that the River Derwent is a Local Wildlife Site and, although outside of OCOR, that there may be opportunities to incorporate biodiversity and Water Framework Directive enhancements.

Response

Comments are noted. The text of 6.12.4 will be amended to reflect the fact that the flood alleviation scheme has been designed to enhance biodiversity and will be managed by the Trust.

More generic principles relating to biodiversity enhancements and Water Framework Directive objectives will be covered by Policy CP19 and CP2 and therefore no change to the Policy is needed.

Comment

Derbyshire County Council considered that there is an inconsistency between

criterion (c), Policy AC7 and AC11, criterion (f). It is considered that there needs to be a clear message to “*enhance the riverside landscape character of the land along the River Derwent*”. The County Council considered that the wording for each policy needed to be clear and consistent to ensure the wording not only deals with flood protection/flood amelioration but also:

- *A landscape buffer zone that enhances the character of the river*
- *Provides access to and connectivity along the river*
- *As well as satisfactory treatment of visual, recreational and natural history importance.*

Response

Policy AC7 sets out the Council’s overall strategy for the River Derwent Corridor. AC7 will be comprehensively reworded and reformatted to take account of comments received and to remove repetition. The reworded Policy will set out a number of objectives that development within the river corridor will need to demonstrate compliance with. Objectives will include ‘*protecting and enhancing the corridor as a key element of the City’s green infrastructure, as part of a green network within and beyond the River Derwent Corridor, including its landscape character and biodiversity*’ and ‘*promoting of the River Derwent Corridor as a sustainable transport route for walkers and cyclists, providing access and connectivity along the riverside*’.

Consistent references to requiring the satisfactory treatment of the area adjoining the River Derwent in terms of visual, recreational and natural history importance will be added to policies AC11, AC13 and AC14, whilst consistent wording relating to flooding and OCOR will be included across all development site policies within the river corridor.

Consistent references to providing good quality cycle pedestrian links, including links to the riverside cycle route will be added to policies AC11, AC13 and AC14, which should satisfy the County Council’s comments regarding access and connectivity within the river corridor.

Comment

Barton Wilmore, representing Goodman UK, supported the identification of the Derby Commercial Park as a Strategic Employment location.

Response

Comments are noted.

Action

- Criterion (c) split into two criteria, referring to Green Infrastructure and flooding
- Criterion (c), relating to flooding and OCOR, reworded
- Additional text added to criterion (c) to reflect that additional land may be incorporated into the Green Wedge.

- Criterion (d) removed, relating to decentralised energy production.
- Paragraph 6.12.4 – amended to refer to infrastructure being in place to enable comprehensive development rather than imminent development
- Added reference to riverside route
- Paragraph 6.12.4 – additional text about flood alleviation and biodiversity.

Policy AC13: Former Celanese Acetate Site, Spondon

Comment

Natural England welcomed the inclusion of criterion (f) and suggested that opportunities are taken to enhance green linkages to the surrounding Local Wildlife Sites and the River Derwent.

Derbyshire Wildlife Trust suggested that criterion (i) reflects the wildlife value of the site and reference the River Derwent (and other) Local Wildlife Sites.

Response

Comments are noted. The Council agree that reference to wildlife sites needs to be added to the Policy. Therefore criterion (f) will be amended to ensure that development proposals contribute to the extension and enhancement of the green infrastructure network, including links to local wildlife sites.

Comment

The Environment Agency supported the inclusion of the policy and welcomed in particular criterion (f) which seeks to ensure that any development contributes to the wider green infrastructure network.

Response

Comments are noted and welcomed.

Comment

Derbyshire County Council considered that there is an inconsistency between this policy, Policy AC12 criterion (c), Policy AC7 and AC11, criterion (f). It is considered that there needs to be a clear message to “*enhance the riverside landscape character of the land along the River Derwent*”. The County Council considered that the wording for each policy needed to be clear and consistent to ensure the wording not only deals with flood protection/flood amelioration but also:

- *A landscape buffer zone that enhances the character of the river*
- *Provides access to and connectivity along the river*
- *As well as satisfactory treatment of visual, recreational and natural history importance.*

Response

Policy AC7 sets out the Council’s overall strategy for the River Derwent Corridor.

AC7 will be comprehensively reworded and reformatted to take account of comments received and to remove repetition. The reworded Policy will set out a number of objectives that development within the river corridor will need to demonstrate compliance with. Objectives will include *'protecting and enhancing the corridor as a key element of the City's green infrastructure, as part of a green network within and beyond the River Derwent Corridor, including its landscape character and biodiversity'* and *'promoting of the River Derwent Corridor as a sustainable transport route for walkers and cyclists, providing access and connectivity along the riverside'*.

Consistent references to requiring the satisfactory treatment of the area adjoining the River Derwent in terms of visual, recreational and natural history importance will be added to policies AC11, AC12 and AC13, whilst consistent wording relating to flooding and OCOR will be included across all development site policies within the river corridor.

Consistent references to providing good quality cycle pedestrian links, including links to the riverside cycle route will be added to policies AC11, AC12 and AC13, which should satisfy the County Council's comments regarding access and connectivity within the river corridor.

Comment

Network Rail stated their support for the policy.

Response

Comments are noted and welcomed.

Comment

An agent acting on behalf of Celanese Acetate Ltd supported the inclusion of the site in the plan. However, they note that the site area should be 72 hectares rather than 52 hectares.

They also considered that there was an inconsistency between the policy and the supporting text. Paragraph 6.13.3 sets out the site constraints but fails to recognise the work the owners have undertaken. They feel that the supporting text should begin with paragraph 6.13.6 which they feel is more positive. Finally, they feel that the text should recognise that the site is in an urban area and its regeneration will have a positive benefit for the wider area.

Response

Support for the allocation is noted and welcomed. The site area will be amended accordingly.

The Council acknowledge that the owners of the site have carried out work to help understand the various constraints facing the site and to identify opportunities. The work suggests that issues such as contamination and flooding can potentially be overcome in principle, subject to viability. The site is not well related to existing neighbourhoods and it is still not clear how comprehensive redevelopment of the site could be adequately accessed.

Therefore, until the Council understand the nature of any potential access and highway solutions and the potential impact on development viability, it is logical to continue to refer to the site is being constrained. However, the supporting text acknowledges the potential benefits that a redevelopment scheme could deliver.

The Council wants to continue to work with the land owner to achieve the appropriate regeneration of this site in the long term. The policy does not preclude any particular use or mix of uses, but seeks to set out the key constraints that exist. Furthermore, the policy is designed to give comfort to residents and businesses that these issues will be properly addressed. However, all of this has to be read in the context that this site is recognised as an important regeneration priority for the City.

Comment

One member of the public requested that, if retail units are proposed on the site, the impact on Spondon's District Centre is assessed. The same member of the public supported the allocation but was disappointed to note that there was no mention of the nature reserve and suggested that it should be preserved, preferably enhanced with better public access. The response continues by stating their surprise that the new bridge over the Derwent, giving access to Raynesway is not mentioned in the Policy.

Response

The Celanese site is an out-of-centre location and therefore any proposals for retail development would need to satisfy the requirements of the sequential and impact tests (subject to scale) as set out in the NPPF and Policy CP13. This would require a developer to consider the impact of retail development in this location on existing centres such as Spondon district centre.

The new bridge over the River Derwent is accessed via a private road through the Derby Commercial Park development site and provides access to employment land to the north of the river. Access to the Celanese site could only ever be provided with the permission of the site owner. Therefore, at the current time it does not necessarily provide a viable access to the Celanese site.

Reference to surrounding local wildlife sites will be added to the Policy.

Comment

A member of the public supported the allocation but considered that part of the site should be used for housing. This would help meet Derby's needs and spread the housing required across the City. If this happened they considered that the developments at Boulton Moor, Chellaston Fields and Wragley Way could be reduced in size.

Another member of the public considered that the site could provide around 2500 houses in addition to schools, retail and commercial properties. It was highlighted that the site has good links to Derby, Nottingham and East Midlands Airport as the site contains a railway station.

Response

See above.

The Policy does not rule out the site being used for residential development, subject to a number of criteria being met. However, not enough is known about the various constraints facing the site in order to give the Council certainty that housing could be delivered on the site during the Plan period. Therefore, the site is not considered to be deliverable or developable for residential development at the current time and cannot be relied upon to deliver the Council's housing requirement.

Comment

Two members of the public stated that the nature reserve should be retained.

Response

Reference to enhancing the green infrastructure network is already set out within criterion (f). Additional text will be added to the criterion referring to links to surrounding wildlife sites and the River Derwent.

Action

- Criterion (e), relating to flooding and OCOR, reworded
- Reference to links with Local Wildlife Sites and River Derwent added to criterion (f)
- Criterion added to promote landscape enhancement of the River Corridor
- Criterion added to require good quality cycle and pedestrian links
- Paragraph 6.13.4 – reference to the removal of Spondon sluices added.

Policy AC14: Osmaston Regeneration Area

Comment

English Heritage welcomed the reference to the historic significance of Rolls Royce and the grade II listed buildings.

Response

The support is welcomed.

Comment

The Environment Agency noted that the Cuttle Brook runs through the regeneration area but is largely culverted. They requested that, where practicable, the opportunity should be taken to remove the culvert and reinstate natural watercourse. They asked that the following is added to the Policy *“Where practicable, the opportunity should be taken to remove culverts and reinstate the Cotton Brook to natural watercourse for the benefit of people, wildlife and the natural environment.”*

Response

There is a Policy in the Green Infrastructure section of the Plan which seeks to open

up culverts and reinstate watercourses where possible. There is also reference in the 'Responding to Climate Change' Policy (CP2) to meeting the requirements of the EU Water Framework Directive which covers this issue. It is therefore considered too specific and detailed for this policy and there is no evidence available to suggest that it is achievable or feasible. The Plan therefore generally would support the opportunity anyway.

No change required.

Comment

Derbyshire and Peak District Campaign for Better Transport supported this policy.

Response

The support is welcomed.

Comment

Derbyshire Wildlife Trust stated that extensive house clearances should take account of protected species for example, bats and house dwelling BAP priority birds.

Response

There is no specific intention in this policy for extensive house clearances. The main development sites are disused employment sites, many of which have already been cleared in anticipation of redevelopment.

Policies elsewhere in the Plan seek to generally protect wildlife concerns should other development proposals come forward. A specific measure in this policy is not necessary.

No change required.

Comment

David Locke Associates, commenting on behalf of Rolls-Royce, recognised that the Osmaston Regeneration Area represents a key opportunity for the creation of quality housing in a central area of Derby and is keen to see this site comprehensively redeveloped.

Response

The comment is noted and the Policy seeks to achieve this

Comment

A member of the public supported the policy.

Response

The support is welcomed.

Comment

OSCAR supported the policy, but suggested a boundary change to reflect the most

up to date thinking about the regeneration proposals with associated amendments to the supporting text.

Response

Support for the policy is welcomed.

The change to the 'Regeneration Area' is relatively small and will not have a significant impact on the policy. As such, the changes suggested will be incorporated into the plan.

Action

- Make minor amendments to policy area and consequential changes to the supporting text.

Policy AC15: Land south of Wilmore Road, Sinfin (Infinity Park)

Comment

Natural England welcomed the inclusion of criterion (j) which requires the provision of green infrastructure throughout the site, including landscape buffers along the Main drain/Sinfin Moor Lane and the Cuttle Brook.

Response

Comments are noted and welcomed.

Comment

Natural England highlighted that the Sinfin Moor Lane Stream is in close proximity to the site and may support a population of water vole; they state that water vole is protected under Section 9 of the Wildlife and Countryside Act 1981 and the council needs to ensure that before a planning application is made, the developer carries out the appropriate surveys.

Response

Reference to the potential for protected species to be present on the site has been added to the supporting text. Policy CP19 relating to biodiversity already seeks to ensure that appropriate survey work is carried out to identify the nature and extent of any impacts on protected species and requires developers to demonstrate what mitigation will be provided.

Comment

The Environment Agency highlighted that this allocation is located in an area of flood risk and noted that the supporting text justified why there are no suitable, alternative sites. However, they state that it would be helpful if a comprehensive flood risk Sequential Test could be applied to make it clear that alternatives have been considered. This will also ensure that the allocation complies with Policy CP2, criterion (m).

Response

Comments are noted.

Further information relating to the sequential approach to allocating land for development will be set out in the Council's Water Position Statement. It is clear, however, that there are no alternative sites within the City which could accommodate this level of development in areas of no flood risk. All four strategic employment sites are subject to some form of flood risk and, when taking need into account, there are no appropriate alternative locations. In addition, this site provides a number of strategic advantages, including proximity to Rolls-Royce and links to the strategic road network currently being implemented.

Comment

The Environment Agency stated that a significant section of the Cuttle Brook runs through the site and welcomed the requirement for a buffer to be provided in criterion (j) but suggested a minor amendment. In addition, the requested that a further criterion is added to ensure that the requirements of the Water Framework Directive is met.

Response

Comments are noted. A minor amendment will be made to criterion (j) in line with the comment from the EA, relating to biodiversity. An additional criterion in Policy CP2 will be added to reflect comments relating to Water Framework Directive objectives.

Comment

The Environment Agency requested that an amendment is made to paragraph 6.15.11 to reflect the current discussions on flood risk management on the site.

Response

Comments are noted. Amendments to 6.15.11 will be made in line with comments from the EA.

Comment

The Environment Agency highlighted the existing problem with the lack of capacity in the foul sewer network in the southern part of the City. They recognise that Severn Trent have responded by building two new combined sewer overflows but the Environment Agency consider that they are not a sustainable solution.

The EA go on to state that they have concerns that the combination of this allocation, plus others to the south of Derby, will create the potential of increasing the volume of discharges from the Combined Sewer Overflows and will prevent receiving water bodies achieving the ecological standards required by the Water Framework Directive. They note that Severn Trent are currently dealing with this issue but have not committed to any specific scheme. They also state that the Council needs to be satisfied that the necessary sewerage system is in place in order to accommodate the proposed growth.

Response

Severn Trent has set aside £1.9 million in their investment programme to provide

long term sewerage capacity to accommodate the planned growth to the south of Derby. They have a statutory obligation to accommodate new development to ensure the additional flows do not increase sewer flood risk and/or environmental impact and so will provide additional capacity as and when it is required to fulfil this duty. The company highlights that the Core Strategy includes development proposals to meet planning aspirations up to 2028 but in order to keep customers' sewerage bills to a minimum, Severn Trent may need to phase improvements to align with development timescale. Severn Trent propose to work with developers, as and when sites come forward, to ensure there is both local sewerage capacity in the vicinity of the development and address the strategic capacity within the main trunk sewers.

On-going modelling work by Severn Trent is being undertaken at the present time to determine the best technical solution to the issues to the south of the City. Solutions to the capacity issues will in turn contribute towards meeting Water Framework Directive objectives.

Correspondence received from the Environment Agency indicates they are happy with Severn Trent's proposals.

Comment

David Locke Associates, commenting on behalf of Rolls-Royce, generally supported the policy and are re-assured by the inclusion of criterion (e) which requires that future development within Infinity Park Derby will be compatible with the reasonable operation of the Rolls-Royce test beds.

Response

Comments are noted.

Comment

Derbyshire Wildlife Trust recommended that criterion (i) is amended to identify biodiversity resources and the need to protect and enhance their value. They recognised that this is contained in paragraph 6.15.13 but suggest that it is better placed within the policy.

They welcome and support the inclusion of criterion (j). DWT raised significant concerns that the attenuation features to the west of the site appear to be within the Sinfin Moor Local Nature Reserve and recommend that this is adjusted.

Finally, they highlight that the area is identified as a Regionally Important Geological Site and, as such, needs protection.

Response

Criterion (i) will be amended to take account of the need to protect and enhance the biodiversity within the site.

Diagram 17 of the Draft Plan provides an indication of the environmental measures that will be required in order to bring the site forward for development. This may include areas for surface water discharge and flood mitigation to the west of the site

within the Green Wedge. Any development associated with providing flood mitigation in this area would need to have regard to Policy CP19 and national planning policy in relation to protecting biodiversity.

Criterion will be added to the Policy to ensure that proposals take appropriate account of the Local Geological Site designation.

Comment

One member of the public objected to the policy due to the loss of farmland.

It was also stated that the number of car parking spaces will be less than 2000 rather than the 6000 planned.

Response

The farmland in question is not regarded to be sufficient quality to justify retention, particularly when balanced against long term economic needs and the planning history of the site (which has been allocated for development for a number of years).

The level of parking to serve this site has not been agreed either through policy formulation or through the consideration of the outline planning applications covering the site.

The Council would wish to limit the number of parking spaces provided through reserved matters applications to an appropriate level in order to promote more sustainable forms of transport. This is addressed through parking standards policies and measures within local and national policy to promote such things as Travel Plans. In any event, the comment relates to the implementation of policy rather than the merits of the policy itself.

Comment

A member of the public highlighted that the Cuttle Brook runs across Sinfin Moor and the banks of the brook and the agricultural fields themselves are important for wildlife and the habitat should be protected.

Response

Comments are noted. The Policy makes provision for the adequate protection of Cuttle Brook and its surroundings.

Developers will be required to carry out appropriate ecological surveying to identify the extent and nature of any impacts on the biodiversity of the area, including the agricultural fields. Proposals that would have an adverse effect upon important sites, species or habitats will only be permitted where the benefits of the development clearly outweigh the impacts and where adequate mitigation, or as a last resort, compensation measures are provided.

No change required.

Comment

A member of the public considered that the development of this site is not required

now that the former Celanese Acetate site is available.

Response

The Celanese site already forms part of the existing employment land supply and therefore would not contribute additional land into to the supply. The regeneration of Celanese is also likely to be a long term project, whereas Infinity Park can assist in meeting short to medium term demands.

The Infinity Park site is a new site that will provide additional land. The Infinity Park site is therefore required to help meet future needs.

No change required.

Action

- Criterion (e) – scale and function added to layout and mix in terms of considerations that may impact upon residential amenity.
- Criterion (i) removed, relating to decentralised energy production.
- Criterion (j) altered to add reference to protection and enhancement of biodiversity
- Criterion (j) amended to add ‘amenity’ and reference to ‘management’ rather than ‘discharge’
- Additional criterion added referring to RIGS status
- Diagram 17 - Flood attenuation features to the west need to be adjusted around LNR
- Paragraph 6.15.11 – Reworded and reference to Water Framework Directive added
- Paragraph 6.15.12 – reference to flooding sequential test added.

Policy AC16: Rolls-Royce Campus

Comment

Derbyshire Wildlife Trust recommended that paragraph 6.16.3 identifies the area that supports the Local Wildlife Site and that plans to redevelop the campus should seek to protect existing green features and provide links such as corridors and stepping stones to the surrounding area.

Response

Agreed. A criterion will be added to ensure that proposals support biodiversity features and enhance green infrastructure linkages wherever feasible. Additional text will be added to the supporting text to explain the new criterion.

Comment

David Locke Associates, commenting on behalf of Rolls-Royce, stated that the

company will actively engage in the development and assessment for options for the realignment of Victory Road and/or the Allenton/Sinfin Industrial Area Green Wedge so, therefore, stated their support for criterion (b).

Response

Comments are noted and welcomed.

Comment

David Locke Associates, commenting on behalf of Rolls-Royce, noted that paragraph 6.16.2 provides scope for the future delivery of complementary uses at the Rolls-Royce campus. They stated that it is unlikely that small scale retail uses would be viable and it may be more appropriate to provide such uses centrally within Infinity Park.

Response

Comments are noted. Reference to the potential for small-scale retail development will be removed from the supporting text.

Action

- Additional criterion added referring to protecting biodiversity and enhancing GI network
- Paragraph 6.16.2 – removed reference to small scale retail
- Paragraph 6.16.4 - reference to green infrastructure and biodiversity added.

Policy AC17: Sinfin Lane

Comment

The Environment Agency (EA) highlighted the existing problem with the lack of capacity in the foul sewer network in the southern part of the City. The recognise that Severn Trent have responded by building two new combined sewer overflows but the Environment Agency consider that they are not sustainable solutions.

The EA have concerns that the combination of this allocation, plus others to the south of Derby, will create the potential of increasing the volume of discharges from the Combined Sewer Overflows and will prevent receiving water bodies achieving the ecological standards required by the Water Framework Directive. They note that Severn Trent are currently dealing with this issue but have not committed to any specific scheme.

They state that the Council needs to be satisfied that the necessary sewerage system is in place in order to accommodate the proposed growth.

Response

Comments are noted. Please see response to the same comment in relation to Policy AC15.

Comment

Natural England, the Environment Agency and Derbyshire Wildlife Trust noted the inclusion of criterion (e) which requires that provision is made for the long-term management and protection the Great Crested Newt habitat.

The Wildlife Trust recommends that the policy identifies the need to promote the long term viability of the population. The Trust states that paragraph 6.17.11 is contrary to national advice by solely relying on SUDs.

The Environment Agency stated that habitat improvements to the Cuttle Brook which borders the site could also provide additional newt habitat and contribute to the objectives of the Water Framework Directive. The Environment Agency suggests that the criterion (e) is expanded to read "*Require that provision is made for the long term management and protection of the Great Crested Newt habitat and where practicable, the opportunity should be taken to reinstate the Cuttle Brook as natural watercourse for the benefit of people, wildlife and the natural environment.*"

Response

The Policy as currently drafted makes reference to requiring developers to make provision for the long term management and protection of the Great Crested Newt habitat. Therefore, the principle is already established in the draft Policy. However, paragraph 6.17.11 will be reworded to note that SuDS features could provide mitigation, therefore not solely relying on SuDS. Other policies in the plan will also provide appropriate guidance and controls and do not necessarily have to be repeated here (the plan should be read as a whole).

Policy CP2 will be reworded to require developments to contribute towards the achievement of Water Framework Directive (WFD) objectives. Therefore specific reference within this Policy is not required. Reinstatement of Cuttle Brook, whilst potentially desirable, is not the only way in which WFD objectives could be achieved on this site. Therefore the Policy cannot require it.

Comment

Derbyshire and Peak District Campaign for Better Transport continued to support the allocation. They presume that the junction improvements required in paragraph 6.17.8 will be provided predominantly by the developer.

Response

The wording of 6.17.8 will be amended to take account of a drafting error. The proposed traffic controlled junction will be on Sinfin Lane to provide access into the site. Junction improvements will be provided by the developer.

Comment

Four people supported the allocation of this site as were pleased to see that the policy included a requirement for a new link road (criterion a). They did however consider that a new railway bridge was essential. Also, one person considered that the design should be amended to allow public transport operators to run services through the site.

Response

Comments are noted. The Council believe that satisfactory access to this site can be achieved without the need for a new railway bridge. This has been demonstrated through the granting of two planning applications covering the site, one of which was approved at appeal and the other has a resolution to grant subject to the signing of a Section 106 agreement. Notwithstanding that a replacement bridge may not be necessary, requiring its inclusion in policy would have a significant impact on the delivery of the site.

The site is well related to the Sinfin Lane corridor which has a number of bus routes operating along it. Whilst bus penetration into the site would be desirable it does not need to be a requirement as the majority of the site would be within reasonable walking distance of Sinfin Lane.

The internal design and layout of the site does not form part of the outline planning permission covering the majority of the site and will be dealt with through the submission of reserved matters applications.

Comment

A Councillor raised concerns about the ability of the local road network and bus providers to cope with an additional 3000 dwellings proposed in the Stenson/Sinfin area.

Response

The cumulative impact of new developments proposed in the Core Strategy has been assessed through the use of the Derby Area Transport Model (DATM). New development will undoubtedly lead to a greater number of cars on the network, which will potentially increase congestion in some areas of the city. However, modelling has shown that the impact will be acceptable when balanced against the requirement to meet the City's growth needs.

Allocating land for housing development in the south of the City has advantages in terms of locating new housing in close proximity to major employment growth. It also provides one of the few opportunities that existing to increase the capacity of the road network, though this needs development to facilitate it.

It must be remembered that development is taking place across the City and all areas have constraints that have had to be taken into account. The selection of the final strategy has had to balance those constraints and the potential impact against the 'need' for development, the availability of 'deliverable' and sustainable opportunities for development and the scope for mitigation that might exist.

Proposed measures such as the Southern Derby Integrated Transport Link will help to disperse traffic around the southern edge of the city, providing motorists with greater choice in terms of arterial routes into the city centre. This will reduce some of the potential impacts on the Stenson Road corridor but it will not mitigate 100% of the impact.

Developers of all sites identified in the Core Strategy will be required to submit

Transport Assessments that will need to consider the cumulative impact of committed developments. If the impact of a development is considered to be unacceptable at the point of application (if, for example, the context in which it was allocated has changed), then the plan still provides the scope to refuse the application. This provides long term checks and balances.

No change required.

Action

- Wording changed from 'will be allocated' to 'is allocated'
- Criterion (e) amended to refer to reinstatement of the Cuttle Brook.
- Paragraph 6.17.11 – reworded supporting text relating to mitigation for Great Crested Newts.
- Paragraph 6.17.8 – removed reference to improvements to the Blagreaves Lane / Stenson Road junction and replaces with reference to Sinfin Lane.

Policy AC18: Wragley Way

(Note: Comments relating to Southern Derby Integrated Transport Link addressed in Policies CP23 and CP24)

Comment

The Highways Agency noted that the proposal would form a new sustainable extension to the City. They also noted that the policy sets out the mitigation measures required to offset the traffic generated. The Highways Agency continue by highlighting that a possible new junction on the A50 is being explored by the HA, the City Council and South Derbyshire but the HA is still concerned about the impact the junction will have on the A50. They stated that there is an agreement between all parties involved that a significant amount of work is required to ensure deliverability, affordability and to explore measures required to address the negative impacts of the scheme.

Response

Comments noted and welcomed. No change required.

Comment

The Highways Agency identified a need for junction improvements in order to support new development. These measures are intended to be delivered through planning conditions on relevant developments or through a contribution strategy covering significant developments on the south side of the City. Therefore, the Highways Agency would like to see this aspect reflected in this policy in a similar way as AC20 refers to the need for junction improvements at the A38/A50 junction.

Response

The extent of development in the City itself would only deliver 180 dwellings and would probably not give rise to strategic improvements in their own right. However the cross boundary site would and the policy will reflect the need to consider

strategic highway mitigation. Text has been added to Criterion 'a' of the policy to state that contributions may be required toward improvements to the "strategic road network". This is less specific than the HA's request, but provides flexibility to ensure any applications are judged on their merits and can provide the most appropriate mitigation required for the context of that application.

Comment

English Heritage raised no overall objections to this policy but stated that, when compared to a similar policy in South Derbyshire's Core Strategy, AC18 is more comprehensive and provides safeguards in to ensure that the character of the adjacent settlement is respected.

Response

The comment is noted. Consistency between Derby and South Derbyshire's policies is obviously desirable, though there is bound to be some differences to reflect the different 'style' of the two documents or, more importantly, the fact that the policies have to be designed first and foremost to consider development within their respective districts. However, both Councils are confident that they are equally robust in ensuring the character of the area is respected.

Some minor amendments will be made to this policy, however, to improve consistency.

Comment

Natural England supported the provision for walking and cycling routes through the site (paragraph 6.18.8) which will provide links with the wider green infrastructure network.

Response

The support is welcomed.

Comment

Natural England stated that they would wish to ensure that a buffer zone is maintained between the proposed development and the Sinfin Moor Lane Meadows Local Nature Reserve and Local Wildlife Site.

Response

The response is noted and the policy has been amended to include reference to the LWS.

Comment

The Environment Agency noted that a number of small watercourses run through the site and provide an ideal opportunity to improve connectivity between habitats in-line with policy CP16.

Response

The comments are noted. This is adequately addressed within the policy.

Comment

The Environment Agency requested that an additional criterion is included in the policy to ensure that the requirements of the Water Framework Directive are fully embedded in the policy. They suggest the following: *“a positive contribution is made to delivering the objectives of the Water Framework Directive and, as a minimum, ensures there is no deterioration in the ecological status of the Cuttle Brook catchment watercourses. Proposals likely to impact upon a watercourse, either directly or indirectly, may require the submission of a Water Framework Directive Assessment”*.

Response

The Water Framework Directive is referenced in Core Policy 2 (CP2) generally and the Plan should be read as a whole. There is no need to repeat the text in this site specific policy.

Comment

The Environment Agency requested that paragraph 6.18.7 is amended to highlight that areas of biodiversity can provide opportunities for engaging the local community with outdoor space for both recreation and learning.

Response

The comment is noted.

The sentiment expressed is accepted here, but the Plan includes specific biodiversity and recreation related policies and should be read as a whole. There may be a number of ‘options’ around how areas of biodiversity importance are used or managed. As such, this will be determined through any planning application and other policies in the plan can provide sufficient guidance at the appropriate time.

No change required.

Comment

The Environment Agency highlighted the existing problem with the lack of capacity in the foul sewer network in the southern part of the City. They recognise that Severn Trent have responded by building two new combined sewer overflows by the Environment Agency consider that they are not a sustainable solution. They have concern that the combination of this allocation, plus others to the south of Derby, will create the potential of increasing the volume of discharges from the Combined Sewer Overflows and will prevent receiving water bodies achieving the ecological standards required by the Water Framework Directive. They note that Severn Trent are currently dealing with this issue but have not committed to any specific scheme. They state that the Council needs to be satisfied that the necessary sewerage system is in place in order to accommodate the proposed growth.

Response

See response regarding Sewer Capacity in response to policy AC15 (Infinity Park).

Comment

The Environment Agency highlighted that this allocation is located in an area of flood risk and noted that the supporting text does not include a justification on why there

are no suitable, alternative sites. They state that it would be helpful if a comprehensive flood risk Sequential Test could be applied to make it clear that alternatives have been considered. This will also ensure that the allocation complies with Policy CP2, criterion (m).

Response

This is a large cross boundary strategic location and flooding and drainage were considered in identifying the appropriate strategic sites for inclusion through the plan preparation and Environmental Assessment process. The vast majority of the site is in South Derbyshire and the majority of the component within the City now has planning permission in principle. Only a very small part of the strategic site is indicated as being within Flood Zone 2 on the EA flood maps and the majority is in Zone 1. More clarification is provided on the sequential test of sites will be provided in the Council's 'Water Position Statement'.

It is also important to note that AC18 also includes appropriate measures to address the issues of flood mitigation and drainage.

The Council is confident that the allocation of the site meets the requirements of the NPPF and its own policies in CP2.

Comment

Derbyshire Wildlife Trust noted that paragraph 6.18.9 identified that the site supports biodiversity features and suggested that the development should protect and mitigate for impacts in-line with legislation and other policies in the Core Strategy.

Response

As the comment states, other policies of the Plan cover this issue. The Plan should be read as a whole. It is not necessary to add specific cross references here, particularly with regard to legislation.

Comment

Derbyshire and Peak District Campaign for Better Transport continued to have concerns about this site although they feel that this is a logical location for an urban extension. They consider that development would exacerbate existing congestion along Stenson Road.

Response

The comment is noted – also see comments elsewhere.

It is recognised that growth in this area will have an impact on traffic and congestion. New strategic highway infrastructure is required by the policies of both South Derbyshire District Council and the Derby City Local Plan to mitigate these issues, but it is unlikely that they will provide 100% mitigation. The site is, however, well related to existing – and growing - employment areas and will be required to provide significant on-site infrastructure. This should also help to mitigate the impact of the development to an extent.

It should also be noted that South Derbyshire's Plan makes it clear that the site as a

whole cannot be delivered until the Phase 1 of the SDITL has been completed. This should provide some further comfort that 2000 dwellings will not be built without some form of major infrastructure provision. This point could be expressed more clearly in the supporting text.

As noted elsewhere, this may be the only opportunity within the urban area to provide deliverable new network capacity. This will benefit the network as a whole.

Comment

The Planning Design Group, representing Hallam Land Management Ltd, supported the policy. They considered that development of the site would meet the vision of the Core Strategy.

Response

The support is welcomed.

Comment

Nathaniel Lichfield & Partners considers that the Core Strategy is unsound as the allocation of this site is not supported by a robust and up-to-date evidence base. They consider that development of the site relies upon the construction of the South Derby Integrated Transport Link and that this makes the site undeliverable.

Response

The delivery of the wider cross boundary site requires the delivery of the new South Derbyshire integrated Transport Link which is a requirement of the Policy. However the land allocated in Derby City does not require any specific strategic highway infrastructure. Part of the site (130 dwellings of the 180 in Derby) already has planning permission subject to a section 106 agreement. The appropriate highway mitigation is also a requirement of the part of the site in South Derbyshire and is reflected in their emerging Local Plan.

The Council is confident that the road is deliverable. Though a final alignment has not been agreed, the link is likely to run through major development sites and has the support of the site promoters. In addition, the Council has an excellent record in obtaining Government funding for infrastructure and this activity will continue. Bids have already been submitted to the LEP, for example, to provide funding for the link. It is also unlikely that this link will be required within the first 5 years of the plan and thus there is some time available to ensure funding is in place.

No change required.

Comment

One person considered that the local road network cannot support an additional 2000 homes. The area has lengthy queues at peak times.

Response

The comment is noted. See comments on this issue elsewhere.

Comment

Two members of the public supported the allocation of this site.

Response

The comments are noted and support welcomed.

Comment

One member of the public objected as development would mean the loss of farmland.

Response

The need for housing has to be balanced against other 'needs'. In this case, the need for housing has outweighed the importance of the land for agricultural uses.

Comment

One member of the public accepted that some residential development is necessary, the scale of the development raised concerns as they considered it will have a major impact on the existing neighbourhood – particularly in terms of noise. They also stated that a large amount of infrastructure would be required, especially on the road network which is already congested.

Response

The comment is noted. See comments elsewhere on traffic implications. The policy also requires that the development properly integrates with existing neighbourhoods in Derby and the Plan also have design and placemaking principles which seek similar objectives.

Action

- Add reference to potential for contributions to 'strategic road network' to criterion 'a'
- Add reference to Local Wildlife Site/Local Nature Reserve at Sinfin Moor Lane Meadows in policy and consequential changes to the supporting text
- Amend text relating to pedestrian and cycle links to make specific reference to Infinity Park
- Add reference in supporting text to explain that the SDITL will be required before the site as a whole is delivered (provide comfort).
- Amendments to text to bring policy in-line with South Derbyshire's policy.

Littleover, Mackworth and Mickleover

Note: A number of responses commented on the overall impact of development on the area. This section sets out these comments.

Comment

Eight people considered that the area had been targeted over the years, taking a lot of development.

Response

All areas of Derby have seen significant residential growth over the past 50-60 years, including the construction of large new estates such as Oakwood in the north-east, Stenson Fields to the south and Silverhill to the west. Derby's regular urban form indicates that growth has spread relatively evenly from the city centre extending outwards in all directions, rather than concentrating growth in one specific location. Derby is now predominantly built to its administrative boundaries and therefore some of the future growth required to meet Derby's needs, will need to be located just outside of the city boundary. Large areas to the north and east of the city are constrained by Green Belt and World Heritage Site designations and therefore the Council is logically looking to the west, south and south-east. It is fair to say, however, that the majority of growth identified within the plan is to the South of the City.

The new housing provision proposed at Hackwood Farm, Radbourne Lane and Onslow Road equates to approximately 7.5% of the overall number of new homes that will be provided in the Derby Urban Area (DUA). This demonstrates that future growth is not being disproportionately targeted at the Mickleover area.

Comment

One person sought clarification about what joint working meant as this has resulted in the building of over 1000 houses which, they feel is against the sustainable aims of the plan.

Response

It needs to be reiterated that the Council is under an obligation to "meet its objectively assessed housing needs" and that there is a Duty to Cooperate between authorities to ensure that these needs are met.

Derby cannot accommodate all of the housing needs that will be generated from within the city during the Plan period. Therefore Derby City Council has been working with the other local authorities within the Derby Housing Market Area (HMA) to ensure that Derby's needs are met in sustainable locations within the HMA, predominantly around the urban area. This joint approach to cross boundary issues enables development needs to be met in the most sustainable way.

Comment

One person considered that development on the edge of Mickleover was not in accordance with the East Midlands Regional Plan.

Response

The East Midlands Regional Plan (RSS) was revoked in April 2013 and therefore its policies cannot be given any weight in the planning process. Notwithstanding this, there is nothing to suggest that the strategy would have been inconsistent with the RSS. This also required a number of dwellings to be provided on the edge of the City.

Comment

One person highlighted that there was a need for smaller properties in the area which would, in their opinion, allow retired residents to downsize.

Two people considered that, based on the findings of the GL Hearn Report, young people will not be able to afford housing in Mickleover.

Response

Comments are noted. Developers will be required to have regard to the Council's Strategic Housing Market Assessment (SHMA) to ensure that an appropriate mix of housing is delivered across the city as a whole during the Plan period. It is acknowledged that downsizing opportunities can help to release family homes onto the market, which in turn can help to satisfy demand.

Affordability is a key issue. This is why the policies in the Plan require developers to provide a proportion of dwellings as 'affordable housing'. However, constraining supply inappropriately would also have a significant impact on house prices; ultimately driving them up and making it even harder for buyers (particularly first time buyers). This is why it is so important for the Council to meet its housing needs.

Comment

One person stated that there is very few employment opportunities located near any of the proposed sites and bus services from Mickleover do not go to the south of the City which will result in most residents using their cars.

Response

It is acknowledged that the traditional employment areas are generally located along the River Derwent corridor and to the south of the city. The proposed employment sites also generally reflect new opportunities within these broad areas. The overall strategy for the Derby Urban Area (DUA) seeks to locate a significant proportion of the new homes to the south and east of the city in order to take advantage of the proximity of existing and proposed employment areas, helping to create more sustainable forms of development.

Whilst access to employment areas is a key sustainability consideration, it is not feasible or viable to locate all of Derby's housing needs solely to the east and south of the city. New housing needs to be provided in a mix of locations in order to be deliverable.

The western side of the city is well related to other employment generating uses such as the University campus and the Royal Derby Hospital and has good links to the city centre. Therefore, new development on the western side of the city will have access to employment opportunities. In addition, the allocations at Rykneld Road and Manor Kingsway include employment land in order to try and rebalance the distribution of traditional employment uses within the city.

No change required.

Comment

The adverse impact on the local road network from development was highlighted by 18 people; in particular the Station Road / Radbourne Lane junction was highlighted as an issue. One resident enquired why there wasn't a western version of the T12 and Southern Derby Integrated Transport Link proposals.

Two people referred to a statement made by the Highways Agency which stated that no development should take place until the A38 improvements have been completed.

The difficulty in finding parking spaces in the main shopping centre was highlighted by five people.

Response

See comments elsewhere relating to the impact of growth on traffic and congestion.

The impact of all of the sites allocated in the Core Strategy has been assessed through a traffic model. The modelling demonstrates that the proposed sites on the west side of the city can be implemented without the need for a new road to help mitigate impacts. Indeed, opportunities for new infrastructure of this scale seem limited in any event.

While the HA have suggested that some development to the west of the City should be phased until after 2021, they have not provided any specific evidence which suggests that this is necessary, or at what point development becomes unacceptable.

Developers of all sites identified in the Core Strategy will be required to submit Transport Assessments (TA) as part of planning applications. TAs will need to consider the cumulative impact of committed developments on the highway network, including the existing A38 junctions. If the impact of a proposed development is considered to be unacceptable at the point of application, then it can still be refused planning permission. At this time, the Council is satisfied that the level of development proposed to the west of the City is acceptable with the current network (providing planned mitigation is provided). Assessing each case on its merits seems to be a more sensible approach to addressing the HA's concerns, than imposing a blanket restriction.

New development at Hackwood Farm and Radbourne Lane (within Amber Valley) will be required to contribute towards improvements to the junction of Radbourne Lane and Station Road. This will help to mitigate the specific impacts of development.

It is important to strike a balance between ensuring that local centres are well used without causing over trading to the extent that it starts to impact upon the vitality and viability of a centre. In terms of pure numbers, Mickleover district centre is well served by parking spaces due to the presence of Tesco.

The parking issues that have been identified within the centre are more specifically

related to the management and layout of spaces in front of the parade. This issue does not provide an in principle reason to make changes to the site policies.

Comment

One person commented that the bus service serving the north of Mickleover needs improving.

Response

New residential development around the northern edge of Mickleover will provide opportunities to improve service provision in this area as the extension of existing services or provision of new ones will be made more viable.

Comment

One person stated that the extra pupils attending the local schools would generate extra traffic, hence more congestion which would be dangerous for the children.

Response

The number of school age children within the city is increasing due to an ever increasing population. This means that space to accommodate them will need to be provided somewhere within the city regardless of where new housing is provided.

Increasing pupil numbers at any school will potentially increase the number of car journeys travelling to and from the school and the Mickleover area is no different. Therefore, no matter where new houses are located there will potentially be impacts on congestion. The key is to ensure that congestion is mitigated by encouraging more sustainable forms of travel to and from schools and through effective enforcement to ensure that safety is maintained. In addition, providing new schools (in particular primary schools) on larger sites will help to reduce the need to travel. This is one of the reasons why the Hackwood Farm allocation is expected to provide a new school on site.

Comment

Nine people and a Councillor considered that the local schools would not be able to cope with the extra pupils.

In contrast, one member of the public noted that their previous comments regarding school provision appear to have been partially addressed through the provision of a new primary school; although there are still concerns that nothing has been said about Secondary School provision.

One person considered that there wasn't a need for a new primary school as existing schools in the area could be improved.

Response

As noted, the Hackwood Farm site will be required to provide a primary school on site. This will provide new capacity.

Development in this area will be required to contribute towards both primary and secondary school provision. The site at Onslow Road may need to be appropriately

phased to ensure that primary needs can be met by new schools developed as part of other new developments in the Mickleover area.

Contributions towards secondary education will be used towards new or extended secondary schools. Murray Park Secondary School is located nearby within the Green Wedge and has some potential for expansion if necessary.

No changes to the Policy are needed.

Comment

The impact on local shops, health facilities, social support, leisure facilities and faith facilities was highlighted by 15 people. One person stated that this impact was not considered in the draft Infrastructure Delivery Plan.

In contrast one person noted that there is a requirement in paragraph 6.21.2 for a new local centre but they question whether this will have the full range of facilities to cater for the amount of development; therefore they considered that Mickleover Village centre will still be put under pressure.

Nine people indicated that the local infrastructure would not be able to cope with the additional housing.

One member of the public stated that all of the indoor sports facilities are located on Pride Park which is out of reach for residents of Mickleover.

Response

It is accepted that housing growth will put additional pressure on local facilities and there are likely to be impacts. The plan provides for this, through site specific policies that set out specific requirements (where appropriate) and in the general principles of requiring 'planning obligations' to mitigate the impact of development. It must also be remembered that 'planning' will not stop once the Local Plan is adopted and the Council will always be looking at ways in which it can provide the necessary facilities for residents.

It is also accepted that this is unlikely to alleviate the concerns of residents in the short term. However, as noted throughout, the Council is obliged to meet its housing requirements and this obligation has to be balanced against the potential impacts. The Plan does everything it can to ensure impacts are kept to a minimum.

The impact on health facilities has been considered as part of the Infrastructure Delivery Plan (IDP). The Council has worked with NHS England and the Clinical Commissioning Group (CCG) to discuss plans for new housing and is confident that the health needs of new and existing residents can be adequately accommodated during the Plan period. Policies in the Plan allow for contributions to be made for the provision of new health facilities as and when required (subject to viability, as with all developer contributions).

The Hackwood Farm site is located some distance from the district centre and therefore it is proposed that a local centre is provided as part of the development to

enhance the sustainability credentials of the site. The Policy requires that the new centre is of a scale to meet the needs of the new community without impacting upon existing centres. Therefore, the centre should provide for the needs of the enlarged community, helping to reduce some of the pressure on the district centre.

There are indoor sports facilities located around the city including swimming pools and gyms in Mickleover and Littleover and other indoor sports facilities at Moorways Sports Centre. Facilities will be maintained at the former Mackworth College site as part of its wider redevelopment.

Comment

Three people highlighted that development would have a negative impact on wildlife, the remnants on the former ridge-and-furrow farming system and make the existing cycleway unattractive for people to use.

Derbyshire and Peak District Campaign for Better Transport and two additional people raised concerns about the encroachment into the Green Wedge at Mackworth College and Onslow Road.

One person questioned what has happened to the Green Belt designation to the north and west of the City.

One person agreed with the Council's desire to protect Mickleover Meadows (6.22.3).

Two people highlighted that, when compared to other areas in the City, Mickleover has no open green spaces and what little there is, is tucked behind houses.

Two members of the public stated that the green fields in the area were recognised as important in an East Midlands Regional document.

Two members of the public stated that the fields are farmed with crops and livestock and this important resource cannot be lost.

Three members of the public indicated that fields to the west of Ladybank Road are ridge and furrow fields and are recognised as having special significance. Therefore, they considered the fields should be preserved.

One person stated that development on greenfield sites in the area is contrary to Policy CP16: Green Infrastructure.

Response

Land to the west of the city is not Green Belt and was not identified as having any special importance in the East Midlands Regional Plan (RSS). The primary function of the Green Belt in and around Derby is to prevent the coalescence of Derby and Nottingham. Land to the west of Derby does not perform this function and therefore is not identified as Green Belt. Green Belt is a land use designation and is not related to landscape quality.

The need for new housing needs to be weighed against a range of other factors such as the need to protect the best and most versatile agricultural land. Land to the west of the city has been assessed as generally being moderate to good (grade 3), in terms of its agricultural quality. This is the same grading as the majority of land surrounding the city, meaning that it is difficult to find enough sites to meet needs without encroaching on grade 3 agricultural land. The agricultural grading is not sufficient to justify retention when weighed against the need for new housing.

The land to the west of Ladybank Road is the site known as Newhouse Farm. The site is located within South Derbyshire and not a matter for Derby's Local Plan.

In terms of impacts on the Green Wedge, the Council consider that the sites on either side of the Wedge can be developed as allocated, whilst maintaining its function of separating Mickleover and Mackworth and allowing countryside to penetrate the urban area of the city. The cumulative impact of developing these sites has been specifically assessed in the Council's Green Wedge Review. The Review concludes that development of both sites will have a negative impact in terms of narrowing but not to an extent that would undermine its functions, provided that development areas are 'rounded off' to avoid the creation of a 'pinch point' in the centre of the Wedge.

Development of these sites actually has the potential to help deliver qualitative enhancements to the Green Wedge including new areas of publicly accessible green space and improved connectivity. The provision of qualitative enhancements is already a requirement within the Policy. Therefore the Policy does not need to change to reflect this point.

Development of greenfield sites has the potential to impact on green infrastructure and biodiversity. It is important to ensure that any negative impacts are mitigated and / or compensated for as required by national and local policies. Developers will be required to carry out appropriate surveying to ensure that the nature of any potential impacts on biodiversity is fully understood. These controls are set out in Policy CP19, which accords with the NPPF.

No change required.

Action

- No change to the plan is required.

Policy AC19: Manor Kingsway

Comment

English Heritage welcomed reference to heritage assets in criterion (g).

Response

Comments are noted and welcomed.

Comment

Sport England objected to the allocation as it appeared to result in the loss of a playing field. They stated that this needs to be justified. They also note that the policy identifies new sports facilities and open space but they are unsure what evidence was used, given that the Playing Pitch Strategy has yet to be completed.

Response

The Policy requires the provision of new sports facilities and open space within the Mackworth / Mickleover Green Wedge. The supporting text of the Policy notes that the provision of new sports facilities should be based on an up to date assessment of need and consider the issue of loss of former sports pitches and how this will be addressed in the context of local and national policy.

Therefore, the Policy already makes adequate provision to ensure that existing sports pitches are replaced, which is in line with local and national policy.

It should also be noted that planning permission has already been granted for development on this site, and thus the issue of loss of sports pitches has been addressed adequately enough to conclude that the site can continue to be allocated for development.

Comment

Derbyshire Wildlife Trust welcomed the recognition given to retaining and enhancing the Green Wedge in paragraph 6.19.5.

Response

Comments are noted and welcomed.

Comment

Planning Potential, representing Kier Property Developments Ltd, stated that, given that the site has been allocated for a major business development for 15 years which hasn't come forward, the policy should be amended to be more flexible and allow non B1 commercial uses on the site. They suggested the following amendment is made to criterion (a):

The construction of a high quality business park (B1) or other employment generating uses on no less than 5 hectares.

Response

The Council has been aware for some time that the developer of the Manor Kingsway site may wish to either reduce the amount of land allocated for a business park and / or increase the flexibility of uses within the business park area of the site. The developer has submitted very little evidence to justify this change. In any case, the Council would not want to provide the level of flexibility in commercial uses as suggested by the developer, without the appropriate evidence and justification. For example, the suggested wording provided by the developer could open up the potential for large scale retail development which would need to be justified in terms of the sequential and impact tests as set out in the NPPF. The suggested wording is very vague and open to interpretation.

Maintaining the existing policy also provides some comfort about the levels of employment likely to be achieved on the site. The idea with the B1 allocation was always to try and offset – to a small degree - the imbalance that exists in employment land across the City and provide a greater number of employment opportunities to the west of the City (which has been highlighted elsewhere). Opening this up to any “employment generating use” may be counterproductive to that aim.

In light of no evidence to justify additional employment generating uses such as retail, leisure or hotels, the Council do not think that it is appropriate to amend the wording of the allocation. If the developer still intends to pursue other employment generating uses, they will need to do through the Development Management process, providing evidence and justification for the move away from the allocated uses. This is a more appropriate way for the Council to ensure its ‘vision’ for the site is met.

It is accepted, however, that imposing a floorspace figure on the site is inconsistent with other policies in the plan and may be unreasonably restrictive. This figure forms part of the existing planning permission and will be relevant to any consideration of ‘alternative’ employment uses should they be proposed, but it is not necessary to include it in policy.

No change required.

Comment

Friends of the Earth stated that the site was supposed to be a City Park in the 1996 Local Plan.

Response

This is incorrect. The redevelopment of the former Manor and Kingsway Hospitals for residential led redevelopment has been identified in the adopted existing Local Plan Review (2006), City of Derby Local Plan (1998), Local Plan for Southern Derby (1994) and the Littleover Local Plan (1989).

Comment

A member of the public requested that the amount of open space in the development is maximised.

Response

Comments are noted. The Policy requires the provision of new open space.

Comment

It was also suggested by a member of the public that a pedestrian/cycle bridge is erected across the A38 to ensure that the green areas in Mackworth is linked to this development as the current underpass is unpleasant. In addition, they suggested that the local road network needs to be improved.

Response

It is felt that the policy already does what the respondent is asking.

The Policy requires that development of the site should contribute towards a link across the A38. This could take the form of a pedestrian / cycle bridge or at grade solution. The policy also required on and off-site road and junction improvements.

No change required.

Comment

A member of the public highlighted the cumulative impact on the road network of this development in conjunction with traffic from the hospital and the Kingsway Retail Park.

Response

The cumulative impact of new developments proposed in the Core Strategy has been assessed through the use of the Derby Area Transport Model (DATM). Whilst new development will undoubtedly lead to a greater number of cars on the network, which could exacerbate existing congestion, it also provides an opportunity to remedy existing issues. Development of the Manor Kingsway site provides an opportunity to remodel the roundabout that provides access into Kingsway Retail Park, helping to improve traffic flow at this point on the network.

Developers of all sites identified in the Core Strategy will be required to submit Transport Assessments that will need to consider the cumulative impact of committed developments and come up with appropriate mitigation packages.

No change required.

Action

- Remove reference to 21,500 sqm from policy
- Additional text added to criterion (b) to say that no more than 100 dwellings should be accessed from the hospital roundabout.
- Additional text added to criterion (d) to say that signalisation of A38 junction will be required.

Policy AC20 Rykneld Road

Comment

The Environment Agency supported the policy but noted that the allocation extends into agricultural land, whose habitat often supports a range of species such as small mammals and birds. Suitable mitigation will be required to ensure that adverse impacts are avoided, and where this is not possible impacts should be minimised and offset. Compensatory habitat should be provided as a last resort. Mitigation should take into account the cumulative impacts of the comprehensive development, not just the individual plots as they are released. This includes the loss of

hedgerows, nesting areas (trees and ground) and fragmentation of habitat. They requested that the policy is strengthened by incorporating the following criterion: *“There to be no net loss in biodiversity and, where possible, for the development to make a positive contribution to biodiversity.”*

Response

Policy CP19 provides detailed policy guidance in relation to the Council’s approach to biodiversity, including biodiversity loss. Therefore it is not necessary to repeat this in the site policy. However, an additional criterion will be added to ensure that developers provide measures to enhance the green infrastructure and biodiversity networks.

Comment

The Environment Agency highlighted the existing problem with the lack of capacity in the foul sewer network in the southern part of the City. They recognise that Severn Trent have responded by building two new combined sewer overflows by the EA consider that they are not a sustainable solution. They have concern that the combination of this allocation, plus others to the south of Derby, will create the potential of increasing the volume of discharges from the Combined Sewer Overflows and will prevent receiving water bodies achieving the ecological standards required by the Water Framework Directive. They note that Severn Trent are currently dealing with this issue but have not committed to any specific scheme. They state that the Council needs to be satisfied that the necessary sewerage system is in place in order to accommodate the proposed growth.

Response

Comments are noted. Please see response to the same comment in relation to Policy AC15.

Comment

Sport England objected to the allocation as it appeared to result in the loss of a playing field. They stated that this needs to be justified. They also note that the policy identifies new sports facilities and open space but they are unsure what evidence was used, given that the Playing Pitch Strategy has yet to be completed.

Response

This comment is not accepted.

The allocated site is currently in use as agricultural fields and does not include the loss of a playing field. Therefore, there will be no loss of facility. The policy does not include specific reference to the provision of new sports facilities or open space. However, the Council would expect green spaces, including playing fields to be provided in line with Policies CP16 and CP17. One of the factors that will be taken into account when applying Policy CP17 will be the need for such facilities, which will be informed by the most up to date evidence, which could include the Playing Pitch Strategy once completed. The policies in the plan are more than adequate to apply the findings of the strategy.

Comment

Derbyshire and Peak District Campaign for Better Transport continue to support the allocation.

Response

Comments are noted and welcomed.

Comment

Derbyshire Wildlife Trust highlighted their previous objections to the outline application. With regard to the policy itself, they indicate that it should be amended as it is not possible to mitigate for the loss of farmland birds and orchard; therefore opportunities for compensation should be sought and the policy should reflect which measures will be sought.

Response

The Council acknowledge that successfully meeting Derby's housing needs will lead to the loss of greenfield sites which may have associated implications for biodiversity. However, the potential impacts need to be weighed against the need for new housing and the ability of the development to mitigate or minimise those impacts.

Where impacts on biodiversity are expected, the Council will require developers to follow the approach set out in Policy CP19 and the NPPF which seek mitigation and as a last resort compensation. Therefore, the possibility the respondent raises can be addressed through the planning application. The issue is already adequately covered by the Plan and no additional criteria need to be added to the Policy.

No change required.

Comment

Nathaniel Lichfield & Partners consider that the Core Strategy is unsound as the allocation of this site is not supported by a robust and up-to-date evidence base.

They consider that development requires a number of contributions for education and consideration of phase 2 of the South Derby Integrated Transport Link. They highlight that there was a resolution to grant permission for 800 dwellings on part of this site but as yet planning permission has yet to be issued and the section 106 package has yet to be agreed.

Response

The respondent is seeking to undermine the allocation of this site in favour of an alternative site to the west of Mickleover. They have questioned the viability of the site on the basis that the S106 on the planning application is yet to be signed (though part of the process of negotiating a S106 is to facilitate delivery of the site).

The Council is continuing to negotiate with the applicant and is confident that an agreement on appropriate developer contributions can be secured from the site in the near future. The consortium of developers who will be building the site are still keen to see it developed and therefore the Council is confident that the site will be

developed in the Plan period. Therefore, the Council do not agree that the identification of this site in any way makes the site unsound.

It is also worth noting that 'Phase 2' of the SDITL is not being considered as necessary for the Local Plan Part 1 and is purely identified as a potential long term project, likely to be delivered post 2028. This has no impact on this allocation.

No change required.

Comment

One agent suggested that the Council should consider whether it is still appropriate to require the provision of employment land as part of the Rykneld Road development.

Response

A small amount of employment land is allocated as part of this development to try and create a more sustainable form of development and to rebalance the distribution of employment land supply across the city. No evidence has been submitted to demonstrate why the employment element should be removed and therefore no change is recommended.

Should an alternative proposal come forward through the development management process, then its merits can be considered against Policy CP10.

No change required.

It is recognised that requiring a minimum floorspace provision is probably unnecessary and inconsistent with the remainder of the Plan. Thus this will be removed.

Comment

A Councillor stated that developer contributions should be made to the provision of the City Park off Moorway Lane.

Response

The Council will seek open space contributions in line with Policy CP17. This could include on-site provision and / or financial contributions to improve the quality of existing green spaces. Contributions could potentially be used towards the delivery of the proposed City Park off Moorway Lane, however the exact level and nature of contributions are still being negotiated with the developers. This is not a matter for the policy.

No change required.

Action

- Criterion and supporting text added requiring green infrastructure improvements
- Removal of employment floorspace figure
- Inserted additional detail about off-site junction improvements required by

conditions

- Paragraph 6.20.6 Reference to green infrastructure and biodiversity added.

Policy AC21: Hackwood Farm

Comment

English Heritage highlighted that they have previously made comments in relation to the impact of this site and its impact on the setting of Radbourne Hall. They stated their disappointment that the policy is not aligned with South Derbyshire where they have included a bullet point requiring the need to protect the setting of the Hall. They consider this omission in our policy is a significant shortcoming and suggested that a joint policy approach should be considered. Environment Agency's comments were supported by three members of the public.

Response

The Historic Environment section of the Plan deals with these kind of issues including a criteria in the policy about ensuring that developments in the City do not adversely affect the setting of heritage assets outside the City. The Plan should be read as a whole. As there will be some development in South Derbyshire as part of this cross boundary site it is more relevant for that Plan to cover the matter. However, the Policy now makes reference to the setting of Radbourne Hall for completeness.

Comment

Natural England welcomed the intention to improve the Rights of Way network with links to the Mickleover to Eggington Greenway and the open countryside.

Response

The comment is noted and welcomed.

Comment

Natural England supported our requirement to improve green infrastructure across the site, including the soft edge to the development where it meets the open countryside but they requested that the disused railway is also a Local Wildlife Site and its nature conservation interest should be protected.

Response

The railway cutting itself is not a part of the development site and there are other policies in the Plan which will ensure its protection. It is not necessary to make this reference within the policy.

Comment

The Environment Agency stated that the allocation includes agricultural land, whose habitat often supports a range of species such as small mammals and birds, and they welcome point (h) which seeks to retain and compensate for loss of hedgerows and trees. However, they consider that an additional criterion is added to strengthen

the policy; they suggest “*There will be no net loss in biodiversity and, where possible, for the development to make a positive contribution to biodiversity and to the delivery of Water Framework Directive objectives.*”

Response

The Policy and the wider objectives of the Plan seek to deliver sustainable development and to meet the needs of the city for new homes. Biodiversity policies exist in other areas of the Plan which should be read as a whole. These are adequate to address the Environment Agency’s comments.

The Water Framework Directive is also referenced in the Biodiversity policies and in the Climate Change policies.

Comment

Derbyshire Wildlife Trust requested that criterion (h) should reflect paragraph 6.21.8. The paragraph identifies a number of biodiversity features (including hedgerows, ridge and furrow, ponds/wetlands and farmland) and the policy should reflect this rather than seeking to provide hedgerows and tree planting. Remaining with criterion (h), the Trust suggests that the Council should seek financial contributions from developers for the maintenance of new Green Infrastructure and compensation towards the Mackworth/Mickleover Green Wedge.

Response

It is considered that the policy and the supporting text, combined with the other biodiversity policies of the plan meet this aim. Criterion (f) requires enhancements to be made to remaining areas of the Green Wedge but the requirements of financial contributions for this would be too specific for this policy. It would be a matter for negotiation at a planning application stage.

No change required.

Comment

CPRE Derbyshire queried the allocation of the site, stating that it is on important agricultural land and therefore, should be held in reserve until the need for more houses is proven.

Response

Derby is unable to meet its objectively assessed needs for housing and is already having to decant its needs to neighbouring authorities. The need for housing exists and this site has been identified as being suitable to contribute to meeting those needs.

There will always be a balance between competing ‘needs’ and in this case it is considered that the need to deliver housing outweighs the protection of the site for agricultural use.

No change required.

Comment

Derbyshire and Peak District Campaign for Better Transport highlighted the constraints to this site from the PGS Site Summary Compendium and highlight that they have not been dealt with in the new policy.

They reiterated their comments to South Derbyshire by requesting that development does not occur until the A38 grade separation scheme is completed.

Response

See comments elsewhere relating to A38 grade separation and phasing. This issue can be addressed through the development management process.

The promoters of the site have agreed that it needs improved sustainability in order to be acceptable as a location for housing. Several requirements of the policy including the requirement for on-site local facilities, better links with Mickleover and the provision of a new primary school are considered to address some of the concerns highlighted in the PGS document. Therefore, the respondent's assertions are not completely accepted.

It should be noted, however, that the City's housing requirements increased following the publication of the PGS and thus all sites had to be given further consideration. When taken with the opportunities to address some of the site's deficiencies, it was decided that the site represented 'the next best' opportunity in the urban area to meet the City's needs.

Comment

The Pegasus Group, representing Miller Homes, supported the allocation.

Response

The support is noted and welcomed

Comment

Nathaniel Lichfield & Partners, acting on behalf of the Commercial Estates Group, noted the allocation of this cross-boundary site. In their submission they noted that the portion of the site in South Derbyshire was considered unsuitable for a number of reasons at the Preferred Growth Strategy Stage and that part of the site, in the City, was not included in their Preferred Growth Strategy document. They noted that the following concerns were raised by the City Council in their Preferred Growth Strategy document regarding the site:

1. Intrusion into the countryside
2. Impact on the setting of Radbourne Hall, a Grade I Listed Building
3. Proximity to existing services and facilities
4. Insufficient capacity in local schools
5. Public transport accessibility
6. Impact on the A38

They also highlight that DCC's recent Cabinet Report states that some of these issues have not been addressed and that the site is not particularly well related to existing services and facilities.

They continue by stating that there is no provision of land for the delivery of a secondary school on either the South Derbyshire or Derby City portions of the site (which Newhouse Farm could provide). The submission continues by stating that the delivery of a local centre is reliant upon the delivery of the Derby City portion of the site.

In conclusion Nathaniel Lichfield & Partners raised doubts over whether the site could be delivered or developed and considered that this allocation is not justified or effective.

Response

Following the publication of the Preferred Growth Strategy, the City's housing requirements increased necessitating the consideration, and inclusion, of sites which were not allocated as part of the Preferred Growth Strategy. The Council decided that, given the information available and further discussions with the site promoters, this site represented the 'next best' opportunity in the urban area to help meet the City's needs. Indeed, the promoters of the site have agreed that it needs improved sustainability in order to be acceptable as a location for housing. Several requirements of the policy including on-site local facilities, better links with Mickleover and the provision of a new primary school are considered to address some of the concerns highlighted in the Preferred Growth Strategy document. Therefore, the respondent's assertions are not completely accepted.

Developers of all sites identified in the Core Strategy will be required to submit Transport Assessments as part of planning applications. Transport Assessments will need to consider the cumulative impact of committed developments on the highway network, including the existing A38 junctions. If the impact of a proposed development is considered to be unacceptable at the point of application, then it can technically still be refused planning permission.

At this time, based on the evidence from its own modelling exercises, the Council is satisfied that the level of development proposed to the west of the City is acceptable with the current network. Assessing each case on its merits seems to be a more sensible approach to addressing the Highways Agency's concerns, than imposing a blanket restriction.

Please refer to the Council's response to comments made by English Heritage regarding the impact the allocation would have on Radbourne Hall.

Discussions are continuing with education officers from the City and County Councils to determine, based on up-to-date information, the best solution for all the allocations across the HMA. It should be noted that the policy requires new infrastructure including a new primary school, highway improvements and connections with Mickleover in order to make it a more sustainable development. It is felt that, on balance, the site can be developed sustainably in order to help meet significant housing needs.

Comment

Mickleover Neighbourhood Board and a Councillor raised a number of objections to the allocation. They were concerned that the site, previously removed from the Preferred growth Strategy, is now back in the Core Strategy. They continued by stating that there seemed to be minimal improvements to the local road network and that the proposed access would create a rat-run. Both considered that the construction of a roundabout at Station Road and Radbourne Lane would achieve little.

Response

Also see comments above.

The site has been included in the strategy to meet assessed housing needs. The policy requires new infrastructure including a new primary school, highway improvements and connections with Mickloever in order to make it a more sustainable development. It is felt that, on balance, the site can be developed sustainably in order to meet significant housing needs all of which cannot be accommodated in the City.

Comment

One person considered that the policy was written in a way that indicates that the Council has already agreed to the development and considered therefore biased.

Response

The policy sets out the requirements which would need to be achieved in order for the site to be developed but the purpose of including the allocation in the Plan is to be clear that the Council has concluded that the principle of development on this site is acceptable and required to meet objectively assessed housing requirements.

Matters of detail, and the consistency between policy and any proposals being considered, is a matter for the development management process and the Council's 'planning control committee'.

No change required.

Comment

One person raised concerns about the increase in dwelling numbers.

Response

The increase in dwelling numbers to a larger cross boundary site will allow a more sustainable form of development with more facilities on-site.

Comment

A person at a drop-in event highlighted that the area suffered from poor air quality and that the additional traffic would make things worse.

Response

There is no record of poor air quality in this location. As an urban fringe site which is

on the edge of open countryside it is very unlikely that the air quality in the location is worse than many other areas of the city.

Comment

Three members of the public stated that surface water run-off flooded both the cycle track and properties on Milton Close. They questioned what the impact will be once the land had been developed.

Response

Development of this site could provide an opportunity to help remedy existing issues related to drainage. Clearly, if Severn Trent / Environment Agency conclude that development of the site will exacerbate an existing flooding issue, it would be reason to refuse a planning application. It is therefore in the developer's interest to ensure that flooding and drainage issues are appropriately addressed. The specific site Policy and the wider Plan already requires developers to address flooding issues, therefore no change to the Policy is necessary.

Comment

One respondent commented that Hackwood Farm would be more acceptable without South Derbyshire's allocation. However, they were resigned to the fact that development would go ahead and so requested that a substantial green corridor is incorporated into the design (along the western boundary).

Response

Both the South Derbyshire Plan and criterion (b) of the site specific policy in the Derby City Plan require landscaping/buffering of the western edge of the site where it meets the open countryside. It is considered to be an important consideration in designing and building out the site and that it satisfies the respondent's concerns.

No change required.

Comment

One person stated that there was a small wooded area which included a number of protected trees located between the back of Radbourne Gate and Hackwood Farm. They hoped that the woodland would remain protected.

Response

There are no records of protected trees (i.e. trees covered by Tree Preservation Orders) on the development site. The development should therefore not affect any protected trees.

Comment

The Mickleover Neighbourhood Board, a member of the public and a local Councillor expressed concerns about the current and potential future problems caused by flooding at Hackwood Farm. The member of the public highlighted that Severn Trent have stated that the sewers cannot accommodate surface water run-off and that the pumping station located on Station Road does not have any additional capacity. The Councillor said that there are known problems currently in the area and had several photographs showing very high water levels and sandbags where properties were at

risk of flooding. With regard to the policy itself two people supported our requirement for a flood mitigation scheme but questioned whether developers would be able to deliver.

Response

The policy requires appropriate flood alleviation/mitigation to be provided on site. It is noted that there is currently an undetermined planning application in the City for flood alleviation measures on the wider site. The developer is arguing that these are not directly related to the development but will improve flood resilience generally in the location. If this is considered to be the case, then this may alleviate some of the respondent's concerns about drainage in the area.

The Climate Change policies in Policy CP2 also require that flooding is appropriately considered in dealing with planning applications.

Action

- Add reference to Radbourne Hall in the policy
- Amend text relating to pedestrian and cycle bridge
- Amend text relating to secondary school provision
- Add text relating to protection of hedgerows
- Add text to provide further guidance on flooding and drainage

Policy AC22: Mickleover and Mackworth

Comment

Derbyshire Wildlife Trust indicated that Onslow Road was previously identified as part of a Local Wildlife Site. The site still retains features of significant biodiversity value, including European Protected Species great crested newt, BAP hedgerows and birds and the Trust consider that the policy is amended to reflect this. They also consider that paragraph 6.22.3 is not sufficient to provide the required protection.

Finally, the Trust consider that, when combined with AC21, there will be significant impacts on the value and function of the Green Wedge and recommend that financial contributions are sought to develop and maintain the biodiversity value and continued public access within the Green Wedge.

The Environment Agency noted that there are a number of drains and small watercourses running through the proposed site. Mirroring the comments made by the Wildlife Trust, they indicated that records show that they are supporting protected species. Reflecting their comments, the EA welcomed criterion (f) but asked that an additional sentence "*Consideration should be given to utilising the drains and small watercourses running through the site to extend the green infrastructure network for the benefit of people, wildlife and the natural environment*" is added. In addition, the requested that an additional criterion is added to the policy "The Council will require...*an appropriate protection plan, mitigation and habitat enhancements due to the presence of protected species being recorded on watercourses to the north of Onslow Road.*"

The Environment Agency requested that criterion is expanded to read “*new development to exploit opportunities to enhance biodiversity and provide sustainable flood alleviation measures informed by a Flood Risk Assessment including hydraulic analysis of the watercourses, to ascertain the specific flood risk from them and to establish any necessary mitigation measures.*”

Natural England supported criterion (f) of the policy but were concerned that proposed development was located over the Mickleover Meadows Local Wildlife Site.

Oxalis Planning, representing Bloor Homes, questioned the status of two fields at Onslow Road following correspondence between the Council and Derbyshire Wildlife Trust which indicates that the boundary of the Local Wildlife Site should be amended. They suggested an amendment to criterion (g) if the boundary has been amended or, if it hasn't, suggested that paragraph 6.22.3 is altered to future-proof the policy.

Four members of the public highlighted the impact development on Onslow Road could have on the cycle track, Mickleover Meadows Local Wildlife Site / Nature Reserve, associated hedgerows and the Green Wedge itself.

Response

Comments are noted. As acknowledged by DWT, two of the fields within the site previously identified as part of the Local Wildlife Site (LWS), no longer meet LWS selection guidelines and have been removed from the LWS boundary. However, whilst the two fields no longer form part of the LWS, a number of the hedgerows within the allocated area still have some nature conservation value. Criterion (g) and relevant supporting text will need to be amended to reflect these changes.

In terms of impacts on the Green Wedge, the Council consider that the sites on either side of the Wedge can be developed as allocated, whilst maintaining its functions of separating Mickleover and Mackworth and allowing countryside to penetrate the urban area of the city. The cumulative impact of developing these sites has been specifically assessed in the Council's Green Wedge Review. The Review concludes that development of both sites will have a negative impact in terms of narrowing but not to an extent that would undermine its functions, provided that development areas are 'rounded off' to avoid the creation of a 'pinch point' in the centre of the Wedge. Therefore, no amendment to the policy is needed in this respect.

Development of these sites has the potential to help deliver qualitative enhancements to the Green Wedge including new areas of publicly accessible green space and improved connectivity. The provision of qualitative enhancements is already a requirement within the Policy. Therefore the Policy does not need to change to reflect DWT's point relating to this issue.

In terms of the other comments made by the EA relating to flooding and biodiversity, criterion (i) already makes reference to requiring developers to enhance biodiversity and provide sustainable flood alleviation measures. The additional wording

suggested by the Environment Agency is too detailed for the Policy, although some of the principles could be better reflected in the supporting text. Therefore, it is recommended that these points are added to the supporting text. However, the Council do not think that any further changes to the Policy are required to reflect these points as the requirements of criterion (i) are adequate.

Comment

Reiterating their comments to AC21, Derbyshire and Peak District Campaign for Better Transport requested that development does not occur until the A38 grade separation scheme is completed.

Response

See similar comments on AC20.

Developers of all sites identified in the Core Strategy will be required to submit Transport Assessments (TA) as part of planning applications. TAs will need to consider the cumulative impact of committed developments on the highway network, including the existing A38 junctions. This is the appropriate time to consider the impact of the development on the network. The evidence we have does not indicate that it would be appropriate to impose a blanket restriction on development in this area prior to 'grade separation' taking place.

No change required.

Comment

Derbyshire and Peak District Campaign for Better Transport continue to support the redevelopment of the Mackworth College site and are pleased to see their comments made to the Preferred Growth Strategy have been incorporated into the policy.

Response

Comments are noted and welcomed.

Comment

Oxalis Planning, representing Bloor Homes, strongly supported the policy as it identified the Onslow Road site. They highlighted that development of the site will not affect the form and function of the Green Wedge and will enhance GI links.

Response

Comments are noted and welcomed.

Comment

Oxalis Planning, representing Bloor Homes, indicated that the boundary shown in the Core Strategy is drawn more tightly than in previous consultation documents. They supported the 'rounded edge' as a design and landscape principle but highlighted that the site boundary doesn't relate to any features on the ground. Therefore, they considered that the full site should be identified in-line with the SHLAA.

Response

The site identified in the Draft Plan reflects the careful consideration given to the objective of ensuring that the Green Wedge here will continue to function properly. This provides a sensible and appropriate compromise between delivering new homes and ensuring the principle of Green Wedges are maintained.

The boundary is, therefore, considered appropriate and should not be amended at this stage.

No change.

Comment

One person considered that the policy was written in a way that indicates that the Council has already agreed to the development and considered therefore biased.

Response

The policy was drafted to reflect what the policy would be if the plan was adopted. As such, it is bound to be drafted in a way which supports the development of the site.

Comment

Nine members of the public and a Councillor objected to the proposed development on Onslow Road stating that it would exacerbate the existing congestion experienced in the area. Concerns were raised about motorists using Onslow Road as a rat-run.

Response

See comments elsewhere relating to traffic and congestion in this area.

The policy requires the development to contribute to improved junction arrangements at Station Road/Radbourne Lane, which should alleviate some concerns. However, increased traffic and congestion is likely as a result of the levels of growth required to meet the City's housing and employment needs. The plan does, however, aim to keep these impacts to a minimum.

Comment

Two members of the public questioned what the appropriate "physical separation" would entail given that the site promoter has stated their intention to remove the mature trees along the boundary with existing properties on Onslow Road.

Two people also specifically objected to the allocation citing the impact on their amenity. A number of houses adjacent to the site are bungalows and the loss of privacy is a concern as is the lack of a buffer between the existing dwellings and the new ones.

At the Mickleover drop-in event there was a consensus amongst a number of people that some sort of landscape buffer is needed between the rear of properties on Onslow Road and the proposed development site. A buffer could help to reduce some of the visual impacts and could provide some ecological benefits if it could be

linked to the ponds to provide a green network for great crested newts.

Response

The Council acknowledge that the proposed site abuts the rear of existing properties located along Onslow Road and wishes to ensure that the amenity of these properties is not adversely impacted by the new development. Whilst existing policies relating to amenity and design would already cover this issue, it is recommended that the site Policy is amended to specifically refer to proposals taking account of the amenity of these properties. Any impacts on amenity could be limited through the appropriate design and layout of the new properties and through the provision of a landscape buffer at the rear of existing properties, for example.

Comment

Three members of the public, plus some attendees at the Mickleover drop-in event, considered that development on Onslow Road would occur on this site in the future and suggested that bungalows should be provided on site.

Response

Built development within this area will be required to be in keeping with the character and context of the surrounding area. The Onslow Road site is surrounded by Green Wedge on two sides and therefore the design and layout of new development will need to respect the sensitivity of the site in terms of impacts on Green Wedge, but also on the amenity of nearby properties. Bungalows, by their nature, are low rise and could potentially be one way of helping to limit the visual impact of the development. However, there are number of other ways in which this could be done, including landscape buffers and structural planting. The developer will be expected to explain how the proposed development will integrate into the character and context of the surrounding area as part of a planning application.

The type and nature of new housing is also expected to take account of the most up-to-date SHMA.

Comment

Four members of the public considered that it was inappropriate to provide affordable housing on the site; all highlighted issues with a nearby development and the associated anti-social behaviour.

Response

Evidence in the 2013 Derby HMA Strategic Housing Market Assessment suggests that the need for affordable housing in the City is significant. Therefore, the Council aims to secure affordable housing provision on all sites over 15 dwellings. The creation of mixed communities is key Placemaking Principle that the Council feels it is important to achieve.

Affordable housing can take many forms including shared ownership, shared equity and social rent and provides housing options for many different sections of society. Whilst it is acknowledged that there have been reports of anti-social behaviour at the former University Campus site, it is not a reason to provide no affordable housing at the Onslow Road site. The provision of affordable housing is a key priority for the

Council and there are many examples of where new affordable housing has been successfully integrated into existing communities.

Ultimately, management of anti-social behaviour is an issue for the police and or housing associations / management companies. No change to the Policy is necessary.

Comment

The capacity of the sewer network in the area was highlighted by two people who highlighted that on two of occasions during 2012 they had raw sewerage flooding their garden. They state that Severn Trent have asserted that a new pumping station constructed on Melbourne Close cannot cope with surface water run-off during extreme weather events.

Response

Development of this site could provide an opportunity to help remedy existing issues related to drainage. The specific site Policy and the wider Plan already requires developers to address flooding issues, therefore no change to the Policy is necessary.

Comment

The impact and local schools was also raised by two members of the public and a Councillor.

Oxalis Planning, representing Bloor Homes, accepted the principle of the solution set out in the policy to meet the education needs of the community.

Response

Development in this area will be required to contribute towards both primary and secondary school provision. The site at Onslow Road may need to be appropriately phased to ensure that primary needs can be met by new schools developed as part of other new developments in the Mickleover area.

Contributions towards secondary education are likely to be used towards new or extended secondary schools (the policy allows for any eventuality). No changes to the Policy are needed.

Comment

One respondent stated that they moved to the area because it had a village atmosphere and considered that development would not only destroy that but also devalue their property.

Response

Like many of Derby's older suburbs, Mickleover was once a distinct village located outside of the urban area of the city. However, the area has seen residential growth over many decades, whether it be through the development of the Silverhill and Brisbane Road estates in the 50s, 60s and 70s or more recent development around Brierfield Way. Given the scale of development that has occurred over the past 60 years it is unlikely that an additional 200 homes will change the character of the

wider Mickleover area.

In order to create the most sustainable forms of development, it is necessary to try and relate new development to the existing urban area. This provides opportunities to utilise existing facilities and infrastructure. Whilst a small number of existing residents may object to this approach, the wider sustainability benefits are clear. Ultimately, the loss of people's views or the perceived devaluation of property are not planning considerations.

Action

- Criterion (a) to be amended to specifically refer to the need to protect the amenity of properties on Onslow Road
- Criterion (g) to be amended to reflect changes to LWS boundary
- Additional supporting text required to provide more explanation about qualitative improvements to the Green Wedge.

AC23: Boulton Moor

Comment

The National Trust and English Heritage noted the sites location in relation to Elvaston Castle and welcomed the inclusion of criterion (o).

Response

Comments noted and welcomed. This criterion will also be extended to include reference to 'other heritage assets'.

Comment

The National Trust is concerned about the impact development in South Derbyshire will have on Elvaston Castle and suggested that detailed design briefs are developed.

Response

Comments noted. The policy echoes South Derbyshire's plan insofar as it highlights the importance of protecting the setting of Elvaston Castle. The policy does not preclude the use of 'design briefs' but this is also not the only way in which the implications of design can be addressed. Therefore, it is considered that the guidance and requirements of the policy are sufficient to provide the protection the National Trust wish to see.

No change required.

Comment

Natural England welcomed the improvements to green infrastructure and open space and hoped that this would include the Alvaston Stream Local Wildlife Site. They were also pleased to note that the Boulton Moor SSSI had been acknowledged

and that the policy requires any adverse impact to be avoided.

Response

Comments noted and welcomed. The nature of improvements to 'green infrastructure' in the area is a detailed matter for discussion through the Development Management process. It is not necessary to pre-judge this in the Local Plan policy.

No change required.

Comment

The Environment Agency noted that the Thulston Brook runs through the allocation and that it includes expansion into agricultural land, whose habitat often supports a range of species such as small mammals and birds. The Environment Agency stated that their records show that there are protected species in the area which will require appropriate protection from disturbance. They requested that the policy is strengthened by including the following text in the policy *"The Council will require: There to be no net loss in biodiversity and, where possible, for the development to make a positive contribution to biodiversity and to the delivery of Water Framework Directive objectives. Where possible, watercourses should be enhanced and protected, thereby contributing to the expansion of the green infrastructure network. Proposals likely to impact upon a watercourse, either directly or indirectly, may require the submission of a Water Framework Directive Assessment. An appropriate protection plan, mitigation and habitat enhancements will be required due to the presence of protected species being recorded on watercourses running through the site."*

Response

See comments elsewhere on this issue. It is considered that this is addressed in Policies CP2 and CP19 and does not need to be repeated in each site specific policy.

No change required.

Comment

The Environment Agency highlighted that this allocation is located in an area of flood risk and noted that the supporting text justified why there are no suitable, alternative sites. However, they state that it would be helpful if a comprehensive flood risk Sequential Test could be applied to make it clear that alternatives have been considered. This will also ensure that the allocation complies with Policy CP2, criterion (m).

Response

Comments noted. The sequential test has been carried out and has come to the conclusion that there are no 'unallocated' suitable or deliverable alternatives that could provide this level of development (and the associated benefits of cross boundary development) in the City which are in a 'better' flood risk situation. Only a relatively small part of the site is actually within a flood zone and it is considered that this can be addressed (development may also lead to a significant improvement in

the drainage situation in the area). It must be recognised that there are relatively few options to consider within the City in terms of meeting its housing needs, and even fewer which do not have some form of constraint. This site provides an opportunity to deliver much needed housing and create a critical mass to support new facilities and infrastructure. These are important in balancing the impacts of development with the benefits its can provide.

The Water Position Statement will provide more information on how the sequential test was applied at a City-wide level.

Comment

The Environment Agency highlighted the existing problem with the lack of capacity in the foul sewer network in the southern part of the City. The recognise that Severn Trent have responded by building two new combined sewer overflows by the Environment Agency consider that they are not a sustainable solution. They have concern that the combination of this allocation, plus others to the south of Derby, will create the potential of increasing the volume of discharges from the Combined Sewer Overflows and will prevent receiving water bodies achieving the ecological standards required by the Water Framework Directive. They noted that Severn Trent are currently dealing with this issue but have not committed to any specific scheme. They state that the Council needs to be satisfied that the necessary sewerage system is in place in order to accommodate the proposed growth.

Response

See comments elsewhere on this issue.

Comment

Derbyshire Wildlife Trust welcomed and supported criterion (c) and suggested that this is an opportunity to seek developer contributions. They also highlight that the area supports a protected species and the green infrastructure needs to take account of the requirements of legislation for protection and mitigation. They conclude by noting that a Supplementary Planning Document is likely to be produced and suggested that is encompasses a wider area.

Response

Comments noted. It is considered that these issues are addressed in AC23 and other policies in the Plan.

No decision has been taken on whether SPD will be prepared (it is only a potential option to be considered in the future). As such, no boundary has been determined, though it is accepted that this may make sense if SPD is ever produced.

No change required.

Comment

Derbyshire and Peak District Campaign for Better Transport continued to support the allocation and were pleased to see that the policy refers to maintaining the Green Wedge.

Response

Comments noted and welcomed.

Comment

Boyer Planning supported the allocation of the site in the Core Strategy but raised objections relating to certain parts of the policy.

In-line with Policy CP1, they considered that a joint policy with South Derbyshire would provide a consistent approach for developers.

Response

Comments noted. Responses to individual issues addressed below.

In terms of a 'joint policy', it is considered that there is a great deal of consistency between the two plans and any differences are probably stylistic or 'Council specific'. The two Council's share a vision for this site and will continue to work together to ensure an appropriate development comes forward.

Comment

Boyer Planning suggested an amendment to the site boundary. They argued that the Draft Plan's allocation did not follow any defensible boundaries and did not make sense when considering the site's topography. They suggested an alternative approach which narrowed the site at the southern end of the site but widened it more toward the north (though no wider than the full extent of the suggested allocation).

Response

The comment is accepted. The amended area actually creates some 'betterment' at the mouth of the wedge by making it wider. There is a consequential narrowing of the wedge to the north of the site, but this will not exceed the width of the widest part of the allocation. As such, it is not considered that the impact on the wedge is any greater than the Draft allocation.

It is accepted that the change should be made.

Comment

Boyer Planning requested that criterion (f) is amended as they do not consider that the development requires facilities to be spread over the site as in their opinion, a single community hub would be more successful.

Response

The development of 800 dwellings on a large site with no specific provision of small neighbourhood facilities may not be a sustainable approach. It is important that residents of the new neighbourhood are able to meet their day to day needs without necessarily having to travel by car to do so. It is accepted that much will depend on the final location and nature of the proposed 'District Centre' in the South Derbyshire part of the development. Should this be located in an accessible location then additional facilities within Derby may not be necessary (or may be able to of a smaller scale than a full 'neighbourhood centre').

It continues to be an important aim of the policy to provide adequate facilities and so the requirement will remain. However, it is proposed to include the word 'appropriate' at the start of the criterion. This will allow the issue to be considered in more detail as and when planning applications are being determined. If the comprehensive masterplan for the site provides sufficient provision outside the City, then it would not be appropriate to provide additional facilities within the City. Thus the aims of the policy would not be undermined. However, it would still give the Council the opportunity to require provision if it deems it necessary.

This will form part of the 'development framework document' and any agreed parameters for the site's comprehensive development.

Comment

Whilst Boyer Planning welcomed and supported criterion (j) they objected to the requirement to provide linkages to Elvaston Castle which is located in another local authority and across numerous other land ownerships.

Response

Comments noted. This criterion is not necessarily asking developers in Derby to provide links to Elvaston Castle – rather it is indicating that the comprehensive development as a whole should achieve this. Removing this reference would be confusing as it would be inconsistent with South Derbyshire's plan.

No change required.

Comment

Boyer Planning suggested the following amendment to criterion (d):

Create strategic landscape boundaries to the outer edges of the developments to mitigate the urbanising impact of new development upon the Green Wedge and surrounding open countryside and to create new defensible boundaries

Response

This text is considered necessary to reflect the role and function of Green Wedge – particularly in terms of maintaining an open and undeveloped character. It is considered that this text should remain in place.

No change required.

Comment

Boyer Planning suggested the following amendment to criterion (g):

As part of the wider urban extension, a A-package of appropriate sustainable transport measures, including contributions to the delivery of a new park and ride and associated bus service to serve this and wider urban extension site as necessary and appropriate.

Response

This point is accepted. This will make it clear that the requirements of the policy will

apply to the site as a whole and help ensure that access arrangements are considered holistically.

Comment

Boyer Planning suggested the following amendment to criterion (h):

As part of the wider urban extension, on-site and off-site highways works, including improvements to Snelsmoor Lane to ensure the impacts on its junctions with the A6 and High Street are satisfactorily mitigated.

Response

See above. The point is accepted, this change will make it clear that highway improvements will be considered in the context of the whole scheme.

Comment

Boyer Planning suggested the following amendment to criterion (l):

“Appropriate” contributions towards the extension of a local secondary school and / or the delivery of a new secondary school.

Response

This change is unnecessary. Contributions are always negotiated on the basis of what is ‘appropriate’ to mitigate the impact of development.

This is different to the using the word ‘appropriate’ in relation to the highways contributions, as this relates to making sure the contributions relate to ‘appropriate’ junctions, not to the *level* of contribution.

Comment

Boyer Planning suggested the following amendment to criterion (o):

That the urban extension ~~as a whole~~ has no adverse impact on the setting of the nearby Elvaston Castle Historic Park and Garden.

Response

It is understood that the respondent is concerned that if development in South Derbyshire was considered to have an impact on Elvaston Castle, then this could mean development in Derby could not go ahead. While this point is accepted to an extent, it is considered that it is important to make the point that the scheme should be looked at holistically. It is not considered that this would occur in practice.

Comment

Boyer Planning suggested that the last sentence of the policy’s final paragraph is deleted.

Response

This is agreed. It is not necessary to set out these measures in policy, as they are covered elsewhere (or by legislation). The text is probably more appropriate in supporting text.

Comment

Boyer Planning suggested the following amendment to paragraph 6.23.7:

Development of approximately 800 homes within Derby ('Snelsmoor Grange') will form part of much larger urban extension to the city that will include a further 1,950 homes just outside of the city in South Derbyshire, as detailed in the table (and map) below. 1,058 of the new homes planned in South Derbyshire already have planning permission after being approved by a Planning Inspector by the Secretary of State in 2009, with revisions subsequently approved by South Derbyshire in 2012.

Response

These are minor amendments which will improve the clarity.

Comment

Nathaniel Lichfield & Partners considers that the Core Strategy is unsound as the allocation of this site is not supported by a robust and up-to-date evidence base.

Response

See similar comments elsewhere. The Council is satisfied that this is a deliverable and developable scheme and that there are no unforeseen or abnormal costs that render it unviable. The respondent has provided no evidence of their own which suggests that this is not a deliverable scheme.

The evidence relating to viability and deliverability must be 'proportionate' and there is no requirement to have individual viability assessments for each site.

On-going discussions with the developers do not indicate any issues in meeting the policy requirements of the Plans. However, the policies in the plans also allow for the negotiation of planning obligations should that be necessary.

No change required.

Comment

Whilst the Chellaston Residents' Association appreciated that there was a need for more housing, they were concerned about the impact additional development would have on local services, schools and the local road network. This concern was reiterated by a member of the public.

Response

See comments elsewhere on the impact of development on traffic and infrastructure.

It is accepted that additional growth will have an impact on all of these issues. However, this policy does require the provision of a new primary school, new retail and community facilities, contributions to a new secondary school or school places, improved green infrastructure and junction improvements. The policy also provides scope for a new park and ride and requires the implementation of new public transport links.

In addition, the completion of T12 and the SDITL should assist in mitigating some of

the impact of development in this area (or at least creating additional capacity which can only help).

It is considered that this policy includes everything it possibly can to try and reduce the impact on the local area. However, as noted elsewhere, this is still unlikely to mitigate those impacts 100% but this must all be considered within the context of meeting the city's housing needs and the fact that there are relatively few options to consider in meeting this need within the City boundary.

Comment

A member of the public raised concerns over flooding on the site, the impact this will have on existing properties and on the local road network. In fact the respondent considers that the site is not an ideal site for development; however, if development does occur then it is considered that the ground level will need to be raised substantially.

Response

Comments noted. Part of the site is within an identified flood zone and, as such, the Council has considered its allocation within the context of the sequential test. The conclusion is that, when taking everything into account, there are no suitable 'unallocated' sites that are better in terms of drainage or which can provide the benefits of development in this location.

The issues in that area mainly relate to surface water run-off and management issues relating to the Thulston Brook water course. It is anticipated that the development of the site will be able to help address these issues.

On balance, while it is accepted that there are drainage issues in that area, these should be manageable through the Development Management process and thus they do not outweigh the overriding need for housing, in what will ultimately be a very sustainable urban extension to the City.

Comment

A member of the public commented on both the policy and the supporting statement. It was considered that criteria (m) and (n) needed clarification and paragraph 6.23.5 provided an unsatisfactory statement. The same member of the public objected to the statement made in paragraph 6.23.14 which indicates that development on this site outweighs the flooding issues and therefore, the Sequential Test.

Response

See above.

It is agreed that the text in 6.23.14 could be misinterpreted. This text will be removed. As expressed elsewhere, it is considered that the site passes the 'sequential test' but that does not mean that there are no drainage issues to consider. The text was trying to highlight the fact that, on balance, the benefits development of the site can bring – not least helping the City meet its obligation to meet its 'objectively assessed needs for housing – have been balanced against these issues and that they have been given considerable weight. This is in the

context of the assumption that the drainage issues can be satisfactorily addressed by development.

It is considered that criteria (m) and (n) and paragraph 6.23.5 provide sufficient guidance for a strategic level plan. It is not necessary to provide extensive detail on how these criteria will be implemented, particularly as there may be different ways of achieving these aims.

No change required.

Comment

At the drop-in event, a member of the public stated that the Council needs to make sure that the Site of Special Scientific Interest (SSSI) is protected.

Response

Comments noted. The policy provides adequate protection for the SSSI.

Comment

At the drop-in event, a member of the public raised concerns that there was no development to the north or west of the City.

Response

This comment is not accepted, nor does it consider the different constraints that exist in different parts of the City.

No change required

Action

- Amend site boundary to reflect comments
- Amend text relating to new retail and community facilities
- Amend text relating to heritage assets
- Amend text relating to flood risk assessment requirements
- Amend text relating to affordable housing
- Delete superfluous criteria relating to IT and energy
- Move text relating to 'measures' the Council might take from policy to supporting text
- Remove text in paragraph 6.23.14 relating to 'sequential test'

AC24: South of Chellaston

Comment

Natural England highlighted that the site is close to the Chellaston Brickworks Local Nature Reserve and Local Wildlife Site and recommended that there should be an undeveloped buffer zone to protect its nature conservation interests.

Response

Comments noted. A buffer was actually made part of the conditions for a recent

planning permission on the Woodlands Lane part of this site and so it is appropriate to add the requirement to policy. As such, should the permission ever lapse and a new scheme promoted, the policy will ensure a consistent approach.

Comment

English Heritage noted that the site lies adjacent to a scheduled monument and that there is also potential for non-designated archaeology within the site including ridge and furrow adjacent to the site. They continue by stating their concern that no reference is made within the policy and supporting text with regard to the heritage assets. They suggested that a further criterion to rectify this is essential.

Response

Comments noted. In the main, this issue is adequately addressed by Policy CP20 and relevant national guidance and legislation.

It is noted that a similar requirement has not been included in South Derbyshire's policy for their part of the site, and so it may be

No change required.

Comment

The Environment Agency highlighted that this allocation is located in an area of flood risk and noted that the supporting text justified why there are no suitable, alternative sites. However, they state that it would be helpful if a comprehensive flood risk Sequential Test could be applied to make it clear that alternatives have been considered. This will also ensure that the allocation complies with Policy CP2, criterion (m).

Response

Comments noted. A very small part of the Derby element of this site is within flood zone 2. The site is considered to have met the 'sequential test' and the drainage issues on the site are able to be addressed.

It also has to be noted that all constraints on development, including flooding and drainage, have had to be balanced against the Council's growth requirements and the limited nature of the options that exist. This location provides an opportunity to deliver cross boundary housing in a generally sustainable way.

The policy also requires comprehensive flood mitigation to be provided.

Comment

The Environment Agency highlighted the existing problem with the lack of capacity in the foul sewer network in the southern part of the City. They recognise that Severn Trent have responded by building two new combined sewer overflows by the Environment Agency considered that they are not a sustainable solution. They have concern that the combination of this allocation, plus others to the south of Derby, will create the potential of increasing the volume of discharges from the Combined Sewer Overflows and will prevent receiving water bodies achieving the ecological standards required by the Water Framework Directive. They noted that Severn Trent

are currently dealing with this issue but have not committed to any specific scheme. They stated that the Council needs to be satisfied that the necessary sewerage system is in place in order to accommodate the proposed growth.

Response

See comments elsewhere on this issue.

Comment

The Environment Agency noted that the Cuttle Brook also runs through the site and as a result have requested that the requirements of the Water Framework Directive are embedded in the policy by adding criterion "*Ensure there is no net loss in biodiversity and, where possible, for there to be a positive contribution to biodiversity and to the delivery of Water Framework Directive objectives. This includes protecting and enhancing the Cuttle Brook and the provision of a landscaped buffer along both sides of the watercourse. Proposals likely to impact upon the Cuttle Brook, either directly or indirectly, may require the submission of a Water Framework Directive Assessment*". In addition, they requested that paragraph 6.24.1 is amended.

Response

Comments noted. It is considered that this issue is adequately addressed in Policy CP2 and CP19 and do not need to be repeated in site specific policies.

Comment

Derbyshire Wildlife Trust welcomed paragraph 6.24.1 but suggested that this is also included in the policy to give it more weight.

Response

Comments noted. An additional reference will be added to a new criterion relating to biodiversity assets.

Comment

Derbyshire and Peak District Campaign for Better Transport requested the criterion (c) needs to allow for air pollution as well as noise from the A50.

Response

Comments noted. It is assumed that the buffer will have multiple advantages. A 'satisfactory living environment' can address all of these, including air pollution. The policy itself does not mention 'noise' as the only reason for such a buffer.

No change required.

Comment

Bellway Homes strongly supported the allocation of this site and the site to the south of Holmleigh Way. They also highlighted that an application has been submitted to South Derbyshire District Council which indicates that they can deliver the site. Finally, they state their support for the requirement that development should contribute towards the provision of new primary and secondary school places.

Response

Comments noted and welcomed.

Comment

Whilst the Chellaston Residents' Association appreciated that there was a need for more housing, they were concerned about the impact additional development would have on local services, schools and the local road network. The same concerns were also raised by a member of the public.

Response

See response to AC23.

Comment

One member of the public objected to the loss of valuable green land and raised concerns over the impact development would have on the local infrastructure, including the local schools.

Response

See comments elsewhere on this issue. It should be noted that the proposal for Chellaston Fields in South Derbyshire includes provision for new primary and secondary school places.

No change required.

Comment

One respondent supported the allocation to the South of Chellaston but highlighted that development should positively contribute to the restoration of the Derby and Sandiacre Canal.

Response

Comments noted. The policy requires any development proposals to safeguard the line of the canal route. This should be sufficient.

No change required.

Comment

One person stated that applications for development in Chellaston are being submitted weekly and no consideration is given to the views of residents.

Response

Comments noted. This appears to be a matter more for the Development Management process. However, it must be remembered that planning – either through the development plan or management processes – is not a referendum on the merits of a proposal or a popularity context. Decisions have to be made on technical evidence and within the context of National and Local planning policies. As such, decisions are made which are often unpopular.

This does not mean, however, that consideration is not given to the views of residents. A number of policies in this plan have been amended to try to address

concerns raised, particularly in relation to infrastructure provision. This is unlikely to satisfy the concerns of residents who do not wish to see development of any kind in their locality but is a clear sign that the plan responds to the concerns raised.

No change required.

Comment

A member of the public enquired as to what flood protection measures will be put in place to alleviate leakage from the Derby Canal. It was highlighted that “leakage used to saturate Peter’s Fields”.

Response

Comments noted. This is a very specific and detailed query that cannot be answered at this stage in the process.

No change required.

Comment

A member of the public raised concerns over paragraph 6.24.3 as it appears to diminish the impact of flooding on properties.

Response

This point is not accepted. The paragraph identifies flooding is an issue on a small part of the Holmleigh Way site but states that development should be able to address the issues. It goes on to properly state that, in allocating the site, the constraints have been balanced with the need to provide housing “*providing appropriate flood mitigation can be secured*”. This is clearly stating that appropriate flood mitigation is an important factor.

It is accepted that reference to ‘the sequential test’ can be mis-interpreted. The site has passed this test, but that does not mean that flooding issues do not still need to be addressed.

Action

- Add new criterion and consequential changes to supporting text to require a buffer between site and LNR and address issues highlighted in 6.24.1
- Remove reference to ‘sequential test’.

Policy AC25: Brook Farm

Comment

Erewash Borough Council welcomed the Council’s requirements to help reduce the impact of the development both in terms of landscaping and its visual prominence.

Response

The comments are noted and welcomed.

Comment

Natural England noted that a green corridor is to be created along the Lees Brook Local Wildlife Site but urged that surveys are carried out before planning permission is determined to determine the presence of water voles.

Response

The issue relating to water voles can be addressed through CP19 and a specific reference is not needed in this specific policy. The biodiversity value of the brook is highlighted within the policy and the buffer should assist in protecting it.

The issues raised can also be addressed through the Development Management process.

No change required.

Comment

The Environment Agency welcomed the requirement for a green corridor as required in criterion (c) but they recommended that the policy seeks to provide enhancements to the corridor to provide additional habitat for the nearby protected species.

Response

The comment is noted. Criterion (c) of the policy states that the green buffer should act to enhance and preserve the biodiversity value of the brooks which would include the issues raised. As such, no change required.

Comment

Derbyshire Wildlife Trust supported criterion (c) as it provides a buffer to the Local Wildlife Site along the Lees Brook. With regard to paragraph 6.25.5, Derbyshire Wildlife Trust suggested that the loss of Green Wedge should be compensated for by either additional provision or allocation of resources elsewhere.

Response

The support is noted and welcomed. The boundaries of Green Wedges will be reviewed in part 2 of the plan. Green Wedges have specific functions in separating and defining communities and allowing the open countryside to penetrate into the city. It is unlikely that any land is available to create new wedges which will serve this purpose and thus the 'compensation' would not be mitigating the loss. We have also not sought this type of compensation in any other area where Green Wedge is to be lost, so it may be inappropriate to do so here.

No change required.

Comment

CPRE Derbyshire queried the allocation of the site, stating that it is on important agricultural land and therefore, should be held in reserve until the need for more houses is proven.

Response

The need for housing has been carefully assessed and the City is unable to meet its needs in its boundaries. Land is being allocated in both South Derbyshire and in Amber Valley to meet Derby's needs. The site has been assessed as being suitable for housing development in order to meet these needs. There will always be a balance to be struck between competing 'needs' and uses but in this case, the need for housing has had to be given considerable weight.

No change is necessary.

Comment

Turley Associates supported the allocation of the site and will deliver up to 275 homes. They considered that the site is available, suitable and achievable. They do state however that point (i) is amended to read "approximately 60 Extra Care units".

Response

The support is welcomed.

CP7 indicates that where Extra Care homes are provided there should be a 'critical mass' of units. In this instance, 60 units are considered to be that critical mass. As such, amending the 'minimum' to 'approximately' would not be appropriate.

If the developer did suggest an alternative figure at some point in the future, this could still be considered against the other policies in the Plan (including CP6 and CP7) but the starting point should be 60 units.

However, one change that could be made is that the current drafting implies that Extra Care is a *requirement* of the policy. This should be amended. While the provision of Extra Care units would be supported in principle, it does not preclude other forms of housing coming forward.

Comment

A number of people objected to this development stating that the local road network, especially Tennessee Road and Oregon Way, would not be able to cope with the increase in vehicles. It was considered that a single access point at the highest point of the site will encourage motorised vehicle use, and with a single access point it won't become a bus route. It was also considered that the proposed roundabout on the planning application would be dangerous. Concerns were also raised that the 'emergency access' indicated in the planning app will be a full access in practice.

Response

The policy in the Plan requires that no vehicular access is taken from Tennessee Road or Acorn Way but does not indicate any specific junctions. The policy makes it clear that improved pedestrian and cycle links will be needed to enable the site to integrate itself with nearby communities.

The evidence base has identified that the site is available for development and can deliver development to meet the significant housing needs within the city. It is also considered that the impact from traffic generation from the development would be

within acceptable parameters within this context.

Several objections seem to have been made which refer to the specifics of a planning application which are not part of the Local Plan proposals. These are matters of detail which do not necessarily mean that the development of the site is unacceptable in principle or unachievable in practice.

Comment

A member of the public thought that the potential for development appears to have been flagged up quite late in the process. It was stated that the site wasn't included in the Atkins report on strategic site options.

Response

The process of Plan preparation is an iterative process. The Atkins Report is not the only 'source' from which potential housing sites could be selected. It is also an increasingly historic document that has been bypassed by the changing context of the plan making process. It has been valuable in preparing the strategy, but is by no means the only piece of evidence relating to housing development that the City has.

The site was previously consulted on in the Preferred Growth Strategy and so it had formed part of the City's strategy for some time prior to the publication of the Draft Plan.

Comment

Four people indicated that local services are already overstretched.

Response

See comments elsewhere on the impact of housing growth on infrastructure.

The comment is noted. The policy requires contributions to school place provision and the evidence suggests that there is school place capacity in the area. Other local infrastructure requirements will be provided through Section 106 agreement. The policy also requires provision of new publicly accessible green space.

Comment

Two people indicated that the local schools would be affected by the increase in pupils; in addition they stated that local Doctors and Dentists are currently oversubscribed.

Response

See above.

The Policy requires contributions to be made for new school places and other infrastructure will be secured through section 106 contributions at application stage.

Comment

One person highlighted that the population of Chaddesden had increased by only 250 people between 2001 and 2011 and therefore only six houses need to be built in the area to accommodate this growth. They consider that only brownfield sites

should be used to accommodate this.

Response

It is not clear how these numbers have been arrived at. In any event, the site is not specifically being identified to meet the needs of 'Chaddesden'. Housing needs are a strategic matter. The City has an assessed housing need of 16,125 new dwellings between 2008 and 2028. There is not capacity on brownfield land to meet these needs and the City is already.

No change required.

Comment

Five people considered that the site should remain Green Wedge. One person highlighted that, in the adopted City of Derby Local Plan Review, the site was allocated as a Neighbourhood Park. One person stated that the site is an important part of Derby's eco-system.

Response

In seeking to meet its housing needs the City has had to rely on land in South Derbyshire and Amber Valley to be allocated to meet its own needs. Although the principle of green wedges is maintained in the Plan, the function of the wedges was carefully assessed in the Green Wedge review and it was considered that this particular wedge was not strongly fulfilling the purposes.

The City Council notes that the land was identified in the City of Derby Local Plan Review as *proposed* public open space, not as an existing neighbourhood park. It has not to date been delivered as such. It is unlikely that the open space would ever be provided as it is not viable to deliver it.

However the development of the site included a proposal to bring forward new public open space which is one of the potential benefits of development.

No change.

Comment

One person highlighted that during the winter the fields become waterlogged and development would exacerbate this. In addition one person stated that the site was on the Lees Brook floodplain.

Response

The flooding issues have been considered by the Council's land drainage engineers. It is a sloping site and the policy requires a buffer between the brook and any residential development. There would not therefore be any impacts from the brook which would be at a lower level. Surface water drainage will need to be carefully implemented on the site and the policy requires this.

No change required.

Comment

Concerns were raised at the drop-in event that once this site is agreed, the developer will want to make it bigger.

Response

The Council has identified a developable area in its plan as well as set the number of dwellings to be delivered. Any divergence from this would be considered against all relevant policies in the plan, and the impact of any increase considered in the round.

There are also requirements for new open space, links and buffers to be provided on site which makes it very unlikely that it could be expanded.

Comment

Another person at the drop-in event stated that the land has historical importance – maybe an ancient burial area (C13 leper colony) and features within the brook. Another member of the public also indicated that there was archaeological interest on the site including ridge and furrow and stonework, probably from a windmill.

Response

The comment is noted but there has been no evidence of such issues and thus there is no reason to de-allocate the site, or amend the policy, based on this comment. This issue can also be adequately addressed through the Development Management process using policy CP20.

Action

- Amendment to make it clear that Extra Care is not a *requirement* of policy, but if it does come forward, then a minimum number will be required.

Policy AC26: Land South of Mansfield Road, Oakwood

Comment

Erewash Borough Council welcomed the Council's requirements to help reduce the impact of the development in terms of landscaping and its visual prominence. In addition, they welcomed the Council's requirement to create a link between Chaddesden Wood and the open countryside and highlighted that a comprehensive surface water management scheme needs to be implemented.

Response

The comments from Erewash Borough Council are noted and welcomed.

Comment

Natural England supported the intention to mitigate the visual impact of the development along the eastern boundary and take account of the nature interest of Chaddesden Wood and the Lime Lane Local Nature Reserve.

Response

The comments from Natural England are noted and welcomed.

Comment

Derbyshire Wildlife Trust welcomed the reduction in the allocated area as there is now a link between Chaddesden Wood and the wider countryside. They stated that they would object to any increase in the allocation. They continued by stating their support for criteria (b) and (f) but they considered that it should be explicitly stated that financial contributions will be sought for the on-going development and maintenance of Chaddesden Wood.

Response

The comments from the Wildlife Trust are noted and welcomed. The issue of financial contributions is addressed in Policy MH1. There may also be other means by which this criterion could be achieved and thus no need to refer specifically to financial contributions within the policy.

No change required.

Comment

Breadsall Parish Council raised concerns about the impact development would have on Breadsall village and the local road network. They highlight that this allocation highlights the Council's failing to protect Greenfield land, and in particular Green belt land.

A number of residents raised concerns about the impact development would have on the local road network. Some highlighted the congestion on the A608 Mansfield road itself while others were concerned that the local roads such as Diamond Drive, Silverburn Drive and Hemlock would be used to access the site; it was considered that these roads are too narrow for any additional traffic. Five respondents were concerned about the impact development would have on traffic in Breadsall Village.

One respondent considered that the creation of a ghost island would not be sufficient and that a roundabout would be an ideal solution. The objector highlighted that the speed limit on the A608 is regularly flouted and that the proposed access is in a dip; therefore a roundabout would slow the traffic down.

Two members of the public noted how narrow the A608 is and questioned whether this would be safe enough for people to walk or cycle down. With regard to paragraph 6.26.4, one respondent questioned what the impact the additional foot and cycle paths would have on the area.

Response

Although the Council acknowledges that this is a greenfield site, it does not form part of the Derby/Nottingham Green Belt. See comments elsewhere on the need to identify greenfield sites.

The concerns of some residents regarding access to the site have been noted and as a result both criterion (c) and paragraph 6.26.4 will be amended to state that vehicular access will *only* be from Mansfield Road. This should alleviate concerns that access would be taken from existing residential streets.

Discussions with colleagues from the Council's Highway Development Control section indicate that the creation of a ghost island is an ideal access solution and would result in the reduction in traffic speeds. In addition, the Council is confident that the development of this number of dwellings would not have a severe impact on the local road network, though some impacts are inevitable. These have to be balanced against the need for new housing development, however.

No change required.

Comment

The Planning Design Group, representing JGP Properties Ltd, supported the policy. However, they also submitted an alternative proposal which includes development on the other side of the Green Wedge. They argue that this would help the Council meet its housing targets and bring improvements to the Green Infrastructure network, while maintaining a functioning green wedge allocation.

An additional submission by the Planning Design Group refined their masterplan for the site by including a potential employment area to the north of the site, fronting Mansfield Road. They stated that developing both parcels of land *"is still a credible way of resolving ever emerging local housing land supply issues, not least in the City Council area, but among the neighbouring Amber Valley and South Derbyshire local authorities within the Derby Housing Market Area (HMA)."*

Response

The comments have been noted. Since the publication of the Preferred Growth Strategy, the Council has discussed, and developed, the proposal with the agents acting on behalf of the landowner. On several occasions, the Council has stressed that development which closes the mouth of the Green Wedge will be resisted as it would be contrary to the principle of Green Wedges and close off Chaddesden Wood from the surrounding Countryside. The respondent's proposals are considered to have too great an impact on the wedge and would fundamentally undermine a principle that the Council is trying to maintain.

It is considered that the solution arrived at is a reasonable compromise, in terms of facilitating new housing development while maintaining a functioning Green Wedge. Therefore, the site allocated in the policy will not be extended and the remaining Green Wedge will continue to be protected.

It should be noted that the housing supply issues are jointly being addressed by the HMA authorities and Amber Valley Borough Council are currently seeking the views of the community, developers, agents and statutory bodies on additional housing sites which could be brought forward to meet the HMA's objectively assessed need. The Council also considers that the additional HMA housing need does not justify the release of additional Green Wedge land in this location for development.

Therefore, the policy will not be changed.

Comment

The City Council's Conservation Area Advisory Committee suggested that

Chaddesden Wood should be shown as a Historic Park and Garden.

Response

English Heritage's records indicate that Chaddesden Wood is not a Historic Park and Garden. However, the Council recognises that Chaddesden Wood is a Local Nature Reserve and an Ancient Woodland.

Comment

It was highlighted that there had been previous applications on this site for both residential and commercial development but were deemed unsuitable due to access issues and the topography of the site.

Response

A number of factors have helped shape the plan's current development strategy and unfortunately this requires the release of some greenfield land to help meet the City's housing needs. Although a previous application was refused, the Council considers that development of the site can be accomplished with certain mitigation measures.

Comment

Some residents highlighted that a site opposite Bishops Drive should be developed before this site.

Response

This site (Breadsall Hilltop) was highlighted in the Preferred Growth Strategy as a location where development could occur, subject to further information being submitted about a range of issues. At the time of publication, the Council was still uncertain whether the site was suitable for development. Information has been provided through this consultation by two agents acting on behalf of the landowners, though it is now too late in the process to include the site.

This information will be analysed to determine if the site is suitable for development and for possible inclusion in the Part 2 Local Plan.

In any event, residents should be aware that the scale of housing need in the City does not really mean that this would be an 'either / or' but 'in addition to' the site at Mansfield Road. The Mansfield Road site would still be required.

Comment

One respondent insisted that the existing footpaths, according to the Police, facilitate criminal activity in the area and raised concerns that the creation of new footpaths plus creating new linkages will increase crime in the area.

Response

The comment is noted. This is quite a deterministic statement which cannot be substantiated. In any event, the Plan's placemaking principles consider issues of crime and anti-social behaviour and this can be addressed through the Development Management process.

Comment

One respondent recognised that Acorn Way had been constructed to cater for development at Oakwood and they question, given the increase in the amount of houses, whether a new road would have to be built. It was stated that this could be from the Heanor/Derby Road through to the A6; if this was the case then it would have an impact on the landscape and add to existing problems.

Response

The comments have been noted. There are no plans, as part of developing this site, to construct a new road, nor is it considered necessary at this time to do so.

No change required.

Comment

Twenty-two residents stated that the site is a wildlife haven which must be protected.

One respondent stated that development on this site would be in conflict with the aspirations of Policy CP16, criteria (a), (b), (d), (f), (g) and (l). One of those respondents questioned whether any assessment had been undertaken to assess the stress development would have on wildlife.

One respondent requested that the green spaces to the north and north-east of Chaddesden Wood are given to the Wildlife Trust, The Woodland Trust or the Council to protect them from future development.

Concerns were also raised about the isolation of Chaddesden Wood through development and the impact this would have on the flora and fauna.

One resident indicated that a number of trees on Primrose Close were subject to a preservation order and therefore a buffer should be incorporated into the development to provide protection.

One respondent stated that the development of this site would be contrary to the Council's Green Wedge Review

Response

The Council notes the concerns of the residents regarding the impact development will have on the local wildlife. However, it should be stressed that the allocated site is situated to the west of the Green Wedge and will not isolate Chaddesden Wood from the open countryside and that development across the entire mouth of the wedge would be unacceptable. A number of factors have helped shape the plan's current development strategy and unfortunately this requires the release of some greenfield land to help meet the City's housing needs. Through development, the Council will require enhancements to be provided to the wood and the remaining Green Wedge as well as improving GI linkages throughout the site. Criterion (b) of the policy requires both a comprehensive landscaping scheme and a buffer zone to minimise the visual impact of the scheme and to improve GI linkages.

The Green Wedge Study recognised that development across the entire promoted

site would have an unacceptable impact on the Green Wedge. However, the Council considers that the site allocated in the plan would not have a detrimental impact on the wedge itself and development would facilitate improvements to the wedge. As such, the proposal is consistent with the Green Wedge Study.

The Council considers that Policy CP18: Green Wedges offers protection from inappropriate development for remaining wedge. Policy CP19 can also help to address issues relating to biodiversity.

The respondents concerns regarding the conflict between development of the site and Policy CP16: Green Infrastructure. Whilst it is recognised that development will have an impact, the implementation of Policy CP16 will ensure that development still contributes to the wider GI network and mitigation measures are put in place to address any adverse impact.

No sites have been selected which do not have some form of constraint or negative implication. However, the policies do try to minimise those impacts where possible. While this will inevitably lead to a loss of green space, this does have to be balanced against the City's growth requirements and its obligations with regard to the NPPF.

Comment

Five respondents requested that, should development occur, the trees and hedgerows on the site would need to be retained.

Response

The comments are noted. The implementation of Policies CP16, CP17 and CP19 should ensure that the importance of the existing trees and hedgerows are recognised and, where possible, incorporated into the development.

Comment

One respondent asserted that the site has clear views of the Derwent Valley World Heritage Site and development would disrupt the views to and from the World Heritage Site.

Response

The comments are noted. The policy recognises the sensitivity of the location in terms of topography, but it is considered that a satisfactory form of development can be achieved.

No change required.

Comment

Sixteen residents highlighted the current lack of school places which would be exacerbated if development occurs.

A number of respondents also highlighted that local facilities are currently under pressure and this development would add to this.

Response

See comments elsewhere on this issue. Development in any location will place additional pressure on school places (indeed, natural growth in the population would also generate pressures *without* any additional housing development).

The Policy requires contributions to be made for new school places in the area. This should serve to mitigate the issue and alleviate concerns.

No change required.

Comment

Three residents requested that, should development occur, no retail units are included in the development. They highlighted that Oakwood already has enough shops and take-aways plus they tend to attract “bored teenagers”.

Response

The comments are noted. The policy does not require any additional retail units.

Comment

Surface water run-off was highlighted as an issue by 16 respondents; a number of these highlighted the recent flooding on Lime Lane and in Breadsall village and were concerned that additional housing would increase the surface water run-off and, as a result, impact on the village again.

Response

The Council is aware of the surface water issues experienced on the site, on Lime Lane and in Breadsall village and considers that the incorporation of sustainable drainage within the development will help to address the issues experienced. This is a requirement of the policy.

No change required.

Comment

Three respondents suggested that further consideration is given to the visual impact the development would have both on Mansfield Road itself and the remaining Green Wedge. The issue of screening the development was highlighted as well; one person requested that, should development occur, that some form of screening is used while another considered that any screening would not negate the developments urbanising impact.

Response

The Council is aware of the sensitive location of the site and both criterion (b) of the policy sets out the measures the Council expects to be provided as part of the development to screen it from both the Lime lane/Mansfield Road junction and from the remaining Green Wedge.

Comment

One respondent objected to the allocation by stating that it would increase both light and noise pollution.

Response

The comments are noted. There is bound to be an increase in both noise and light pollution as a result of growth. This site is, however, relatively small when compared to some allocations and thus the impact is unlikely to be sufficient to justify removing the site from the plan.

Comment

Seven residents objected to the inclusion of any affordable housing on the development as this would not be compatible with the existing properties. A number considered that the provision of affordable dwellings should be focussed in the City Centre.

Response

The Council is aiming, through the plan, to promote sustainable communities and deliver a wide choice of homes for all members of the community thus reflecting the requirements of the National Planning Policy Framework, paragraph 50. Therefore, it is essential to incorporate all types of housing in all new development across the Derby and not focus the provision of affordable housing to certain areas of the City.

Comment

One resident stated that there is documented evidence of Roman activity on the site.

Response

The comment is noted. If this is the case, then it can be addressed through Policy CP20 and the Development Management process. Specific reference in the policy is not required and the issue would not justify removal of the site from the plan in any event.

Action

- Criterion (c) and paragraph 6.26.4 will be amended to state that vehicular access will only be from Mansfield Road.

Policy MH1: Delivering Infrastructure

Comment

Natural England was pleased to note that Green Infrastructure, including public open space was included in the policy.

Response

The comments from Natural England are noted and welcomed.

Comment

English Heritage welcomed reference to public realm improvements and the enhancement of cultural heritage.

Response

The comments from English Heritage are noted and welcomed.

Comment

Derbyshire County Council welcomed both the policy and the supporting text but considered that the policy would be improved by setting out exactly what items of infrastructure are required and seen as critical to the delivery of the Local Plan and clearly stating how that infrastructure will be funded and delivered.

Response

The comments are noted. The specific policies in the plan indicate the infrastructure required to support development; the IDP also contains the projects, plus costings. It is also anticipated that the IDP will be reviewed on a regular basis and will evolve to recognise the changing infrastructure demands of the plan, which the policy cannot. Therefore the policy and supporting text are sufficient and do not need to change.

Comment

Sport England welcomed the inclusion of this policy. However, they consider that sports facilities should be referenced under 'Health and Community Facilities' rather than Green Infrastructure as not all sports facilities would fall under the latter category.

Response

The comments are noted. The point is broadly accepted but the criterion is primarily intended to account for play areas or, for example, new pitches. It is not felt that there is really any harm in linking 'sport and play' to GI in this context. Equally, should a need be identified, there is no reason why built 'sport and leisure' facilities could not be provided under the heading of 'health and community'. As such, it is not felt that any change is really necessary.

Comment

Sport England highlighted that paragraph 7.1.5 states that the Infrastructure Delivery Plan sets out the necessary infrastructure to support development. They note that it may not include all necessary infrastructure as there is not the evidence in place to support it.

Response

This is a fairly minor and somewhat semantic point. The IDP will be updated on a regular basis to reflect changing evidence and needs. As it stands today, it does set out the essential infrastructure to meet the objectives of the Core Strategy. The fact it may be updated to include additional projects in the future does not change that fact.

No change necessary.

Comment

Derbyshire Wildlife Trust requested that the provision for the management and maintenance of the ecological framework to achieve biodiversity enhancements within the Green Infrastructure is included in the policy. Also, criterion (b) should include enforcement, where required.

With regard to criteria (c) and (f) DWT support the use of Section 106/CIL and suggest that this could be targeted at areas of change where development will result in identified impacts where mitigation cannot be achieved and in locations where impacts and loss of Green Wedge will occur.

Response

Comments regarding criterion (b) are accepted.

In terms of (c) and (f), it is agreed that S106/CIL *could* be targeted in such areas but it is unnecessary of this policy to be too specific. As worded, a flexible approach can be taken.

The issue of management is addressed in criterion (f) and does not need to be repeated in the initial list. The reference to the 'provision of green infrastructure' is considered to cover all forms of provision – including management and maintenance.

Comment

Turley Associates submitted comments on behalf of Western Power Distribution. They highlighted that the development strategy would have implications for their service and highlighted the different types in installation they operate. They also clarified that development does not necessarily require the relocation of strategic power lines such as pylons where sites can be developed in situ.

Response

The comments are noted.

Comment

A number of people sought assurances at a drop-in event that we were still working with Amber Valley Borough Council and South Derbyshire District Council to ensure that the necessary infrastructure is provided on cross boundary sites.

Response

The four HMA authorities have signed a Statement of Continuing Co-operation. This document provides certainty to both the Inspector and the public that the four authorities will work together to deliver the HMA growth strategy once the plans have been adopted.

Policy CP1 also helps to address how cross boundary issues will be addressed.

Action

- "Use enforcement powers added to criterion (b).

Monitoring How we are Doing

Comment

English Heritage requested that further thought is given to the monitoring indicators for policies CP20, AC5, AC9 and AC10. They state that indicators could include statistics for all types of heritage assets, all types of asset at risk, grant take-up, number of shopfront applications etc.

Response

Comments are noted. The Council agree that additional indicators need to be included in order to adequately monitor the relevant policies. Consideration will be given to adding further indicators, including the ones suggested by English Heritage, although the robustness and resource implications of additional indicators will need to be considered.

Comment

Derbyshire Wildlife Trust agreed with the monitoring indicators for CP19 but suggested that it also includes a measure of Local Wildlife Sites in positive management to link in with the Government's Single Data List which is submitted to Defra. Derbyshire Wildlife Trust suggested that monitoring CP16 includes the ANGSt standard.

Response

Comments are noted. The Council agree that additional indicators need to be included in order to adequately monitor the relevant policies. Consideration will be given to adding further indicators, including the one suggested by the Wildlife Trust, although the robustness and resource implications of additional indicators will need to be considered.

With regard to ANGSt, the Council will set out its own standards in the Part 2 Local Plan and will use these standards to monitor the policy accordingly.

Comment

A member of the public stated that, in relation to CP2, there is a need to monitor traffic volumes.

Response

The Council already collects information on traffic volumes across the City from a number of 'strategic locations'. It would be reasonable to include the results of this as a monitoring indicator for CP2 (and potentially other policies in the Plan). It is recommended that this should be added to the relevant table.

Comment

A member of the public fully supported the indicator to monitor the net amount of Green Infrastructure in the City (Policy CP16).

Response

The comment is welcomed and noted.

Comment

A member of the public considered that one of the indicators for CP23 should be the delivery of the Strategic Cycle Network Development Plan; plus the delivery of active travel audits on all new transport developments to key stakeholders within an agreed timescale; adoption of 20mph zones in the City and, for AC2 number of market stalls rented out in the City.

Response

It is accepted that the 'delivery' of the Strategic Cycle Network would be a useful indicator for Policy CP23 and it is recommended that this should be included. However, it is not accepted that the suggested indicator for 'active travel audits' would be appropriate. This would appear to be more of a policy objective. In addition, there is nothing specific about the adoption of 20 mph zones within the Plan (nor is it something that relates to the adoption of the Plan as this would not constitute a 'planning' issue). The point relating to market stalls is noted and could form part of general 'health check' information for the City Centre. It is agreed that this should be included within the indicators, subject to the Markets Review referenced in Policy AC2.

Comment

A member of the public objected to the lack of indicators monitoring the creation or retention of bus lanes.

Response

Bus lanes are not referred to specifically within the Core Strategy and in and of itself is not an 'outcome' or 'objective' of the plan. The outcome/objective is the increased use of public transport across the City (primarily relating to ensuring development is in close proximity to existing bus routes or that development contributes to the provision of new services). In terms of monitoring the effectiveness of the strategy in terms of promoting the use of public transport, a more appropriate indicator would be bus patronage. Provided the indicators include this issue, there is no need for any change.

Action

- Policy CP2 – include an indicator to monitor traffic levels at strategic locations in the City.
- Policy AC2 – include indicator to monitor the number of market stalls rented out in the City.

Appendix A: Status of the City of Derby Local Plan Policies

Comment

The National Trust is not convinced that the policies in the Core Strategy, especially in relation to environmental resources, fully replace the existing saved policies in the

Response

The Council considers that the policies contained in the Core Strategy will, when adopted, effectively replace the policies contained in the current adopted Local Plan. Any areas of 'deficiency' can be addressed in Part 2 if they are matters of detail. However, the Council is convinced that the Part 1 Plan addresses these issues satisfactorily.

Comment

English Heritage noted that many of the existing historic environment policies in the CDLPR will be replaced by CP20. While they fully supported CP20, they considered that many of the existing policies to be removed dealt with development management and as such would leave a significant policy void. This in turn will give rise to the risk of potentially harmful development. They requested that new development management policies are provided or that policies E18, E19, E20, E21 and E22 are saved.

Response

Comments are noted. The Council clearly wish to avoid creating a policy void, particularly in relation to the protection and enhancement of heritage assets. Therefore, the Council agree that it is prudent to save the more detailed elements of Policies E18, E19, E20, E21 and E22 as suggested by English Heritage. The saved elements can then be reviewed through the Local Plan Part 2, with further development management guidance being provided where necessary. This will allow the existing CDLPR policies to be fully replaced at this stage, avoiding any potential for a policy void. However, the Council is still happy that CP20 provides appropriate robust guidance.

Comment

The saving of Policy E24 is supported by Safer Derbyshire.

Response

The comment is welcomed and noted.

Action

- Amend reference to E19-E22 as being 'Partially Replaced'.

Appendix B: Parking Standards

Comment

David Locke Associates, commenting on behalf of Rolls-Royce, welcomed the rationalisation of parking standards but stated that, due to the exceptional circumstances regarding the location of the existing sites which are not well served by public transport, are taken into account when proposed enhancements are brought forward.

Response

Policy CP23 makes reference to the accessibility of the site in question being an important factor in deciding what levels of parking are acceptable. This would include access to public transport. No change to policy is required, therefore.

Comment

A Councillor objected to the parking standards for cycles; it was considered that they were too low and should be reviewed in the Part 2 Local Plan.

Response

Comments noted. Specific parking standards for all uses and all types of parking will be reviewed in Part 2 of the plan. At this time, it would be inappropriate to amend this element in isolation from the rest.

Action

- No amendments to the document are required.

Appendix C: Open Space Standards

No comments have been received by the Council.

Action

No amendments to the document are required.

Policy Omissions

Comment

Andrew Close

Signet Planning, representing William Davis, indicated that a 10.5 hectare site in the Mickleover/Littleover Green Wedge adjacent to Andrew Close is both deliverable and viable. They highlighted that development would not narrow the Green Wedge and bring about a number of benefits to the wedge itself. Indeed, they asserted that development of this brownfield site meets the criteria set out in CP18: Green Wedges. Signet Planning also indicate that development of the site would provide an area of open space which would assist in contributing to the Council's vision for green infrastructure.

One member of the public objected to the inclusion of Andrew Close in the Core Strategy. They highlighted that this site is one of the few remaining wildlife/green area in the vicinity.

One member of the public welcomed the withdrawal of Andrew Close from the Core Strategy; highlighting that this will be as open space when Heatherton is extended.

Response

The promoted site at Andrew Close is not considered to be a strategic site. The promoters have indicated that it could deliver circa 100 dwellings and it is not part of

a wider cluster of sites which could comprise a strategic location. There is some doubt as to whether the site is brownfield. It used to be part of Mickleover Sewage Treatment Works but it appears to have returned to a natural and vegetative state.

Although the site is in the Green Wedge, it is accepted that the Green Wedge Review has identified some potential for the wedge to be narrowed in this location. This was reflected in the 'PGS' consultation which identified the site as a 'star' site.

Notwithstanding whether or not the site is 'strategic', there are a number of issues which need to be resolved/clarified in order for the site to be deemed suitable for residential development. These include the extent to which development could occur, proximity to the A38, land drainage and flooding matters and issues relating to proximity of the Brook, potential biodiversity issues and school place availability. While the site promoters have been working to address these issues, there are still issues to address and the evidence has not been submitted in time to consider the site in the Part 1 plan.

This site could, however, be given further consideration within the Part 2 process.

Comment

Borrowash Road, Spondon

Freeth Cartwright submitted a representation on behalf of the owners of two parcels of land at Borrowash Road, Spondon. They request that the Green Belt boundary is revised to remove the two plots of land which would resolve "*longstanding land use planning issues relating to these sites and in so doing would provide clarity as to future use to the benefit of both landowners and those who use the wider site for sports and leisure purposes*".

Response

The NPPF, paragraph 83, states that, once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of a Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

The Derby-Nottingham Green Belt was assessed as part of the former regional Plan and this was partly revisited as part of the current Local Plan work. This confirms that the Green Belt on the eastern side of Derby is a particularly sensitive part of the overall Green Belt. Consequently, the Local plan does not seek to amend any of the existing boundaries of the Green Belt which will be retained and incorporated into the Part 2 Plan.

The site lies within a sensitive part of the Green Belt and removing the site from the Green Belt altogether would be likely to increase flexibility for further development options and would also be likely to increase visual harm to the Green Belt.

It is not considered that the case made by the respondent constitutes "an exceptional circumstance" that would warrant a change to the Green Belt boundary. As such, it is not proposed to make this amendment.

Comment

Moorway Lane, Littleover

Signet Planning submitted a representation on behalf of Peveril Homes. In it they stated that land to the west of Moorway Lane, Littleover is suitable to help to Council meet its housing needs by providing between 350 and 400 new dwellings. They suggest that the development is close to local facilities, will provide improved access to the Green Wedge and bring about improvements to green infrastructure.

In contrast, a member of the public who attended a drop-in event was happy to note that the Moorway Lane site is not included in the strategy and expressed a desire to see the City Park developed.

Response

The promoted site has been considered inappropriate for residential development. Assessment of the site concluded that it was not suitable for residential development for a number of reasons including significant impact on Green Wedge, poor access off Moorway Lane, poor access to local shopping facilities, school place availability and relationship to the existing urban area (it does not relate well to either to Heatherton nor Littleover).

The evidence provided by the respondent has not altered this view of the site and, as such, it is not intended to include the site in the Part 1 plan.

Comment

Breadsall Hilltop

Both Lathams and Peacock and Smith submitted representations on behalf of Durose Estates for a site at Breadsall Hilltop. The site was highlighted as a 'Star Site' in the Preferred Growth Strategy and it was considered that the site could come forward as an allocation in the Part 2 Local Plan. The masterplan provided by both agents indicates that approximately 263 dwellings could be provided along with additional social infrastructure enhancements. The masterplan recognises that development at this location will be significantly narrowed but considered that its function will still remain. To enhance integration with the surrounding area both improved pedestrian/cycle links are proposed. In addition, natural screening will be utilised to minimise the visual impact of the development.

Response

The representations from both agents acting on behalf of the landowners are noted.

It is accepted that the Council has previously identified the site as having potential for development within the 'PGS'. However, at the time it was considered that there were still issues to be addressed before the site could be allocated for development. While the site promoters have been working to address these issues, the evidence has not been submitted in time for the site to be considered in the Part 1 plan.

It is the intention of the Council to consider the suitability of the site, based on information provided and continuing discussions, for possible inclusion in the Part 2 Local Plan.

Comment

Telecommunications

Mono Consultants Limited highlighted the importance of including a policy for telecommunications in the Core Strategy and referred to paragraphs 42 and 43 of the NPPF.

They suggest that the following policy and justification should be included in the plan:

Proposals for telecommunications development will be permitted provided that the following criteria are met:

- i. the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;*
- ii. if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;*
- iii. if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.*
- iv. If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.*

When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.

Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings.

Response

The Council considers that the NPPF, paragraphs 42 to 46, provide a framework through which future planning applications can be determined and that the policy would be classed as 'development management' rather than strategic. As such, it is not necessary or appropriate to include the policy in Part 1 Plan.

However, the Council will consider the inclusion of a policy in the Part 2 Local Plan.

Action

No change to the document is required.

Miscellaneous Comments

Comment

One member of the public was disappointed that the Core Strategy hasn't addressed the incidences of HGV's from the West Hallam Storage Depot going through Spondon.

Response

Although the Core Strategy aims to promote alternative and sustainable means of transport, the issues relating to HGV's in Spondon cannot be addressed in the plan. This is a traffic management issue, not a strategic planning issue.

Action

- No change to the document is required.

Sustainability Appraisal

Comment

Natural England recognised that the Sustainability Appraisal is at an interim stage but consider that their interests in the natural environment have been fully considered.

Response

Comments noted and welcomed.

Comment

English Heritage stated that they have not been able to look at the sustainability appraisal but hope that issues regarding the historic environment have been addressed.

Response

Comments noted.

Comment

Boyer Planning considered that Part 29 of the Sustainability Appraisal should be amended to reflect the positive impact the provision of new health facilities as part of the Boulton Moor allocation would have.

Response

Comments noted. This point is accepted.

Comment

Oxalis Planning, representing Bloor Homes, requested amendments are made to the assessment of Onslow Road by removing reference to "*impact on wildlife sites*" and "*potential adverse impact on a designated Local Wildlife Site*".

Response

Comments noted. See comments on AC22.

Comment

Friends of the Earth considered that the carbon dioxide emissions from the incineration plant weakened and rendered the other reductive schemes null and void.

Response

Comments noted. The proposal mentioned by the respondent has not been implemented as yet and thus there can be no evidence that its emissions will have the suggested impact. No change required.

Comment

Friends of the Earth considered that the statements made in both the Sustainability Appraisal and the Core Strategy underestimate the impact development will have on air quality in the City and, as a result, the health of Derby's population.

Response

Comments noted. The respondent has provided no quantitative evidence that this is the case. No change required.

Comment

Friends of the Earth noted that, on page 18 of the Sustainability Appraisal, regeneration is supposed to narrow the gap between deprived and affluent areas of the City. However, Friends of the Earth stated that the most polluting development is located here by the Council.

Response

Comments noted. This is a very narrow view of the issue. Regeneration is not just about air quality or pollution, it is also about job creation, providing homes for those who need them, clearing and remediating derelict sites and improving accessibility. There are many examples where regeneration has had this effect. It is inappropriate to focus on one proposal, which in any event, is controlled by the Environment Agency and which has been considered acceptable in planning terms.

Comment

Friends of the Earth stated that the Sustainability Appraisal does not contain the open space standards for Normanton and Arboretum.

Response

Comments noted. The SA does not contain open space standards; this is the purview of the Local Plan. The SA does consider whether *proposals* in the Local Plan will have an impact on a range of issues including open space. These are properly addressed with regard to proposals impacting on Normanton and Arboretum.

Comment

Friends of the Earth stated that the wildlife list contained on Page 22 should contain the common lizard.

Response

Comments noted.

Comment

Friends of the Earth considered that it is imperative that the Sustainability Appraisal contain open space standards to indicate which wards have the least open space.

Response

Comments noted. See comment above. The SA assesses the *impact* of proposals in the plan against a baseline position. The SA illustrates where existing open space is located. It is not considered that a change is necessary.

Comment

Friends of the Earth stated that there was no recognition, on page 40, that it is poor air quality which contributes to life expectancy reduction. Air quality cannot be 'generally good' when it contains four Air Quality Management Areas.

Response

Comments noted. AQMAs identify localised areas of air quality problems, generally associated with traffic. When taken in the context of the City as a whole, the air quality of the majority of areas is actually good. As such, it is considered that this reference is accurate.

Comment

A member of the public stated that the public transport times provided in the Technical Appendix reflected the optimum travel time rather than peak travel times. The response continued by stating that poor bus connections in the City Centre add to the overall length of journeys.

Response

Comments noted.

Comment

A member of the public questioned if the Sustainability Appraisal is truly independent.

Response

Comments noted. The SA has been prepared by consultants on behalf of the Council. They have provided their objective expert opinion on the proposals in the plan, and their views have been used to assist in the plan's development. It is, however, a Council document.

Action

- Amendments to the Sustainability Appraisal to take account of changes to the

Local Plan policies and address comments made above.

Habitat Regulations Assessment

Comment

Natural England was satisfied that the assessment has been carried out comprehensively, followed accepted methodology and agreed with the conclusion that the Core Strategy would not be likely to have a significant effect on a European Site either alone or in combination with other plans.

Response

The comments are noted and welcomed. No further actions are necessary.

Comment

Derbyshire Wildlife Trust agreed with the conclusions of the Assessment.

Response

The comments are noted and welcomed. No further actions are necessary.

Action

- No further action necessary.

Derby HMA Strategic Viability Assessment

Comment

The Home Builders Federation and Gladman Developments Ltd raised a number of concerns about the assumptions used in the report which they consider does not accord with the NPPF, paragraphs 173 and 174. They also highlight that a number of policies in the plan (CP2, CP3, CP7, CP17, CP21 and CP23) have not been tested. They therefore concluded that the Council's plan is unsound as it was not tested in accordance with the NPPF.

Response

The PBA Economic Viability Report did not include all of the costs associated with development as its intention was to give a broad indication of the *level* of overage that would be available for development. The model provided did allow for the impact of affordable housing or other policies to be considered. Officers have used this model to consider the implications of different policies to assist in the development of policy.

This would give each local authority the opportunity to consider whether its policies were deliverable or not. This evidence was used to decide the broad parameters of policy (for example, the SHMA would suggest a much higher *need* for affordable housing than the policy requires and this has been influenced by the evidence base for viability).

The PBA report is not the only evidence used to determine policy requirements. Further work has been carried out by National CIL Services, which will be used to help determine the policies that will be Submitted to the Secretary of State. This work does include a more detailed assessment of the impact of policy – including the effect of such things as the Code for Sustainable Homes.

The Council has also taken the views of developers into account- particularly site promoters who have assured the Council that their sites are deliverable.

Each policy within the plan that requires a contribution from a developer makes it clear that it will be subject to viability. This promotes a positive and flexible approach to development. It would be foolish to exclude certain requirements from policy based on evidence in 2013 which would become viable over the 15 year life of the plan. Therefore, the Council has been careful to ensure that the particular economic context of any development can be taken into account at the relevant time. This would appear to be an eminently sensible approach.

Importantly, there is no suggestion that all of the requirements of the policies listed will be paid for by developers through S106 or CIL. Other sources of funding will be sought from Government, the LEP and other agencies such as the HCA. All of these will help contribute to the deliverability of the plan throughout its 15 year lifespan.

It should also be noted that the NPPF requires evidence to be ‘proportionate’ and limited to what is necessary to be able to justify the policy approach taken. It is considered that the approach taken is justified. The Council will, however, endeavour to produce a ‘position statement’ relating to the above issues to support the Examination of the plan.

It is not considered, therefore, that the plan is contrary to the requirements of the NPPF.

Action

- No change required.

Infrastructure Delivery Plan

Comment

The Highways Agency stated its satisfaction that the IDP provides a robust evidence base for the Core Strategy.

Response

The HA’s comments are welcomed and noted.

Comment

The Highways Agency state that the cost of the A50 Junction Improvements Plan should be amended to >£3 million.

Response

Agree with the comment; the relevant part of the IDP has been amended accordingly.

Comment

The Highways Agency noted that the A38 Derby Junctions scheme is not in the draft IDP and state that the Government has announced its intention to deliver this scheme. The total cost and start date have yet to be confirmed.

Response

Agree with the comment; the relevant part of the IDP has been amended accordingly.

Comment

The Highways Agency considers that the cost of delivering the A38 Pinch Point Scheme is now £6.7 million.

Response

Agree with the comment; the relevant part of the IDP has been amended accordingly.

Comment

The Highways Agency agreed with the ranking system used in the IDP and are happy with the ranking for each transport scheme.

Response

The comments from the Highways Agency are welcomed and noted.

Comment

Erewash Borough Council supported the IDP and, in particular, welcomed the inclusion of the A38 Pinchpoint Scheme and the A52 Congestion Management and Integrated Transport Package.

Response

The comments from Erewash Borough Council are welcomed and noted.

Comment

Natural England noted the section on Environmental Infrastructure and the projects identified in the Infrastructure Delivery Schedule. They presume that Green Infrastructure which relates to new development will be funded through individual negotiations in terms of S106 agreements and CIL.

Response

Natural England is correct in its assumptions; Green Infrastructure will be funded either through Section 106 agreements or the Community Infrastructure Levy.

Comment

Sport England welcomed the inclusion of sports facilities in the IDP but highlighted

that this needs to be based on up-to-date evidence (such as the emerging Playing Pitch Strategy).

Response

The comments from Sport England are noted. The Council acknowledges that an up-to-date assessment is required and, at the time of writing this response, is in the process of concluding an Outdoor Sports Strategy. This has been undertaken in-line with national guidance and with the input from Sport England.

Comment

English Heritage noted the contents of the plan and welcomed the inclusion of the restoration of the Derby and Sandiacre Canal.

Response

English Heritage's comments are noted and welcomed.

Comment

The Environment Agency highlighted the existing problem with the lack of capacity in the foul sewer network in the southern part of the City. They recognise that Severn Trent have responded by building two new combined sewer overflows by the EA consider that they are not a sustainable solution. They have concern that the combination of allocations to the south of Derby, will create the potential of increasing the volume of discharges from the Combined Sewer Overflows and will prevent receiving water bodies achieving the ecological standards required by the Water Framework Directive. They note that Severn Trent are currently dealing with this issue but have not committed to any specific scheme. They state that the Council needs to be satisfied that the necessary sewerage system is in place in order to accommodate the proposed growth.

Response

Please refer to an earlier response to the Environment Agency's comments about the City's sewer network in Policy AC15: Land South of Wilmore Road, Sinfin (Infinity Park Derby). The wording in the IDP relating to the City's sewer capacity will be amended to reflect Severn Trent's comments.

Comment

The Environment Agency suggested a number of amendments to the section relating to OCOR to bring it in-line with up-to-date information. In addition, they highlighted that a statement on Page 7 was factually incorrect and have provided new information to rectify this.

Response

Agree with the comments made by the Environment Agency and the IDP will be amended accordingly.

Comment

The Environment Agency noted that they had been in discussions with the site operators at the Former Celanese Acetate Site, Spondon regarding their future water abstraction needs. They state that the owners are exploring options for de-

commissioning the Spondon Sluices which are no longer required and which act as a barrier to the migration of fish. They suggest that the IDP may wish to reflect this.

Response

It appears that, from additional information provided by the Environment Agency, some work has already been carried out on the sluices to meet health and safety regulations. Two further stages in the project need to be carried out, one of which is an appraisal for a long-term solution for the structure. Until this appraisal has been carried out, and costs determined, the project will not be included in the Infrastructure Delivery Plan. However, it should be noted that the IDP will be regularly reviewed on an annual basis and the project, which the Council considers is important, will be included once a final solution has been determined. Therefore, no change to the IDP is required.

Comment

Derbyshire Fire and Rescue suggested that the following text is added to the IDP to bring it in-line with the County Council's Infrastructure Delivery Plan.

In terms of supporting new growth and the delivery of sustainable communities, it is vitally important that new housing is well-designed and addresses safety and the needs of vulnerable people. Houses must provide adequate safety for the occupant throughout the occupiers' life.

Derbyshire Fire and Rescue Service is actively engaged in a campaign to ensure that all domestic properties are fitted with sprinkler systems. Sprinkler systems are exceptionally effective through their ability to control a fire before it develops to life threatening proportions. DFRS should be consulted on all planning policy and planning applications so that the implications for fire safety can be considered. Developers can help to anticipate the future needs of residents and prevent having to retrofit properties by installing 32mm mains water risers and sprinkler systems as part of new housing developments.

Response

The comments are noted and the suggested text will be incorporated into the relevant section.

Comment

Turley Associates submitted comments on behalf of Western Power Distribution. They highlighted that the development strategy would have implications for their service and highlighted the different types in installation they operate. They also clarified that development does not necessarily require the relocation of strategic power lines such as pylons where sites can be developed in situ.

Response

The comments are noted.

Comment

Nathaniel Lichfield and Partners recognised that public sector funding cuts and changing funding mechanisms provides uncertainty over what resources are

available to spend on infrastructure in the future. Therefore, they considered that it is vital to ensure that viable sites are identified.

Response

The comments are noted. It is considered that the sites identified in the Local Plan are viable and deliverable.

Comment

Nathaniel Lichfield and Partners also raised concerns regarding the phasing/timetable for the delivery of the South Derby Integrated Transport Link.

Response

See comments elsewhere. The Council considers that the phasing and timescale is appropriate at the present time.

Comment

Nathaniel Lichfield and Partners noted that the IDP identified the need for a new secondary school to serve the south of the City; they suggested that Newhouse Farm could provide a suitable location.

Response

The comments are noted. This is something that would need to be addressed through South Derbyshire's Local Plan. At this time, this is not a proposal of their plan and thus it is not appropriate to include this in the IDP.

Comment

The Planning Design Group stated that the provision of the South Derby Integrated Transport Link in the IDP is consistent with their Masterplan.

Response

The comments are noted.

Comment

The Planning Design Group highlighted that land under the control of Hallam Land Management Ltd could be made available to allow the expansion of school facilities at Sinfin Community School.

Response

The comments are noted.

Comment

With regard to Wragley Way, the Planning Design Group highlighted an inconsistency between the IDP which refers to a single school and the draft policy which refers to two primary schools.

Response

The Council considers that the amendments made to the policy itself will address any inconsistencies. However, no change will be made to the Infrastructure Delivery Plan.

Comment

Oxalis Planning, representing Bloor Homes were concerned that both the IDP and the Core Strategy itself implied that, from an infrastructure perspective, Onslow Road may not be deliverable in advance of larger sites nearby. They objected as this approach implies that if the school at Hackwood Farm does not come forward, the site at Onslow Road cannot be developed.

Response

The Council does not agree with the interpretation of both the policy and the Infrastructure Delivery Plan and considers that neither should be changed.

Comment

Although one respondent supported the inclusion of the restoration of the Derby and Sandiacre Canal, they considered that its economic benefits were not recognised in the IDP.

Response

The IDP is not the document to set out all of the benefits arising from the restoration of the canal. As such, no change is required.

Comment

A number of comments were submitted by Lightspeed Derby regarding the Communication Infrastructure section. Additional companies operating in the area were suggested for inclusion. In addition, suggestions were made relating to the existing capacity and recent provision in the City as well as pointing out a number of funding streams.

Response

The comments from Lightspeed Derby have been noted. The relevant sections will be amended to reflect the new information.

Comment

Derbyshire Wildlife Trust welcomed the recognition given to cross-boundary impacts and the need to plan for infrastructure across the HMA. They also stated that the use of SUDs should not be 'explored' as it is an essential element of sustainable design. In addition, DWT suggested that a number of additional projects/developments are included in the IDP.

Response

Agree with the comment. The Background to Water and Flooding Infrastructure will be amended accordingly. Reflecting the Derby HMA Water Cycle Study (2010), the sentence will now state "Encourage the use of Sustainable Drainage Systems (SuDS) to reduce..."

Action

Water and Flooding Infrastructure

- The augmentation of the reservoirs in the Derwent and Dove Valley's from Rutland Water is incorrect. This reference has been deleted.

- Amend the Infrastructure Delivery Schedule for Water and Flooding Infrastructure to take account of Severn Trent's proposals.
- The overall cost of Our City Our River is changed to £94.9 million.
- The funding shortfall is shown as £58.6m
- The timescale of the project has been changed to 2014 to 2029
- The priority has been changed from "Medium" to "High"
- The schedule notes that the Council adopted the Masterplan in July 2012 and that Derby City Council is the lead organisation
- The sentence relating to SuDS in the Specific provision Initiatives will now read "Encourage the use of Sustainable Drainage Systems (SuDS) to reduce the amount of surface water flooding".

Communications Infrastructure

- D2N2 and W3Z Broadband has been added to the non-developer funding sources section of the schedule.
- The figures stating the take-up of Broadband and Superfast Broadband in the City has been updated to reflect new data provided by Ofcom.
- The Digital City Programme, Surf the City project and the various programmes run by Spark are included in the background text.

Environmental Infrastructure

- The environmental benefits arising from the restoration of the canal have been removed from the schedule. The text stating the Council's support for the scheme remains.

Health and Emergency Services

- The Background section will incorporate the text provided by Derbyshire Fire and Rescue Services regarding sprinklers. The following text will be added:

In terms of supporting new growth and the delivery of sustainable communities, it is vitally important that new housing is well-designed and addresses safety and the needs of vulnerable people. Houses must provide adequate safety for the occupant throughout the occupiers' life. Derbyshire Fire and Rescue Service are actively engaged in a campaign to ensure that all domestic properties are fitted with sprinkler systems. Sprinkler systems are exceptionally effective through their ability to control a fire before it develops to life threatening proportions. Developers can help to anticipate the future needs of residents and prevent having to retrofit properties by installing 32mm mains water risers and sprinkler systems as part of new housing developments.

5

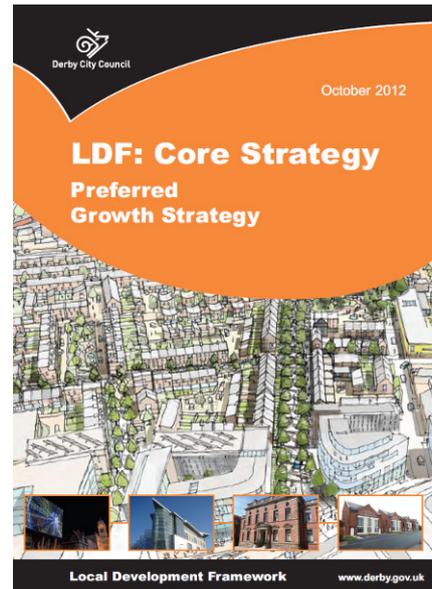
**Summary of representations made
pursuant to the Preferred Growth Strategy
Consultation**

The Preferred Growth Strategy consultation ran for 12 weeks, starting on the 1 October 2012 and ending on the 21 December 2012.

Primarily, the consultation focussed on the aligned approach for the delivery of housing across the Derby Urban Area but also considered the location of employment sites within the City.

This statement sets out:

- Which bodies and persons were invited to make representations at each consultation stage
- How they were invited to make representations
- A summary of the main issues raised and a response from the Council



The consultation was undertaken in a co-ordinated approach with our Derby Housing Market Area partners, Amber Valley Borough Council and South Derbyshire District Council. This approach ensured that the information provided and the questions asked were consistent.

Key Principles

A key principle behind improving community involvement in the planning process is the concept of “front-loading.” This means getting ideas and options for plans discussed at much earlier stages of preparation. This should enable agreement to be reached between the various parties involved in the process, rather than wasting time and resources over resolving conflict.

To ensure the consultation was undertaken consistently across the three authorities, a HMA Consultation group was established. The Group ensured that:

- a) a consistent message is presented to the community
- b) resources are managed in an efficient way
- c) duplication and repetition is avoided, which in turn should reduce consultation fatigue

The Consultation

The Preferred Growth Strategy Consultation took place between 1 October and 21 December 2012.

Although the consultation was open to everyone, resources primarily were focussed on those communities affected by the Council’s proposed housing strategy.

Separate but aligned consultation documents were produced by the three HMA authorities – Amber Valley Borough Council, Derby City Council and South Derbyshire District Council.

Who was consulted?

The consultation was carried out in accordance with Planning Regulations, the Council's adopted Statement of Community Involvement and the Council's adopted Consultation Policy.

We engaged with Statutory Consultees, organisations and individuals on the LDF Database, the Council's Neighbourhood Partnerships, Diversity Forums, members of the community and internal officers.

Although the consultation was open to everyone to comment on, the communities directly affected by our strategy were intentionally targeted.

How was the consultation carried out?

The Compendium of Publicity Material contains copies of all of the publicity material produced and press articles published during the consultation.

The following is a brief description of the methods used to engage with interested parties during the Preferred Growth Strategy.

- **Political Sign-Off and Member Briefing & Engagement**
Each individual HMA authority secured political sign-off of the consultation document in accordance with their constitutional process.

The method of briefing and engaging elected members was tailored to the individual authority.

In accordance with the National Planning Policy Framework's Duty to Co-operate the HMA local authority partners will maintain:

- Continuous informal and formal discussion regarding statutory and non-statutory consultations
 - Targeted consultation regarding Spatial Development
- **Mailshot to interested parties**
Before the consultation started a letter or email to everyone on our LDF consultation database. The database contains the contact details of the specific consultation bodies, general consultation bodies and members of the business and local community. In addition emails were sent to Chief Officers and Councillors informing them of the consultation.

Interested parties were also informed of the consultation through 'Your City, Your Say'.

In addition, the consultation was publicised by utilising the mailing list of the following:

- **Neighbourhood Partnerships:** Currently this has a distribution list of around 1,606 people which includes residents, local businesses, faith groups, Councillors and Officers.

- Derby City and Neighbourhood Partnerships: An email was sent to around 2000 people during the week commencing 29 October 2012. The distribution list mainly contains the contact details of public, private and 3rd sector organisations.
- Derby City Council: The Council's Customer Services database contains around 5000 records and an email was sent to everyone on the database.
- The City Council's "In-Touch" magazine is emailed to all staff on a weekly basis and articles were included on the 8 and 30 October 2012 e-shot.
- The Preferred Growth Strategy consultation was also highlighted on the City Council's main webpage.
- Derbyshire County Council's HMA webpage included links back to each respective authorities website
- Press releases and articles
Derby City Council carried out a press briefing on the 3 September 2012, two days before the committee report and draft document was made available to the public. The resulting press articles from the BBC and the Derby Evening Telegraph are included in the Compendium of Publicity Material.

At the start of the engagement process each individual authority issued a press release which contained quotes from either the lead or most appropriate member or the HMA Joint Advisory Board.

A second press release was issued before the Westfield drop-in event to encourage people to attend. This resulted in an article in the Derby Evening Telegraph on the 27 October 2012.

- Posters and banners
Posters were put up in Council offices, local libraries, sports and community centres, post offices and local shops. Posters were also sent to the Neighbourhood Managers for distribution.

Freestanding banners publicising the consultation were also put in the Council's reception at 1 Albion Street, Roman House and one banner spent a week in each library.

- Deposit documents
The Preferred Growth Strategy, summary leaflet and response form was put on the Council's website, Council offices and local libraries.

Documents were also sent to the Neighbourhood Managers.

To support the consultation, the following documents were made available:

- Derby Housing Market Area Housing Requirements Study (September 2012)
- Derby City Council Green Wedge Study (2012)
- Derby Urban Area Transport Modelling Report (November 2012)
- Also three position statements for education, water and transport were published. These papers set out how our knowledge of each subject had developed through discussions with our partners and, as a result, influenced our current strategy.

Although not part of the consultation itself, people could submit comments on all of the evidence base documents.

- Website

Our website (www.derby.gov.uk) was updated to contain information about the consultation. The webpage included the Core Strategy Options Paper, response form and, later, the frequently asked questions paper. The webpage also contained a link to an on-line consultation form.

In addition, we included a link to our HMA partner websites.

- Launch Event

A launch event was held at the Pride Park Stadium on Wednesday 17 October 2012. This gave stakeholders, developers and agents an opportunity to find out about the consultation and to put questions to Officers from the HMA authorities. As well as sending a general invitation out, specific infrastructure providers were invited to the event. These providers would have the chance to discuss their requirements in private prior to the main event beginning.

- Community Groups

Over the consultation period, members of the Spatial Planning Team were invited to, and attended, the following Neighbourhood Partnership meetings:

- | | |
|---|----------------------------|
| ● Blagreaves Neighbourhood Forum | Wednesday 10 October 2012 |
| ● Darley Neighbourhood Forum | Wednesday 10 October 2012 |
| ● Mackworth Neighbourhood Forum | Monday 15 October 2012 |
| ● Oakwood Planning and Transportation Sub-Group | Monday 15 October 2012 |
| ● Sinfin & Osmaston Board | Tuesday 23 October 2012 |
| ● Chellaston Neighbourhood Forum | Thursday 25 October 2012 |
| ● Mickleover Neighbourhood Forum | Wednesday 31 October 2012 |
| ● Littleover Neighbourhood Board | Wednesday 28 November 2012 |
| ● Chaddesden Neighbourhood Forum | Monday 3 December 2012 |
| ● Alvaston Neighbourhood Board | Wednesday 5 December 2012 |
| ● Boulton Neighbourhood Forum | Thursday 6 December 2012 |
| ● Abbey Neighbourhood Board | Tuesday 11 December 2012 |

Officers also attended the following Diversity Forums:

- Voices in Action Monday 8 October 2012

- 50+ Forum Thursday 18 October 2012
 - Disabled people's Forum Thursday 6 December 2012
 - Minority Communities Thursday 13 December 2012
- Drop-in events

A number of drop-in events were held throughout the consultation period. In some instances these were held jointly with our HMA partners. Events undertaken jointly with Amber Valley Borough Council are highlighted with a star (*) while events held with South Derbyshire District Council are highlighted with a hash (#). This approach ensured that members of the local community could discuss the proposals with officers from both Councils.

 - All Saint's Heritage Centre, Aston-on-Trent# Tuesday 23 October 2012
3:00pm to 7:30pm
 - Westfield Shopping Centre Saturday 27 October 2012
10:00am to 4:00pm
 - Littleover Methodist Church# Thursday 1 November 2012
3:30pm to 7:30pm
 - The Diocesan Centre, Mackworth* Tuesday 6 November 2012
4:00pm to 7:00pm
 - Stenson Fields Primary School# Wednesday 7 November 2012
4:00pm to 7:30pm
 - Mickleover Country park Social Club# Wednesday 14 November 2012
3:00pm to 7:30pm
 - Alvaston Library Thursday 15 November 2012
3:00pm to 7:00pm
 - Chellaston Academy# Wednesday 21 November 2012
3:30pm to 7:30pm
 - Da Vinci Community School Tuesday 27 November 2012
3:30pm to 7:30pm
 - Elvaston Village Hall# Thursday 6 December 2012
3:00pm to 7:30pm
 - Pear Tree Library, Normanton Wednesday 12 December 2012
3:00pm to 7:00pm
 - Presentations

An Officer from the Planning Policy team attended the following groups:

 - Conservation Area Advisory Committee
 - LTP Steering Group

Summary of Responses

The following section summarises the responses the Council received through the consultation. To accord with the requirements of the Data Protection Act no comments have been attributed to an individual; in contrast comments received from Statutory Bodies, businesses, developers and their agents are attributed.

The responses are taken from formal written representations and comments made at the drop-in events, Diversity Forums and Neighbourhood Partnership meetings. In total we received 171 responses.

The comments below have been organised based on the chapters in the 'preferred growth strategy'.

- Section 4.1 deals with comments on the Strategy and Vision
- Section 4.2 considers comments made on Sustainable growth and Regeneration
- Section 4.3 summarises comments on the overarching housing strategy, looking at the amount, location and distribution.
- Section 4.4 deals with site specific comments
- Section 4.5 concludes by summarising comments made in respect of certain topics such as climate change, retailing and the environment.

Strategy and Vision

Erewash Borough Council generally supported the Council's approach to the location of housing and employment growth. The Council believes it is important for Derby City Council and South Derbyshire District Council to continue its partnership working to ensure that the transport infrastructure implications arising from planned new growth to the south and south-east of Derby are fully considered and appropriately mitigated.

Natural England generally supported the Vision, particularly the aim to provide a Green Infrastructure Network which includes the Derwent Valley and the Green Wedges. They also support the requirement that all Green Infrastructure should be provided as an integral part of development. They supported the Council's requirement to take opportunities to use GI to adapt to increased flood risk. They also welcomed paragraph 5.27 in the section on "*Transport and Highways*" which sets out to provide greater transport choice for all and identifies sites that encourage walking, cycling and the use of public transport as we generally support initiatives aimed at sustainable transport modes that help to reduce carbon emissions.

The National Trust considered that the intentions set out in the Strategy and Vision are correct for the City and appropriately address issues relating to sustainable development within a major city that is tightly constrained by its administrative boundary. The particular recognition of the challenges to protect the City's unique heritage and to provide and retain green infrastructure resources, and the commitments to do so, is welcomed. They continued by supporting the overall approach, to economic development including the consideration of cross-boundary issues. The approach is considered to be well-founded in relation to the characteristics of Derby and the challenges that it faces.

A developer commented that while they supported the key areas identified within the 'Vision' they would need to be expanded in the final Core Strategy to fully conform to 'The Derby Plan'.

Pegasus Group, on behalf of Talavera Estates Ltd, support the overall vision and welcome the joined up thinking between the three local authorities to produce a joint strategic vision for the overall Derby HMA as per paragraphs 178-179 of the NPPF.

RPS, representing St Modwen noted general support for the City Centre strategy in principle. However, they commented that the document was silent on retail uses outside the city centre. In order to aid the regeneration of derelict urban sites outside the centre, they felt that policies should be flexible to allow mixed uses in line with market demand to include appropriate elements of retail and leisure that would not impact on the vitality and viability of the city centre.

Radleigh Homes generally supported the Council's vision for Derby, specifically the recognition that in order to deliver the Vision, the Core Strategy will 'retain a thriving sustainable and innovative economy' and that it will need to 'identify suitable greenfield land to meet development needs sustainably.

URS, representing Rolls Royce submitted comments supporting the HMA's strategy stating that it *"is a major step forwards in achieving growth and a major improvement in the supply and quality of housing in and around the City"*.

A number of individuals supported the Council's desire to create a compact and liveable City.

Littleover Neighbourhood Board indicated that they supported five of the six objectives listed under 'Our Vision for Derby'. However, they did not agree with the objective of *"identifying suitable greenfield land to meet development needs sustainably"*. They considered that the use of greenfield land should be a last resort and that its use should only be permitted when all other options have been exhausted. They considered that identifying greenfield sites at this stage was giving a 'green light' to developers and was premature. They also questioned the extent to which 'windfalls' had been factored into the overall supply figures.

Two members of the public supported the Plan's vision of economic regeneration and the enablement of High-Tec enterprises. The same individuals also supported other aspirations of the plan, namely the creation of a Green Infrastructure Network, protection of the City's heritage, the regeneration of the City Centre and the principles of sustainable development and high quality design.

A Councillor stated that improving employment opportunities for the people of Derby has to be the lead objective; without employment opportunities people would not be able to afford the new homes.

Response

Comments of support for the vision and strategy are noted and welcomed.

The Preferred Growth Strategy contained a brief summary of the vision for the Core Strategy. The Local Plan, Part 1 Core Strategy contains a more comprehensive

Vision which it is now considered reflects the Derby Plan.

The Preferred Growth Strategy focussed primarily of the scale and location of housing in and adjacent to the City and contained a brief summary outlining the direction of other policies in the emerging Core Strategy. The Local Plan, Part 1 Core Strategy will contain policies dealing with retail uses outside of the City Centre.

Sustainable Growth and Regeneration

The National Trust supported the overall approach, to economic development including the consideration of cross-boundary issues. The approach is considered to be well-founded in relation to the characteristics of Derby and the challenges that it faces.

Derbyshire County Council expressed broad support for the Preferred Growth Strategy in terms of scale and distribution of housing. They welcomed the opportunity to continue to work with the HMA authorities under the Duty to Co-operate. Their representation also indicated that the PGS had been underpinned by a robust evidence base and that the strategy broadly conformed with the Regional Spatial Strategy for the East Midlands which still seeking to identify identified needs. There was support for the consideration which had been given to the potential release of Green Belt sites and the reasoning why no Green Belt had been release in the City was also supported.

The promoters of one of the housing sites has suggested that the location of proposed employment sites could lead to over intensive development in the south of the city and lead to overloading of the highway network.

Littleover Neighbourhood Board generally support the options for employment growth, although they have noted that they would like to see more options for mixing light business uses and residential uses as this will increase sustainability. The principle of mixing employment and residential uses was also supported by another respondent.

Littleover Neighbourhood Board also stated their support for retaining a thriving and sustainable economy and regenerating the city centre and older urban areas.

Respondents have stated their support for the vision for economic regeneration, the enablement of high tech enterprises and the delivery of the GTC.

Two respondents have stated their support for the regeneration of the city centre.

Need for more innovation and provide offices with residential above. It was suggested that more options should be considered to mix housing and employment.

One individual noted that there is very little employment development on the west side of the city, necessitating commuting along congested routes.

A Councillor suggested that improving employment opportunities for local people should be the lead objective.

Response

The comments supporting the various strategies for growth and regeneration have been noted.

As part of developing the evidence base for the respective Core Strategies, the HMA undertook a transport modelling exercise, initially, for the Derby Urban Area. The exercise considered the cumulative impact of development thus helping Officers understand the impact development will have on the local highway network. The Council is confident, therefore, that subject to proposed mitigation the housing and employment development in the City can come forward in an acceptable manner.

Whilst the majority of traditional industrial uses are located along the river corridor and in the south of the city, the west of the city accommodates the Derby Royal Hospital and the main Derby University campus. These are both major employers within the city helping to balance employment provision across the city. However it is recognised that further rebalancing is needed. The mixed-use proposals for both the Manor Kingsway and Rykneld Road developments, in the west of the city include employment provision to help rebalance employment provision across the city as a whole.

General Housing Strategy

Housing Numbers

A number of comments were received about the methodology used to determine the HMA's housing provision.

A planning agent acting on behalf of several volume house builders, and a number of other planning consultants, submitted a response which outlined their concerns about the methodology used in the Housing Requirements Study (HRS) to determine the housing requirements for the Housing Market Area. The respondent also provided their own view as to what the HMA housing requirement was. The main observations and challenges to the setting of the requirement were:

- The Regional Spatial Strategy is based on out of date evidence and is not in accordance with the National Planning Policy Framework and therefore housing requirements based on the Regional Spatial Strategy are unlikely to be found sound.
- It is necessary for authorities to meet the full objectively assessed housing requirements of their area.
- The National Planning Policy Framework sets out how housing requirements should be identified including meeting household and population projections taking into account migration and demographic change, addressing the needs for all types of housing including affordable housing and the needs of different groups in the community and catering for housing demand.
- The HRS does not account for existing unmet housing needs.

- The normal way of dealing with unmet need is to address it over a 5 year period (20% of net housing need per year)
- Although the 2008 CLG Household Projections constitute the most reliable and up to date figures, the raw data from the 2010 based population projections indicates an upward direction of travel between the two and leads to the view that when the 2010 Household Projections are published they are likely to result in an increase in overall household requirements over the plan period.
- As well as considering projections and existing backlog and allowance should be made for second homes. A recommendation is made that 1.1% should be used as a second home figure.
- The response challenges the way that vacancy rates have been assessed in the housing requirement study. The respondents suggest that a vacancy rate of 3.2% is appropriate (based on NAPAU).
- The Chelmer model is supported and recognised as an appropriate model to calculate requirements including assumptions being made for the various components listed above.
- In summary and considering all of the separate issues above the consultant suggests that an appropriate housing requirement figure for the Derby HMA 2008-2028 is 54,482 and points out that the Council's figure is therefore some 20,000 dwellings short of the requirement.
- The consultants also commented that the Popgroup model which had been used in the HRS work had been known to produce spurious results and that they were surprised that a better recognised and respected model like the Chelmer model had not been used.
- As a matter of detail relating to the modelling work, the consultants were critical of the migration element of the HRS work. They felt it was not appropriate to deviate from official projections and there was little that could be done to reduce the number of EU immigrants. In the consultant's view the migration work therefore did not reflect the real requirement and would result in under provision of housing.
- Concerns were also expressed about the fact that the HRS work made assumptions about internal out migration seemed to be greater than those projected by the 2010 SNPP.

Hallam Land Management consider that the overall amount of new housing being proposed under represents actual housing need and the housing target should be set higher.

The promoters of the Boulton Moor East allocation within Derby are concerned that the Housing Requirement Study (HRS) does not propose a housing figure for the HMA based on 'objectively assessed needs' and therefore does not accord with the

National Planning Policy Framework. They go on to note that they are unclear how the findings of the HRS have been used to inform the figure used in the Preferred Growth Strategy and highlight the legal requirement for development plan preparation to be in conformity with the Regional Plan (CALA Homes Three Judgement, May 2011). The promoters have concluded that there are no exceptional circumstances that would justify a reduction in housing numbers from the RSS figure and that the rationale for lower provision lacks robust justification, particularly in light of more up-to-date projections. The promoters have also noted that it is unclear how under provision of housing over the past few years (monitored against the RSS target) have been factored into the new housing provision figures.

Bellway Homes and Clowes Developments have pointed out that reducing housing numbers in the Derby HMA by 3,000 (compared to the RSS figure) would have an adverse impact upon Derby's future growth. They have also objected to the inclusion of a windfall allowance of 1,250 dwellings as a source of future capacity as it is not clear how they will be delivered. They have also cast doubt on the deliverability of some higher density schemes that have planning permission.

A local community group responded with the view that using current building trends was the best mechanism by which to identify the future number of homes required.

A private individual supported that fact that the government projections are too high and requirement should be lower and commented that the level of focus on housing delivery was not sustainable.

McCarthy and Stone Retirement Lifestyle Ltd reiterated that the Council needs to proactively plan for specialist accommodation in the Core Strategy.

Response

Due to the number of representations challenging the HMA's housing figures, the Council asked the consultants who undertook the Housing Requirements Study to consider, and respond to the points raised and to take account of any updated evidence (including any available data from the 2011 Census). The consultants revisited some of the areas of concern including considering previous housing delivery shortfall, vacancy rates, second homes and more up to date Census data. The results from further analysis of these areas and in light of data being released from the 2011 Census led to an increase of the recommended HMA housing figure by 1,654 to 35,354.

The three HMA authorities have considered this evidence and concluded that the revised figures are a robust and objective assessment of the area's housing needs. As such, they have concluded that proposals put forward in their PGSSs will have to be updated, otherwise there would be a risk on not meeting the requirements of the NPPF. While these figures are lower than the Government's projections, they are considered to be a more robust reflection of local circumstance.

After consideration of the data and the implications of growth, a decision was taken that Amber Valley would increase their housing figure by 400, South Derbyshire by 754 and Derby City's by 500 to 12,500.

Based on the available evidence, the three HMA authorities do not consider that

higher requirements suggested by some respondents are robust, sustainable or deliverable.

For more information on housing need and the reasons for the amendments please see the 'Derby HMA Strategic Housing Market Assessment (SHMA) – Update (2013)'.

The SHMA update also considered needs for specialist housing including meeting the needs of the aging population.

Direction of Growth

The Council received numerous comments both supporting and objecting to the areas of proposed growth in and adjacent to the City.

The National Trust did not object to the overall approach set out in the consultation document. However, they considered that development on the fringes of Derby, outside its boundaries, should have regard to the characteristics of the adjoining HMA authorities.

Erewash Borough Council supports the Councils approach to focus development to the south and south-east of the City as this approach will assist in the long-term protection of the Derby/Nottingham Green Belt. They recognise however that increased traffic generated as a consequence of Derby's proposed strategy of growth if successfully implemented is likely to have a noticeable impact on traffic flows through Borrowash as a result of increased usage of the A6005 (Nottingham Road). The importance of the A52 as a trunk road and its role in enabling traffic to flow to and from Derby should be a major consideration in the selection of sites which contribute to the growth of employment sites to the east of the City.

Hallam Land Management supported in part the HMA's focus for development on the urban area and welcomes the recognition that there is a need to provide a significant proportion of new housing to the south of the City. They also welcome the acknowledgment that greenfield land release is required if housing needs are to be met.

There was general support for the proposed strategy not proposing any further growth as urban extensions to the Mackworth Estate into Amber Valley for reasons including traffic impact and impact on heritage assets at the Kedleston Estate. In addition, two respondents supported the concept of development being located to the south of the City.

There was general support from individuals for the direction of expansion of the city should be to the south and consolidation of urban extension sites is supported.

An individual made a comment that the PGS indicates that part of the reasoning for not identifying development land to the west of the city is because of lack of school places. However the lack of school places is an issue in many other locations also.

A local Resident's Association suggested that a better strategy to having extensions at the edge of the City would be to develop new homes in satellite locations 4-8

miles from Derby is locations which have good transport access to the City Centre and could be designed from scratch to provide their own infrastructure. Suggested locations were between Elvaston and Shardlow and near Egginton.

An individual commented that the reasoning given as to why some sites were not included in the strategy was flawed because those reasons equally applied to sites which had been included in the strategy.

The Radleigh Group supported the criteria set out in paragraph 5.17 which set out the considerations made by the Council during the site selection process.

Concern was raised by a Neighbourhood Board that:

- urban extensions to the built area of the city and into Amber Valley and South Derbyshire are not consistent with the Core Strategy's vision of Derby being a compact city. The vision to maintain Derby as a 'compact and liveable city' was supported.
- It was suggested by the Board that rather than large urban extensions the strategy should consider more organic development around the many villages in South Derbyshire.
- In order to support the level of growth proposed as urban extensions in South Derbyshire the proposed new road which is identified is vital and S106 should be used to ensure that the essential infrastructure is provided. It was suggested that the road should be implemented before the new residential development takes place. Schools places are a particularly important element of the new infrastructure which will be required to support development in this location.
- A new secondary school should be provided in South Derbyshire rather than expansion of existing City schools to meet the increasing education needs.

An individual commented that housing on the western side of the City is not well linked to employment uses and that bus and cycle routes should be provided to link the two.

Planning Design responded on behalf of their clients objecting to the overall strategy. By concentrating development predominantly to the south of the City, they feel that this is contrary to the requirements of the National Planning Policy Framework, paragraph 50.

Response

The Core Strategy's aim is to ensure that the City remains compact and the draft strategy can achieve this by focussing development within the City's administrative boundary through the use of brownfield sites and by bringing vacant properties back into use. As noted elsewhere, this will not meet Derby's objectively assessed housing need and thus the Core Strategy would be found unsound. As such, the Council has considered evidence and issues of sustainability and has taken the decision to release greenfield sites within the City and support for sustainable urban extensions, where necessary and appropriate.

While the Council recognises people's concerns, it is considered that it has selected sites that can be delivered within the minimum impact on wildlife and biodiversity and which ensure viable 'green wedges' are maintained. In all cases, the Core Strategy's detailed policies will try to ensure that development on greenfield sites makes contributions to improve existing 'green infrastructure' and protects features of importance.

It has been suggested that new settlements some distance from Derby would be a more appropriate solution. This is not accepted. The NPPF requires strategies which are sustainable, viable and deliverable. It is questionable whether a large new settlement or settlements would necessarily be sustainable. Notwithstanding the effect on greenfield land and environmental assets (likely to be greater than urban extensions owing to the need for more infrastructure and supporting development), it is likely that a significant proportion the people living in such settlements would still work in the City and still need to use the City's services and facilities. As such, it is unlikely to reduce trips made by car (indeed, it may increase them) and thus could lead to increased carbon emissions and increased congestion on main arterial routes. This would also have associated issues of pollution, safety and economic impact.

Large new settlements are also unlikely to be deliverable. The upfront infrastructure costs may be prohibitive – particularly in trying to make the locations 'sustainable'. The number of dwellings that could realistically be built on an annual basis would also not negate the need for housing sites elsewhere.

Sustainable urban extensions provide an opportunity to provide development in areas which are well related to existing services and facilities, or which together with development within the City, can create a critical mass to facilitate the delivery of new facilities and infrastructure. Clearly, there will still be an impact on roads and the environment – this is an inevitable consequence of growth. However, urban extensions are likely to have less of an impact and offer more opportunities for mitigation than new settlements.

Brownfield/Greenfield Development

A number of people highlighted the need to utilise brownfield sites before releasing greenfield land for development. Some people suggested that all of our housing needs could be met on brownfield sites while some sought clarification that all of the City's brownfield sites had been taken into account in developing the current strategy.

A Neighbourhood Board objected generally to greenfield development, especially in green corridors and wedges and suggested that these sites should only be developed as a last resort.

A housing developer supported the strategy to release Green Wedge and greenfield sites in order to meet the housing numbers required. They refer to the representation made on their behalf by a planning consultant about the general scale of development required and the fact that because more dwellings are actually required than the PGS is seeking to accommodate then more greenfield land will be required.

They also acknowledged that the city will be unable to meet its needs on brownfield sites alone.

A general comment from an individual was that the strategy should consider bringing vacant properties back into use and carefully consider the service provision impacts of all of the proposed new development.

In contrast, at a meeting with the Oakwood Planning and Transportation Sub-Group, attendees recognised that all of Derby's housing needs cannot be met by developing brownfield land but concerns were raised over the impact any development would have on the green wedge and more specifically, Chaddesden Wood.

Response

The use of brownfield sites rather than greenfield in the Core Strategy is a recurring comment in this and previous consultations. The PGS identifies a number of brownfield sites which together would deliver over 3000 dwellings (not including windfalls).

However, it is recognised that, in Derby, there is not enough deliverable brownfield land to help meet the target of 12,000 dwellings. This was the conclusion of the 'Brownfield Regeneration Statement' published in 2012. Although priority is given to brownfield development in the plan, a number of greenfield sites, including sites within existing green wedges, have had to be identified for development in order to meet the requirements of the NPPF.

The Council's strategy is to prioritise brownfield development and regeneration but it must also produce a strategy that is 'deliverable' and meets housing needs in full. As well as the statement mentioned above, it has also used other evidence base, including its Strategic Housing Land Availability Assessment to identify as many brownfield sites as possible to contribute to the housing target. The evidence gathering work included a 'call for sites' where land owners and developers were asked to identify sites for housing as well as the Council identifying sites itself. The strategy must identify sites which will deliver new housing during the Plan period so in assessing each site regard has been had to constraints which might affect the reality of the site being developed for housing. It is accepted that other brownfield sites will inevitably be identified over time and the housing supply within the strategy therefore includes a 'windfall' allowance of 1,000 dwellings to account for housing which will come forward on sites which are not currently identified. Windfall sites must by definition be brownfield development.

The Council recognises that making the best use of the City's existing housing stock is good for sustainable development and regeneration and the Council has done a great deal in recent years to bring empty homes back into use. At the end of 2010, it was estimated that there was about 4,603 vacant residential properties in Derby, which accounts for around 4.5% of the total housing stock. By the end of 2011 it is estimated that this figure had fallen to around 3,892. In June 2012 the vacancy level was 3.7% of the total housing stock. It is important to point out that there will always be empty homes for a variety of reasons and even if the figure was substantially reduced, this would not provide sufficient numbers to meet the City's needs in the long term.

Infrastructure

The Council received a number of comments highlighting the impact future growth would have on the City's infrastructure.

Derbyshire Fire and Rescue Service noted that the location and scale of growth in and adjacent to the City may have implications for future service delivery in terms of geographical coverage and response times. They state that it is important to ensure that, where required, the need for new fire infrastructure is acknowledged in the emerging local plan documents to ensure that such infrastructure is properly provided.

The Environment Agency noted that there is an existing problem with lack of capacity in the foul sewerage system in the southern/south western part of Derby. So far, this issue has been addressed by provision of some sewerage improvements but also two new combined sewer overflows (Wilmore Road, Sinfin and St David's Close, Chellaston). The preferred housing sites DER/0001, 0104 and 0118 and the Global Technology Cluster site at Sinfin Moor have, in the absence of improvements to the foul sewerage system have the potential to increase the frequency and volume of discharges from combined sewer overflows (CSOs) and exacerbate foul flooding problems in Chellaston. This will jeopardise achievement of Water Framework Directive good ecological status/potential for watercourses in this area (the Cuttle Brook is currently failing to achieve good ecological potential due to diffuse urban pollution). This issue is clearly identified in the Derby Housing Market Water Cycle Study.

Concerns were raised on a number of occasions that development on the edge of the City would result in the residents using facilities in the Derby, putting pressure on the Council's services. They also highlighted that any Council Tax would be paid to Amber Valley and South Derbyshire rather than the City Council.

An individual commented that putting new housing on the urban fringe in other local authority areas is not efficient because of the resources and how councils deliver them.

Sport England highlight that the proposed housing growth will increase demand for both indoor and outdoor sports facilities.

Several individuals objected to housing growth generally and the main reasons given were on highway capacity/increased traffic and congestion and on school place availability.

Response

The comments from the Environment Agency and have been noted. On-going discussions with Severn Trent through the development of the Core Strategy and the associated Infrastructure Delivery Plan have highlighted this issue. Severn Trent is currently exploring ways in which to alleviate the issues currently experienced to the south of the City. The solution will be included in the Infrastructure Delivery Plan.

Derbyshire Fire and Rescue has been an important contributor to the Core Strategy and, through on-going discussions, have played a key role in the development of the Infrastructure Delivery Plan. It is recognised that development will have an impact

on service delivery and response times and that close liaison between the Fire Service and the City Council will ensure that any issues will be addressed at an early stage.

The issue of residents in one authority using facilities in another is not something which is directly related to planning. The Core Strategy will ensure, however, that development in one authority's area will make appropriate contributions through planning obligations to new facilities or mitigation in the other.

The Council's development strategy is informed and influenced by a number of factors. Although the impact of development on existing schools is an important consideration; the effect of development on the highway network, environmental considerations and the impact on local facilities and service providers are also taken into account.

A number of comments suggest that existing facilities are inadequate and that this should either lead to a reduction in overall housing provision and/or specific sites should not be allocated. Clearly, ensuring that people have good access to jobs, schools, shops, healthcare facilities and other facilities that meet their day-to-day needs is important in delivering a sustainable strategy. While growth will add to some existing pressures, this is not necessarily a reason to stop development. It does, however, identify a need to provide additional, extended or improved facilities to meet the increase in demand. The Core Strategy will contain policies that will require developers to provide new facilities where none exist, or contribute to the expansion/improvement of existing facilities, subject to viability.

Planners from the HMA authorities and Education Officers from both the City and County Councils are working together at a Housing Market Area level (Derby City, Amber Valley and South Derbyshire) in planning the future housing and education needs of the City to ensure that school places are available for the needs generated by the new houses. In some instances this may require the expansion of existing schools while in others it may require the building of new education facilities. Discussions will continue to ensure the best solution is achieved based on up-to-date information, the results of the next consultation and the refinement of the site allocations in the Core Strategy.

A number of comments also relate to the impact growth will have on traffic and transport. There will inevitably be a greater amount of traffic as a result of growth. Every effort will be made to manage this by reducing the need to travel, promoting public transport, walking and cycling, by requiring developers to provide local improvements (such as junction improvements) and by implementing or facilitating new infrastructure. This is not to say all of the impacts of growth will be mitigated. However, sites and locations for growth have been selected which provide the best opportunity to manage traffic and where it is considered the increase would not lead to severe or unacceptable problems.

The policies for each site allocation will also set out what specific measures will be required to help mitigate transport issues. Where necessary they will also specify the number and location of access points and sets out where off-site improvements will be needed.

Viability

Agents acting on behalf of Talavera Estates commented on the viability of delivering sites. They highlighted the provision of affordable housing should be reviewed. They state that a target of 40% would be difficult to deliver at a time when most developers are struggling to deliver 20%.

Response

Evidence in the 2013 Derby HMA Strategic Housing Market Assessment suggests that the need for affordable housing in the City is significant. The Council will require developers to contribute to meeting the City's affordable housing needs through the delivery of new homes provided by way of planning obligations as well as by delivering new affordable housing itself in partnership and will seek innovative solutions to funding and providers. However, the Council realises that the delivery of affordable homes by developers is a cost burden to them and does not wish to unduly constrain the delivery of new housing generally. The Draft Core Strategy will suggest a 30% target on all sites of 15 dwellings or more, subject to viability. Further work on this will be carried out before the Submission of the Plan as part of work on the Council's draft CIL charging schedule. This, along with comments on the draft Plan, will help to finalise this policy.

Suggested Alternative Sites

A general comment was made by an individual that there are other sites which could accommodate growth which have not been identified in the strategy including land at Macklin Street and the Varsity Grange site in Mickleover.

The Rolls Royce Light Alloy Foundry site should be developed for housing to minimise the loss of greenfield sites.

Alfreton Road was identified as an area that could be reallocated to allow new housing, helping to remove a number of derelict areas of employment land. It would also be an opportunity for existing businesses to relocate to more modern premises.

Planning Design suggested that their site off North Avenue, Darley Abbey should be allocated in the plan.

Response

The comments regarding alternative locations for residential development have been noted. In general it must be noted that the Part 1 Local Plan considers the location of the strategic housing sites to meet the needs of the City. The Council will be considering additional, smaller scale sites in the Local Plan Part 2.

Site Specific Comments

This section provides summaries of the comments we received for individual sites and our responses.

Brook Farm (DER/0016)

The promoters of this site strongly support the proposal to release some greenfield sites within the city and have suggested that the housing figures set out in the Preferred Growth Strategy should be regarded as a minimum. In particular, they strongly support the proposed allocation of the Brook Farm site. They have

suggested that the site is immediately available, suitable for residential development and that 298 units could be delivered.

A response from Turley Associates, acting on behalf of the Radleigh Group, supported the allocation and recognised that the allocation of some Green Wedge sites was needed to meet the Council's housing requirements. The response continued by highlighting the sustainability of the site due to its proximity to a public transport route, local schools and amenities. They also consider that a small scale development would not have a detrimental impact on either the character of the area or on the local road network.

The Environment Agency, along with other respondents, noted that some of the site lies within flood zone 3a and stated that a sequential approach should be applied and that a detailed assessment of flood risk should be undertaken. The EA stated that a detailed model of the watercourse will be available in the near future.

Members of the public also suggested that development of the existing fields will increase the amount of run-off entering the brook system which will exacerbate existing flooding problems. The provision of ponds as suggested by the developer was not thought to be sufficient to mitigate the additional run-off.

One respondent suggested that the new houses will not be able to get insurance as the insurance industry will not insure properties close to watercourses.

Natural England were glad to note that a green corridor is to be created along the Lees Brook but would urge that surveys are carried out before planning permission is granted for the presence of water voles which have been observed on the adjoining Chaddesden Brook.

The County Council Archaeologist has identified that the field and hedgerow pattern in this area of the city has remained largely unaltered since at least the early 19th century. This could represent the fossilisation of ancient strip fields, albeit in a relatively isolated wedge of landscape. The proximity to Lees Brook may also suggest potential for prehistoric activity. They have recommended that this site is subject to archaeological evaluation at a pre-application stage, with geophysics in the first instance supplemented by trial trenching to validate.

The promoters of the Acorn Way site have formally objected to the allocation of the Brook Farm site on the basis that development would reduce the penetrating effect of the Green Wedge, reduce the proximity of built development and open countryside and erode the rural character of the area, particularly as the site may be visible from the north.

Existing congestion was highlighted as an issue, particularly around Chaddesden Park Schools. It was also suggested that additional development in this area will only exacerbate existing problems. Access to public transport was also highlighted as a potential issue

The proposed access points onto Oregon Way and Tennessee Road were highlighted as a problem. A number of people commented that these points were not appropriate to serve the proposed development and could potentially be dangerous.

Concerns were also raised about the ability of existing amenities and local facilities to absorb the impact of new housing development in this area. There were particular concerns about the impact on local schools, doctors and dentists which it was suggested were already over-subscribed.

In a specific response objecting to the development of greenfield land at Brook Farm, a representation was made stating that all new housing should be concentrated on brownfield and derelict land.

A number of people voiced concerns about the potential loss of an important wildlife and recreational space. It was suggested that the area supports a wide range of wildlife and that the area is well used by local people for recreational purposes including dog walking along existing footpaths.

Respondents were concerned about the impact that development would have on the Green Wedge itself. In particular, the validity of the existing Green Wedge allocation was questioned by one respondent who questioned why the area is allocated as Green Wedge if the area can be built on.

The promoters of the Brook Farm site held their own local public consultation where they revealed their intention to submit a planning application to develop the site. This led to a further number of objections to the development of the site in the form of telephone calls, emails and letters. The general thrust of the objections were based on several of the reasons mentioned above but in particular people's concern's focused on highway safety concerns, especially on Tennessee Road where the local primary school is located, loss of green space, impacts on wildlife, flooding and loss of rights of way. A local 'action group' has been formed to specifically oppose the allocation or development of the land for housing. Specific concerns were also raised by local residents that public rights of way may cross the site and may be lost if the site were to be developed.

Response

It is recognised that, in Derby, there is not enough brownfield land to help meet the target of 12,000 dwellings. Although priority is given to brownfield development in the plan, a number of greenfield sites, including sites within existing green wedges, have been allocated for development.

The impact of the development on the Green Wedge was considered in the Council's Green Wedge Study. It stated that "development of this site for housing would clearly reduce the penetrating effect of the Green Wedge, reducing the proximity of built development and open countryside. Development in this area may be visible from the north due to the topography of the land and would be intrusive within the Green Wedge. It would also erode the rural character".

However, the study goes on to conclude that "this area of the Green Wedge makes very little contribution towards separating different areas of the city due to the narrowness of the western end of the Green Wedge. Therefore development of the

site would not have a significant impact in terms of reducing separation or leading to coalescence. Development would be well related to the existing urban area and would not impact upon the mouth of the Green Wedge. On this basis the site may have some development potential.” It is considered, therefore, that the site can be allocated for development without seriously undermining the overall Green Wedge policy or strategy.

Developers will be required to submit a full Traffic Assessment (TA) as part future planning applications. They will be expected to provide mitigation measures to help reduce the impact of the new development. If detailed modelling carried out by the developer suggests unacceptable levels of highways impact then proposals are unlikely to be permitted. However, at this stage we are confident that the level of traffic likely to be generated would be acceptable and is unlikely to have an unacceptable impact on the locality. In response to concerns raised by both the public and Highways colleagues, the draft Policy for the site will specifically preclude access from Tennessee Road or Acorn Way.

The developers of the site will be required to carry out detailed modelling of the flood regime and will need to set out how they intend to mitigate any potential flood risks associated with the development. If development is likely to be exacerbated in surrounding areas, proposals are unlikely to be given planning permission. New development must ensure that there is no net increase in surface water run-off when compared to greenfield sites. As part of the planning application, the applicant must submit details indicating how flooding issues will be addressed. In this case, the developer has indicated that measures will be put in place to alleviate surface water run-off, including a balancing pond to the north of the site.

The cumulative impact of future development on local facilities has been raised during previous consultations. The Council recognise that additional housing will have an impact on local facilities and have, through the Core Strategy process and the development of the Infrastructure Development Plan, instigated dialogue with the necessary infrastructure providers. Discussions have been held with Officer’s from the City and County Councils Education departments, utility companies, health providers and the emergency services to enable them to take account of our strategy in their future plans.

The comments regarding archaeology have been noted. The suggested requirement can be secured through a planning condition on future applications.

Concerns over the potential loss of wildlife habitats on the site have been considered and it is felt that the main areas or habitat include the brook and its fringes and the hedgerows. The draft policy for the site will include a requirement for consideration of these areas and retention/enhancement where possible. Specifically, a green corridor/buffer along the edge of the brook should maintain wildlife habitats. It is noted that a number of walked routes which may potentially be public rights of way crossing the site. The Council is investigating the status of these routes. The draft policy for the site will require links and routes for walking and cycling to be provided across the site and forming connectivity with existing facilities and the open countryside.

Acorn Way

The promoter of this site has challenged the decision to rule this site out in the PGS. They have stated that they can demonstrate that satisfactory access arrangements can be achieved off Acorn Way and Derby Road and have suggested that West Park School has informally agreed to accommodate the secondary needs generated by the site. Whilst accepting that the promoted site is not well related to development in Chaddesden or Spondon, the promoters contend that it would be well related to the ribbon development along Derby Road and would not therefore be isolated.

From a Green Wedge perspective, the promoters have stated that the site is some distance from the narrowest and most sensitive parts of the Green Wedge and would have minimal impact upon penetration. They have suggested that the promoted site could be developed without undermining the principle of the Green Wedge and that an extension to the school could be built on previously developed areas of the wedge and therefore could be acceptable from a green wedge perspective.

They have also noted that the site is to the south of the ridgeline helping to screen it from the north and that development would enhance a scruffy site and potentially help to implement proposals for new public open space to the north of the promoted site.

In summary, the promoters of the site believe that the site is sustainable, is located in a suitable location for residential development and is achievable and viable. They have suggested that the site is preferable to other green wedge locations that have been selected in the PGS and that the Council's assessment of the green wedges is flawed. The objections to the other sites submitted by the promoter are listed under the responses to each of the relevant sites.

The decision not to allocate the land at Acorn Way was supported by one respondent.

An outline planning application for this site has now been submitted.

Response

The Council's Site Summary Sheet, produced to support the Preferred Growth Strategy considered a number of factors in assessing the suitability of Acorn Way in helping to meet Derby's housing need. It concluded by noting that development would have an unacceptable impact in this part of the Chaddesden/Spondon green wedge, creating an 'obvious intrusion' into the Green Wedge visually bridging the gap between the distinct suburbs of Chaddesden and Spondon, reducing the openness of the wedge and its penetration into the City from the open countryside to the north. There are also serious concerns about the ability to create a safe and technically acceptable access to the site.

For the reasons above, the site will not be identified in the Draft Core Strategy and an appropriate site for housing development.

Land to the east of Spondon (DER/0025)

One respondent supported the decision not to allocate land to the east of Spondon in the PGS for development. It was stated that the land is currently Green Belt and

highlighted that, should development occur, it would seal off Dale Road Park from the surrounding countryside.

Response

Comments supporting the Council's decision not to allocate land to the east of Spondon have been noted.

Lime Lane (DER/0030)

The promoters of the Lime Lane site consider that the number of houses proposed by the PGS is insufficient and should be increased to reflect the ONS 2008 household projections, in line with recent appeal decisions. They suggest that the allocation of medium sized sites such as Lime Lane are crucial to housing supply in the City as they have fewer constraints and are deliverable in short timescales. They have also reduced the site area of the promoted site to try and better reflect the Green Wedge Review and are suggesting that the revised site could accommodate up to 270 dwellings. They have examined certain aspects of the design including drainage, highway issues and integration with the surrounding area and have suggested methods to address these issues.

The promoters of the Acorn Way site have formally objected to the potential allocation of the Lime Lane site on the basis that it would be difficult to maintain the Green Wedge principle even if development was restricted to the western side of the axis and that development would be located in a sensitive part of the wedge, i.e. the mouth. They have also noted that there is no obvious boundary to delineate a potential development site to the west of the green wedge axis.

A number of people raised concerns about whether local roads will be able to cope with traffic associated with development of this area and whether existing roads would provide appropriate access points. It was also noted that existing roads and junctions will need to be improved in order to provide safe access to the site, particularly the Lime Lane / A608 junction. One respondent mentioned that the Breadsall roundabout on the A61 may need to be traffic light controlled.

It was also stated that, due to poor public transport serving the area, most residents are reliant on their cars which in turn causes congestion in the area and additional housing will exacerbate this problem.

One respondent suggested that access to the site should not be provided via Primrose Close or Foxglove Close as this will create more pollution and disruption, whilst access for construction lorries was noted as another issue. There were also concerns about access from Limedale Avenue.

It was stated on a number of occasions that development on this site contradicts the Core Strategy's intention to improve, protect and enhance green infrastructure.

There were concerns about development in this area due to the impact on wildlife. It was noted that the existing Green Wedge provides an important wildlife corridor linking Chaddesden Wood (which is an ancient woodland) and the Green Belt land to the north. It was mentioned that the Wood is home to important habitats for rare butterflies and bats and that habitats will decline if the wildlife corridor is severed. On

this basis, one respondent suggested that the erosion of the Green Wedge would go against the European Community Biodiversity Strategy.

The development of this land for housing would eliminate or significantly reduce wildlife access to the Chaddesden Wood Nature Reserve. It is already scientifically acknowledged that the fields in question form a wildlife corridor to/from the wood for species such as the larger Noctule and Serotine Bats. The rare Purple Hairstreak Butterfly would be another under threat.

It was believed that the site was suggested for development for a small number of houses which would fund improvements to Chaddesden Wood. There is concern that the development on Lime Lane would effectively isolate the Local Nature Reserve which, as a consequence, would see a rapid decline in species of birds, bats and mammals using the wood, resulting in less public use of wood as a wildlife resource for local residents. It was also stated that considering this site for development is contrary to the Core Strategy's intention to protect and enhance green infrastructure.

The recreational value of the green wedge land was recognised by a number of respondents. It was suggested that land to the north of Chaddesden Wood is used by dog walkers and by children to play.

It was suggested that Park View Primary School is already oversubscribed and will not be able to accommodate additional children generated from the site, whilst expansion of Breadsall Hilltop would cause considerable disruption and expense.

In terms of secondary provision, it was noted that Da Vinci would not be convenient for pupils generated by the Lime Lane site as it could take 18 minutes by public transport. It was suggested that the distance would promote parents to pick up and drop off in cars.

A number of respondents were concerned about the implications of building on Lime Lane. They stated that there are a number of watercourses under the fields and there are some existing issues of surface water run-off from the site. It was highlighted that, currently, a significant amount of water runs off the fields onto the junction of Lime Lane and the A608. They are concerned that building on the land will make the problem worse thus requiring significant improvements to the local infrastructure. Concerns were also raised that future development would increase the risk of flooding in Breadsall.

It was considered that Oakwood doesn't have the necessary services and infrastructure to accommodate further development on the scale proposed in the Preferred Growth Strategy, such as schools, shops and sewer capacity.

Concerns about the impact the development on house prices was raised as an issue.

The County's Archaeologist noted that Roman, Saxon and medieval finds have been recorded from the general area of Breadsall Hilltop, and this site should be subject to archaeological evaluation at a pre-application stage, with geophysics in the first instance supplemented by trial trenching to validate.

Response

For responses on the scale of growth, please refer to Section 4.3.

Although the site indicated in the SHLAA indicated that development would encompass the entire mouth of the Green Wedge, it wasn't the site promoter's intention to develop the entire site. Discussions between Officers and the site promoters have refined the overall proposal, retaining a functioning Green Wedge and thus the link between Chaddesden Wood and the open countryside to the north. In addition, the Council will require the developer to provide improvements to the remaining Green Wedge as part of the overall scheme.

As part of any planning application the Council will expect that an appropriate ecological assessment is undertaken identifying the nature and extent of any impact and mitigating measures that need to be taken.

Developers will be required to submit a full Traffic Assessment (TA) as part future planning applications. They will be expected to provide mitigation measures to help reduce the impact of the new development. However, if detailed modelling carried out by the developer suggests unacceptable levels of highways impact then proposals are unlikely to be permitted. At this stage, however, it is considered that the level of traffic generated is unlikely to have such an impact and, with proper local mitigation measures, should be able to create a satisfactory form of development.

On-going discussions between Planning Officers and the site promoter have refined the proposals for this site. It is proposed that a single vehicular access will be located on Mansfield Road, where there is also access to existing regular bus services. Additionally, pedestrian links between the development and the surrounding area will be enhanced and improvements, yet to be determined, will be made to the remaining Green Wedge.

Planners from the HMA authorities and Education Officers from both the City and County Councils are working together at a Housing Market Area level (Derby City, Amber Valley and South Derbyshire) in planning the future housing and education needs of the City to ensure that school places are available for the needs generated by the new houses. In some instances this may require the expansion of existing schools while in others it may require the building of new education facilities. Discussions will continue to ensure the best solution is achieved based on up-to-date information, the results of the next consultation and the refinement of the site allocations in the Core Strategy.

Flooding has been experienced in Breadsall, located to the north, and at the junction of Mansfield Road and Lime Lane and options will be developed as part of the development to address this. New development must ensure that there is no net increase in surface water run-off when compared to greenfield sites. As part of any planning application, the applicant must submit details indicating how flooding issues will be addressed. In this case, the developer has indicated that measures will be put in place to alleviate surface water run-off, including a balancing pond to the north of the site.

The comments regarding archaeology have been noted. The suggested requirement

can be secured through a planning condition on future applications.

Breadsall Hilltop (DER/0101)

The promoters of the site are supportive of the proposed allocations made in the PGS and support the allocation of additional sites to ensure that the shortfall of 600 houses is met during the plan period. They consider that the land at Breadsall Hilltop should be allocated in order to fill the shortfall and that the site is superior to the other 'star' sites identified in the PGS. They have suggested that development to the north of the city centre would help to rebalance the strategy.

The promoters have submitted an indicative development strategy to demonstrate how the site could be developed which includes space for residential development, a new primary school, potential CHP plant and community spaces.

Concerns were raised about the visual prominence of the site and the impact of development on the Green Wedge. The volume of traffic generated by the development site was also highlighted as a potential problem, particularly the potential impacts on Mansfield Road and Bishop's Drive. In addition, an individual thought that there may be contamination issues arising from the sites previous use.

It has also been highlighted that development of the site may increase the amount of surface water run-off resulting in flooding at the bottom of the slope.

Finally, it was considered that development would change the character of the area and that the provision of social housing will cause the area to deteriorate.

The County Council's Archaeologist stated that the site is close to or on the postulated line of the Rykneld Street Roman Road (HER 99016). It is recommend archaeological evaluation at a pre-application stage, with geophysics in the first instance supplemented by trial trenching to validate.

Response

Development in this area has the potential to be visually prominent from the west and north due to the topography of the land. Therefore, development proposals would need to be carefully designed to ensure that prominence is reduced through innovative design and landscaping.

The site was highlighted as a 'Star Site' in the Preferred Growth Strategy, based on the identification of some development potential in the Council's Green Wedge Review. Therefore, the Council's view is that some development could occur without undermining the Green Wedge principle in this location, although a definitive developable area is yet to be formally identified. The star designation highlighted that more information was required before a final decision could be made.

Developers will be required to submit a full Traffic Assessment (TA) as part future planning applications. They will be expected to provide mitigation measures to help reduce the impact of the new development. However, if detailed modelling carried out by the developer suggests unacceptable levels of highways impact then proposals are unlikely to be permitted. As noted below, the site is not likely to be identified in 'Part 1' of the plan to allow further investigation of certain deliverability issues. This will also allow further investigation of the traffic impact and mitigation

measures that may be needed.

New development must ensure that there is no net increase in surface water run-off when compared to greenfield sites. As part of the planning application, the applicant must submit details indicating how flooding issues will be addressed. In this case, the site promoter has indicated that measures will be put in place to alleviate surface water run-off, including a balancing pond to the west of the site.

Planners from the HMA authorities and Education Officers from both the City and County Councils are working together at a Housing Market Area level (Derby City, Amber Valley and South Derbyshire) in planning the future housing and education needs of the City to ensure that school places are available for the needs generated by the new houses. In some instances this may require the expansion of existing schools while in others it may require the building of new education facilities. Discussions will continue to ensure the best solution is achieved based on up-to-date information, the results of the next consultation and the refinement of the site allocations in the Core Strategy.

On-going discussions have been held with the site promoters since the publication of the Preferred Growth Strategy. The Council are still uncertain as to the deliverability and viability of this site and have decided not to allocate the site in the Part 1 Local Plan. There is still an opportunity for the site to be allocated in the later Part 2 Local Plan if the Council's concerns can be addressed.

The comments from the County's Archaeologist have been noted.

Derbyshire Royal Infirmary

One respondent questioned whether the recently granted permission for the supermarket would affect the number of houses the site was expected to provide.

Natural England welcomed the aim of creating a "green link" to the Arboretum and suggested that all opportunities to increase green infrastructure within urban sites are taken. As these proposals are for the redevelopment of brownfield sites and will involve the demolition of buildings they advised that surveys are carried out to check for the presence of bat species which may have used the old buildings to roost in.

The Environment Agency had no major concerns with the site. However, they highlight that surface water mapping indicates a large area of potential flood risk from surface water flooding which will need to be assessed.

Response

The provision of a supermarket at the DRI site is part of a comprehensive mixed-use redevelopment of the site. Therefore, the granting of permission will not affect the overall number of houses the site is expected to provide.

The comments from Natural England and have been noted and an assessment would be required as part of the planning application. It is not considered that their comments raise any impediment to the allocation of the site. Comments regarding the 'green link' are noted. Every endeavour will be made to ensure that this link – and other improvements to green infrastructure – are implemented.

The comments from the Environment Agency and have been noted and an assessment would be required as part of the planning application. It is not considered that this is an impediment to the allocation or development of the site.

Osmaston (DER/0006)

The Environment Agency indicated that the Cotton Brook is culverted through the site. They continue by stating that the site lies within flood zone 1 and hence there are no associated flood risk concerns, however, any future development of this site will have to consider measures to open up the culvert. Whether the brook is daylighted or is left in culvert, an easement from the brook will have to be incorporated into the final design.

The County's Archaeologist stated that the former Rolls Royce site (Nightingale Road) retains no potential for below-ground archaeology, although the Grade II Listed frontage building should obviously be retained. The others two areas (Glossop Street and Elton Road) have no archaeological potential.

Response

The comments from the Environment Agency and the county Council's Archaeologist have been noted and an assessment would be required as part of the planning application.

Amen Alley

One respondent raised concerns that any high rise development on this site may spoil views of the Cathedral and could have the effect of isolating Cathedral Green from the rest of the city centre. They also highlighted the need for any development on the site to be sympathetic to the character of the Cathedral.

Response

The Tall Buildings Strategy was completed but has never officially been adopted by the Council. It was originally intended to form part of a Design SPD, however work on the wider document has not progressed. The Council is currently reviewing options for how the Strategy can be incorporated into future guidance and how findings can be incorporated into Policy. The Core Strategy will identify locations in the city centre that are more and less appropriate for tall buildings, utilising the findings of the Tall Buildings Strategy.

Policies in the draft Core Strategy relating to design, heritage and character, in addition to a subsequent Supplementary Planning Document on design will ensure that development is sympathetic to the character of the Cathedral.

Bold Lane and Middleton House

One respondent highlighted the need to ensure that any development maintains the frontage and skyline of Sadler Gate.

Response

The comments have been noted. The Core Strategy policies relating to design, heritage and character will address the respondent's concerns.

Eastern Fringes

Natural England welcomed the aim of creating a "green link" to the Arboretum and suggested that all opportunities to increase green infrastructure within urban sites

are taken. As these proposals are for the redevelopment of brownfield sites and will involve the demolition of buildings they advised that surveys are carried out to check for the presence of bat species which may have used the old buildings to roost in.

The County's Archaeologist highlighted that a desk-based assessment has identified potential for remains of early 19th century housing and industry, but no potential for archaeology of earlier periods. Some evaluation is envisaged to assess preservation, but I recommend that any further work on significant areas could be carried out under a planning condition.

The Campaign for Better Transport generally supported the redevelopment of this site as it is reasonably well-served by public transport and within easy cycling distance of the City Centre and Pride Park.

Response

The comments from the three organisations are welcomed and have been noted. Issues raised by Natural England and the County Archaeologist can be adequately addressed as part of any application.

Goodsmoor Road and Sinfin Lane

The Environment Agency has noted that the Cuttle Brook dissects the northern sections of the site. They continue by stating that the site lies within flood zone 1 and hence there are no associated flood risk concerns. They have reviewed a flood risk assessment submitted for the site that has considered flood risk arising from the brook. An easement from the brook should ideally be sought to allow access to the watercourse for essential maintenance and future improvement works.

Hallam Land Management Limited noted that the development of Goodsmoor Road and Sinfin Lane would place increase demands on capacity at Sinfin Community School.

A member of the public supported this allocation but highlighted that highway improvements are needed to connect Goodsmoor Road and Sinfin Lane. It is suggested that the railway bridge would need to be two-way.

Response

The comments from the Environment Agency and have been noted and an assessment would be required as part of the planning application.

The broad location as identified in the Plan now has planning permission for over 700 dwellings across 2 sites and the principle of development there has been established. No change to the bridge was required through the planning permission. However, highway and access improvements would be made as part of the wider development.

Planners from the HMA authorities and Education Officers from both the City and County Councils are working together at a Housing Market Area level (Derby City, Amber Valley and South Derbyshire) in planning the future housing and education needs of the City to ensure that school places are available for the needs generated by the new houses. In some instances this may require the expansion of existing schools while in others it may require the building of new education facilities. Discussions will continue to ensure the best solution is achieved based on up-to-date

information, the results of the next consultation and the refinement of the site allocations in the Core Strategy.

Boulton Moor East (DER/0105)

The promoters of the land within Derby City (Bellway Homes and Clowes Developments) have stated that the Boulton Moor proposals would make a significant contribution to meeting future housing needs and would be in-line with the NPPF. They have commended the findings of the Green Wedge Review and consider that their current approach is entirely appropriate and deliverable.

They have offered their support in principle to the allocation of additional land in the Boulton Moor area in South Derbyshire. They have noted that all parties involved in the development of the cross boundary site have agreed to work cooperatively. They have pointed out that the Regional Plan outlined a need for 'significant urban extensions around Derby' and this is considered to be the most sustainable and logical approach to growth in the HMA.

However, the promoters of the Acorn Way site have formally objected to the proposed allocation of the strategic Boulton Moor site on the basis that it is not well related to existing facilities such as shops and would lead to greater education capacity issues when compared to the Acorn Way site. They have also suggested that development of the site would cause detrimental impact upon the Green Wedge in terms of narrowing, loss of openness and potential visual impact.

The Highways Agency stated that it is working with the Derby HMA authorities to identify the cumulative traffic impact of the sites proposed at Boulton Moor, Chellaston Fields and Wragley Way and the transport infrastructure required to support them. The Highways Agency does not consider that the provision of a new junction on the A50 represents an acceptable solution on its own or that a new junction, together with the required wider infrastructure enhancements to the Strategic Road Network it would necessitate, represents a viable transport option to serve the proposed sites

Natural England noted that the Boulton Moor SSSI is close to the development but have concluded that development would be unlikely to have an impact on it.

The Environment Agency have highlighted that a significant part of the north-west portion of the site lies within Flood Zone 2 and that mapping indicates there are surface water risks at this location. They have welcomed the commitment to address flood risk at this site and indicated that a sequential approach should be undertaken for any site allocation in this location. They have also pointed out that should the site be found to be sequentially appropriate, a detailed assessment of flood risk will be required.

English Heritage suggested that development of the site may have impacts on the setting of the grade II* Elvaston Castle registered park and garden.

The County archaeologist has pointed out that there is little archaeological information for the surrounding area, which may have historically been marginal land. It has been recommended that the site is subject to archaeological evaluation

at a pre-application stage, with geophysics in the first instance supplemented by trial trenching to validate.

The Campaign for Better Transport supported this proposed development in the past, as a good position for a sustainable urban extension. They have highlighted the need for a Park and Ride in this location to help reduce car traffic into the city. They have also suggested that new or modified bus services may be needed to serve the site.

Concerns about the impact of development on flooding in the surrounding area have also been raised by members of the public.

Members of the public have identified that existing local road infrastructure will not be able to cope with the additional traffic.

One respondent has suggested that the land should not be built on as it is Green Belt land.

Response

The Boulton Moor site within Derby will form part of a larger strategic location including land within South Derbyshire. Comprehensive development in this area will create a critical mass of new housing that will be capable of delivering on-site facilities such as new shops and schools. Therefore, the proximity to existing local facilities is not a concern in this location.

The land is currently designated as Green Wedge not Green Belt. Green Wedge is a local designation that can be reviewed by the Local Planning Authority.

The Green Wedge Review fully accepts that release of land within Green Wedges for housing development will have a detrimental impact upon their width and openness. The Review attempts to identify the promoted sites within the Wedges that will have least impact in terms of function. It concludes that, due to the width of the Boulton Moor Green Wedge, a viable Wedge can be maintained whilst also releasing land on both sides of the Wedge for housing development. The principle of this is demonstrated in Figure 2.42 of the Review.

In contrast to this, the Review concludes that release of the promoted land at Acorn Way would have a high level of impact upon the Chaddesden / Spondon Green Wedge. The Review concludes that release of the site could undermine its strong definition and cause narrowing to the extent that separation of Chaddesden and Spondon is undermined. Therefore, impact on the function of the Green Wedge is deemed to be greater at Acorn Way than at Boulton Moor.

Comments on drainage are noted. The developers of this area will be required to carry out detailed modelling of the flood regime and will need to set out how they intend to mitigate any potential flood risks associated with the development. If development is likely to be exacerbated in surrounding areas, proposals are unlikely to be given planning permission.

The Boulton Moor site is one of the few locations within the city that can potentially accommodate large scale housing development that will form part of a strategic

location. The lack of alternative options and the extent of identified housing needs mean that the site is compliant with the provisions of the sequential test. Further information about the sequential assessment of housing sites will be set out in a flooding position statement.

Developers will be required to submit a full Traffic Assessment (TA) as part future planning applications. They will be expected to provide mitigation measures to help reduce the impact of the new development. High level modelling by the Local Planning Authority has indicated that the impact of the proposed development in this area can be satisfactorily mitigated. However, if detailed modelling carried out by the developer suggests unacceptable levels of highways impact then proposals are unlikely to be permitted. The Council is confident, however, that with appropriate mitigation in place, the impact of traffic can be managed satisfactorily.

Planners from the HMA authorities and Education Officers from both the City and County Councils are working together at a Housing Market Area level (Derby City, Amber Valley and South Derbyshire) in planning the future housing and education needs of the City to ensure that school places are available for the needs generated by the new houses. In some instances this may require the expansion of existing schools while in others it may require the building of new education facilities. Discussions will continue to ensure the best solution is achieved based on up-to-date information, the results of the next consultation and the refinement of the site allocations in the Core Strategy.

The Heritage Policy in the Core Strategy will include a requirement to ensure that development within Derby does not adversely impact upon the character and setting of heritage assets located outside of the city boundary, such as Elvaston Castle. Whilst the development site in South Derbyshire lies much closer to the Elvaston Castle if development in this area, within the City, is considered to have a significant adverse impact upon the significance of the heritage asset then it is unlikely to be approved. The emphasis will be on the developer to ensure that proposals respect the proximity of the heritage asset.

The comments from the County archaeologist have been noted. The suggested requirement can be secured through a planning condition on future applications.

Fellow Lands Way (DER/0176)

Bellway Homes and Clowes Developments support the allocation of land at Fellow Lands Way. They have stated that the overall housing provision figure is not high enough and that to aid delivery, all of the sites indicated with a star on the proposals map should be allocated. They note that the Fellow Lands Way site has no demonstrable obstacles to delivery and should be released without delay. They have stated that a planning application will be submitted in the near future which will help to fill any gaps in information about the site.

Natural England noted that the Boulton Moor SSSI is close to the development but have concluded that development would be unlikely to have an impact on it.

Members of the public have highlighted that this site is of outstanding natural beauty and that building houses will destroy the rural character of the area. They have also

identified that the site has ecological value in terms of the flora and fauna it currently supports.

The impact of the proposed development on congestion in the local area has been raised as a significant issue. Potential congestion around Chellaston High Street and Snelsmoor Lane has been identified as a concern.

One member of the public has also suggested that public transport provision is limited in this area of the city.

Concerns have been raised about the impact of development on this site on flooding in the surrounding area. One member of the public has also suggested that new homes in this area are unlikely to be insurable due to flood risk.

School provision has been mentioned as an issue in this area of the city.

One member of the public has suggested that the site is good quality agricultural land and it should be used for food production rather than housing development. There is little archaeological information for the surrounding area, though prehistoric activity has been noted on the Noel Baker School site to the north. It was recommended that the site is subject to archaeological evaluation at a pre-application stage, with geophysics in the first instance supplemented by trial trenching to validate.

Response

Developers will be required to submit a full Traffic Assessment as part future planning applications. They will be expected to provide mitigation measures to help reduce the impact of the new development. However, if detailed modelling carried out by the developer suggests unacceptable levels of highways impact then proposals are unlikely to be permitted. At this stage, the Council is confident that such detailed modelling will not conclude that the impact on traffic is unacceptable and thus this is not an impediment to the identification of the site in the strategy.

The site lies within flood zone 1; however, the developers of this area will be required to carry out detailed modelling of the flood regime and will need to set out how they intend to mitigate any potential flood risks associated with the development. If development is likely to be exacerbated in surrounding areas, proposals are unlikely to be given planning permission.

The Council consider that as part of the overall desire to reduce the reliance on the motor car that the provision of public transport to serve the new development is essential and will be working with providers to ensure that access to or existing services or improvements to services in this area are improved.

Planners from the HMA authorities and Education Officers from both the City and County Councils are working together at a Housing Market Area level (Derby City, Amber Valley and South Derbyshire) in planning the future housing and education needs of the City to ensure that school places are available for the needs generated by the new houses. In some instances this may require the expansion of existing schools while in others it may require the building of new education facilities. Discussions will continue to ensure the best solution is achieved based on up-to-date

information, the results of the next consultation and the refinement of the site allocations in the Core Strategy.

The comments regarding archaeology have been noted. The suggested requirement can be secured through a planning condition on future applications.

A planning application for this site has now been submitted and is likely to be determined by Planning Committee in November 2013.

The Broad Chellaston Area

Natural England stated that the Woodlands Lane site adjoins the Chellaston Brickworks Local Nature Reserve which is important for unimproved neutral grassland. They are glad to see that existing trees and hedges and footpaths on the eastern side of the site are being retained which are immediately adjacent to the nature reserve. They also noted that the topography is to be considered on this site in order to minimise the impact of the development on the surrounding landscape.

Agents acting on behalf of Talavera Estates Ltd supported the allocation of land to the south of Chellaston (DUA3). They envisage that the site will bring around 500 new dwellings.

The local Resident's Association raised a number of concerns about infrastructure generally to serve Chellaston including concerns about distances that residents of new homes would need to travel to facilities and about the cumulative infrastructure requirements and the number of sites.

The Resident's Association accept that growth is inevitable but do not feel that the levels of growth in the PGS are required. Emphasis should be put on meeting needs by using existing properties including regeneration of more central brownfield sites rather than using Greenfield and particularly Green Wedge sites.

Several individuals commented that the area is being choked by housing and that supporting infrastructure including schools and roads needs to be provided as well as existing infrastructure improved.

Several individuals commented about the specific school capacity problems in the Chellaston area. Schools are over-subscribed, have little or no room for expansion.

An individual commented about the fact that medical facilities in the area are stretched and would not cope with the increase in housing proposed in the strategy.

A private individual commented that parts for the Chellaston area still maintains a rural feel and building on these green areas will damage the environment of the suburb. Concern was raised about wildlife being adversely affected including birds, mammals and habitats.

An individual commented that the area is relatively crime free. New low cost housing will lead to increased crime, noise and antisocial behaviour.

Response

It is recognised that, in Derby, there is not enough brownfield land to help meet the

target of 12,000 dwellings. Although priority is given to brownfield development in the plan, a number of greenfield sites, including sites within existing green wedges, have been allocated for development. In releasing land from green wedges, an important policy objective has been to ensure a green wedge remains, albeit smaller, and to seek improvements to the remaining open area where possible.

The cumulative impact of future development on local facilities has been raised during previous consultations. The Council recognise that additional housing will have an impact on local facilities and have, through the Core Strategy process and the development of the Infrastructure Delivery Plan, instigated dialogue with the necessary infrastructure providers. Discussions have been held with Officers from the City and County Councils Education departments, utility companies, health providers and the emergency services to enable them to take account of our strategy in their future plans.

The Council, through policies in the Core Strategy, will ensure that the impact on the City's biodiversity is understood and mitigated against.

The National Planning Policy Framework requires local authorities to address the need for all types of housing, including affordable housing and the needs of different groups in the community. Evidence in the 2013 Derby HMA Strategic Housing Market Assessment suggests that the need for affordable housing in the City is significant and as a result the Council will require developers to contribute to meeting Derby's affordable housing needs.

Land off Holmleigh Way (DER0155 and DUA4)

English Nature stated that the site is bounded by the Derby Canal on the western side of the site which is also a site for BAP woodland and forms an important habitat mosaic in the area. Any green infrastructure within the proposed site could therefore link into this Local Site which will help to encourage the expansion of the local ecological network.

The Environment Agency noted that some portions of this site lie within flood zone 2 of the Cuttle Brook. The sequential approach should be applied to the site allocation. Should the site be found to be found sequentially appropriate a detailed assessment of flood risk will be required. They also advised that their records show protected species through EU Habitats Directive Annex 2 and given full protection under the Wildlife and Countryside Act Schedule 5 are known to exist within 1km of the proposed site.

The County Council's Archaeologist requested that pre-application work on the site should include assessment of palaeo-environmental potential in the vicinity of Cuttle Brook, and evaluation of the western part of the site (geophysics, trial trenching), which is close to the Swarkestone Lowes monuments.

Bellway Homes supports the allocation of the site and highlight that it is well located to local services and facilities and has good accessibility to a bus service which provides links to the City Centre. They also support the Council's assertion that new social infrastructure will need to be delivered as part of the Council's growth strategy.

An individual objected to the building of any houses on these sites because of environmental impact, loss of green land and lack of adequate infrastructure including school places and medical facilities.

Response

In Derby, there is not enough brownfield land to help meet the target of 12,000 dwellings. Although priority is given to brownfield development in the plan, a number of greenfield sites, including sites within existing green wedges, have been allocated for development.

The Council, through policies in the Core Strategy, will ensure that the impact on the City's biodiversity is understood and mitigated against.

The cumulative impact of future development on local facilities has been raised during previous consultations. The Council recognise that additional housing will have an impact on local facilities and have, through the Core Strategy process and the development of the Infrastructure Development Plan, instigated dialogue with the necessary infrastructure providers. Discussions have been held with Officers from the City and County Councils Education departments, utility companies, health providers and the emergency services to enable them to take account of our strategy in their future plans.

The comments from the County's archaeologist have been noted.

Rykneld Road (DER/0001)

Sport England objected to the loss of playing fields on this unless the loss can be justified through policy set out in the NPPF. If there is no surplus in the area, the fields would have to be excluded from our allocation or replaced. If there is no surplus these playing fields would need to be excluded or replaced and the Core Strategy will need to allocate land and identify the means to provide new replacement facilities in the infrastructure delivery plan.

Natural England suggested that this proposal could provide an opportunity to link the GI in this site, along with the proposed pedestrian and cycle routes, to the surrounding countryside and also to green spaces in the urban area such as the hospital grounds.

The Environment Agency note that the site lies within flood zone 1. They note that the Holly Brook borders the northern part of the site. This watercourse has no flood zone attributed to it due to the small nature of its catchment meaning it has not been mapped. They have reviewed a technical assessment of the risk to the development from the Holly Brook on the current undetermined planning application. They have no major concerns with this site as an acceptable maintenance strip from the brook is achievable. Irrespective of the outcome of the planning application, the proposed easement from the Holly Brook needs to be protected in all future design proposals.

The County's Archaeologist notes that the site (adjacent to the Rykneld Street Roman Road) was subject to desk-based assessment and evaluation (geophysics) at a pre-application stage. Some relatively minor areas of archaeological potential were identified, and conditions have been recommended to secure further investigation of these areas at a post-determination stage.

Residents of Kilnsey Court submitted a representation questioning our assertion that the area does not flood as they have experienced flooding twice since 2007 from the nearby brook. They also highlight that the long-term maintenance of the brook needs to be considered either by the Council or by the landowner.

Response

Comments regarding flooding are noted. The developers of this site will be required to carry out detailed modelling of the flood regime and will need to set out how they intend to mitigate any potential flood risks associated with the development. If development is likely to be exacerbated in surrounding areas, proposals are unlikely to be given planning permission.

The Council is currently completing a Playing Pitch Strategy which will provide an up-to-date assessment which will help to inform future planning decisions. However, in this instance the site in question is located in South Derbyshire and already has planning permission. The comments received by the City Council relating to this site have been forwarded to the planning officers at South Derbyshire District Council.

The comments from the County's Archaeologist have been noted.

Andrew Close (DER/0028)

The Environment Agency notes that the Hell Brook dissects part of this site. Although the site is shown to lie within floodzone 1 and appropriate easements will be required in future designs.

The County Council's Archaeologist notes that the site appears to show well-preserved medieval ridge and furrow earthworks on aerial photographs, although vegetation obscures the earthworks at ground level. The site is close to the line of the Rykneld Street Roman Road (HER 99016). The representation continues by recommending that the site is subject to archaeological evaluation at a pre-application stage, with geophysics in the first instance supplemented by trial trenching to validate.

The landowner supported the inclusion of the site and recognised that the development of greenfield sites was essential to meet the City's housing needs. They highlight that additional work has been commissioned to satisfy the Council's uncertainty over the suitability of the site. As part of the submission, they have ascertained that development of the site would not significantly impact on any heritage assets; that the ecology report highlighted that there are no constraints to development; that development would not necessitate the delivery of a new primary or secondary school and that the site is in a sustainable location.

Members of the public raised concerns over the capacity of the local road network to cope with the additional development proposed on this site; respondents highlighted that Haven Balk Lane was already congested and that the layout of the existing estate contained a number of blind and dangerous bends.

Three respondents were concerned over the loss of a valuable open space which is used by the local community. One respondent also stated that the site is used by bats for feeding. In their representation, the Friends of Littleover Park stated that,

due to its location and the diversity of flora and fauna, the site would make an ideal Local Nature Reserve. A member of the public also submitted a list of rare animals and birds which use the site.

It has been stated that Littleover Community School is oversubscribed and will not be able to cope with any additional pupils.

Response

The comments submitted by the landowner have been noted and the additional information submitted will help the Council understand the impact development would have on the area.

The comments from the Environment Agency and have been noted and an assessment would be required as part of the planning application.

The comments from the County's Archaeologist have been noted.

The site was highlighted as a 'Star Site' (potential housing site) in the Preferred Growth Strategy. This designation highlighted that the Council thought the site could come forward to help meet Derby's housing needs but more information was required before a final decision was made. On-going discussions have been held with the site promoters since the publication of the Preferred Growth Strategy however the Council are still uncertain as to the acceptability of this site and have decided not to allocate the site in the Part 1 Local Plan. There is still an opportunity for the site to be allocated in the later Part 2 Local Plan if the Council's concerns have been addressed. However, it must be noted that the land owner or anyone else can, prior to the adoption of the Core Strategy, submit a planning application for development of the site if they wish to do so. If this were the case then the application will be judged against the current City of Derby Local Plan Review and any other relevant material considerations which could include the Preferred Growth Strategy and the Local Development Framework evidence base.

Developers will be required to submit a full Traffic Assessment (TA) as part future planning applications. They will be expected to provide mitigation measures to help reduce the impact of the new development. However, if detailed modelling carried out by the developer suggests unacceptable levels of highways impact then proposals are unlikely to be permitted. As noted above, this site is not to be identified in the 'Part 1' plan at this stage. As such, there is scope to carry out further analysis of the transport impact of any proposal and any mitigation that may be required.

The Council, through policies in the Core Strategy, will ensure that the impact on the City's biodiversity is understood and mitigated against as far as possible should the site be developed.

Planners from the HMA authorities and Education Officers from both the City and County Councils are working together at a Housing Market Area level (Derby City, Amber Valley and South Derbyshire) in planning the future housing and education needs of the City to ensure that school places are available for the needs generated by the new houses. In some instances this may require the expansion of existing schools while in others it may require the building of new education facilities. Discussions will continue to ensure the best solution is achieved based on up-to-date

information, the results of the next consultation and the refinement of the site allocations in the Core Strategy.

Mickleover and Mackworth

In relation to the impact of further growth to the west of the A38, the Highways Agency (HA) have confirmed that the Strategic Road Network (SRN) within the Derby area is already under pressure, particularly the A38, and this has implications for the level and location of future development and the approach to managing future SRN impacts. The problems of congestion on the A38 route through Derby can be resolved only through the Derby Junctions scheme which will provide grade separated junctions. However, there is currently no certainty over the timescale for the delivery of these improvements. This situation means that potential impacts of development on the A38 Markeaton and Little Eaton junctions will need to be carefully considered through the Core Strategy process.

The HA has expressed significant concern over the potential impact of development to the west of Derby. They have stated that should additional development be proposed in this area, it would require its impacts on the A38 to be fully investigated so that any required mitigation and development thresholds (in relation to delivery of A38 junctions) could be fully considered. The HA have clarified the Council's understanding of their position in relation to further development on the West of the A38 by confirming that "the HA notes that, the Preferred Growth Strategy indicates that 'development [on the western side of Derby] would not be appropriate in advance of the three long-standing proposals for junction improvements on the A38'. This does not quite set out the position of the Agency as, even though it has serious concerns regarding the impact of development on the western side of Derby, judging the appropriateness of specific development proposals will require further transport assessments to be undertaken.

Response

The Government recently announced their commitment to support Highways Agency's prioritised schemes, including the A38 Derby junctions grade separation, subject to value for money and deliverability considerations. These improvements are anticipated to provide benefits both to the strategic road network and to the local transport network. The timing of these potential improvements remains uncertain and it will be important to engage with the Highways Agency during the next period of consultation to understand how this influences their position.

Onslow Road (DER/0021 & DER/0027)

Natural England raised concerns that this site is within the Mickleover School Meadow Local Wildlife Site which is an example of unimproved neutral grassland. They recognise that the proposal strengthens the green corridor along the former railway cutting but they go on to state that development will still represent a loss of habitat which is underrepresented within the City. They continued by stating that the site makes an important contribution to the wider ecological network which is a specific aim of the NPPF. Natural England concluded that the proposed allocation does not comply with the NPPF. In view of national concerns about the decline of biodiversity, the proposal should be reviewed and if an overwhelming case can be made for its retention, this should be set out as reasoned justification.

The Environment Agency stated that there is a watercourse which dissects the eastern portion of the location. Whilst the watercourse has no flood zone attributed to it, this is likely to be the small nature of its catchment meaning it has not been mapped. The EA have no major concerns in principle to the allocation of these sites, but there is currently insufficient information to demonstrate the extent of the flood zone from this watercourse, therefore the required easement for new development is unknown and a hydraulic analysis of this watercourse will be required to establish the specific flood risk arising from the watercourse and any appropriate mitigation measures.

The Environment Agency advised that allocation DER/0021 is a Local Wildlife Site which has the presence of several protected species adjacent, including those protected through EU Habitats Directive Annex 2 and given full protection under the Wildlife and Countryside Act Schedule 5.

The County Council's Archaeologist highlighted that the site borders well-preserved blocks of medieval ridge and furrow on the Murray Park School site to the east and north. I recommend that this site is subject to archaeological evaluation at a pre-application stage, with geophysics in the first instance supplemented by trial trenching to validate.

Agents acting on behalf of Bloor Homes Ltd supported the inclusion of the site in the strategy. They agreed with the assessment of the site and stated that they feel it would be delivered in five years.

A number of respondents raised concerns over the exacerbation of existing traffic issues on Onslow Road and Station Road. There was a general feeling that the area is already at capacity in terms of traffic and associated congestion, which would already be made worse by the permission off Radbourne Lane in Amber Valley. A number of people also raised concern that this would increase the risk of accidents, both from increased traffic but also as Onslow Road has a number of 'blind bends'. Similar issues were raised at both the Mickleover Neighbourhood Board and 'drop-in' sessions at Mickleover County Club.

Additional concerns were raised about the provision of 'social housing' in the area, with some commenting that Mickleover was an unsuitable location for such development.

In addition, a number of people indicated that the area did not have sufficient school places, doctor's surgeries or other facilities.

A number respondents highlighted the impact development would have on the local wildlife and the impact on the nearby Local Nature Reserve, the loss of trees and the high risk of flooding, especially on Station Road.

A member of the public submitted an ecological assessment highlighting the ancient hedgerows bounding the site and the diverse flora and fauna found on the site. The submission also highlighted that a pond (listed on the Derby City Pond Survey 2004/05) was used by Great Crested Newts.

Another member of the public highlighted that the current healthcare provision cannot support an increase in population and asks if new services will be provided.

Response

Developers will be required to submit a full Traffic Assessment (TA) as part future planning applications. They will be expected to provide mitigation measures to help reduce the impact of the new development. If detailed modelling carried out by the developer suggests unacceptable levels of highways impact then proposals are unlikely to be permitted. At this stage, however, the Council is confident that the scale and nature of the development can be accommodated satisfactorily and this should not prejudice the identification of the site in the strategy. To help allay concerns, the draft policy for the site will only allow vehicular access from Station Road and establishes the need for junction improvements at the junction of Station Road and Radbourne Lane.

The cumulative impact of future development on local facilities has been raised during previous consultations. The Council recognise that additional housing will have an impact on local facilities and have, through the Core Strategy process and the development of the Infrastructure Development Plan, instigated dialogue with the necessary infrastructure providers. Discussions have been held with Officer's from the City and County Councils Education departments, utility companies, health providers and the emergency services to enable them to take account of our strategy in their future plans.

The National Planning Policy Framework requires local authorities to address the need for all types of housing, including affordable housing and the needs of different groups in the community. Evidence in the 2013 Derby HMA Strategic Housing Market Assessment suggests that the need for affordable housing in the City is significant and as a result the Council will require developers to contribute to meeting Derby's affordable housing needs.

The Council, through policies in the Core Strategy, will ensure that the impact on the City's biodiversity is understood and mitigated against. In further assessing the suitability of the site for development, Derbyshire Wildlife Trust (DWT) have advised that the two fields within the proposed housing site that are currently part of the Local Wildlife Site (LWS) "do not support grassland vegetation of sufficient interest to be included within the LWS" and intend to recommend their deletion from the LWS. DWT do however, consider that "the hedgerows and ponds [within the proposed housing site] should potentially be retained within the LWS pending further information on the value of the ponds and possible presence of great crested newt". With this in mind the reasoned justification for the site recognises the comments made by Natural England and DWT and states "Development on the southern side of the wedge should be sensitively laid out to take into account the nature conservation interest both on and adjacent to the site at Mickleover Meadows Local Nature Reserve (LNR) and to exploit opportunities to create high quality pedestrian and cycle links between existing or proposed routes and green spaces beyond the site". The impact on the Local Nature Reserve will therefore be addressed through the planning application process and any adverse impacts will be mitigated against.

The comments from the County's Archaeologist have been noted.

Mackworth College

Sport England has objected to the inclusion of this site, unless it can be justified in the context of policy, due to its loss of playing field or other sports facilities. The allocation of the site would need to meet the tests set out in NPPF Par 74 and we would object to any loss of playing field unless one of the 5 exceptions in our policy was demonstrated as being applicable. Sport England suggest that the existing playing fields are protected and reconsideration should be given to the allocation until the Playing Pitch Strategy has been completed and clarifies if there is a surplus of playing field in the area (to meet bullet 1 NPPF Par 74). If there is no surplus Sport England feel this site would need to be excluded or facilities replaced (in accordance with bullet 2) and the Local Plan will need to allocate land and identify the means to provide new replacement facilities in the infrastructure delivery plan.

Natural England noted that the development will strengthen the green corridor provided by the Mickleover railway cutting Local Wildlife Site which is an important example of unimproved calcareous grassland.

Mackworth Parish Council supports the exclusion of land at Radbourne Lane, Mackworth and land at Markeaton Stones, Markeaton Lane from the HMA PGS's. They raised concerns that these sites would be impact on Mackworth Estate (Derby City) as there are insufficient facilities, such as doctors, dentists or shops for any additional numbers. They also raised the fact that there are not enough places at the local schools and the roads, given the huge congestion already on A52 and A38, could not cope with the additional vehicles. They also highlighted that land on Radbourne Lane is Grade 3 agricultural land and therefore, should not be developed. The Parish Council also stated that the land at Markeaton Stones is agricultural land which is prone to flooding.

Transport was one of the main areas of concern for those who responded to the consultation. Concerns related to the cumulative impact of several developments close together (including the permitted Amber Valley site at Radbourne Lane).

However, Cycling Derby recognises that this site has easy access to the existing Mackworth bus routes, and to the 'railway' cycle path. They hoped that the development would aim to cater for a minimum number of car users, given the difficult access to Mackworth, which involves negotiating either Markeaton Island or narrow residential streets.

Local respondents raised concerns regarding the loss of existing Green Wedge and proposed open space both in terms of the principle and the extent of the loss proposed by the sites at Onslow Road and land south of Mackworth College. Particular concern was also raised regarding the adequacy of the remaining wedge, the risk of Mickleover and Mackworth merging and how this could be worsened by the extension of Murray Park Secondary school, also located within the wedge, which this housing growth is likely to necessitate.

The GP Partners at Mickleover Medical Centre raised concerns that existing provision in Mickleover cannot support an increase in the level of housing. This comment is made in general and with reference to the three sites included in the

PGS in this vicinity, Onslow Road, Manor Kingsway and land south of Mackworth College.

Several comments from individuals were made about a number of issues relating to development around Mickleover. The reasons for objection to development included the general lack of adequate facilities including those at the District Centre, the increase in traffic resulting from the development creating highway safety problems and the lack of appropriate school places. Impact on wildlife, ecology and open land was also a major concern generally expressed by several people.

Several individuals responded indicating that development between Mickleover and Mackworth would have an unacceptable impact on the Green Wedge and would narrow it to the point where it could not maintain its function in separating the communities of Mackworth and Mickleover adequately.

Response

As part of developing the evidence base for the respective Core Strategies, the HMA undertook a transport modelling exercise, initially, for the Derby Urban Area. The exercise considered the cumulative impact of development thus helping Officers understand the impact development will have on the local highway network. Developers will be required to submit a full Traffic Assessment (TA) as part future planning applications. They will be expected to provide mitigation measures to help reduce the impact of the new development. High level modelling by the Local Planning Authority has indicated that the impact of the proposed development in this area can be satisfactorily mitigated. However, if detailed modelling carried out by the developer suggests unacceptable levels of highways impact then proposals are unlikely to be permitted.

The Green Wedge Study assessed the potential of this site for development in terms of the impact on the Green Wedge. It suggested that “there may be some potential scope to release additional land on either side of the green wedge at the former Mackworth College site and at Onslow Road / Station without undermining the overriding principle of the green wedge. As currently promoted, the sites in these locations would lead to an unacceptable level of narrowing and would create a pinch point in the centre of the green wedge. If development could be 'rounded off' on both sides it may overcome some of the major concerns, although there would clearly still be narrowing of the green wedge.”

The cumulative impact of future development on local facilities has been raised during previous consultations. The Council recognise that additional housing will have an impact on local facilities and have, through the Core Strategy process and the development of the Infrastructure Development Plan, instigated dialogue with the necessary infrastructure providers. On-going discussions have been held with the Primary Care Trust and its replacement, the Clinical Commissioning Group, to highlight the Council's growth strategy and allow them to formulate a strategy in response. Discussions have also been held with the City and County Council's Education Departments, utility companies and the emergency services to enable them to take account of our strategy.

The comments from Sport England are noted. To ensure compliancy with the NPPF and to satisfy Sport England's concerns the Council is currently carrying out a

Playing Pitch Strategy. The Strategy will examine current provision of playing pitches, tennis courts and bowling greens and will provide a series of recommendations and standards which will be used to inform both the Core Strategy and all future planning decisions.

Hackwood Farm (DER/0018)

Although not allocated in the strategy, four members of the public submitted comments on this site. One member of the public thought that the site should be included while the remaining respondents supported the Council's decision not to allocate it; citing flooding and school capacity issues.

The County Council's Archaeologist noted that the site forms part of a landscape block probably representing fossilisation of medieval strip fields, albeit with some enlargement of fields in more recent times. Because of its scale it should be subject to archaeological evaluation at the pre-application stage (geophysics and trial trenching).

Representations were submitted on behalf of Miller Homes stating why they consider the site should be allocated. The submission focussed on land within the City boundary but also recognised the benefits of allocating a larger, cross-boundary site. The submission stated that the site was in a sustainable location and is well connected to local facilities and services. They recognise that public transport links are, at the current time, poor but are confident that this situation will change when development occurs. In addition, they consider that development would offer economic benefits to the area. They recognise that a larger, cross-boundary development would result in more facilities being provided on site, including a primary school.

Subsequently to the Preferred Growth Strategy consultation a planning application has been submitted to the City Council for residential development, retail development and open space uses on the site. The application is, at the time of drafting this report, undetermined but it has drawn over 100 objections, particularly from local residents.

Response

The comments submitted regarding this site have been noted and considered. It is likely that the level of response to the PGS consultation was low because the site had not been identified as a preferred growth location. However the level of objection to the current planning application indicates that there is a high level of objection to the development of the site.

The Preferred Growth Strategy identified a number of reasons why the site was considered inappropriate for housing development. These all related to the sustainability of the site and included in particular:

- *Issues relating to intrusion into the countryside*
- *Potential Impacts on the setting of Radbourne Hall*
- *Proximity to existing facilities and Services*

- *Insufficient capacity in local schools*
- *Public transport accessibility*
- *Impact on the A38*

As part of their response to the Preferred Growth Strategy Consultation, the promoters provided a series of possible solutions to address many of these issues. Although these will not address all of the concerns, such as the distance to Mickleover District Centre, it is now considered that the site is acceptable in principle for residential development given assessed housing needs.

More specifically, the promoters have identified that they could provide a new primary school on site to meet school place needs. They have also set out proposals to establish a local centre on site in order to meet the immediate local shopping needs arising from the development and proposed junction improvements at the Station Road/Radbourne Lane junction have been submitted. New pedestrian and cycle links can be formed to connect the site better to existing networks and the wider Mickleover area, including the District Centre including a pedestrian and cycle bridge over the Mickleover to Egginton Greenway. Bus penetration into the site has been deemed possible. The promoters have also suggested that, as part of a wider cross boundary development into South Derbyshire, they can provide landscape screening/buffering to protect the setting of Radbourne Hall and to create a better integration with the open countryside beyond.

Further, there is a possibility of considering land drainage and flood mitigation measures as part of the development which would alleviate flooding problems affecting existing residential properties close to the site.

Since the publication of the Preferred Growth Strategy, the Government has announced 'pinch point' funding for interim improvements to the A38 and more recently their commitment has been confirmed to support Highway Agency prioritised schemes, including the A38 junctions and grade separation, subject to value for money and deliverability considerations.

It should be noted that at the time of writing this report, the planning application which only relates to land in Derby City has not been determined. The applications details are not fully consistent with all of the measures identified above and in particular do not propose any development in South Derbyshire nor any new on-site new school.

Manor Kingsway (DER/0003)

Natural England recommended that the proposed replacement public open space should link with the surrounding natural habitats which include the Local Sites of the Bramble Brook and the A38 Roundabout, an example of semi improved natural grassland, in order to strengthen local ecological networks.

Two members of the public submitted commented on this site. One thought that development would be a benefit as long as open space is included while the other considered that it is vital to protect the green space as it is.

Another member of the public highlighted that the current healthcare provision cannot support an increase in population and asks if new services will be provided.

The Campaign for Better Transport raised a number of concerns about this site. It is not clear where on the site housing would be provided and the site is poorly served by public transport.

A number of respondents highlighted the congestion in this area while one respondent pointed out that current healthcare provision would not be able to cope with the additional housing.

Response

It is estimated that development on the Manor Kingsway site will provide around 700 dwellings and the provision of high quality, accessible open space is essential to meet the needs of the community. Based on existing provision the Council, through the application process, will determine if open space will be provided on-site or if improvements will be made to existing sites in the vicinity.

The site now has planning permission for a scheme meeting the broad requirements of the policy. The impact on traffic has been considered as part of this process. It is considered that, with the required mitigation measures in place, the development will have an acceptable impact on traffic and congestion.

The Council consider that as part of the overall desire to reduce the reliance on the motor car that the provision of public transport to serve the new development is essential and will be working with providers to ensure that services to this area are improved.

The Council recognise that additional housing will have an impact on local facilities and have, through the Core Strategy process and the development of the Infrastructure Development Plan, instigated dialogue with the necessary infrastructure providers. Discussions have been held with Officers from the City and County Councils Education departments, utility companies, health providers and the emergency services to enable them to take account of our strategy in their future plans.

Wragley Way, Sinfin and Stenson Fields (DER/0104, DUA5, DUAPP2 & DUA6)

Please note that while much of this proposal sits outside the City boundary, the Council has received a number of comments about the proposals and they are included here for completeness.

The Environment Agency noted that the Barrow Drain borders the southern extent of the site, and part of the site lies within flood zone 2. They highlight that a sequential approach should be applied to the site allocation. Should the site be found to be sequentially appropriate a detailed assessment of flood risk will be required and appropriate easements from the watercourse should be considered in any future development design. The Environment Agency's records show several protected species across parts of this area which are protected through EU Habitats Directive Annex 2 and given full protection under Wildlife and Countryside Act Schedule 5.

Network Rail suggested developing a new railway station on the Derby to Burton line. In their submission they recognised that there are issues of capacity and rolling stock, and limited scope for a regular stopping pattern at present, but they considered that the provision of a station at this location could be a practical solution when combined with a Park and Ride facility for the City. They highlight that funding could be an issue as new stations are expected to be self-supporting but suggested solutions to this. Finally, they recognised that this suggestion would have to be considered in conjunction with the future of Pear Tree Station. Network Rail concluded that further feasibility work, including impact on capacity and timetables would have to be carried out along with exploring how this could be funded.

The County Council Archaeologist noted that a geophysical survey and evaluation trenching of this site in 2006 identified no archaeological potential beyond channel fill deposits with palaeo-environmental potential, although the evaluation did not cover the eastern end of the potential allocation site where the boundary intersects a known prehistoric cropmark site (HER 27419) and is close to other known south of the A50. Pre-application work for the site should therefore include geophysics and trial trenching of the eastern area not previously covered. Work on the central/western areas should be restricted to investigation of the channel fill deposits which could be secured by planning condition.

Hallam Land Management Limited supported the Council's allocation of land at Wragley Way and considers that the two sites (DER/0104 and DUA6) could bring a wide range of social, economic and environmental benefits. To support their comments Hallam Land Management submitted a vision for the sites. They also consider that development at Wragley Way could facilitate the development of the Global Technology Cluster.

Hallam Land Management Limited continued by noting that paragraph 9.12 refers to two new primary schools. They state that options to provide the necessary education infrastructure to accompany development need to be explored further but the solution could be one two form entry primary school rather than two one form entry schools.

Rolls Royce stated that their order book is very healthy and that over the next 20 years additional people will need to be attracted to work in Sinfin. It is key that the city and environs are an attractive place to live and work in order to ensure that employees are successfully recruited and retained.

A number of comments from local residents have been received raising concerns over the principle of developing on greenfield sites on the edge of the City.

Comments were received relating to potential safety issues on Deep Dale Lane that would result from increased activity in the area.

A local Councillor submitted comments on the impact the proposals set out in the Preferred Growth Strategy would have on the area. He feels that additional development would increase the amount of traffic and thus make the existing situation worse. He also questioned the inclusion of a connection with T12 was

questioned, was it a necessary? He continues by highlighting the visual impact the new road would have.

Response

It is recognised that, in Derby, there is not enough brownfield land to help meet the target of 12,000 dwellings. Although priority is given to brownfield development in the plan, a number of greenfield sites, including sites within existing green wedges, have been allocated for development. The principle of Derby City Council working with its neighbours (Amber Valley Borough Council and South Derbyshire District Council) to meet the three authorities housing need was established in the Regional Plan. The Distribution of housing across the Housing Market Area was developed as it was recognised that Derby cannot meet all of its identified housing need within its administrative boundary. It was also considered that urban extensions to the City would provide the most sustainable solution.

Planners from the HMA authorities and Education Officers from both the City and County Councils are working together at a Housing Market Area level (Derby City, Amber Valley and South Derbyshire) in planning the future housing and education needs of the City to ensure that school places are available for the needs generated by the new houses. In some instances this may require the expansion of existing schools while in others it may require the building of new education facilities. Discussions will continue to ensure the best solution is achieved based on up-to-date information, the results of the next consultation and the refinement of the site allocations in the Core Strategy.

High level modelling by the Local Planning Authority has indicated that the impact of the proposed development in this area can be satisfactorily mitigated subject to the provision of Phase 1 of the 'South Derby Link Road'. This will be a key piece of infrastructure that will also be needed to help create additional capacity on the network as a whole (and thus help to mitigate the impact of other developments). It is considered that this is a necessary piece of infrastructure that can have significant benefits for the City as a whole. The design of the road is too detailed an issue for the Core Strategy, however, general policies on design and landscaping would apply.

The draft policy for the site will also require the implementation of new / improved cycle and pedestrian links – in particular to help improve accessibility to the nearby District Centre and strategic employment area to the east.

The allocation of a site for a new railway station and associated Park and Ride would, most likely, be situated in South Derbyshire therefore, a detailed response would be provided by Officers from South Derbyshire District Council. Briefly however, the HMA authorities tentatively explored the possibility of developing a station close to the City but informal discussions with Network Rail highlighted the issues over the network's capacity and funding issues. Therefore, it was considered that if there is a desire to progress this at a later stage in the plan process, additional and detailed work would have to be undertaken.

The comments from the County Council's Archaeologist have been noted.

It should be noted that subsequently to the Preferred Growth Strategy consultation

the site promoters have submitted a planning application for 130 dwellings on part of the land which is in the City south of Wragley Way. At the time of writing the planning application is undetermined and the applicants are and are continuing to provide further information to both the City Council and South Derbyshire District Council to support and evidence the allocation of the cross boundary strategic location as a residential development location.

Global Technology Cluster

Natural England noted that the GTC proposal is adjacent to the Sinfin Moor Lane Meadows Local Nature Reserve. They would wish to ensure that this site would not be adversely affected by the proposal. In addition, they noted that the Sinfin Moor Lane stream, which crosses the site, could support a population of water vole. As the water vole is protected under section 9 of the Wildlife and Countryside Act 1981 (as amended) it should be ensured that before a planning application is made that the developer carries out appropriate surveys to establish whether water voles are present in and adjacent to the area. If water voles are present then the proposal may need to be amended to ensure that the work does not result in an offence i.e. does not result in disturbance to water voles or in loss of their burrows.

Natural England welcome the wildlife protection measures that the proposal incorporates including an environmental protection zone along the Sinfin Moor Stream and either side of Sinfin Moor Lane, a wildlife site and walkways, structural planting and extensions to both Moor Plantation and Sinfin Moor Park. They have also noted that the green wedges either side of the development will be protected and will provide opportunities for habitat creation and biodiversity enhancement.

The Environment Agency noted that they have previously provided comments for this site. They consider that, on reflection, that the flood risk assessment they have been presented with will form an important part of the masterplan and detailed development proposals. They conclude that they have no concerns with the allocation of the site for employment use from a flood risk perspective. However, they state that Officers should refer to their comments on the site allocations submitted to South Derbyshire.

The County Archaeologist has noted that geophysical surveys and some evaluation trenching has taken place on all but the southern part of this site (south of Lea Farm). This work has suggested that the majority of the site is of little archaeological potential, having been a shallow lake in the Palaeolithic period and remained marginal until very recent times. Some potential for Palaeolithic lake-edge deposits was identified towards the eastern edge of the site and it is proposed that this area (only) is targeted by a conditioned scheme of work. South of Lea Farm, no work has been undertaken, though a similar pattern seems likely. It is recommended that desk-based assessment is carried out in the first instance to assess the extent of lacustrine deposits in this area, and to identify any further areas of potential.

Christ Church College (Oxford) own some of the land associated with Lea Farm at the southern extent of the proposed allocation. They have stated their support of growth to the south of the city and are confident that employment uses could be developed during the Plan period.

Hallam Land Management supports the employment allocation for the land south of Wilmore Road which includes the Global Technology Cluster. They acknowledge that an extension into South Derbyshire is a long-term prospect and consider that the residential allocation to the south of Wragley Way would help support the employment allocation.

Rolls Royce asked the Council to clarify how the impact of re-routed traffic using the new T12 link road will be mitigated in the Sinfin Campus area. Rolls Royce have acknowledged that they would like to make spatial, environmental and safety improvements to the Sinfin Campus area and therefore understanding the impact of T12 will be key to decisions in this area.

The Campaign for Better Transport support the development of this site, although they have noted that it is not clear how the site will be connected to the rest of the city by car, cycle and bus. They have suggested that a developer funded bus service should be provided and that realistic travel plans should be submitted by businesses to show how they are discouraging car use. It is noted that this is particularly relevant to those businesses that are not directly related to the technology cluster and could potentially be located elsewhere.

Two respondents have stated their support for the vision of economic regeneration and enablement of high tech enterprises including the Global Technology Cluster

One member of the public suggested that the GTC could have parking within the ground flood of buildings or on the roof of buildings to reduce land take and to help integrate development with the environment.

A Councillor has raised concerns about the impact of a new road crossing Sinfin Moor Lane in order to access the allocated land to south, around Lea Farm. It has been suggested that the principle of this goes against the existing Local Plan allocation. An alternative route running from the Holmleigh Way roundabout to the Lea Farm site has been suggested, in order to safeguard the route of Sinfin Moor Lane. It is suggested that links between the land to north and south of Sinfin Moor Lane are unnecessary.

It has also been suggested that severance of the recreational route would have an impact upon the mental health of local people.

Response

The comments supporting the allocation have been noted and welcomed.

The comments from Natural England regarding the possible presence of Water Voles on the site have been noted. As part of any planning application the Council will expect that an appropriate ecological assessment is undertaken identifying the nature and extent of any impact and mitigating measures that need to be taken. The Core Strategy policy for this site will include a number of environmental measures that will seek to protect the biodiversity and nature conservation value of the area.

As part of the preparation of the Core Strategy, detailed traffic modelling has been carried out to help understand the impact of proposals, including the new link road. In addition to this, modelling was also carried out in support of a planning application

for the new link road which Planning Control Committee resolved to grant in 2013. The results of this modelling are publicly available and can be used by Rolls Royce to help inform proposals for the Sinfin Campus area.

Developers will be required to submit a full Traffic Assessment (TA) as part future planning applications. They will be expected to provide mitigation measures to help reduce the impact of the new development. High level modelling by the Local Planning Authority has indicated that the impact of the proposed development in this area can be satisfactorily mitigated through the implementation of T12 and the 'South Derby Link Road'. However, if detailed modelling for specific elements of the site were to suggest unacceptable levels of highways impact then proposals are unlikely to be permitted.

The Proposals Map for the existing City of Derby Local Plan Review shows an indicative alignment for the proposed T12 link road and includes indicative lines coming from the central roundabout heading east and south towards Sinfin Moor Lane. Whilst this indicates that Sinfin Moor Lane may need to be crossed in order to access the land to the south, there may be other options that could provide access to this land, without crossing Sinfin Moor Lane. The Core Strategy will continue to identify the principle of the T12 link road and the 'South Derby Integrated Transport Link' which will connect this area to Wragley Way. However, further work is needed to identify the exact of alignment of the road that will connect T12 to Wragley Way and the land south of Sinfin Moor Lane. The draft policy for the site will highlight what issues will need to be considered in any design, in particular the need to minimise the impact on the recreational and biodiversity value of the route.

The Core Strategy Policy for this area will include a requirement to ensure that development proposals respect the biodiversity and recreational value of Sinfin Moor Lane.

The comments regarding archaeology have been noted. The suggested requirement can be secured through a planning condition on future applications.

Former Celanese Site

Agents representing Celanese Acetate Limited (CAL) submitted detailed comments including a draft development framework showing how the site could be developed in the future. Having carried out a high level review of the constraints on the site, such as flooding, access and contamination, they have suggested that the site could be viably redeveloped for a mix of uses including residential development. Initial suggested uses include, over 1000 new homes, 4.5 hectares of new employment space, 17.5 hectares of new public open space and space for new community uses. They have also noted that there may be some potential for a new park and ride service and upgrading of the existing level crossing.

A small number of members of the public have also identified that some parts of the former Celanese site may be appropriate for housing development.

Network Rail supports the Council's desire to develop a vision for the re-use of the former Celanese site. Network Rail is particularly interested in the impact of new

development on Spondon Station and the potential to remove the level crossing adjacent to the site.

Natural England noted that the proposal is located beside the River Derwent with the Acordis Effluent Beds Local Wildlife Site on the east bank which includes a Derbyshire Wildlife Trust BAP habitat. They would wish to ensure that this site remains undeveloped and left as a natural area beside the river with appropriate protective measures applied to it. In addition, they have also noted that there is a Local Wildlife Site, known as Alvaston Scrub, an area of unimproved natural grassland, immediately to the south of the site together with Biodiversity Action Plan (BAP) flood plain grazing with some small areas of Habitat Action Plan woodland areas. Further to the south is the Elvaston Local Nature Reserve which is part of the Elvaston Country Park. Natural England would wish to ensure that the proposed development does not adversely affect any of these protected areas and have suggested that a buffer zone is left undeveloped on both sides of the River Derwent.

One respondent suggested that the Celanese site should be considered for development, particularly in light of proposals to re-open the Derby-Sandiacre Canal.

Response

The Council welcome engagement from Celanese Acetate Limited and wish to continue working with their representatives to develop a vision for the re-use of this strategically important site. Discussions are still at a very early stage and further work is needed in order to understand the constraints to enable the full consideration of mixed-use development in this location.

As part of any planning application the Council will expect that an appropriate ecological assessment is undertaken identifying the nature and extent of any impact and mitigating measures that need to be taken.

Derby Commercial Park

Natural England noted that the proposal is located beside the River Derwent with the Acordis Effluent Beds Local Wildlife Site on the east bank which includes a Derbyshire Wildlife Trust BAP habitat. They would wish to ensure that this site remains undeveloped and left as a natural area beside the river with appropriate protective measures applied to it. In addition, they have also noted that there is a Local Wildlife Site, known as Alvaston Scrub, an area of unimproved natural grassland, immediately to the south of the site together with Biodiversity Action Plan (BAP) flood plain grazing with some small areas of Habitat Action Plan woodland areas. Further to the south is the Elvaston Local Nature Reserve which is part of the Elvaston Country Park. Natural England would wish to ensure that the proposed development does not adversely affect any of these protected areas and have suggested that a buffer zone is left undeveloped on both sides of the River Derwent.

The Environment Agency have previously provided comments regarding the land to the south of the River Derwent highlighted in this site allocation and have no objection to allocating the site for employment use, subject to the submission of a Flood Risk Assessment (FRA) with planning applications.

The Environment Agency also identified that the land to the north of the River Derwent lies largely in Flood Zone 3. With the development of the OCOR vision, it is

envisaged that the flood risk to this land will be reduced. Whilst the EA have no major concerns regarding the allocation of the land for employment use, a detailed FRA will be required alongside planning applications.

The County Council Archaeologist has identified that the eastern portion of the site falls within the Historic Environment Record (HER) for the British Celanese site, although there is no evidence to suggest significant industrial activity in this part of the site. The western part of the site includes HER records for ridge and furrow earthworks and a medieval pottery scatter. Both parts of the site may have undergone recent landscaping and it is recommended that archaeological desk-based assessment is carried out in the first instance to identify any remaining potential.

Response

The comments from the Environment Agency and the County Archaeologist have been noted.

There are already a number of permitted planning applications relating to development on this site, including an outline planning permission covering the full extent of the allocation. Infrastructure works including highways and flood alleviation works have already been completed, including the provision of a new wetland area as part of the flood alleviation programme. Construction of the first buildings on this site has now commenced.

Derwent Triangle (Chaddesden Triangle)

Network Rail, the current owners of the site, and St Modwen, who have been selected as Network Rail's development partner, have both supported the inclusion of the site within the PGS. Both, however, have raised concerns over the range of potential uses included in the document and have requested that the final policy takes a more flexible 'bespoke' approach to uses. An 'illustrative' masterplan has been submitted for discussion purposes. In particular, they have indicated a desire for a range of 'complementary' uses. While they indicate that they wish to continue a dialog with the Council, and any proposals are open for further discussion, they have indicated a desire to see scope for such uses as car showrooms, pub/diners, restaurants, hotels and leisure uses. They also wish to see a proportion of the site given over to the development of a large retail store. They argue that this is necessary to enable the delivery of the site and that it would complement retailing in the City Centre. A number of reports have been submitted by St Modwen in support of these proposals. They provide evidence relating to the employment land market, the justification for retail and ecological issues.

The City of Derby Local Plan Review (CDPLR) identifies land to the south of the 'Chaddesden Sidings' site as an area of Green Wedge and proposed leisure and recreation. Network Rail has asked for the Green Wedge boundaries in this area to be revised in order to allow potential rail, or employment, development to take place. They argue that the existing boundaries are arbitrary and an 'historical accident' following gravel extraction. However, they do accept that development here would impact on the 'openness' of the Green Wedge. The Council's Green Wedge Study indicates that part of the function of this area is also to provide flood storage. It has been suggested that re-alignment would be particularly helpful in view of the

possibility of new stabling accommodation in this location for trains upon electrification of the Midland Main Line, planned for around 2020.

English Nature Stated that the site is immediately adjacent the River Derwent, which is a Local Wildlife Site, with the Sanctuary Local Nature Reserve on the opposite bank. There is also a riverside path running along the length of the Derwent in this area. Natural England would therefore wish to ensure that these areas are appropriately protected and are not adversely affected by the proposal. They suggested that an appropriate buffer zone is left undeveloped beside the River Derwent which can be planted with native species and contribute to the local ecological network and green infrastructure of the area.

The Environment Agency recognises that the site forms part of the Our City Our River flood alleviation scheme and highlight that all potential development visions will have to be referred through the joint Environment Agency/Derby City OCOR teams at the earliest opportunity. Their submission continues by stating that the site overlies alluvium above the Mercia Mudstone Group which are classified as Secondary A and B aquifers respectively. This potential site allocation is located on a former landfill site and its development has the potential to cause pollution to the groundwater resource and will require careful consideration and an appropriate environmental assessment that covers the whole site. They conclude by stating that they have not had any detailed involvement with this site however we have recently provided comments for an application on part of the site where we noted that the central, north western and eastern-most areas of the site have not been targeted for inspection. Given the previous use of the site as railway sidings that contain spoils of spent ballast, it would be prudent to ensure that all parts of the site have been suitably investigated.

Westfield [*represented by Quod*] raised concerns about the potential for retail, or other closely related uses (such as cinemas) on the site. They argue that the wording used in the PGS is too open-ended. They argue that retail on the 'Chaddesden Triangle' site would be contrary to the NPPF and that it could undermine investment in the City Centre. Westfield also suggest that any policy for the site should make it clear that, in the event of relocation of retail development from other areas, that there would be no net increase in floorspace permitted or any change to the range of goods currently permitted to be sold.

Although not objecting to the allocation, Lafarge Aggregates Ltd have indicated that they have an existing aggregate recycling facility and ready mix concrete facility based at Chaddesden Sidings. They state that the operation lies in close proximity to potential growth and consideration is given to ensure that development would not compromise or jeopardise the continued operation of the facility. They highlight that operations has the potential to give rise to adverse environmental impacts on adjoining users through HGV movements, noise and dust.

The County Council's Archaeologist indicated that although the site has undergone significant ground disturbance during the last century, a desk-based archaeological assessment should be undertaken to confirm its land use history.

Response

The comments from English Nature relating to nearby features of environmental

importance are noted. The draft policies in the Core Strategy provide adequate protection for both the River Derwent and Local Nature Reserve resulting from any development on this, or any other, site in the City. Furthermore, the draft policy for the site requires developers to require the 'satisfactory treatment' of the River, not only in terms of its natural history value, but also in terms of its visual and recreational importance. The draft policy does not stipulate that a buffer should be provided, or provide detail on how this 'treatment' should be implemented. It is considered that this is something that would be too detailed for the Core Strategy policy and what could be addressed at application stage. The draft policy does, however, make reference to potential flood mitigation measures being incorporated into the Lower Derwent Green Wedge. This could also help to address English Heritage's comments over time.

The Environment Agency's comments relating to flooding and OCOR are thought to be adequately addressed by the draft policy. It will make specific reference to the implementation of OCOR and providing satisfactory flood mitigation measures.

Comments on potential contamination of the site relating to landfill are noted. It is considered that this issue can be addressed through the normal development control procedures and should not be an impediment to allocating the site for business and commercial development.

It is not considered that a suitability robust case has been made to allocate the site for large scale retail development, either in terms of national retail policy or viability. The main argument appears to relate to viability and, at this stage, details of the overall scheme or the financial requirements associated with it are not fully understood. In light of the potential impact of any large scale retail proposal – and uncertainty over what this may mean for other retailing in the area – an allocation would not be a sensible approach.

It is recognised, however, that there may be situations where alternative development to basic 'employment' uses may be needed to facilitate development. This may not always have to be retail. As such, the draft policy will allow for alternative uses subject to a number of criteria. This will include the extent to which it is needed to facilitate the comprehensive delivery of the site and facilitate other required infrastructure to allow access to the site. This approach allows the prevailing context to be taken into account at the time of any application and does not pre-judge the role – or impact – of retail. It is considered that this approach may also alleviate some of the concerns of Westfield with regard to impact on the City Centre.

While not specified as an acceptable use on the site, it is recognised that there may be some scope for leisure uses which can complement the major leisure activity on Pride Park (including the football stadium, multi-event arena and indoor football centre/gym). Such uses would still be subject to the criteria of the policy, however.

Issues relating to archaeology can be addressed adequately through draft and saved policies and it is not considered that the strategic allocation of the site should have any impact on existing operations.

The comments from the County Archaeologist have been noted.

Topic Specific Comments

The Built Environment

One individual highlighted the need for well-designed residential areas, noting that the design of new developments is just as important as the location. The design of developments should help to engender community cohesion and social interaction so that neighbours can look out for each other. This is particularly important given the ageing population.

Another respondent suggested that the development industry needs to be more innovative and imaginative in terms of design. They suggested solutions such as underground parking should be investigated.

One respondent raised the issue of how 'Building for Life' and 'Lifetime Homes' standards relate to the new 'bedroom tax'.

Response

It is agreed that the design of new homes is just as important as their location. The Core Strategy will outline the Council's commitment to following the 'Building for Life' approach to housing design to help ensure that there is an improvement in housing design in the future. The Council also intends to produce a design guidance document to try and bring together best practice guidance and raise the overall design standard of the city.

The Core Strategy needs to strike a balance between providing enough guidance to help raise the overall design standard of the city, whilst not wanting to be overly prescriptive. The Council is supportive of innovation and is keen for developers to develop imaginative proposals.

The Core Strategy cannot control who moves into individual properties. Therefore, it is not possible to know whether units will be occupied by people receiving housing benefit. Any property could be purchased and then privately rented to someone who is in receipt of housing benefit.

The Building for Life and Lifetime Homes standards only seek better and more inclusive residential designs, they do not stipulate how many bedrooms should be provided.

The Historic Environment

English Heritage welcomed the recognition within the vision to protect Derby's unique built heritage and references to regeneration within the Derby Valley Mills World Heritage Site.

English Heritage have highlighted that the PGS makes no reference to archaeology and other historic environment attributes under section 5.10. They regard this as a significant omission.

English Heritage highlighted the need to complete the Tall Buildings Strategy for the City Centre.

English Heritage noted that the justification for housing growth section should make greater reference to historic environment considerations to be fully compliant with the National Planning Policy Framework.

The National Trust appreciated the recognition of the challenges to protect the City's unique heritage. They also welcome the recognition of the significance and contribution that heritage assets make to Derby residents, workers and visitors – including the wider consideration of nearby assets outside the City boundary but which also play an important part in the life of the City and its attractiveness, especially for investment and tourism.

The National Trust welcomed the decision not to allocate strategic housing sites on the northern and western edges of the city due to the potential impacts on the settings of Kedleston Hall and Radbourne Hall.

The County Council's Archaeologist stated that large greenfield sites, even where no known archaeological constraints are present, retain significant potential for hitherto unknown archaeological deposits. The majority of greenfield housing allocations will therefore require some form of pre-application archaeological input (typically geophysics, usually supplemented with validating trial trenching) to establish the presence/absence, character and significance of archaeology on the site. They continue by stating that the City Centre is the location of an Archaeological Alert Area (City of Derby Local Plan Policy E21), corresponding to the area of the Saxon and medieval town. Larger developments here are likely to require desk-based assessment and the results of archaeological field evaluation.

One respondent has stated their support for the protection of heritage and the sensitive transformation of the Darley Abbey Mills site.

Littleover Neighbourhood Board stated their support for protecting Derby's unique built heritage.

One individual highlighted the importance of maintaining the frontages and skyline of Sadlergate and noted that high rise development around the Cathedral Quarter area could impact upon views of the Cathedral and the openness of Cathedral Green.

Response

Comments of support for the Council's approach to heritage are noted.

The heritage policy in the Core Strategy will make reference to protecting archaeology and other historic environment attributes.

The Tall Buildings Strategy was completed but has never officially been adopted by the Council. It was originally intended to form part of a Design SPD, however work on the wider document has not progressed. The Core Strategy will identify locations in the city centre that are more and less appropriate for tall buildings, utilising the findings of the Tall Buildings Strategy. In addition to this, the Council is currently reviewing options for how the Strategy can be incorporated into future design guidance.

The justification of the draft proposals will make greater reference to historic

environment considerations in order to be fully NPPF compliant.

Green Wedges

Network Rail noted that there is still a need to identify greenfield land for development and welcomed the commitment to re-assess the role and function of the City's Green Wedges.

Erewash Borough Council consider that it is important that the City Council maintains its approach to protect the principle of Green Wedges as they fulfil a key purpose in providing green corridors that help link the City's urban areas to surrounding open countryside. We do however agree with the City Council's consideration that an over-reliance on brownfield sites may become unviable in light of economic conditions that are likely to continue to impact upon the construction sector. It is thought that the need for new greenfield sites will need to stay under review in order to provide an appropriate amount of development land to help the City Council meet objectively assessed needs.

A site promoter suggested that the Core Strategy should not include Green Wedge designations as the NPPF does not support such designations. Therefore, the continuation of such a policy would not be justified.

Rolls Royce supported the principle of Green Wedges and suggested an adjustment to the Allenton/Sinfin Green Wedge in order to allow them to build new accommodation to the north of Merrill Way.

A member of the public welcomed the publication of the Council's Green Wedge Review.

A member of the public supported the Council's desire to keep the Green Wedges and suggested that sites located on Green Wedges should be kept in reserve in case they're not needed for development.

The Campaign for Better Transport has highlighted the need to ensure retention of a viable Green Wedge between Alvaston and Chellaston.

Response

Support for the principle of Green Wedges is noted.

Each Green Wedge in the City was reviewed as part of the Green Wedge Study (2012). This provided valuable evidence as to where there may have been opportunities to release land for development without undermining their core role and function. This has led to the identification of a number of development sites within Green Wedges. However, in each case it is felt that the function of the remaining Green Wedge would not be undermined. It is felt that this work also provides a robust evidence base for the protection of land within Wedges considered necessary to retain their function.

The Core Strategy will maintain the principle of Green Wedges within Derby. They are a long standing policy objective. Whilst the NPPF does not make specific reference to the inclusion of policies within Local Plans to protect Green Wedges, it does recognise the importance and value of green infrastructure which Green

Wedges form a fundamental part of in Derby.

Notwithstanding this, there may still be a necessity to review some additional Green Wedge boundaries in 'Part 2' of the Local Plan in order to meet overall housing needs.

Green Infrastructure

The Environment Agency stressed that the City Council has an obligation to improve and maintain water quality and new development can be seen as an opportunity to do this; the EA highlights that this can be done by improving the connectivity and biological complexity of all watercourses in design proposals by, for example, creating tree-lines water bodies. The EA also stated that they would be concerned about the loss or damage to any BAP habitat or species and want assurances that local, regional and national priorities are protected; also that any loss or damage to priority habitats are mitigated for and offer a net gain for biodiversity.

The National Trust supported the approach set out in the Core Strategy. They recognised that the City is quite extensively built up to its boundaries it is essential that space is found to provide good quality, multi-functional, green infrastructure to meet a range of needs. Key among these is the importance of the Green Wedges and the access that they provide to the countryside around Derby, especially that of landscape, ecological and historic importance.

The Woodland Trust highlighted the importance trees and woodlands, planted in appropriate locations, can play in improving water quality and help to alleviate certain types of flooding. The Trust also states that planting trees in urban areas can enable people to adapt to climate change through shading of buildings and open spaces and thus reducing temperatures in summer. In addition, the Trust would like to see irreplaceable habitats such as ancient woodland and ancient/veteran trees given absolute protection from development. Care should be taken to ensure that no development destroys or damages ancient woodland and the Woodland Trust would like to be consulted on the impact. The Trust would also like the Core Strategy to set targets for new woodland creation and tree planting as part of an integrated network of green infrastructure (refer to the Trust's "Access to Woodland Standard").

St Modwen RPS supported the strategy to improve the City Green Infrastructure network. They go on to state that the Chaddesden Triangle can assist with green infrastructure enhancements by improving the riverside environment of the site incorporating flood defences into the design and the safeguarding of land along the southern boundary of the site to enable the reinstatement of the former Derby and Sandiacre Canal.

The Friends of Littleover Park stressed the importance open space plays in promoting peoples well-being, especially in high density developments where gardens tend to be smaller. They also underlined the importance of hedgerows, ditches and brooks in providing routes between wildlife areas and open space. With regard to hedgerows they stressed that thought should be given as to how they can be incorporated into new developments and consideration given to their future maintenance. They continued by stating that brooks should not be canalised or culverted and that drains need to be both safeguarded and managed. Finally, they

stress that new open space should include links to existing spaces and be designed and managed in a way that supports both human use and biodiversity.

One member of the public supported the Plan's desire to create a Green Infrastructure network.

Members of the public stated that greenfield sites, especially the Green Belt and Green Wedges should not be developed and that encroachment into the Green Belt should be the last resort.

A number of comments received objected to development on greenfield sites, including Green Belt and green wedge, and the resultant urban sprawl this would create. In a number of instances, it was suggested that brownfield sites should be developed in favour of Greenfield sites. The majority of comments focussed on the City's green wedges with respondents concerned about the impact future development would have on the wedges themselves. A number of respondents thought that the proposed allocations in the green wedges contradict our intention to create, protect and enhance green infrastructure.

Verbal comments made during the public consultation highlighted the public's concern over encroachment into the countryside and the impact our proposals will have on Derby's green wedges especially at Boulton Moor, Lime Lane and Onslow Road. It was highlighted by the Littleover Neighbourhood Board that the development of urban extensions on Greenfield land was contrary to the Council's vision of creating a compact city.

It was suggested that the links between new development and existing open spaces needs to be improved.

The restoration of the Derby and Sandiacre was supported by two members of the public. One respondent has suggested that a marina should be built in Derby to serve the Derby and Sandiacre Canal once it is restored. It was felt that this would have some significant economic benefits. Castleward was suggested as a potential location.

Response

Green Wedges are considered by the Council to be an important, local planning policy which helps to provide a number of benefits to the City. However, it is recognised that, in Derby, there is not enough brownfield land to help meet the target of 12,000 dwellings. Although priority is given to brownfield development in the plan, a number of greenfield sites, including sites within existing Green Wedges, have been allocated for development.

The draft Core Strategy will contain a number of policies which is hoped will address many of the concerns raised. The overarching Green Infrastructure Policy seeks to ensure that green infrastructure is a key component in any future development. The Biodiversity policy seeks to protect internationally and nationally important sites and species in addition to locally designated sites. The policy continues by affirming that ancient woodlands, veteran trees and Hedgerows are covered by this policy.

The provision of high quality, accessible open space is a key aspiration for the Core

Strategy for improving not only the health and well-being of the community but by contributing to the wider green infrastructure network. New development will either provide new, or provide improvements to existing spaces across the City.

While the restoration of the canal is something that will continue to be supported, it is not thought appropriate or necessary to earmark land for a marina at this stage. Castleward has been identified as a strategic mixed-use regeneration area that can help meet Derby's short-medium term housing and employment needs. Identifying the site for a marina would undermine this aim and prejudice the development.

Open Space

Turley Associates, acting on behalf of the Radleigh Group, supported our strategy on green infrastructure but suggested that paragraph 5.21 should have an additional criterion added; they state "it is recommended that an additional bullet point be incorporated to recognise that the redevelopment of land designated for public open space may in some cases be acceptable where it can be demonstrated that there is no scope to deliver the public open space or maintain it in the long-term".

The Radleigh Group generally supported the Council's strategy for green infrastructure but felt that it should also be recognised that redevelopment of land designated for public open space may, in some cases, be acceptable where it can be demonstrated that there is no scope to deliver the public open space or maintain it in the long term. They suggest the following bullet point is added "if the redevelopment of land designated for public open space may in some cases be acceptable where it can be demonstrated that there is no scope to deliver the POS or maintain it in the long term".

The Friends of Littleover Park suggested that there is a need to provide allotments in the Littleover area to cater for existing demand. The group also reiterated the continuing support from the local community for a new major park off Blagreaves Lane; this would form a link between Sunnydale Park to Millennium Wood and King George V Playing Fields. Finally, they asserted that the area between Chain Lane and the ring road has little open space and that any land which becomes available, such as the Severn Trent reservoir, should be safeguarded.

Concerns have been raised about future provision of open space and the impact future development will have on existing provision. A number of respondents thought that there wasn't enough open space in Derby at the moment and one respondent recommended that everyone should be within a 10 to 15 minute walk of a green space.

This issue was also raised at the Littleover Neighbourhood Board where it was felt that more open space would be needed if development is to take place.

At the Chellaston drop-in event it was suggested that more facilities for young people and teenagers are needed.

Response

The Council recognises the multiple benefits the provision of high quality, accessible open space can play such as improving the physical and mental well-being of the community and reducing the impact of climate change. The Core Strategy's draft

open space policy will ensure the continued provision of open space in Derby and include a variety of standards for quality, quantity and accessibility. In addition, the new policy aims to introduce an element of flexibility to ensure that different types of open space are provided based on local need.

The City of Derby Local Plan Review, Adopted January 1996, contains a number of saved policies. Policy L4 sets out allocations for new or extended open space. It is the intention of the Council to review these allocations to ensure that they still meet the needs of the community. This review will be undertaken through the development of the Local Plan Part 2.

Playing Fields

Sport England raised a number of concerns regarding our stance on the provision and protection of playing fields in the Core Strategy. They stated that no reference is made to sports usage of green infrastructure and the important role sport infrastructure plays in delivering healthy communities is made in the PGS.

Sport England also highlighted the important role secondary schools can play in providing key sports infrastructure and that policies should encourage their use.

Sport England highlighted that no reference is made to sports usage of green infrastructure which is an important oversight. They also object as the criteria proposed in relation to proposals that might lead to the loss of public open space are not in accordance with the NPPF, Paragraph 74. They highlight, for example, some sports facilities on open space might be under used but this can be caused by land owners not providing access or not maintaining facilities and therefore not representing lack of demand/need for the facility – this is a regular issue with industrial playing fields. Sport England identifies three sites (Manor Kingsway, Rykneld Road and the former Derby College) which appear to lead to the loss of playing fields. Sport England recommends that these fields are protected at least until a Playing Pitch Strategy is completed. Finally, Sport England queried how are gaps in existing provision of open space to be addressed (see the NPPF, Paragraph 73).

Response

The City Council is currently undertaking a Playing Pitch Strategy which, when completed, will inform both policies in the Core Strategy and all future planning decisions. It is expected that the Study will be completed in the autumn of 2013.

A draft policy will be included in the next Core Strategy consultation document which will set out how the Council will seek to protect, and provide new, playing pitches over the plan period. This policy will reflect current national planning policy.

Climate Change

The National Trust stated that reducing greenhouse gas emissions and adapting to the impacts of a changing climate remain key considerations for the planning system and it is important and relevant that Derby has a robust approach to these considerations. They continued by stating that the Council should take action to reduce transport emissions both by retaining a compact form of development and promoting public transport.

St Modwen RPS agreed with the principles of tackling climate change and water management through new development. However, they go on to state that policies do not place onerous requirements on the developer of regeneration sites which would likely impact on economic viability and delivery.

A private individual supported the general strategy for tackling climate change and water management.

Response

The impact of climate change and addressing its impact is a fundamental part of the emerging Core Strategy. The draft Core Strategy will contain an overarching climate change policy in addition to other policies dealing with, for example, green infrastructure, flooding and sustainable development.

Flood Risk, Sustainable Drainage and Water Management

Network Rail responded to the consultation by supporting, in principle, the work which the City Council is doing with the Environment Agency to put in place a flood risk management strategy to help to regenerate the Derwent Valley. They however highlight concerns about site delivery and the fact that requirements which are overly onerous in terms of developer contributions would be unwelcome and hinder delivery.

The Environment Agency discussed sustainable waste in more detail and highlighted that waste management is a key consideration for growth and regeneration. They highlighted that some of the proposed site allocations are in proximity to sites regulated by the EA and are licensed under the Environmental Permitting Regulations 2010. The Environment Agency continues by stressing that the City Council has an obligation to improve and maintain water quality and new development can be seen as an opportunity to do this; the Environment Agency highlights that this can be done by improving the connectivity and biological complexity of all watercourses in design proposals by, for example, creating tree-lined water bodies.

The Environment Agency noted that there is an existing problem with lack of capacity in the foul sewerage system in the southern/south western part of Derby. So far, this issue has been addressed by provision of some sewerage improvements but also two new combined sewer overflows (Wilmore Road, Sinfin and St David's Close, Chellaston). The preferred housing sites DER/0001, 0104 and 0118 and the Global Technology Cluster site at Sinfin Moor have, in the absence of improvements to the foul sewerage system have the potential to increase the frequency and volume of discharges from combined sewer overflows (CSOs) and exacerbate foul flooding problems in Chellaston. This will jeopardise achievement of Water Framework Directive good ecological status/potential for watercourses in this area (the Cuttle Brook is currently failing to achieve good ecological potential due to diffuse urban pollution). This issue is clearly identified in the Derby Housing Market Water Cycle Study.

The Environment Agency noted that the increased amount of waste water and sewage effluent produced by all new site allocations needs to be kept under review to ensure that no deterioration in water quality; there may be a requirement for expansion and upgrading of current sewage treatment systems.

The issue of surface water run-off and its future management was raised at the Littleover Neighbourhood Board. It was suggested that Sustainable Urban Drainage Systems are incorporated into any new development and that a developer should be forced to put the system in place.

It was stressed by a respondent that the River Derwent is not the only source of flooding in Derby.

Response

The Outline Water Cycle Study examined both water quality and the sources of flooding across the Housing Market Area. The Study highlighted that, in addition to the River Derwent, flooding was experienced from other watercourses in the City, sewers and from surface-water run-off. In addition, the Water Cycle Study indicated that poor quality of the watercourses running through the City. In all cases, the Study made recommendations on how this can be addressed.

Through on-going discussions between the City Council and Severn Trent, proposals are being developed which will help to improve sewer capacity in the south of the City which, in turn, will reduce the risk of sewer flooding over the plan period.

New development must ensure that there is no net increase in surface water run-off when compared to greenfield sites. As part of the planning application, the applicant must submit details indicating how flooding issues will be addressed. There are a number of measures developers can utilise to ensure that surface water run-off is managed and reduced.

On certain sites developers will be required to carry out detailed modelling of the flood regime and will need to set out how they intend to mitigate any potential flood risks associated with the development. If development is likely to increase the risk of flooding in surrounding areas, proposals are unlikely to be given planning permission.

Our City Our River

One respondent recognises the issues arising from the River Derwent flooding but asserts that more needs to be done to make it a vibrant waterway which would benefit the City. Therefore, while accommodating future climate change and rising river levels, it is considered that there is an opportunity to create attractive residential and leisure developments as well as footpaths, trails and corridors.

Response

A number of responses have been received through previous consultations highlighting the important role the River Derwent can play in making Derby an attractive place to live and work. The Council sees the Our City Our River project as key in making the River Derwent a key natural resource in Derby. The aspirations of the OCOR project and the importance of the River Derwent are reflected in a number of Core Strategy policies dealing with, for example, climate change, green infrastructure and heritage.

Education

Sport England make the point that secondary schools in particular can provide key local sports infrastructure if they are located in the right place, designed to

accommodate community use and provide secure community access. Policy should encourage this as part of the network of social infrastructure provision for sport.

A significant amount of concern both in general and in relation to specific sites related to pressure on existing school places. Particular sites mentioned, include Andrew Close, Lime Lane, Onslow Road, land south of Holmleigh Way and land north of Fellowlands Way. The point was also made that the building of more new houses should go along with providing adequate places at the local schools for people who live in the catchment area otherwise there would be an increase in unnecessary journeys by car adding to congestion.

Littleover Neighbourhood Board was keen to see joined up provision of school places with South Derbyshire on the cross boundary site.

Chellaston Residents Association raised concerns that the level of growth on a number of smaller sites will necessitate a new school but they are not sure how this can be secured.

Questions were also raised regarding the impact of the Government's push for new academies on the provision of sufficient school places and how insufficient school places have been used to resist certain development but not other sites which seem to have the same impacts on schools.

Response

Planners from the HMA authorities and Education Officers from both the City and County Councils are working together at a Housing Market Area level (Derby City, Amber Valley and South Derbyshire) in planning the future housing and education needs of the City to ensure that school places are available for the needs generated by the new houses. In some instances this may require the expansion of existing schools while in others it may require the building of new education facilities, including a number of new primary schools on urban extension sites alongside the need for a new secondary school(s). Discussions will continue to ensure the best solution is achieved based on up-to-date information, the results of the next consultation and the refinement of the site allocations in the Core Strategy.

The important role secondary schools play in providing local sports infrastructure is recognised by the Council and this point will be examined in more detail in the Playing Pitch Strategy which is currently being developed. It should be noted that a number of existing secondary schools as well as any new secondary schools will be Academies outside of local authority control.

Healthcare

The Mental Health Trust also request that local, accessible healthcare facilities, including provision of mental health and children's services are included as part of major new development.

The GP Partners at Mickleover Medical Centre raised concerns that existing provision in Mickleover cannot support an increase in the amount of housing. This comment is made in general and with reference to the three sites included in the Preferred Growth Strategy in this vicinity, Onslow Road, Manor Kingsway and land south of Mackworth College.

Chellaston residents have expressed concerns that existing medical facilities in Chellaston are overstretched and that whilst the new surgery on the west Chellaston development has helped it will not cope with the level of new growth.

Response

The cumulative impact of future development on local facilities has been raised during previous consultations. The Council recognise that additional housing will have an impact on local facilities and have, through the Core Strategy process and the development of the Infrastructure Development Plan, instigated dialogue with the necessary infrastructure providers. In this case, Officers have held discussions with the Clinical Commissioning Group (and formerly the Primary Care Trust) to determine, and address, the impact of future development in and around the City. We will continue to work with the health providers as the plan is drafted and implemented.

While the draft Core Strategy does not specifically identify locations for the provision of new healthcare facilities, it does indicate where new development will require supporting community facilities and policies to ensure delivery through S106 or CIL (if adopted). This provides an appropriate policy framework to ensure additional provision can be provided where necessary.

Emergency Services

Derbyshire Fire and Rescue Service (DFRS) considered that the scale of growth in and adjacent to the City may have implications for future service delivery in terms of geographical coverage and response times. Therefore, they suggested that it is important to ensure that where required, the need for new fire infrastructure is acknowledged in the emerging local plan documents to ensure that such infrastructure is properly provided.

DFRS also highlighted that modern Community Fire Stations not only provide a vital community safety and emergency service function but also an important role within the local community that they serve by offering community orientated services such as youth outreach / engagement projects. Therefore, such facilities are capable of being incorporated within locations such as local centres which may be considered as part of major residential urban extensions.

The rationalisation of land interests by DFRS including the disposal and redevelopment of existing land and property and provision of a new training centre / headquarters within the Derby Housing Market Area (i.e. within the administrative area covered by Derby City; Amber Valley Borough and South Derbyshire District Councils) during the plan period. Therefore, DFRS would like to explore opportunities for suitable policy wording within the Core Strategy to secure allocation of a suitable location for the provision of a new training facility / headquarters if required.

DFRS highlighted that sprinklers provide numerous benefits, primarily by significantly slowing the spread of fire thus assisting the fire and rescue services in their response to such emergencies. DFRS are keen to explore the possibilities of securing relevant planning policy references in the local plan to reflect their aims of

delivering domestic sprinkler systems, either through design guidance or infrastructure planning.

Derbyshire Constabulary considered that the current strategy would not have an adverse impact on the delivery of their service but they did stress that on-going discussions with the Council would help them to re-evaluate the situation.

Response

The comments from the Derbyshire Fire and Rescue Service and Derbyshire Constabulary have been noted. Officers from the City Council have been in regular contact with the emergency services at the outset of the Core Strategy process and have had a valuable input into the development of the Council's Infrastructure Delivery Plan. It is envisaged that this dialogue will continue to take account not only of the Council's Growth Strategy but also the changing service provision of both the Fire Service and the Ambulance Service. It is felt that the wording of policies within the draft Core Strategy will provide the necessary scope to address any applications for new facilities (particularly policy CP21).

Community Facilities

Sport England raised concerns regarding the lack of reference to built sports facilities within the document as they are key to delivering healthy communities. Lack of leisure facilities and places for young people to go were also raised as concerns by respondents from Mickleover.

The Save the Pub Group highlighted that, through the National Planning Policy Framework, paragraph 70, new responsibilities were introduced for local councils to promote the retention and development of local pubs. They suggest that strong policies are needed to protect and support community pubs. They highlight that this is now especially important as the Localism Act has now introduced new powers for local people to nominate community facilities as local pubs.

A private individual noted that more investment is needed in the City's culture.

Response

Comments noted. The draft Core Strategy will contain a policy for the provision and protection of community facilities.

In some cases, public houses can provide an important local community facility. Draft Policy CP21 includes public houses in the list of facilities that may be addressed by this policy. In considering any application for the loss of a pub, it would be necessary, however to first assess whether it is currently fulfilling a more 'community' role. Public houses in the City Centre, for example, may not fall into this category.

Contributions

Network Rail supported the assertion that the Council will continue to seek contributions to provide appropriate mitigation and to help promote travel choice. They make particular reference to developments that have a particular impact on existing rail infrastructure, with particular reference made to Network Rail's policy in seeking the elimination of level crossings (where possible).

Network Rail have also highlighted that the Council has the opportunity to address transport issues through the Community Infrastructure Levy. This 'opportunity' has also been highlighted by a number of other respondents.

Response

In conjunction with the Core Strategy, the Council is required to produce an Infrastructure Delivery Plan which sets out the infrastructure necessary for support future development and provide a key piece of evidence for the Community Infrastructure Levy. The draft IDP will contain a number of projects and initiatives which will both help mitigate the impact of future development and provide alternative, sustainable transport measures.

The draft Core Strategy will also contain a number of policies aimed at promoting more sustainable forms of transport.

The Council has commissioned consultants to undertake a viability testing study which will include an examination of how different levels of affordable housing will affect the deliverability of new development.

Parking

A private individual representing local businesses highlighted the adverse impact current parking policies are having on the City Centre, and particularly the Cathedral Quarter. It was noted that the Preferred Growth Strategy did not include a section on the pricing and maintenance of public car parks.

Response

In response to consultation that took place in 2012, a decision has been taken to remove the distinction between parking standards in the City Centre and rest of the City. This was highlighted as a specific area of concern.

The draft Core Strategy will use the same maximum standards for commercial development as set out in the City of Derby Local Plan Review across the City. It is intended that these standards will be reviewed as part of the 'Part 2' Local Plan process.

It has been concluded that maximum standards for residential development are not helpful. The 'needs' of residential development are very much dependent on the nature of the housing proposed and local circumstances. It is felt that the '6Cs Guidance' produced by the City and County authorities in Derbyshire, Leicestershire and Nottinghamshire contains an appropriate calculation to deal with residential development (based on research published by the DCLG).

Retailing

A private individual representing local businesses highlighted the impact out-of-centre retail parks, the construction of the Westfield Centre and the rise of internet shopping is having on retailers in the City. They consider that current policies in the adopted Local Plan have not been adhered to and retailers have been allowed to diversify which has also had an impact on footfall and sales in certain parts of the City.

Response

The concerns of the respondent are noted. Enhancing the vitality and viability of the City Centre is a key objective of the Council and the draft Core Strategy will continue

to contain policies that will seek to achieve this aim. It is fair to say that the vitality and viability of parts of the City Centre have suffered to an extent during the economic downturn. This has coincided with the opening of Westfield, which has clearly had some effect on certain parts of the centre as a result of relocations. The general impact of Westfield has, however, been very positive; leading to an increased number of visitors to the city and an substantial overall improvement in the quality of the retail stock. However, other factors outside the control of the Council have also had a considerable impact such as the aforementioned economic downturn and the internet. It is considered unlikely that levels of retail will ever return to their pre-recession levels and thus the Council's policies for the City Centre recognise that there will be a need for diversification of activity. This may be in the form of a more flexible approach to retail frontages, for example.

The assertion that existing Local Plan policy has not been adhered to is not accepted. It is true that the CDLPR contained policies designed to restrict retailers in out-of-centre locations from selling goods more appropriate on the 'high street'. It is fair to say that in light of national planning policy and the result of various planning appeals (locally and nationally), it has not been possible to completely stop retailers selling a certain amount of goods that the respondent may feel are having an adverse impact. This has necessarily lead to a more flexible implementation of the policy. The business models of many retailers, including supermarkets, have changed and it would not be possible for Derby to maintain a food-only or bulky goods-only approach in light of such changes, particularly where that has been accepted elsewhere by Inspectors. However, while the Council has allowed some flexibility, it still maintains a policy of imposing conditions to minimise the amount of floorspace where 'high street' goods are sold. This may inevitably divert some trade from defined centres but it should ensure that the 'complementarity' between town centre and out-of-centre development is maintain, Equally, a number of retailers have found legal loopholes in planning conditions which have allowed them to sell an unlimited range of goods. While this is unfortunate, it is not an example of the Council not adhering to its own policies.

The draft Core Strategy policy will maintain the general approach to conditions but will recognise that each case should be considered on its merits. The Council still wishes to maintain some level of restriction as a 'free-for-all' would be counterproductive and damaging. It has been shown, however, that the implementation of a standard range of goods restriction is increasingly unworkable in the modern retail climate. This may mean a complete moratorium on non-bulky goods is appropriate in some cases and a more flexible approach in others, depending on the scale and nature of the goods sold. In all cases, the objective of maintaining and enhancing the vitality and viability of defined centres will be a primary concern.

Energy

Through the consultation, Western Power set out their operational requirements which will need to be taken account of. They highlighted that their strategic electricity distribution circuits run both underground and as overhead lines. They also indicate that there may be sub-stations in the vicinity. Generally, Western Power Distribution would expect developers of a site to pay to divert less strategic electricity circuits operating at 11,000 Volts (11kV) or below. This may include

undergrounding some 11kV and low voltage overhead lines as necessary. Western Power Distribution would normally seek to retain the position of electricity circuits operating at 132,000 Volts (132kV) and 66,000 Volts (66kV) and in some cases 33,000 Volts (33kV), particularly if the diversion of such circuits placed a financial obligation on Western Power Distribution to either divert or underground them as Western Power Distribution would not be party to any planning application and any such obligation would also go against the statutory and regulatory requirement on Western Power Distribution to operate an economic and efficient electricity distribution system.

Response

The comments from Western Power have been noted. On-going discussions will be held to ensure that the company has a constructive input into both the Core Strategy and the Infrastructure Delivery Plan.

6

**Summary of representations made
pursuant to the Options for
Housing Growth Consultation**

The 'Options for Housing Growth' engagement took place between 12 July and 30 September 2011. The consultation material was produced jointly by Amber Valley Borough Council, Derby City Council and South Derbyshire District Council.

At this stage in the preparation of the Core Strategy, the Government had begun



Through the enactment of the Localism Bill, the Government has begun the process of revoking the East Midlands Regional Strategy (RSS). The RSS is the document which set housing targets and outlined the general location for new development across the Derby Housing Market Area (HMA). With such significant changes to the planning system, the three HMA authorities decided to take a step back and re-assess future housing provisions, and engage with local communities to encourage them to participate in the development of our Core Strategy.

How was the consultation carried out?

Quite simply this engagement process asked two questions – how much housing do we need and where will it go.

The Compendium of Publicity Material contains the publicity material produced and press items related to this consultation.

- Mailshot to interested parties
Before the consultation started a letter or email to everyone on our LDF consultation database. The database contains the contact details of the specific consultation bodies, general consultation bodies and members of the business and local community. In addition emails were sent to Chief Officers and Members informing them of the consultation.

An email to everyone registered with the Council's "Your City, Your Say" consultation service.

- Deposit documents
The consultation material for this stage consisted of:

Options for Housing Growth Document – this document sets out a number of options for both the levels of housing growth, based on population projections, and the broad location of housing across the Housing Market Area.

Options for Housing Growth Summary Leaflet – this summarises the main consultation document.

Questionnaire – this asked ten questions requiring the respondent to consider the different housing growth options, the locations for growth and provide any additional comments.

Population Projections – Following the Government’s announcement to revoke the Regional Plans, the Nottingham and Derby Housing Market Area authorities took the opportunity to re-examine how many new homes should be planned for based on population projections derived from up-to-date data. Four documents were produced; one looked at the HMA as a whole while the remaining three concentrated on each individual authority.

Documents were made available at the Council’s Customer Service Centre at 1 Albion Street, the Council’s receptions at Roman House and Saxon House and local libraries. In addition, the summary leaflet was sent to the Neighbourhood Managers.

An article about the consultation was also included into the Neighbourhood Forum information pack which is sent to all members.

- Website
All of the consultation material for all three authorities was hosted on one website by Derbyshire County Council with links from each authority’s webpage to this site – www.derbyshire.gov.uk/derbyhma

- Press articles and advertisements
An article in the Derby Evening Telegraph on the 5 July 2011

An advertisement was placed in the Derby Evening Telegraph publicising the second drop-in session and where consultation documents were available.

- Posters
Posters were put up in Council offices, local libraries and various locations in the District Centres.

- Workshops
A HMA developer and business event was held at Pride Park on the 21 July 2011.
This event was attended by 42 representatives from the business and developer community. The event consisted of a number of presentations covering each aspect of the consultation document – population projections, amount of housing and its general location.

Following the ‘Your neighbourhood’ consultation, the majority of the Council’s Neighbourhood Forums established a Planning and Transportation Sub-Group specifically to provide us with a local perspective as we developed our Core Strategy. Two workshops were held on the 26 July and the 14 September 2011. Both events were held at The Quad between 6:00pm and 8:00pm.

The aim of the first event was to disseminate the information contained within the consultation material to the groups, enabling them to understand the challenges the Council is facing and allow them to ask questions either as part of the workshop or on a one-to-one basis with officers from the Spatial Planning Team. In addition the sub-groups were able to request the presence of a planning policy officer at their meetings

This second workshop built on the engagement process the Council began with the sub-groups on the 26 July 2011. The event, attended by 15 people, aimed to get everyone thinking about the impact of the different population scenarios and where, generally, future development could be located across the Derby Housing Market Area. The evening began with a brief presentation recapping the current consultation. This was followed by the first task which asked people to consider the impact of the different growth scenarios on various members of the community. This was followed by a second presentation about the different options for where development could go and the second task asked people to consider general locations across the HMA.

On the 12 September 2011 Officers attended a meeting of the Voices in Action. Membership of Voices in Action comprises of a cross section of young people living in the City. Approximately 30 young people attended the event where they discussed the pros and cons of three scenarios:

- Scenario 1: Development within the City
- Scenario 2: Development on the edge of the City
- Scenario 3: Development outside of the City

An offer was made by officers to organise similar events for the other Diversity Forums however this was not taken up. Although the offer was not taken up, each group was directed to the consultation material.

- Planning and Transportation Sub-Group meetings
Officers from the Spatial Planning Team were invited to attend the following meetings to discuss the consultation and how our proposals would affect their area.
 - Oakwood 18 August 2011
 - Allestree 19 August 2011
 - Darley 31 August 2011
 - Mickleover 8 September 2011

- **Drop-in events**

A drop-in event was held at the Quad on the 26 July 2011 between 3:00pm and 5:00pm. This drop-in event was open to the public and members of the Neighbourhood Forums. The session consisted of two presentations followed by a question and answer session. There was also an opportunity for attendees to have a discussion with officers from the Spatial Planning Team.

A second drop-in event was held on the 6 September 2011 at The Quad between 3:00pm to 8:00pm. This followed the same format of the previous drop-in event on the 26 July 2011 with officers talking informally to members of the public about the consultation. The event was publicised by an advert in the Derby Evening Telegraph, by a reminder sent to all members of the Neighbourhood Forums and letters sent to members of the Landlord Liaison Group. In total 22 people attended the event.

What were the main issues?

The questionnaire accompanying this engagement process contained 14 questions. In total we received 67 responses from members of the public, planning and transportation sub-groups, developers, neighbouring authorities and planning consultants.

Question 1

Having looked at our consultation document, how much housing do you think we should be planning for? Please give reasons.

Four alternative growth scenarios were provided.

- **The first was based on balanced migration providing 1,500 per year in the HMA (30,000 in total) or 991 dwellings per year in Derby.**
- **The second was based on current building trends providing 1,613 per year in the HMA (32,260 in total) or 687 dwellings per year in Derby.**
- **The third was based the Regional Plan targets providing 1,830 per year in the HMA (36,600 in total) or 720 dwellings per year in Derby.**
- **The fourth was based on Government projections providing 2,395 per year in the HMA (47,900 in total) or 1,216 dwellings per year in Derby.**

Opinion to the question varied. In some cases members of the public felt that they did not have enough information or experience to provide a reasoned response. However, the remaining responses highlighted the marked difference in opinion between members of the public, developers/agents and statutory bodies.

Members of the public were divided over the four scenarios with responses equally split between providing housing based on a balanced migration or on the Regional Plan. Some respondents favoured a figure lower than the first option while others stated that housing growth should support economic growth.

Developers and agents overwhelmingly chose Government projections as a basis for housing provision over the plan period which would ensure that the Core Strategy would reflect the Government's growth agenda. It was also recognised that the downturn in the market is only temporary and that over the plan period construction would pick up. One agent stated that no precise figures should be planned for but suggests that building over the RSS targets would be preferable.

Many of the statutory bodies had no opinion. However, the CPRE felt that the figures provided in the balanced migration scenario offered a better starting point for calculating future housing needs rather than the RSS targets but also feel that more weight should be given to the current building trends as they reflect the average pace of development over recent years. In contrast Network Rail, who submitted comments as a landowner rather than a statutory consultee, considered that a higher provision over the minimum RSS target should be considered. Many highlighted the need to consider future infrastructure; the CPRE highlighted the need for infrastructure to support future growth while the Environment Agency stressed the need for new development to meet the aims of the Blue Corridor.

In some cases, respondents suggested their own housing targets. Some suggested a figure between the Regional Spatial Strategy targets and the Government projections while some were substantially lower than the balanced migration scenario with the shortfall being made up by bringing empty properties back into use.

Question 2

Which of the main options in the consultation document for distributing new housing do you support? Are there any other options which you support?

- **Option 1: Concentrate most development in and adjoining Derby. Redevelopment of brownfield sites in Derby and significant Greenfield expansion immediately within and on the edge of the City.**
- **Option 2: A greater role for other towns. As with Option 1 but with a greater amount of housing development dispersed across the main towns of Alfreton, Belper, Heanor, Ripley and Swadlincote.**
- **Option 3: A greater role for rural settlements. As Option 2 but development would be even more dispersed to include some named villages and other rural locations**
- **Option 4: New Settlement(s). An option which could be pursued with Options 2 and 3, involving the concentration of significant amounts of development in one or more freestanding new settlements.**

There was little consensus from members of the public. Development in and adjoining Derby, discussed in Option 1, was the most popular. However, this was closely followed by Options 2 and 3; all three receiving virtually the same amount of support. There were a number of representors who felt that none of the options were suitable. One respondent mirrored the views made at some of the

events Officers' held during the consultation, namely that no-one would welcome large scale development in their area and that it needs to be spread across the City. Although some considered Option 1 was the most suitable, they argued against encroaching into both the countryside and the green wedges. Many also felt the Option 1 would be suitable for making the best use of existing services and infrastructure.

The opinion of developers and agents was less diverse with the majority being in favour of Option 1. This option was still in accordance with the extant Regional Spatial Strategy which had already been examined. Some consultants agreed with the public regarding option 1 making the best use of existing services and infrastructure. A few respondents considered that an amount of development discussed in Option 2 would be preferable to enable the regeneration of certain towns across the HMA.

Option 4, a new settlement, had little support from all respondents.

Question 3

Our estimates indicate that around 10,000 new homes can be delivered in Derby City between 2008 and 2028 through 'brownfield' sites and existing commitments. Do you agree with this? If not, please give reasons.

Members of the public: the majority of respondents agreed with the estimate with most saying brownfield land must be used. However, 1 person stated that not everyone wants to live on brownfield land so some green field development is required. Some respondents don't think there is enough brown field land to accommodate the requirement. One respondent thinks 10,000 is too large a number for Derby. Some made comments about good design and some people said a definite 'No' to using any Green wedge or green belt.

Developers and agents: The majority who responded feel there is not enough robust evidence for them to make an informed response. However, it is felt that the amount of available brownfield land will not provide sufficient housing to meet the target without green field development. Bearing in mind the current build rates and the economic climate, they are unsure that the annual targets cannot be met in the early years of the plan. Concerns were raised about remedial works needed on some brownfield sites.

Statutory Bodies: The Environment Agency raised concerns about the capacity of the waste water and foul sewerage network as a potential constraint to growth. Natural England supports the use of brownfield over Greenfield but feel the sites need to be carefully assessed and have detailed assessment in case of rare biodiversity. It was suggested that a policy requiring green and brown roofs in new urban developments should be included in the Core Strategy.

Question 4

Are there any locations where urban extensions to the existing built up area of Derby would best be accommodated – or avoided? Please give reasons.

Members of the Public: Congruent with responses to the previous questions, members of the public generally thought that development into the green belt or green wedges, for example at Oakwood, should be resisted. This green wedge in particular was highlighted for its proximity to Chaddesden Wood and the Site of Special Scientific Interest (SSSI) at Breadsall and its links with the Great Northern Greenway.

Many members of the public were concerned about any additional development in Mickleover following the approval of an application on Radbourne Lane. They were against an urban extension at Mickleover citing issues over congestion particularly on the A38 and Western Road, the impact on local facilities and the increased pressure on local schools and medical facilities, the loss of countryside, the negative impact further development would have on Mickleover Village and insufficient open space to meet the needs of existing residents. In contrast certain members of the public considered that an urban extension, located to the north of Onslow Road would be an ideal location. An urban extension at Mickleover was also favoured as it would make best use of existing transport links to aid commuting. In addition one member of the public was in favour of growth between Mickleover and Findern.

Further development in the Sinfin Moor area, particularly Lowes Lane, should be resisted as this is a haven for local wildlife and has a network of well-used footpaths and bridleways.

An area south of Wragley Way was also suggested.

The south and south-east of the City was highlighted as a preferable location for new development as it would complement the economic growth planned for the area. It was also considered that this area would be better served by the local transport infrastructure.

The Darley Abbey Society states that there may be some scope for infilling but feels that the Conservation Area and the World Heritage Site afford little opportunity to provide land for development.

The Derby Civic Society highlights a number of brownfield sites which should be developed which include Castleward, the DRI, Friar Gate Goods Yard, the Kingsway Hospital and Nightingale Road. They also consider that some expansion of Chaddesden, Alvaston, Sinfin, Littleover, Mickleover and Mackworth 'seems inevitable'

Statutory Bodies: The Environment Agency highlighted areas to the north and south of the City which lie on the floodplains of the rivers Trent and Derwent which would prohibit development due to the risk of flooding.

Natural England highlighted the biodiversity value of many brownfield sites and advises that the impact on the local wildlife is taken into account when allocating sites.

Developers and Agents: Again certain developers and agents reiterated their concern regarding how many dwellings could be accommodated on brownfield sites.

Many responses from developers and agents supported the development of urban extensions and suggested sites which could help Derby meet its housing needs over the plan period.

Oxalis Planning suggested a site north of Onslow Road in Mickleover which would provide a small addition to the urban area.

Radleigh Homes recognised the importance of the Nottingham/Derby Green Belt and highlighted the draft National Planning Policy Framework's stance in its continued protection. To meet the housing needs to the east of the City, they propose a site at Brook Farm.

Development to the south west of the City, particularly to the north of Andrew Close in Littleover, was suggested by William Davis Limited. They highlighted the sites sustainability credentials due to its *'proximity to key amenities such as local shops and schools as well as regular bus links to the large range of amenities available in Derby'*.

Boyer Planning acting on behalf of Clowes/Bellway suggested that Boulton Moor would make an ideal site for both contributing to Derby's housing need and enhancing the green wedge itself.

Finally, Capita Symonds acting on behalf of JGP Properties highlight the various constraints faced by the HMA authorities in finding suitable sites for development adjacent to Derby. These include the proximity of Kedleston Hall, the flood zone 3 found to the eastern edge of the City and the issues of surface water as highlighted in the Water Cycle Study. They conclude that the site at Lime Lane, which lies within a green wedge, offers the best opportunity for expansion within the City boundary.

Question 5

If we pursue urban extensions to Derby, should we consider identifying sites currently in the Green Wedges and/or Green Belt for development? If so, where?

The majority of members of the public responded by saying definitely "No" to developing green wedge or green belt. However there is a small group of people who think an area at Onslow Road would be a good piece of land to develop. One person mentioned small areas of Oakwood that could be developed as long as there were improvements to the infrastructure. The developers feel it would be good to build on green wedges/belt and that they are sustainable locations.

All Statutory bodies think they need to be preserved with some saying they are important for natural habitats and biodiversity.

A number of developers and agents recognise the importance of the City's green wedges but recommend that a review of the boundaries is undertaken as part of the planning process. In many cases they felt that sites within green wedges could be developed which would not be detrimental to the form and function of the wedges whilst bringing additional benefits to the locality.

In addition to the sites at Onslow Road, Andrew Close, Boulton Moor and Lime Lane suggested in Question 4 by developers and agents, a number of additional green wedge locations were advocated.

2 Cities Planning suggested that land to the east of Acorn Way would provide an opportunity for future development. They maintain that development in this location would not undermine the overall function or effectiveness of the green wedge.

Capita Symonds acting on behalf of JGP Properties highlighted, in their submission, the restrictions to development of green belt to the east of the City and the World Heritage Site to the north. However, they highlight that green wedges are a local designation and drew attention to the Panel Report of November 2007 which stated that '*Green Wedges...should not be unduly restrictive and must be subject to review in order to accommodate new development*'. They consider that a site on Lime Lane, discussed in question 4, a site on Lime Lane is ideal for development while retaining the principle of the green wedge.

Pegasus Planning, acting on behalf of Miller Homes, suggests the land at Hackwood Farm which '*is predominantly unconstrained by green wedge, with only a part of the site fronting Station Road falling within the existing green wedge*'.

Question 6

If we pursue major growth in the five main towns; Alfreton, Belper, Heanor, Ripley, Swadlincote:

- a) Which town(s) would benefit most from development? and**
- b) In which locations in and around the five main towns would development be of most benefit and in which locations would development have the greatest adverse impact? Please give reasons**

With regard to the first part of this question some members of the public felt that they were unable to comment on this because they didn't know enough about the towns.

However, looking at all of the responses together a number of towns across the HMA were suggested. In Amber Valley, Ripley was the most favoured location closely followed by Heanor. The proximity of Ripley to the A38 and A617 was highlighted as a benefit. Swadlincote in South Derbyshire was the only town which was suggested.

However, just as many people stated that development in the towns was not an option and the most sustainable locations for development were in or adjacent to Derby.

Respondents highlighted the need to use brownfield sites before considering Greenfield sites for development.

The Environment Agency highlighted the findings of the Strategic Flood Risk Assessment which indicate that the five main towns are in areas of relatively low flood risk and the Water Cycle Study which indicate that there is some spare capacity at the Water Treatment Works serving Belper, Heanor and Ripley whilst the Milton works may constrain growth at Swadlincote.

No sites were suggested for possible development in the towns.

Question 7

Are there any places outside urban areas (for example, in villages or other rural places) where there is a need or opportunity for development and growth?

Many representors saw the benefit of building in villages across the Housing Market Area. Development however, should be based on need and be affordable. It was considered that the size of the development should be restricted, should retain the character of the area and ensure that local services are not put under pressure. A number of locations were suggested, primarily by members of the public and statutory bodies, for possible places outside of the urban areas where there is a need for development and growth.

A number of sites in Erewash were suggested including Stanton Ironworks and around Smalley in addition to a general comment about development taking place “between Derby and Nottingham”. Other locations include:

- Around Ashbourne
- Willington
- Bretby
- Small-scale development around Etwall but retaining the space between Mickleover
- Thulston Fields
- Sutton on the Hill
- Radbourne
- Findern

Question 8

If 'new settlement(s)' is your preferred option, can you make any suggestions about where one or more might be built?

The majority of responses to this question came from members of the public with developers and agents providing few views. The overriding response was that the creation of a new settlement was not a sustainable option. Concerns were raised over the availability of a suitable site with one respondent stating that unless an unused military base or brownfield site is available then the settlement would be built on a greenfield location, which is unacceptable; another questioned the timescale for delivery whilst another questioned the economic benefit for the City in developing a new settlement.

Locations such as Hilton, Stanton Ironworks and Draclow Power Station were suggested.

Question 9

Thinking about all the options and any comments you may have previously made in response to our earlier consultations, are there any key investments needed in your community (e.g. open space) which you think might be successfully addressed through development?

The majority of responses to this question came from members of the public who said the following:

- Open spaces are very important with adequate public facilities from the outset of a new development
- Old Normanton Road college site needs developing
- More sustainable travel choices
- Small business development to stop reliance on a small number of local employers
- An extension and improvements to Chaddesden Wood
- An extension to Parkview School
- Improvements to A608, Mansfield Road
- Make the river frontage more desirable
- Canal corridor should be prioritised as there are many brownfield sites adjacent which could be leisure development opportunities
- Improved cycle routes
- Extension to Derby bus station to accommodate growth

Some of the responses reiterated the comments we received during the Options Consultation where we initially enquired about the type of infrastructure communities needed over the plan period.

Views expressed from Statutory Bodies were about protecting and enhancing existing community assets. Also, important heritage assets, such as Calke Abbey and Kedleston Hall, are not diminished or eroded as a result of new development. It was suggested to enhance the multifunctional nature of greenspaces created or enhanced as a result of new development. New growth should also provide for long term management of green infrastructure.

Question 10

Do you have any other comments on the housing options or more general comments on how this consultation process could be improved?

Due to the nature of this question, not many people responded to it. From members of the public who did, one of the respondents thought South Derbyshire's approach to the consultation was better than that taken by Derby City Council. Another thought better use could be made of Council publications and the web site. Other comments received were:

- It should be the responsibility of the developer to insert planning notices in the local press and they should approach the impacted local householders and that the planning process should not be at the expense of individual households.
- Derby is a market city and should stay small and keep its countryside
- It is good that the Council is seeking resident's views, but concerned about the Government advisers are developers
- Large growth will increase congestion
- Better use should be made of brownfield land
- Should look at other EEC and international countries about the consultation process and prediction of future growth

Developers made the following comments:

- Growth should be employment led not housing led
- There is a need for specialist accommodation for the elderly

Statutory bodies made the following comments:

- Consideration should be given to constraints such as ecological and heritage assets
- The National Trust is strongly opposed to development impacting on the established setting of Kedleston Hall

Questions and Answers from the Developer and Business Event

The following representatives from each HMA authority were available to answer the questions:

- Rob Thorley, Amber Valley Borough Council
- Steve Buffery, Derbyshire County Council
- Rob Salmon, Derby City Council
- Andrew Waterhouse, Derby City Council
- Ian Bowen, South Derbyshire District Council

Question: Why aren't the other scenarios being presented in the consultation document?

Steve Buffery reiterated that the four scenarios that have been presented are indicative of a broad range. Andrew Waterhouse added that the outputs of some of the scenarios are similar and therefore there would be some duplication. Andrew Waterhouse also noted that the consultation material is aimed at a broad spectrum of people so we don't want to confuse people by presenting too many scenarios.

Question: Why aren't we working with Erewash Borough Council?

Steve Buffery stated that Erewash is part of the wider Nottingham Housing Market Area but that discussions are ongoing with counterparts in Erewash. Rob Salmon added that we're not working in a silo and that we need to stay abreast of what is happening not just in Erewash but other areas such as East Staffordshire and North West Leicestershire.

Question: Are all the timescales on the evidence base documents September?

Rob Salmon stated that the timescale on the Strategic Housing Land Availability Assessment (SHLAA) refresh will be the end of the year to coincide with the Annual Monitoring Report. Andrew Waterhouse added that discussions are ongoing about the Strategic Housing Market Assessment, just trying to determine whether we're doing a full review or just a refresh. Obviously colleagues in Housing have different requirements from the document. Basically no deadline set as yet. In terms of viability, we can't really set any deadlines until we're further down the line with the distribution and quantum questions.

Question: What's the current thinking on the Community Infrastructure Levy?

Rob Salmon noted that the three Local Planning Authorities are working together on a charging schedule, although the charges are likely to be different in each area. Community Infrastructure Levy seems to be the only viable option at the moment.

Question: How are we engaging with employers?

Andrew Waterhouse responded that the Chamber had been invited to this event, but we need to do a lot more yet. We also need to do more liaisons

internally as well. Rob Salmon added that the Renaissance Board are fully aware of the issues.

Question: What's been the general response from the public in terms of growth in towns and villages?

Ian Bowen suggested that the new settlement idea has had some support on the basis of it being away from existing settlements and therefore having less impact. Development in the villages has provoked some strong reactions, but there could still be some real benefits to this approach. Rob Salmon added that we need to draw out more pros and cons of the new settlement approach as it's not really been tested before.

Question: Are we consulting with the education authorities in relation to secondary provision? Access to secondary schools is a key to the desirability of developments.

Ian Bowen noted we have been talking with the County and City education departments and will continue to do so, although we need to get fully up to speed in light of academies etc.

Question: Any ideas as to where a new settlement could be located?

Rob Salmon added that we've had a few ideas, but it wouldn't be right to speculate at this point.

Points raised during the Drop-in Events 6 September 2011 3.00pm to 8.00pm

- Housing growth should be linked to employment levels. Why are we planning to build further housing when we may lose employers like Bombardier?
- Can more housing be justified when developers are not completing existing developments for example, Strata Homes site on Goodsmoor Road, Derby
- Development should be directed to locations in need of an uplift for example in Swadlincote
- Although there will be pressure to do so, the Council should not build in the Green Belt, Green Wedges or on the City's open spaces
- The Council will need to consider the amount of social housing required in new developments. Social housing should not be concentrated in one area as this could create a ghetto. Social housing should be spread throughout new developments.
- Is there a need for more flats in the City?
- New development will create additional traffic and parking problems
- Why hasn't the city park come forward?

- How do you incorporate and balance the aims of the Regeneration Strategy with the content of the Local Plan?
- Have we taken account of all the brownfield sites in the City? This needs to be done before any building takes place on Greenfield sites.
- Concerns were raised about building in areas where the existing infrastructure is at breaking point.
- What's happened to all of the sites around the City which were highlighted for possible development around the edge of the City?
- How can members of the public make decisions on issues that are so complex? Will there be a methodology for coming up with an answer?
- It would make sense for new development to be centred on the main transport routes such as the A52, A38 and A50.
- Development within the region should be centred on the East Midlands Airport, as future economic growth is likely to be based on global logistics.
- The need for housing is very much based on uncontrolled immigration into the UK, combined with a welfare state that rewards young people for getting pregnant.
- Need to deliver the proposed city park in its entirety. The City Council should be pursuing national funding streams in order to deliver it.
- The higher housing targets are completely undeliverable.
- There are lots of vacant sites along the route of the new inner-ring road which should be developed

Quad Drop in Tuesday 26th July 2011

- Why haven't we included Erewash in our considerations?
- What impact does leaving Erewash out have on Chaddesden, Oakwood and Spondon? Could they potentially miss out?
- How will the passing of the Localism Bill fit into the timescales of the Core Strategy?
- How sure are we that we can progress with a strategy that is less than the projections, without government interference?
- How are neighbourhoods expected to know how many houses need to be built?
- When will housing types be considered? We can't leave it to developers to decide as they don't always get it right.
- To what extent can the Core Strategy have a vision for local areas such as Chester Green? What level will it drill down to?
- Will infrastructure constraints be considered in the Core Strategy?
- Do the housing figures account for needs in the public and private housing sectors? Osmaston could be a key contributor on the public sector front.

- Some of the housing figures being presented would equate to the equivalent of Oakwood being built every five years. This could mean that we need to consider building upwards as well as outwards.
- To reach the level of housing suggested by the government projections we would need to double current build rates. This simply isn't possible.
- If too much housing is provided it will lead to a nose dive in prices which could suck people in who don't necessarily work nearby. This could lead to unsustainable work patterns.
- What's happening with the Community Infrastructure Levy?
- Does the quality of agricultural land need to be considered?
- What status does Green Wedge have?
- How can we sustain the priority for brownfield development if we need to provide a whole package to demonstrate deliverability of such sites?
- Can the Core Strategy set standards that go beyond the existing Code for Sustainable Homes building regulation standards?
- Will the opportunity for increased Council Tax returns and New Homes Bonus ultimately drive decisions?
- People living in PUA extensions will undoubtedly utilise facilities in the city. How can Council Tax be recouped by the city?
- Will recent job losses in the city (Egg, Bombardier, Post Office, Celanese) be factored into housing number decisions?
- Housing numbers should be based on capacity in terms of land and infrastructure, rather than looking at these issues once we've come up with a number.
- Core Strategy should be heavily weighted towards housing renewal schemes in Rosehill and Normanton.
- Need to be aware of the impact of new development on flooding.
- Are we taking into account the number of vacant properties in the City?
- Is development still going ahead at the edge of Derby in Amber Valley?
- Any new development at the edge of the City will exacerbate existing infrastructure problems and what are we doing to address this?
- We may have underestimated the amount of brownfield housing that could come forward from Osmaston?
- Regeneration of existing housing in areas like Pear Tree is something that the Core Strategy should address. There are lots of areas in the city where the existing housing stock is in terrible/uninhabitable condition.
- Very difficult to get communities to work together in some areas of the city. Consultation and regeneration activity not necessarily reflective of the communities that are being targeted.
- We should be looking at reducing car parking throughout the city and using the surplus land for new housing development.

- Have we considered *all* of the potential for housing – Celanese for example?
- Concerns over South Derbyshire “dumping” its housing requirement onto Derby.
- Infrastructure in Alvaston and Allenton is already stretched.
- Protection of Boulton Moor Green Wedge
- Has there been any feedback from South Derbyshire about their preferences for the location of new housing?
- Green Wedge issues – green wedge policy ought to be more flexible in terms of allowing leisure uses which cannot be accommodated elsewhere (but which may not always fit into existing policy). Land for leisure uses is in short supply and expensive. Green Wedges can provide an alternative
- Phasing issues re: A38. Should be no development in south-west Derby until A38 flyovers are complete.

Planning and Transportation Sub-Group Event

Wednesday 14th September 2011

Task 1

Group 1

Higher Growth	
Pros	Cons
Providing smaller units may not put pressure on services – schools Maybe better able to meet housing need Reduce housing waiting list May lead to reduction in house prices Brings more spending power into the City	Highway infrastructure can't cope - Stenson Rd, Pastures Hill, Mansfield Rd Attract people who may out commute May make brownfield sites less attractive to develop Pressure on green wedges/open space School capacity
Lower Growth	
Less pressure on Greenfield Less pressure on services	House prices Attracting employees Overcrowding Higher rental prices

	Less range of housing?
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Location

New Settlement:

- Road connections
- Large enough to support facilities/employment
- Environmental constraints
 - Flood plain
 - Agricultural land

Towns & Villages

- Heanor/Ripley could benefit from new development and could give a boost
- Alfreton/Swadlincote
- Expanding the towns is better than expanding villages
- Balancing between providing for town/village needs without attracting larger scale growth
- Developers not as keen on areas with poorer image
- Possible site in Western On Trent – former Ukrainian centre

Around Derby

- Re-allocating employment sites
- Retain green wedges as they are but accept development outside that retains the wedge
- Nibbling away at the green wedge leads to more pressure in the future
- Principle of green belt less important than function of green wedge
- Oakwood green wedge – lesser of the evils
- Littleover/Mickleover taken fair share
- Share the pain
- Thulston Fields may be acceptable if one big site preferred
- East of Spondon Green belt site

Group 2

This group didn't really get into detail about the pros and cons of each scenario but had a much generalised discussion about development in and around Derby.

Growth	
Pros Could use small areas of green areas in and around Derby Lower growth could give a better quality of life	Cons Lack of good public transport Building out side of the City could push up house prices Using brownfield sites is expensive due to constraints of site and contamination

General comments received from this group:

- A number of Rolls Royce workers don't live in the City with some travelling, by choice, long distances.
- Some sort of Birth control measures should be introduced
- High rise/high density is the only way
- What do we really want Derby to be? Most people don't want it to be another Nottingham

The conclusion from both groups is that the growth could be accommodated across the city using small bits of the green belts/fields and then talk to neighbouring authorities to take further growth.

Comments from the Planning and Transportation Sub-Groups

Oakwood

- All members of the group had attended the Quad session so were fully accepting of the need for more housing in the Housing Market Area;
- Discussed the potential for high rise / density development and the problems of deliverability.
- Discussed specific sites that are being promoted in the Oakwood area. Group accepted that if greenfield extensions are required in the PUA that both land on Lime Lane and at Breadsall Hilltop (green wedge sites) could be developed, provided that there were community benefits, such as an extension to Chaddesden Wood or road improvements etc.
- When looking at the city as a whole, the group identified the Thulston Fields / Boulton Moor and Wragley Way areas as most appropriate locations for PUA extensions over and above land at Spondon or Mickleover.
- Councillor Wood was particularly keen for officers to go away and look for a site for a new settlement, rather than coming out with a blank sheet of paper.

He did suggest that there could be some potential in Erewash, around the junction of M1 and A42, although this is North West Leicestershire. General consensus was that new settlement option probably wouldn't be a goer.

- Identified that Smalley and Willington might be villages that could take more development and would benefit from enhanced facilities.
- The group came to the conclusion that the Regional Spatial Strategy target is probably the most appropriate as it is more achievable than the high end projection, is the most tested / evidenced option and would lead to less negative impacts (such as affordability issues etc) compared to the lower end scenarios.
- Need to ensure that areas of good quality agricultural land are protected as there will be a need for home grown food production when oil starts to run out.

Allestree

- Radbourne Lane has been given permission for 530 units and a single access point. Are there any other potential developments from Amber Valley that will impact on Allestree?
- There has been talk about 500 on Kedleston Road – any update on this?
- A comment was made about the densities and the quality of new homes built – larger room sizes are required.
- It was felt a Mature Suburbs Policy is required as part of the Core Strategy
- A concern was raised about developments being able to sustain the test of time and that this was open to interpretation.
- Concerns were raised about the green wedges being diluted with new development.

Darley

- The group felt that they had had a lot of infill housing in the past, particularly near the city centre and this had led to parking problems.
- They felt that in the future if housing were to be provided it should include more family housing as it was becoming dominated by apartments etc (especially around Chester Green)
- They agreed that providing a mix of housing generally was important.
- Although there was no overall view on the best housing distribution option, a member felt that a new settlement away from Derby looked like the best option but then a discussion followed on the fact that no site has been identified and it would be dependent on South Derbyshire or Amber Valley agreeing to take potentially large amounts of Derby's growth was a complicated issue in itself.
- **Voices in Action**
- Where Can New Housing Go?
- There are three options to choose from.

Group 1		
Option 1: Within the City	Option 2: On the edge of the City	Option 3: Outside of the City
<p><u>Good</u></p> <p>Easy access to social infrastructure</p> <p>The Rolls Royce site in Osmaston is a good regeneration opportunity site</p>	<p><u>Good</u></p> <p>Close to existing facilities</p> <p>Not as much pollution</p> <p>Support for local businesses</p> <p>More space for mixed development</p>	<p><u>Good</u></p> <p>South Derbyshire has more space</p> <p>Business for public transport</p> <p>Growth potential</p> <p>Will give a good quality of life</p> <p>More space for mixed development</p>
<p><u>Bad</u></p> <p>Lack of space for housing</p> <p>No room for gardens</p> <p>Lack of social housing</p>	<p><u>Bad</u></p> <p>Traffic pollution from commuters</p> <p>Requires more green space in city</p> <p>Less public transport</p> <p>Pressure on service</p>	<p><u>Bad</u></p> <p>Other Local authority area</p> <p>Traffic pollution</p> <p>Less public transport</p> <p>No social infrastructure</p> <p>Social isolation</p> <p>Pressure on activities for young people</p> <p>Pressure on public services</p>

Group 2		
Option 1: Within the City	Option 2: On the edge of the City	Option 3: Outside of the City
<p><u>Good</u></p> <p>Less travel to work</p> <p>Infrastructure already in place</p> <p>Encourage the use of public transport</p> <p>Replaces existing poor housing</p>	<p><u>Good</u></p> <p>Close to existing facilities</p> <p>Good existing infrastructure</p> <p>Good decent road network</p>	<p><u>Good</u></p> <p>Out of the way</p> <p>If there is sufficient growth to be self sufficient</p> <p>Lots of space</p>

Group 2		
Option 1: Within the City	Option 2: On the edge of the City	Option 3: Outside of the City
<p><u>Bad</u></p> <p>Tall buildings spoil views</p> <p>Parkland maybe used</p> <p>Developments might be crammed therefore more people</p>	<p><u>Bad</u></p> <p>Lots of green areas – maybe lost</p> <p>Already just housing estates</p> <p>Poorer public transport</p>	<p><u>Bad</u></p> <p>Further to travel to main areas</p> <p>Access to schools</p> <p>Becoming noisy & congested</p>

Group 3		
Option 1: Within the City	Option 2: On the edge of the City	Option 3: Outside of the City
<p><u>Good</u></p> <p>Easy access to shops</p> <p>Good access to schools</p> <p>Less competition</p> <p>Popular</p> <p>Might encourage more walking & use of public transport</p> <p>Could improve social cohesion</p> <p>Make something useful out of nothing</p>	<p><u>Good</u></p> <p>More space for development</p>	<p><u>Good</u></p> <p>Reduced congestion</p>
<p><u>Bad</u></p> <p>Over crowding</p> <p>More congestion</p> <p>More pollution</p> <p>Could be more tension</p> <p>More competition</p> <p>Will there be enough schools/jobs?</p>	<p><u>Bad</u></p> <p>Further distance to travel to city centre</p> <p>Change in community</p> <p>Cost</p> <p>Increase in pollution</p> <p>Loss of green areas</p> <p>Spoiling views</p>	<p><u>Bad</u></p> <p>Opposition from existing residents</p>

- **Conclusion:** Two of the three groups thought development on the edge of the city was the best option, while the other group thought inner City development would be best.

7

**Summary of representations
made pursuant to the Three
Topic Consultation**

This consultation began on 24 February 2012 and ended on 26 March 2012.

A number of issues developed through the preparation of our evidence base and processed the consultation responses. This consultation gave officers, developers and agents and the local community the opportunity to provide their views on a number of approaches for each topic.

Unlike the previous three consultations, we carried out a targeted consultation, focussing on certain stakeholders. To reiterate, Regulation 25 of the Planning and Compulsory Purchase Act 2004 states that we must consult with '*general consultation bodies as the local planning authority consider appropriate*'.

The consultation material for this stage consisted of three individual documents:

- **Parking Strategy**
Concerns have been raised recently about the Council's parking policies and their perceived impact on investment, particularly in the City Centre. It is understood that, from a planning perspective, these are focused on parking standards and the amount of spaces permitted with new development.

The consultation document contained five approaches for how car parking could be dealt with in the future.

- **Open Space Standards**
Concerns have been raised which suggest that the current practice of requiring on-site open space as part of major housing developments has existing, and on-going, resource implications. This is mainly in terms of the long-term maintenance of an increasing amount of open space. In addition the protection of all open space in the City is seen as unsustainable and the future of some areas of open space which are poorly sited, poorly used or difficult to maintain needs to be undertaken.

- **Out-of-Centre Shopping**
Recent changes to the retail market, national planning policy and the economic climate has led to increasing pressure on this policy. Retailers are changing their business models to sell a wider range of goods and many wish to open stores in both in-centre and out-of-centre locations. In addition, a number of retailers have found loopholes in historic permissions which has meant they could open stores in locations that would not normally have been permitted (an example of this is Next on the Kingsway Retail Park). There



is an increasing gap between the policy and the reality of the situation in the City

In addition the Council produced a Brownfield Regeneration Strategy which, although not part of the consultation process, was made available for people to inspect and comment on.

- **Brownfield Regeneration Strategy**
The 'Derby Housing Market Area: Options for Housing Growth' consultation indicated that the City could realistically deliver around 10,000 new homes through existing commitments and brownfield land.

Analysis of the consultation responses highlighted the public's support of the Council's aspiration to use brownfield land and fill empty properties to help meet the housing needs.

The Brownfield Regeneration Statement sets out what the Council and its partners are doing to ensure the major brownfield sites are regenerated. It also sets out how many new homes could potentially be built on a range of brownfield sites and provides further details on what is being done to ensure Derby's empty homes are being brought back into use.

This exercise was undertaken solely by Derby City Council.

Who was consulted?

The Council consulted all Specific and General consultees as required by the regulations and all of those persons or bodies contained within its consultee database at the time.

The consultation was carried out in accordance with the Council's adopted Statement of Community Involvement. Therefore, we engaged with the Neighbourhood Boards, Diversity Forums, members of the community and internal officers.

The Compendium of Publicity Material contains the publicity material and press coverage of the consultation.

How was the consultation carried out?

- **Mailshot to interested parties**
Before the consultation started a letter or email to everyone on our LDF consultation database. The database contains the contact details of the specific consultation bodies, general consultation bodies and members of the business and local community. In addition emails were sent to Chief Officers and Members informing them that the consultation was taking place and inviting them to make comments.

An email to everyone registered with the Council's "Your City, Your Say" consultation service.

The Council's Neighbourhood Forums, and in particular the Planning and Transportation Sub-Groups, were informed that the consultation had begun and the subjects it covered.

The Council's Diversity Forums were informed that the consultation had begun and the subjects it covered.

The consultation was highlighted in the St Peters Quarter Business Bulletin

The consultation was highlighted in the Cathedral Quarter Business Bulletin

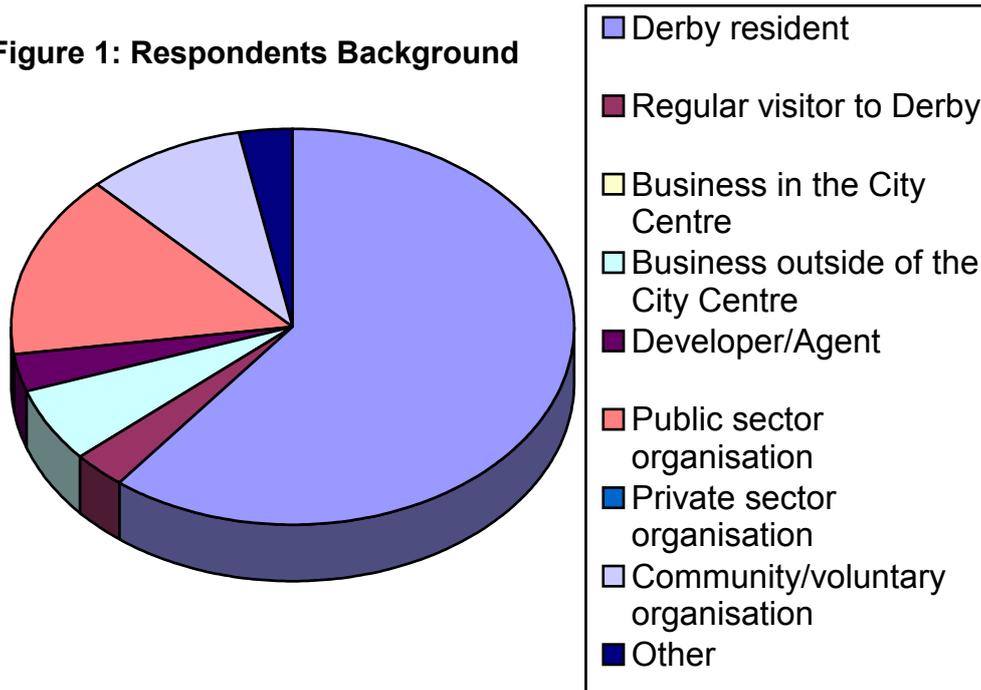
- **Deposit documents**
The consultation material for this stage consisted of an individual document setting out the options for each topic and the Brownfield Regeneration Strategy. Each consultation document had a specific response form.
- **Website**
All consultation documents were put on the Council's website. In addition, an on-line form was made available for respondents to submit their comments electronically.
- **Press releases**
A press release was issued on the 27 February 2012 which resulted in two articles in the Derby Evening Telegraph on the 28 February and 3 March 2012.
- **Internal Consultation**
An article was included in the Council's "In Touch" magazine on the 5 March 2012. This is a weekly e-magazine which is sent to all Council employees.
- **Presentations**
An Officer from the Planning Policy team attended the following groups:
 - Vibrant City Centre Group
 - Derby Property Alliance
 - Marketing Derby Agents Meeting

What were the main issues?

Open Space

In total, we received 34 responses from members of the public, developers and statutory bodies. Figure 1 below indicates who responded to the consultation.

Figure 1: Respondents Background



Question 1

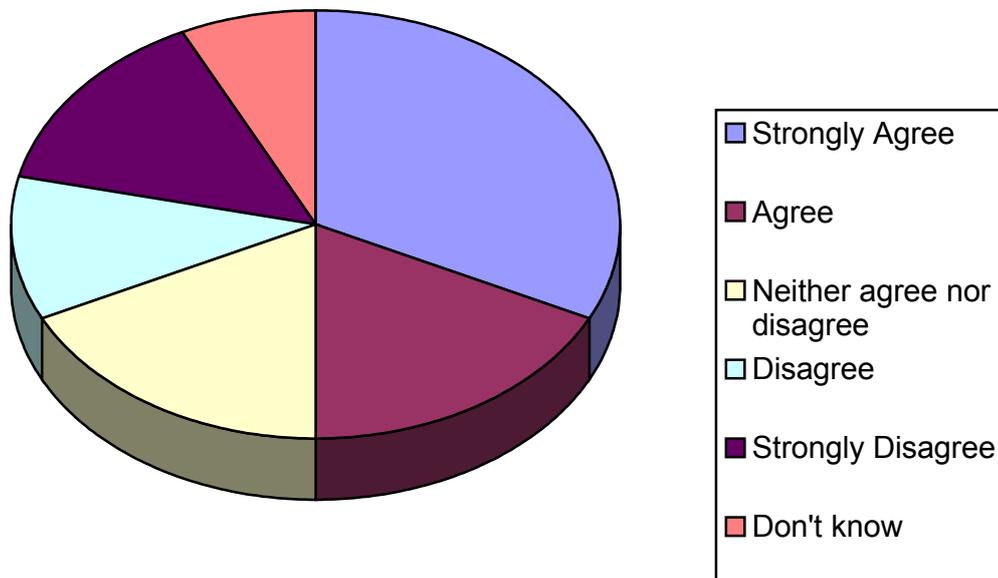
Question 1 set out three approaches for the future provision of open space across the City. These approaches would inform future policies in the Local Plan.

Approach 1 suggested that we continue to use the current local plan policies by:

- a) Protecting all public open space unless an assessment has been undertaken which clearly shows that it is surplus to requirements, and
- b) Continuing to have regard to a minimum standard of 3.8 hectares of open space for every 1000 people distinguishing between incidental and major open space

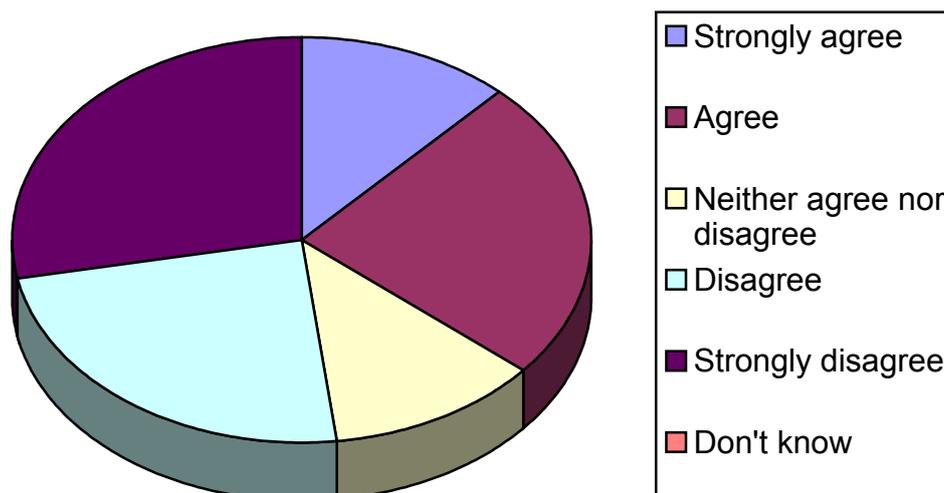
Figure 2 below indicates the response to approach 1. It highlights that half of those who responded agreed with its continuation in the local plan and, if combined with those people who neither agree nor disagree, there is a significant amount of support for the retention of this approach.

Figure 2: Response to Approach 1



Approach 2 would allow a greater flexibility for the provision of open space in the future. This approach would continue to protect most open space but would provide the flexibility to allow for the development, for example for housing, on open space even where there is a surplus. In particular it could allow for the development of open space that is poor quality and not valued by the community. This approach could provide funding to improve the quality of other public open space in the local area. Figure 3 below shows the responses to this question.

Figure 3: Response to Approach 2



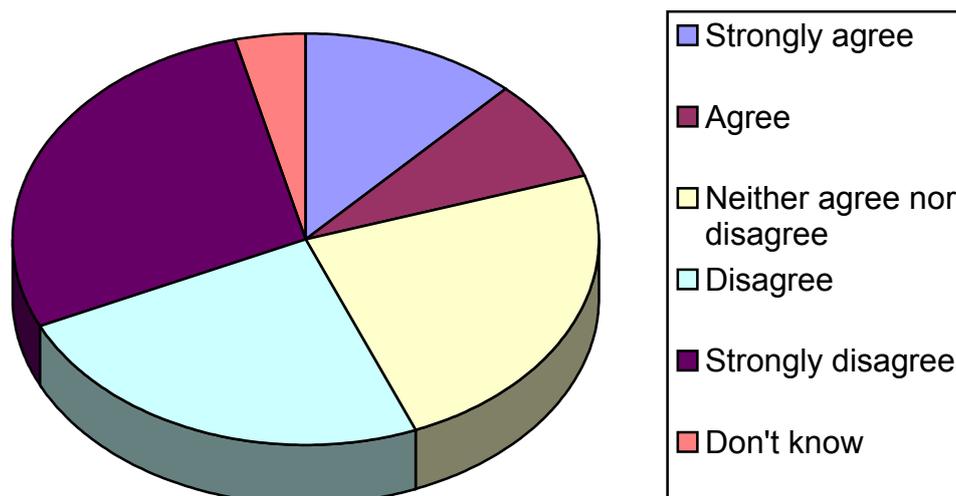
The responses we received indicate that the majority of people disagree with this approach.

Approach 3 proposed to reduce the overall amount of new open space identified as part of new development and at the same time seek more financial contributions to improving the quality of existing public open space. This approach will allow more flexibility to seek financial contributions to improve the quality of existing public open space close to new residential developments rather than always seeking new open space. New open space would normally be prioritised where:

- a) access to existing open space in the area is poor and financial contributions to nearby sites would have little benefit
- b) the site is large and justifies the provision of smaller areas of open space on site
- c) the development is close to a proposed new park and could contribute to its delivery

Figure 4, below, indicates the response to Approach 3.

Figure 4: Response to Approach 3



The results indicate that there are a significant number of respondents who were opposed to this option. However, it is apparent that there are a large number of people who neither agreed nor disagreed with this approach.

In addition, people were asked to provide additional comments to back-up their comments; the following is a summary of the salient comments:

- It was felt that any new policy in the Local Plan should be based on up-to-date information as required in the National Planning Policy Framework. Indeed, one representation highlighted that the existing standards in the City of Derby Local Plan Review were based on out-of-date information and a new assessment is needed to ensure that future policies take

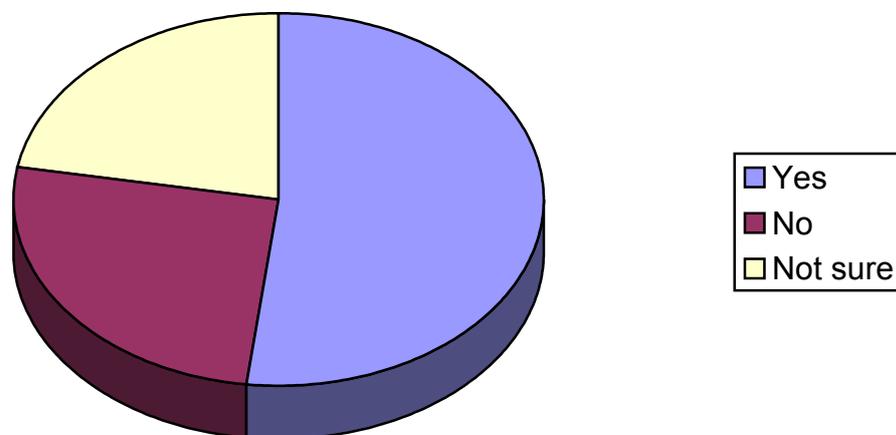
account of the changes in provision since the Local Plan's adoption.

- It was also considered that a review of open space should be undertaken in conjunction with a playing pitch review.
- Some respondents highlighted the need to build on brownfield sites first rather than building on greenfield sites.
- As previously discussed, there is a general support for Approach 1. However, some people did recognise the benefits of approaches 2 and 3.
- It was considered that approach 2 would be less restrictive than approach 1 and it would allow the Council to re-assess the future of certain types of open space which weren't valued by the local community. It was also considered that, in certain cases, by releasing certain pieces of open space to improve the rest of the space may be acceptable. However, in contrast some respondents thought that, as there isn't enough open space in the City, no open space should be released for development.
- There is still a need to provide a city park serving the south of Derby.
- There was a concern that the consultation appeared to concentrate on public open space such as parks and recreation grounds rather than looking at open space as part of the Green Infrastructure Network

Question 2

Question 2 sought people's views on how much open space we should provide on new developments. Over the plan period new development will be carried out in both the inner city areas as well as Derby's suburbs. We wanted to know if we should provide the same amount of open space in inner city areas and for higher density developments on brown field sites as we would on greenfield sites?

Figure 5: Open Space Standards



Additional comments relating to this question highlighted the need to base any decision on up-to-date information on quality, quantity and accessibility. Other

comments indicated that the provision of open space is more important in inner city areas and new developments on brownfield sites should be built at a lower density with larger gardens which would offset the need for more open space. Finally, it was suggested that the provision of new open space should be based on the demographics of the new development.

Question 3

Question 3 suggested that the Council could be more flexible in the type of open space provided. For example, we could provide less formal open space such as playing fields and formal recreation areas in return for alternatives such as natural or semi-natural open space or allotment gardens.

Figure 6: Other types of open space in Derby

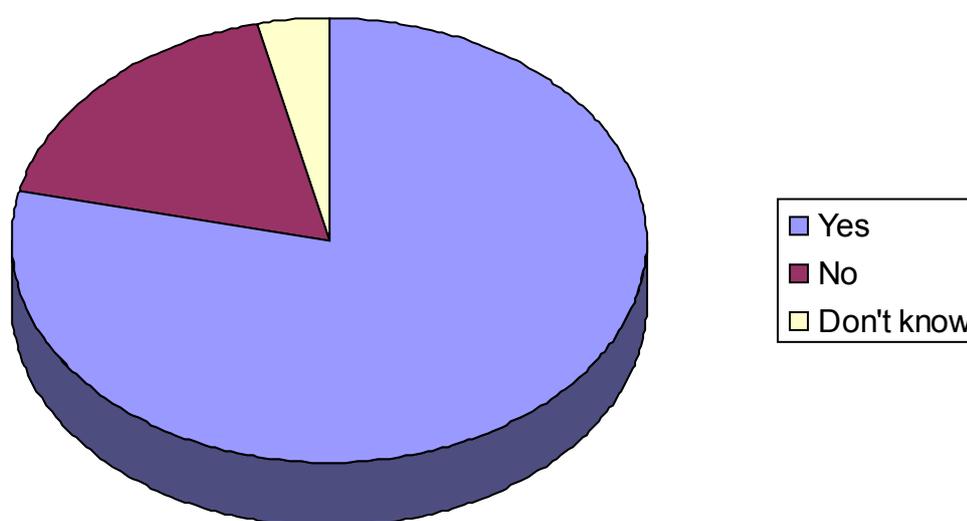


Figure 6 indicates that the general consensus was supportive of providing different types of open space in the City. While it was recognised that there is still a need to provide facilities for children and young people, respondents thought that providing, for example, natural and semi-natural greenspace would benefit biodiversity and help address the impact of climate change. It was suggested that the Council should consider using Natural England's Natural Greenspace Standards (ANGSt).

Many respondents highlighted that the provision of open space tends to be predictable and by providing other types such as meadows, allotments, community gardens or woodland planting would reduce the maintenance costs, improve Derby's ecology and provide a varied urban landscape. By adopting a more flexible approach would allow the constraints of an individual site to be taken account of during the design stage.

However, it was reiterated that any decision on the type of open space provided should be informed by an up-to-date open space study.

General comments

The perception of open space in the City appears to be positive however some people were concerned about the amount of litter.

One respondent stated that future open space should be multi-functional, providing options for leisure, nature conservation and flood relief.

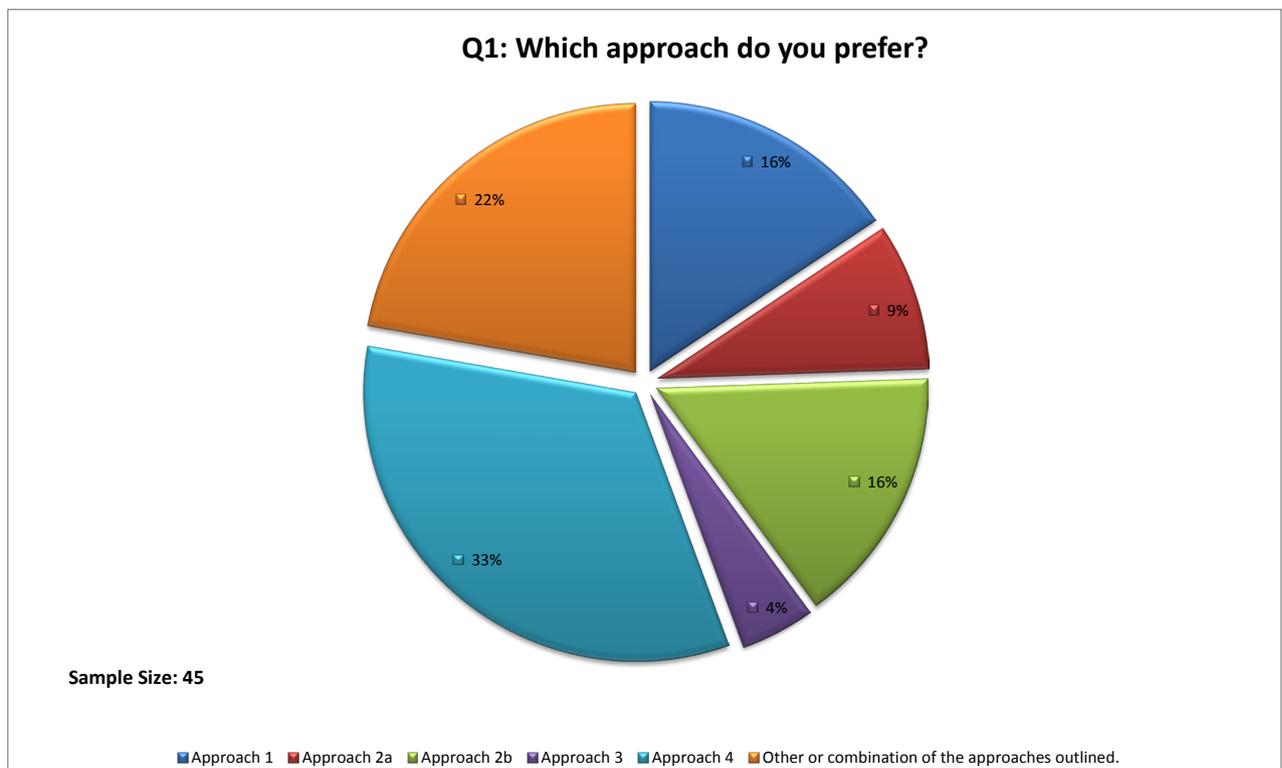
Parking

In total, we received 45 responses from members of the public, developers and statutory bodies.

Question 1

Which of the broad approaches outlined do you think would be the best for Derby?

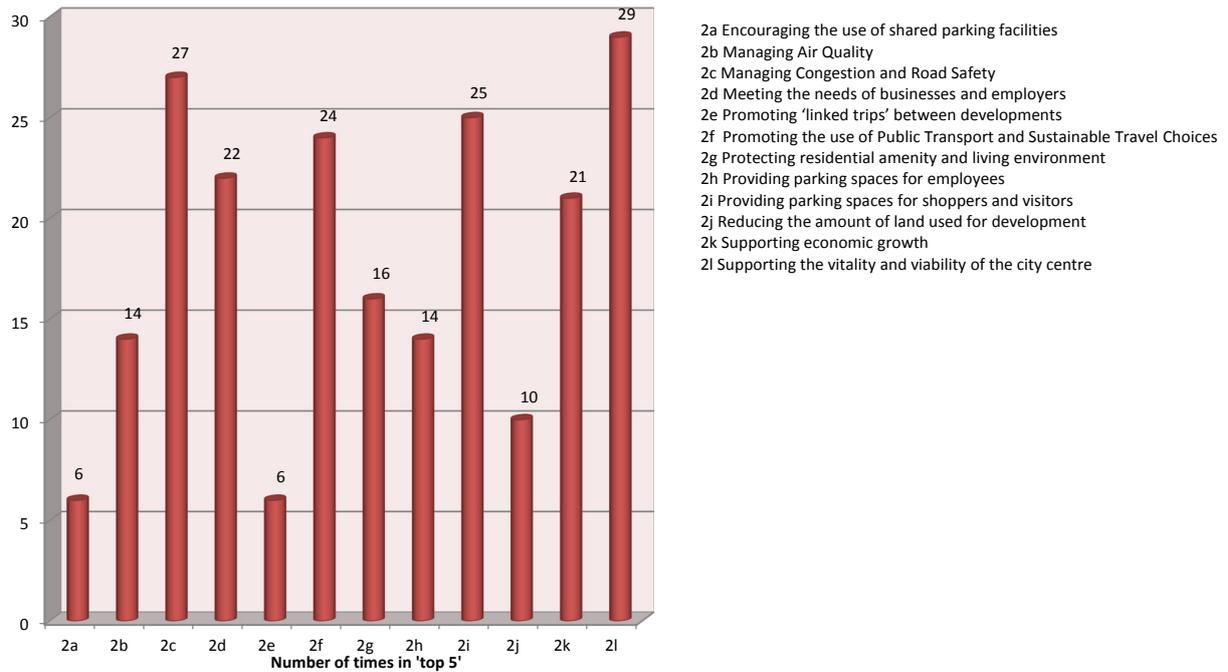
- Approach 1: Continue to use the City of Derby Local Plan Review policies
- Approach 2a: relax parking standards in the City Centre
- Approach 2b: Relax parking standards across the city
- Approach 3: Provide new public parking in the City Centre
- Approach 4: A flexible approach to car parking taking into account the needs of the development and/or the nature of the area
- Other or a combination of the approaches outlined



Overall, the most favourable option is Option 4 which seeks to provide a more flexible approach to parking by removing the maximum parking standards and base decisions on the characteristics and needs of the individual development.

Question 2 required respondents to prioritise twelve issues which could impact on the provision of car parking in the City. The results shown overleaf indicate how many times a certain issue made the respondent's "top 5".

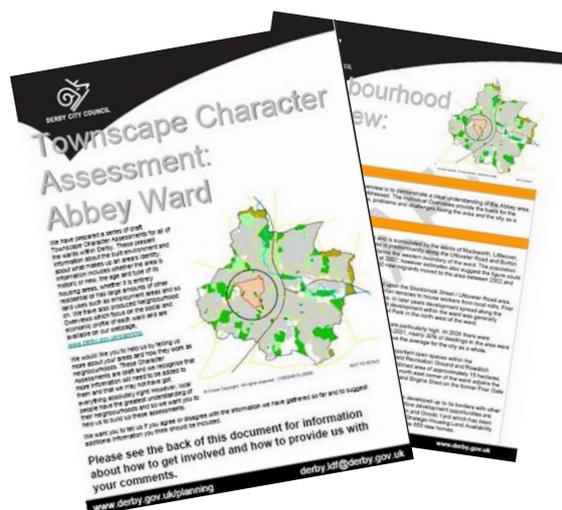
Q2: Prioritising Issues



8

Summary of representations made pursuant to the Your Neighbourhood Consultation

Following the completion of the Options Consultation in the spring of 2010, the Coalition Government made significant changes to the planning system by introducing the 'Localism Agenda'. The Government also announced its intention to revoke the higher levels of planning policy, most notably the Regional Spatial Strategy (RSS). At the time of carrying out the Your Neighbourhood engagement the Localism and Decentralisation Bill was progressing through Parliament with the hope of being enacted early in 2012.



With such significant changes to the planning system, the three HMA authorities decided to take a step back and re-assess the future based on the revocation of the RSS and engage with local communities to encourage them to participate in the development of our Core Strategy.

The consultation began on 16 February 2011 and ended on 31 May 2011.

Who was consulted?

The City Council's Neighbourhood Forums provided the most accessible avenue for engaging with the community. Every electoral ward in Derby has at least one neighbourhood forum. Neighbourhood forums are open public meetings for all local residents, community organisations and businesses. They are chaired by a local ward councillor and are held at a local venue every two or three months. They are an opportunity for the local community to find out what's happening in their area and to discuss issues and priorities. The forums are open public meetings, giving the chance for the community to talk to councillors, the local police, council officers and other service providers.

How was the consultation carried out?

- Deposit documents
Neighbourhood Overview Summaries – a development of the Neighbourhood Overviews produced for the Options Consultation which now includes comments received during that consultation

Townscape Character Assessment – assessment of the built environment and what aspects make up the character of the area – building age, style, density and layout.

Questionnaire – this was used as a prompt for people to start thinking about their area. What they feel is good, bad and what they would like to retain. It also enquires if they would like to be part of a Planning and Transportation sub-group.

- Community Groups

Officers from the Spatial Planning Team attended, and gave presentations at the following forum meetings:

- 16 February 2011 Sinfin Neighbourhood Forum
- 23 February 2011 Mickleover Neighbourhood Forum
- 24 February 2011 Normanton Neighbourhood Forum
- 9 March 2011 Boulton Neighbourhood Forum
- 9 March 2011 Spondon Neighbourhood Forum
- 10 March 2011 Arboretum Neighbourhood Forum
- 10 March 2011 Oakwood Neighbourhood Forum
- 16 March 2011 Allestree Neighbourhood Forum
- 23 March 2011 Alvaston Neighbourhood Forum
- 29 March 2011 Derwent Neighbourhood Forum
- 5 April 2011 Mackworth Neighbourhood Forum
- 6 April 2011 Littleover Neighbourhood Forum
- 13 April 2011 Blagreaves Neighbourhood Forum
- 14 April 2011 Chellaston Neighbourhood Forum
- 20 April 2011 Darley Neighbourhood Forum
- 27 April 2011 Abbey Neighbourhood Forum

Planning Officers were not able to attend a meeting of the Chaddesden Neighbourhood Forum during the consultation period. However, Neighbourhood Managers were able to give a brief presentation just before the consultation period began and publicity material and documents were made available later.

Two officers attended each forum, making themselves available before the meeting to answer any questions on a one-to-one basis. A presentation covering the following points was then made:

- To explain the Government's approach to planning, including proposals for new Neighbourhood Development Plans produced by communities themselves
- That we are continuing to develop our Core Strategy despite changes to the planning system
- Due to the changes we can look afresh at certain aspects, for example the location and amount of new housing, but that any changes need to be properly justified by evidence
- That all of the work we have undertaken, including comments made from previous consultations are still valuable

- It is important for the local community to get involved in the Core Strategy process by setting up a Planning and Transportation Sub-Group. This group could also, if desired, write a Neighbourhood Development Plan with the help of planning officers if and when the Localism Bill becomes law.

Officers then discussed the content of the engagement material, stressing that any comments are valuable. Finally, officers answered questions from the forum.

In addition to attending the Neighbourhood Forums, planning officers attended two community drop-in events arranged by forums themselves.

- 12 March 2011 My Mickleover
This was a drop-in event where members of the public could informally discuss issues in the ward with various Council departments.

Publicity for the event was included in the Mickleover Directory which was distributed to 6000 households. The event was also publicised on the internet (www.mickleoverpeople.co.uk) and information was included in the Neighbourhood Forum information pack.
- 23 May 2011 Vision Littleover
This was a drop-in event where members of the public could informally discuss issues in the ward with various Council departments.

To publicise the event a flyer was distributed to a number of businesses and residential properties in Littleover and Heatherton. In addition the event was publicised in the information pack sent to all members of the Neighbourhood Forum.

What were the main issues?

The questionnaire accompanying this engagement process contained 14 questions and the following four focussed on people's thoughts about their local area:

- Question 1: Where do you consider your local area or community to be?
- Question 2: List three good things, for example what you would like to preserve and protect
- Question 3: List three things you would like to change or improve
- Question 4: Are there any community facilities or services that your area needs or you think should be improved?

Question 5: Would you like to represent your area on planning and transportation issues?

Question 6: Do you have any comments to make on our Neighbourhood Overviews or Townscape Assessments?

The following is a summary of the comments made at each Neighbourhood Forum and the responses to all of the questions.

Abbey

One person made comments about Abbey.

Q1 - Where do you consider your local area to be?

- Abbey (St Albans Road)

Q2 - Good Things to preserve and protect

- The local parks and open spaces
- Bus service
- Keeping Abbey ward clean and tidy

Q3 – Things to change or improve

- Seeing Royal Derby Hospital parking removed from St Albans Road/Louvain Road
- Seeing more residents coming to and showing an interest in the neighbourhood forums

Q4 - Community Facilities or Services Needed

- Please would the traffic department keep their eye on the ring road A5111 as at the moment there are 16000 vehicles going south, 15000 vehicles going north? Which I am sure has increased since the last survey.

Allestree

Six people made comments about Allestree.

Q1 - Where do you consider your local area to be?

- Allestree
- Allestree & Darley Abbey
- Area around Park Farm
- Allestree - between Park Farm, Allestree Park and A6 north of A6/A38 junction.

Q2 - Good Things to preserve and protect

- Green infrastructure such as green spaces and large gardens, street trees and proximity to open countryside

- Reliable bus service
- The distinctive character of the mature local areas representing the social development of the locality.
- The parklands and open green spaces, also the adjoining countryside remaining as countryside
- The safe environment of low crime levels and living in a community which cares about the neighbourhood
- Street trees
- Footpaths and jitties
- Kedleston Road hedge and marsh green wedge
- Ease of access to the surrounding countryside by walking or cycling - currently there is very little 'sprawl' from Allestree apart from west side of Kedleston Road old rugby ground.
- It is a pleasant leafy suburb and cities should retain these areas to attract people to live within and contribute to the city rather than having to live outside it to give this environment.
- Free local bus service (subsidised)
- Good shopping area at a Park Farm
- Good Bus service
- Allestree Park
- Low rise/low density housing

Q3 – Things to change or improve

- A bus service that goes to the bus station rather than only to Albert Street
- Serious enforcement regarding loss of garden land for car parking, especially when of non-SuDS standard.
- More wildlife friendly treatment of green space by the City Council.
- More facilities for young people - particularly sports & youth clubs
- More car parking facilities with controlled limited waiting at various pressure spots
- A reduction in anti-social behaviour in a few areas of Allestree
- Punctuality of Allestree bus service and return to running to the bus station
- Reduction in the volume of traffic and traffic congestion on Kedleston Rd particularly at Five Lamps and to a lesser extent the A38 flyover
- Re-greening of streets where front gardens have been converted to car parks because of street parking restrictions
- Change the notion that it is OK to infill with high density development such as 'garden' type developments. Larger gardens help give this area its feeling of space - we should not crush that everywhere we find it.

- Whilst not wanting to deny more people the opportunity of enjoying what this area has to offer, inappropriate and intensive development could damage what is special about this location.
- Development proposals should be targeted on brownfield sites
- Once we build on open or green sites, we never get that space back again for everyone to enjoy.
- Maintain park areas - increase child play area sites
- Improve litter picking in alleys/ footpaths
- More police presence in park areas
- Stop developers buying large properties to develop as over dense, poor quality housing.
- Better quality shops especially at Blenheim Parade
- Local bus services should go into the bus station

Q4 - Community Facilities or Services Needed

- There seems to be a need for a centre where older people can meet and socialise
- It is tedious and difficult to have to trek across to and around the Royal Derby Hospital for every medical matter, especially if unwell and elderly. Can consultants not visit a more local centre?
- Allestree is somewhat lacking in facilities for younger children & teenagers and I would have thought a sports & leisure centre attached to Woodlands School would be a tremendous asset to the people of Allestree. This would no doubt only be feasible with PFI investment
- More allotments
- More activities for the elderly & teenagers
- Have a local drop in centre - possibly Park Farm, for residents to bring to the attention of officials any concerns
- Stricter controls on housing planning/building of new properties, particularly in filling building of properties in house gardens.
- The local authority should involve itself more in public transport. It is irresponsible to say that bus timetables & routes are the responsibility of the bus companies. DCC duty is to provide good quality services for its residents.
- Allestree Park is scenically fine and deserves more DCC resources, only one ranger is totally inadequate. Allestree Hall is a disgrace - is the Council waiting for vandals to break in and burn it down. Allestree Park has good woodland and isolated trees, however woodland needs constant care and this needs full time presence in DCC of a qualified arboriculturist and needs to do what is necessary.

Q6a - Comment on Neighbourhood Overview

- On housing it states there are fewer smaller properties than in other parts of the city, is this accurate as there are quite a number of 2 bed bungalows.
- I would not like to see an increase in large scale retail stores which would threaten the viability of existing businesses, but it would be beneficial to shoppers and businesses at Park Farm to see vacant units occupied and the centre re-vitalised.
- I thought they gave a fair description of the area. It also explained why this is a popular part of the city. I do think it important for cities to retain a range of areas and housing provision. If there are attractive areas within a city it encourages people to live there and be a part of the city and contribute to it. Otherwise, they would have to find a more pleasant place to live away from the city while they commute in to work.

Q6b - Comment on Townscape Assessment

- Given the age profile of Allestree residents with a high level of older people, consideration should be prioritised towards facilities for day care particularly for the disabled and dementia sufferers. This would reduce the strain on permanent carers.
- Townscape character should include identified wildlife sites of natural history value including
- Markeaton brook System, Allestree Park LNR, Kedleston Road hedge, Kedleston Road
- Marsh, Markeaton Park and Woodlands School hedges and mature trees.
- My house was built in 1939 so the map is not quite correct.

Alvaston

Three people made comments about Alvaston.

Q1 - Where do you consider your local area to be?

- Alvaston between the shopping centre and YMCA
- Alvaston

Q2 - Good Things

- The transport links are good - it's easy to get anywhere by bus, train or air
- The shops are varied enough for most everyday items.
- I was dismayed to learn that Alvaston was the fifth most deprived ward in the city. What actions help to improve this? I presume an influx of extra jobs becoming available may help, and this could happen if the Commercial Park takes off. Similarly, if the land on Raynesway that has been cleared is taken by some industry the job total could increase. I

wonder if more could be made of the heritage aspects of the western section - particularly thinking of how well the Roundhouse has been utilised and also big plans which have been proposed for the area around the station.

- It would be good if some of this enterprise could spread out down London Road.
- Wasn't there a plan sometime to build a Derby ARM (like a boat lift) somewhere on the river around the Pride?
- Park area - another chance to connect to Alvaston and generally raise the profile.
- Within walking distance of Alvaston park and the bird sanctuary
- Parks
- Elvaston Castle
- Shopping Centre
- The local bus service

Q3 - Change or Improve

- Some more trees would be good, although obviously suitable space is required for this
- Some different shops would be good - an Alvaston branch of Bestwicks (of Allenton) and a Barclays!
- A ranger for Alvaston Park to encourage more people to use and enjoy
- Rubbish & dog waste
- Parking on narrow pavements and over drive ways
- More places to place dog waste
- Hedges should be cut back where pavements are very narrow
- Better connection of bus service between Alvaston & Allenton not just from the Blue Peter

Q4 - Community Facilities or Services Needed

- There seems to be good services offered
- More litter bins
- We are very well provided for regarding facilities and services

Arboretum

Two people made comments about Arboretum.

Q1 - Where do you consider your local area to be?

- City centre

Q2 - Good Things

- There is a fair bus service - except on Sundays

Q3 - Change or Improve

- Improve support for neighbourhoods - some action on absentee landlords, social housing managers (ombudsman will not accept complaints from home owners)
- Cyclist on pavements
- That stupid zig-zag access slope from the Eagle Centre next to the Castle and Falcon

Q4 - Community Facilities or Services Needed

- community facilities in city centre
- restore good neighbourhood - with support to deal with neighbourhood problems.

Blagreaves

One person made comments about Blagreaves.

Q1 - Where do you consider your local area to be?

- Around Blagreaves Lane, Stenson Road junction

Q2 - Good Things

- Cluster of Schools eg Gayton, Ridgeway
- Cluster of shops at Blagreaves Lane & Stenson Road

Q3 - Change or Improve

- Improve declining bus services
- Improved medical services
- Improved primary routes to cope with not only local but increased traffic from outlying areas

Q4 - Community Facilities or Services Needed

- Number & variety of shops and improved park areas
- In my view a major problem is South Derbyshire developing housing estates next to the City. They get away without contributing to the city's infrastructure.

Boulton

Two people made comments about Boulton.

Q1 - Where do you consider your local area to be?

- Stenson Bubble in the South, Borrowwash in the East, Darley Abbey in the North and The Barracks in the West
- Alvaston & Boulton

Q2 - Good Things

- The cycle paths along the River Derwent and along the old Derby canal
- The lower part of the Derwent below Goodman development
- All existing jitties including the public footpaths

Q3 - Change or Improve

- All dropped kerbs to realign them with the main road being accessed
- Road markings so that vehicles give way to pedestrian crossing their path

Q4 - Community Facilities or Services Needed

- Sheltered seating within the Alvaston DC, improved toilets and more bollards to stop illegal parking.
- A crossing over London Rd local to the island at Raynesway.
- Services that are at present dealt with at the City Hospital accessed within the local District Centre.
- Bus access to Allenton that is accessible from my area without having to change buses.
- Seat in green areas.
- Upgrading of the cycle path along the Derwent with seating and picnic tables.
- Create the following - a new road from Meadow Lane to the new Raynesway island and new footpaths between Green Lane and Glastonbury Road and another between Green Lane footbridge and Borrowwash weir following the route of the old culvert.
- Make a cycle path below Raynesway road bridge higher to stop the flooding at time of high river water.
- Generally cut back the vegetation along the river so that wildlife can be seen.
- Take more account of the disabled user on crossings etc as the green man flashing blocks the view as to what traffic is approaching.

Darley

One person made comments about Darley

Q1 - Where do you consider your local area to be?

- Darley Abbey, but the links /connections to the city Centre, Strutts Park & Chester Green are important

Q2 - Good Things

- The quality of footpaths & cycle routes need preserving
- There is a good sense of community in (improving) Darley Abbey
- Agricultural quality, all types and all open spaces

Q3 - Change or Improve

- An air of neglect/abandonment - Duke Street, Bath Street, Silk Mill
- University parking and student domination of some West End streets. (university good)

Q4 - Community Facilities or Services Needed

- better use, physical integration of the Adventure Centre in Darley Park
- A takeaway would be good at the old PO on Duffield Road
- Maintain the through ped/cycle route through St Benedict's (provides access to Park Farm)

Q6a - Comment on Neighbourhood Overview

- I think it is good to use wards to define larger neighbourhoods, especially to engage Councillors, which is really important. However, unlike e.g. Mickleover) Darley is very varied, physically, economically and socially and it is closely linked to the City Centre. Analysis and action needs to reflect this variety; one size does not fit all. Some things (the river, the parks, the A6 and Kedleston Rd) can unify but others, house prices, educational opportunity, the A38, Alfretton Rd and the inner ring road) are barriers.

Littleover

Three people made comments about Littleover.

Q1 - Where do you consider your local area to be?

- Littleover District centre
- Littleover Village
- The area bounded by Burton Road, Manor Rd, Uttoxeter Rd and Chain Lane

Q2 - Good Things

- Shopping

- Transport
- Would like Littleover to continue to be a good residential area
- Council planted bulbs & trees
- Bus routes plus over 60's bus pass
- Local parks, footpaths etc
- Free bus service for senior citizens
- Resident's parking scheme
- Grass verges

Q3 - Change or Improve

- Speed reduction on all roads
- More police presence
- Too many takeaways - causing litter problems
- Too many front gardens being used as car parks and car sales areas
- Thoughtless parking in residential areas
- No further house building on perimeter of area or in back gardens

Q4 - Community Facilities or Services Needed

- A village hall type facility for community meetings
- More open space for recreation
- A library
- Littleover village shop fronts looking jaded & tired and need more of a 'centre' feel
- Heatherton bus time table - unreliable as opposed to Mickleover which is very reliable (perhaps due to the bus lane?)
- The possibility of further housing development on the south side and of South Derbyshire would have an adverse effect on neighbourhood infrastructure. The road system is already over capacity as are the junior & senior schools. Therefore I am opposed to further housing development.
- The development of the Royal Hospital has had a heavy impact on the roads during travel times and on residents where parking is a huge problem. However, development on the Kingsway site maybe less of a problem if more schools are provided to support families who move there.
- A library is needed

Q6a - Comment on Neighbourhood Overview

- The main roads which border and impact on the area Burton Rd, Uttoxeter Rd, Ring Rd and A38 are already heavily congested. The

further development of the Rykneld Rd area should not be approved, the additional traffic would only add to these problems.

- The approved new development at Manor-Kingsway will be intolerable, located as it is opposite a large trading estate which already has its problems due to there only being one road in and out! Already, the cross roads at Manor Kingsway junction are overcrowded particularly, the right hand filter from Kingsway to Uttoxeter Rd. The Argos store soon opening on Kingsway site will only make things worse.

Mackworth

Four people made comments about Mackworth.

Q1 - Where do you consider your local area to be?

- Markeaton Park to Radbourne Lane
- Mackworth Estate

Q2 - Good Things

- Green open spaces, e.g. Markeaton & Mackworth
- Green Spaces , open countryside & green wedges
- Footpath from Prince Charles Ave to Murray Park School
- Good bus services to City Centre
- Good bus service to enable elderly to retain independence
- Sporting facilities
- Community Transport
- Library
- Trees

Q3 - Change or Improve

- Green open spaces
- Cycle path to link Mickleover Station area with open countryside to avoid heavy traffic
- Link cycle path to old Mickleover Railway Station
- Employment facilities
- New/proper medical centre
- Protection of grass verges
- Need more leisure facilities

Q4 - Community Facilities or Services Needed

- More for young people
- Extra police to patrol areas exposed to vandalism

- Extra cycle paths
- All consultations should be well advertised to enable everyone to participate
- Improve sporting facilities in light of the loss at Mackworth College
- large new housing developments are a major concern with extra volume of traffic
- Slower traffic on narrow estate roads - perhaps 20mph limit?
- Bus service to Hospital/Kingsway shops
- If more housing is built then more facilities are needed
- Improvements to shopping area to include parking

Q6a - Comment on Neighbourhood Overview

- Lack of allotment provision is sorted as one should be up & running next year.

Mickleover

Six people made comments about Mickleover.

Q1 - Where do you consider your local area to be?

- Devonshire Drive Shops, Vicarage Road, Doctor's Surgery, Mickleover Library, St John's Church
- Mickleover
- Mickleover, especially the western edge and Mickleover Village Centre
- The parade in the Village Centre, the Community Centre and the Library and the area up to the Church

Q2 - Good Things

- That sense of community and mutual helpfulness
- Ease of access to the City Centre
- With family in London & Glasgow, the proximity of East Midlands Airport is useful.
- Apart from traffic noise it is a quiet area
- Clean and tidy
- Excellent bus service, including into Derby city centre
- Our lovely new library.
- Our choice of doctors & dentists
- The parks, green wedges and open spaces, especially around the Silverhill estate
- Our tree lined roads, small cul-de-sacs, low rise housing and range of

housing mix for different

- Age groups and life styles
- Allotments
- The old historic centre of the village which is a conservation area
- The fact that Mickleover is predominantly residential
- The Memorial Hall & Community Centre
- The first class bus service
- Adi zone at Vicarage Park
- The Pavilion on Vicarage Park
- The youth service
- Wildlife corridor up to Radbourne Lane and extending up to Etwall Road
- Clear division between Mickleover and Mackworth

Q3 - Change or Improve

- Reduction of through traffic e.g. Station Rd.
- Better disabled/parking by the shops on Devonshire Drive
- Improve village centre (the parade)
- Urgent action on empty buildings adjacent/between HSBC & Coop Travel
- Reduce speeding traffic
- Congestion and parking in the village centre. If there were better public transport to and from the villages in South Derbyshire, which use the facilities in Mickleover, maybe this would reduce congestion and the need for additional parking in Mickleover. This might also benefit Mickleover residents who work outside the city boundary. South Derbyshire could also improve the facilities in villages like Etwall, Findern, Hatton and Hilton and so reduce congestion and the pressure on the facilities in Mickleover. We are advised that Mickleover's parking is used to an extent as a park and ride for the Royal Derby (City) hospital, so maybe improved transport from outside the city or better hospital parking could improve the Mickleover village parking situation
- Improved parking /congestion in village centre
- Traffic congestion in Mickleover village and on the surrounding routes in and out of Derby especially at peak times. Traffic coming into the village from the west needs to be slowed down by a 30 mph limit before the roundabout at the Mickleover Court as this is on a pedestrian route into the village, and preferably before the access to the Mickleover Country Park estate for the same reason.
- The shops in the parade are beginning to look a bit run down, and

never had any architectural merit. Their appearance could be tidied up and made more in keeping with the conservation area in the process. Those on Ladybank Road could also do with a face lift.

- The site of the old Jet petrol station is an eyesore and needs developing with sensitivity to Mickleover's conservation area.
- Develop brownfield sites first
- Any development should factor in the expanding elderly market, as well as children & families plus shops, services & parking for all
- Youth service to come down more regularly to change people's perception of young people
- More community focused events involving young people
- Less traffic on Ladybank Road
- Reduce speeding traffic along Ladybank Road particularly early morning and late at night

Q4 - Community Facilities or Services Needed

- Empty properties should be modernised and occupied, compulsory purchased if necessary. We should ensure all available plots are used before building on farmland
- Leisure facilities are very limited as are the times when they are accessible.
- The community centre is a valuable resource but is very small. If it was expanded into the car parking area, substitute parking would need to be found close by (maybe where the derelict site of the old petrol station is)?
- It would be a shame to demolish the old village school to improve things as that is the most obvious building of character visible in the village centre.
- NHS dentists are needed, if Tesco vacates, their site it could be used for extra shops Mickleover requires.
- Requirement for increase in allotment provision

Q6a - Comment on Neighbourhood Overview

- We are broadly in agreement with the key points, especially the comments and concerns mentioned in the Neighbourhood Overview Summary 2011. Regarding brownfield development, we would hope that this would be in keeping with the residential mix and low rise nature of the existing housing in the suburb.
- We think that South Derbyshire should be persuaded to develop its own villages and their facilities for those residents of south Derbyshire to help take the pressure off the facilities in Mickleover provided by Derby City Council.

Q6b - Comment on Townscape Assessment

- The Townscape Character Assessment refers to the layout of the Silverhill Estate and how it relates to areas of open countryside beyond. We like the mix of housing types and green spaces, footpaths and tree planting that characterises this estate. Also the reasonable sized gardens and generally adequate parking for families and visitors compared with newer estates. The cul-de-sacs allow for mini neighbourhoods and friendly relationships to develop. The close proximity and easy access to the countryside by footpaths and cycle routes is a real bonus and a fundamental part of the character. The loss of these green fields and footpaths (and the loss of wildlife habitat) to any further development should be avoided at all costs.
- Do not agree there is significant area of green wedge in the area. The majority of green wedge to the south is a golf course and not accessible by the public.

Normanton

One person made comments about Normanton.

Q1 - Where do you consider your local area to be?

- Normanton / Upperdale Road
- Normanton

Q2 - Good Things

- Normanton Park
- Existing bus services
- Existing shops

Q3 - Change or Improve

- Removal of planning blight - this brings house prices down
- More diversity of shops - no new fast food takeaways

Q4 - Community Facilities or Services Needed

- A bus link to the railway station
- A bus link to the bus station

Oakwood

Three people made comments about Oakwood.

Q1 - Where do you consider your local area to be?

- Large modern housing development with a good balance of pathways and green open spaces
- Oakwood/Spondon
- Oakwood

Q2 - Good Things

- Good transport links to Derby City Centre
- Adequate leisure and retail facilities. No more shops needed as Morrisons, Asda and Sainsburys already only a few miles away.
- The green wedge that runs through Oakwood, particularly the open fields around the Lime Lane area. Housing density in Oakwood is high and gardens are small. These areas provide welcome open green spaces. Many people use them for walking and recreation. It would be a real shame if they were sold to developers and this would be strongly opposed by local residents such as myself
- The Oakwood wood/nature reserve
- Post Office

Q3 - Change or Improve

- Improved footpaths within the LNR, they get very wet and muddy
- Some public transport between Oakwood and Spondon. Many children from Oakwood attend West Park school with no way of independently getting there. Alternatively, a safe footpath which runs near to Locko Road, enabling people to walk between Oakwood and Spondon.
- Lower speed limit on Morley Road.
- Morley Road from the Kings Corner, all the way down to Chaddesden is always in a poor state due to the buses bouncing up and down on the speed ramps. This makes it very dangerous when cycling on the road.
- Extend Parkview school in order to encompass a wider catchment. Our catchment school is in another ward almost 2 miles away and would take 45 mins to walk with a small child.
- It would be nice to be able to buy fresh and/or local produce from independent shops in Oakwood. Currently there are no independent butchers/bakers or grocers. Fresh produce can only be purchased at the Co-op on the district centre. Independent shops would help to give Oakwood more of a community feel which at the moment it lacks.
- Conservation in Chaddesden Wood. This year many of the bluebells are obscured by swathes of nettles and the pond has all but dried up.

Q4 - Community Facilities or Services Needed

- Swimming pool to be added to Springwood LC, extended opening hours to Oakwood Library,
- Improved access to badminton courts at Springwood during cricket close season
- That the 'green wedge' north of LNR becomes part of the LNR
- A swimming pool added to the Leisure Centre would be well used by

the residents of Oakwood and the surrounding wards.

- More events and opportunities that involve the community as a whole. The Oakwood Gala is a good example of this.

Q6a - Comment on Neighbourhood Overview

- The overview states that Oakwood has no major supermarket. In my opinion this is not an issue for the residents as there is a Morrisons, Asda, and Sainsburys all within 10 minutes drive. For those people that don't drive the Coop store in the district centre is large and more than adequate. It is more of an issue that there is no petrol station on the estate.
- It is of concern that the green wedge has been highlighted as an area of possible development. Oakwood is already a very large estate with few facilities relative to its size. The catchment area of the local school is inadequate for the number of children who require places. The estate lacks a community feel and ethos. Building further houses would only exacerbate these issues. Further to this the local residents hugely appreciate the open spaces. The woods and fields are well used by many members of the community and it would be a shame if these areas were lost in order for more houses to be built.

Sinfin

Two people made comments about Sinfin.

Q1 - Where do you consider your local area to be?

- From old Sinfin all the way to Wragley Way from Stenson Road across to Sinfin Moor Park.

Q2 - Good Things

- The frequency of buses.
- The shopping centre & chemist.
- The parks and recreation ground are wonderful amenities for all Derby people and should remain intact for present and future enjoyment.

Q3 - Change or Improve

- Night classes (maybe at Community School)
- Early evening health activities i.e. walking

Q4 - Community Facilities or Services Needed

- Existing roads are struggling to cope with the amount of traffic coming into Sinfin; they can't cope with anymore housing.

Spondon

Two people made comments about Spondon.

Q1 - Where do you consider your local area to be?

- From the cricket club & adjacent allotments through to Dale Road, Locko Rd to the Church
- Spondon
- The Village and the whole of Spondon

Q2 - Good Things

- All allotment sites
- Shopping facilities
- Parks
- Sense of community
- Excellent local shopping area with all the essentials available
- Spondon Flyer bus service
- The village centre shops with original fronts
- Excellent bus service
- Historic buildings
- The older buildings
- The Village Hall

Q3 - Change or Improve

- Improve Dale Rd park to include a skate park
- Extend school facilities - out of school
- More car parking in the centre of the village - back of Village Hall? An area of Brunswood Park?
- Removal or reduction of HGV traffic through the village centre
- Better community facilities 'south' of the bypass
- Better park facilities
- Chapel St Precinct - blot on the landscape
- Reduction in take away food outlets - fuelling the obesity crisis in young people
- More allotments
- Heavy traffic through the village
- Improved Sports/community facilities
- More road exits towards Derby

Q4 - Community Facilities or Services Needed

- More use of schools
- Community facilities - whilst the Village hall is an excellent facility, this

is predominantly due to the Community association rather than the City Council

- Better sporting facilities/sports centre on Park road, more modern village hall, purpose built youth centre for the young, Revive type centre.
- Relief road out of the village
- Business grants to minimise empty premises, it would encourage more variety and hopefully introduce healthy competition.
- Spondon desperately needs a sports centre along the lines of Springwood.
- If bus fares were cheaper it would encourage more people not to use their cars.
- Village toilets are topical!
- Sports & more community spaces

Q6b - Comment on Townscape Assessment

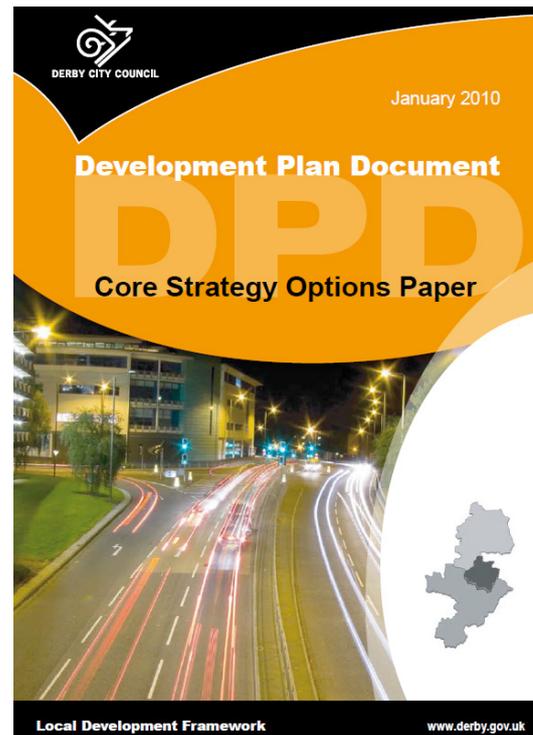
- On 'health' is the 'above average' incidence of heart disease more than would be expected given the population is 'generally older'?
- On 'Flood risk' the phrase 'flood zones 2 and 3' is not meaningful to the 'man in the street'
- Under 'Regeneration', as a member of the Derby & Sandiacre Canal Society, I would have preferred a more positive statement on restoration than 'there may...be opportunities'.

9

**Summary of representations made
pursuant to the Core Strategy
Options Paper Consultation**

The Core Strategy Options consultation began on Friday 15 January 2010 and carried on, initially, until Monday 29 March 2010. However, due to public interest, the consultation period was extended until the 28 May 2010. The consultation was aligned with our Derby HMA partners and sought the public's views on:

- The Spatial Portrait of Derby
- The key challenges and issues for the Core Strategy
- The emerging Housing Market Area spatial vision
- The emerging spatial vision for Derby City
- Options for where new development could go
- Topic based options



Who was consulted?

The Council consulted all Specific and General consultees as required by the regulations and all of those persons or bodies contained within its consultee database at the time.

The consultation was carried out in accordance with the Council's adopted Statement of Community Involvement. Therefore, we engaged with the Neighbourhood Boards, Diversity Forums, members of the community and internal officers.

How was the consultation carried out?

The Compendium of Publicity Material contains copies of all of the publicity material and Press articles arising from the consultation. Before the consultation started we sent a letter or email to everyone on our LDF consultation database. The database contains the contact details of the specific consultation bodies, general consultation bodies and members of the business and local community.

The following is a brief description of the methods we used to engage with interested parties during the Options Paper consultation.

- Member briefing
A Member briefing session was held on the 21 October 2009 to inform all Councillors of the forthcoming consultation, the content of the Options Paper and its implications for both the City and the wider Housing Market Area.
- Mailshot to interested parties

Before the consultation started a letter or email to everyone on our LDF consultation database. The database contains the contact details of the specific consultation bodies, general consultation bodies and members of the business and local community. In addition emails were sent to Chief Officers and Members informing them of the consultation. Interested parties were also informed of the consultation through 'Your City, Your Say'.

- Press releases and magazine articles

A joint HMA press release was issued which resulted in two articles on the 26 January and 10 February 2010. This was followed by the BBC who ran an article on the 12 February 2010.

Following increased public interest during the consultation, an additional HMA press release was issued informing the media of the extension to the consultation. This resulted in an article in the Derby Evening Telegraph on March 20 2010.

An article about the consultation was included in Your City, Your Say which is a free council magazine delivered to every household in the city.

- Posters and banners

Posters were put up in Council offices, local libraries, sports and community centres, post offices and local shops. Posters were also sent to the City Council's Neighbourhood Managers. Banners publicising the consultation were also put in the Council House, Roman House and one banner spent a week in each library.

Freestanding banners were erected at various locations throughout the City. A banner was located in the Council House reception and the main city centre library for the entire duration of the consultation.

An additional banner was erected for a period of seven days in each of the following local libraries during the consultation:

- Allenton
- Allestree
- Alvaston
- Blagreaves
- Chaddesden
- Mickleover
- Pear Tree
- Sinfin
- Spondon

- Deposit documents

The Options Paper, summary document and response form was put on the Council's webpage and deposited in Council offices and local libraries. Later in the consultation, a 'Frequently Asked Questions' paper was published and made available in the same locations.

- Website

Our website (www.derby.gov.uk) was updated to contain information about the consultation. The webpage included the Core Strategy Options Paper, response form and, later, the frequently asked questions paper. The webpage also contained a link to an on-line consultation form.

In addition, we included a link to our HMA partner websites.

- **Workshops**
Three workshops were held on the 4 March 2010 between 1:30pm and 7:30pm. Each workshop ran for 1½ hours. Invitations were sent to everyone on our LDF database and at through our Boards and Forums. In total 64 people attended the workshops representing local businesses, Neighbourhood Boards, Diversity Forums and residents groups.
- **Community Groups**
Each Neighbourhood Board consists of between 10 and 25 people and is made up of the following:
 - Ward Councillors
 - Representatives from the Police, the Primary Care Trust, Derby Homes, Housing Associations, the Youth Service, a school representative and a Locality Services Officer
 - Between five and twelve residents including representatives from community groups and young people aged between 14 and 17

Over a period of five months members of the Plans and Policy Team attended all of the Neighbourhood Boards on the following dates:

- Arboretum 25 November 2009
- Alvaston 7 December 2009
- Abbey 8 December 2009
- Sinfyn & Osmaston 9 December 2009
- Spondon 9 December 2009
- Normanton 21 December 2009
- Oakwood 11 January 2010
- Mackworth 21 January 2010
- Derwent 27 January 2010
- Darley 3 February 2010
- Mickleover 4 February 2010
- Allestree 10 February 2010
- Blagreaves 15 February 2010
- Chaddesden 17 February 2010

- Chellaston 18 February 2010
- Littleover 10 March 2010
- Boulton 11 March 2010

At each Board meeting officers did a brief presentation and this was followed by a question and answer session. Before the 15 January 2010, Neighbourhood Board members were informed that a consultation was taking place and asked for their opinions of our Neighbourhood Profiles. Board Meetings after the 15 January were taken through the two Strategic Options and asked to comment on both the Strategic Options the Neighbourhood Profiles. Board Members were also asked to inform the Neighbourhood Forums about the consultation, the workshops and the drop-in events.

Members of the Plans and Policies Team attended the following Diversity Forums during the Options consultation period:

- 19 January 2010 Gender Diversity Forum
- 21 January 2010 Disabled People's Diversity Forum
- 28 January 2010 Minority Communities Diversity Forum

At each meeting a presentation was made about the Options Consultation outlining national and regional policies, previous consultation exercises, our evidence base and the Strategic Options for the City. This was then followed by a question and answer session.

- Drop-In events and public meetings
Four drop-in sessions were held at the Guildhall foyer on the following dates:
 - Wednesday 20 January 2010 between 9:30 and 12:30
 - Saturday 6 February 2010 between 9:30 and 12:30
 - Wednesday 17 February 2010 between 2:00 and 6:30
 - Thursday 18 March 2010 between 9:30 and 12:30

Each drop-in event was publicised through the posters, banners, consultation documents and via the Neighbourhood Boards. The informal sessions gave the public an opportunity to chat to members of staff about the content of the Options Paper.

Following increased public interest during the consultation and it was clear that additional public drop-in sessions would be necessary. Twelve drop-in sessions were held in local libraries around the city on the following dates:

- Thursday 15th April Sinfin Library 2:00pm-6:45pm

- Thursday 15th April Allestree Library 2:00pm-6:45pm
- Tuesday 20th April Mackworth Library 2:00pm-6:45pm
- Thursday 22nd April Blagreaves Library 2:00pm-6:45pm
- Tuesday 27th April Mickleover Library 2:00pm-6:45pm
- Tuesday 27th April Pear Tree Library 2:00pm-6:45pm
- Tuesday 27th April Pear Tree Library 2:00pm-6:45pm
- Thursday 29th April Revive Healthy Living Centre, Roe Farm Lane 2:00pm-6:45pm
- Monday 10th May Chellaston Community Centre 2:00pm-6:45pm
- Tuesday 11th May Osmaston Local Housing Office 3:00pm-7pm
- Wednesday 12th May Osmaston Local Housing Office 2:00pm-5:00pm
- Monday 17th May Alvaston Library 2:00pm-6:45pm
- Wednesday 19th May Spondon Village Hall 2:00pm-6:45pm

The events were publicised by posters displayed at Council offices, local libraries and sports and community centres.

In addition officers from the City Council attended a drop-in exhibition organised by South Derbyshire at the Mickleover Country Park Social Club on Wednesday 31 March between 4:00pm and 8:00pm. Officers from both councils were available to discuss the consultation options with residents.

Two further public meetings were held to discuss the Options Paper, and more importantly the possible development sites surrounding the city. The first meeting was held on the evening of the 3 March 2010 at the Mickleover Primary School where approximately 200 residents attended. The meeting was organised by the Mickleover Neighbourhood Manager on behalf of local councillors and open to the residents of Mickleover, Mackworth and Allestree. Officers from the three HMA authorities attended to answer questions about the Core Strategy and the allocation of potential housing sites adjacent to the city boundary. Officers from Derby City Council and South Derbyshire District Council were invited to attend a meeting organised by the Chellaston Residents Association on the 24 March 2010 to discuss the possible development sites adjacent to the ward in South Derbyshire. Approximately 60 members of the Residents Association attended the meeting.

Officers from the Plans and Policy Team informed the following groups about the Core Strategy and, more specifically, the Options consultation:

- Derby and Derbyshire School Place Planning Group
- Research and Consultation Group

- Landlord Consultative Group
- Internal Consultation
We informed key internal officers about the consultation and sought their thoughts on the content of the document.

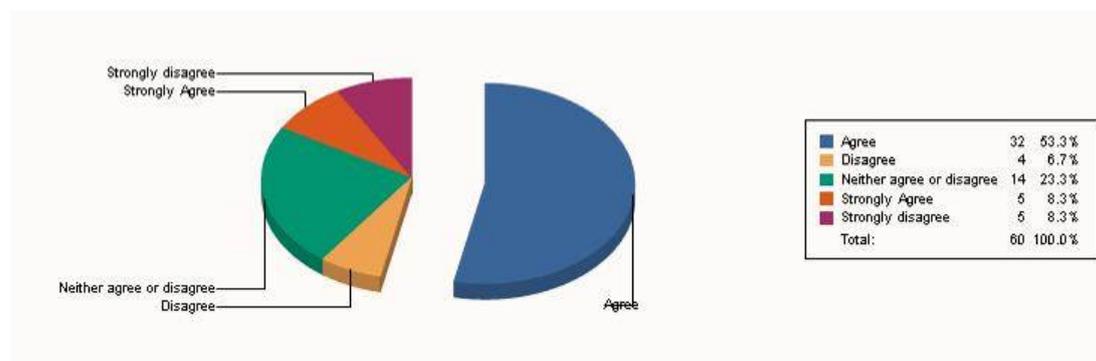
What were the main issues?

Following our consultation we received 165 responses commenting on the content of the Options paper.

Individuals	103
Specific consultees	34
Planning Consultants/developers	28

The following is a summary of the main comments made in writing or at the workshops.

How strongly do you agree or disagree with our description of the City in the 'What Derby is like today' section?

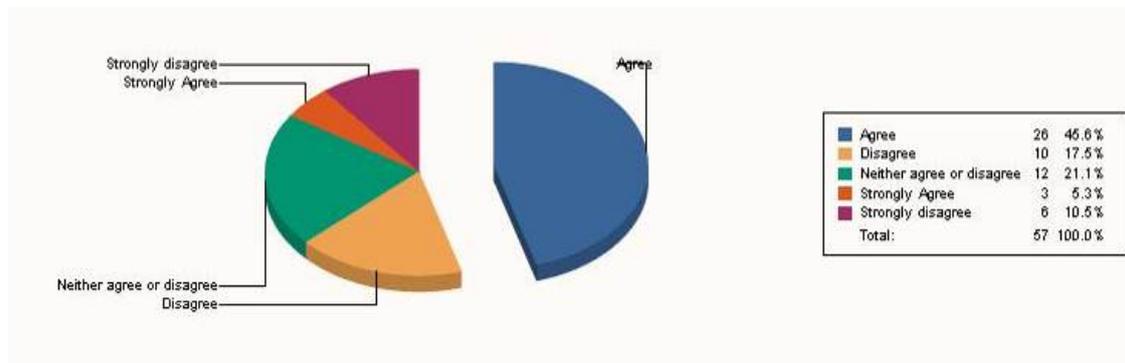


Most respondents who completed the questionnaire either agreed or strongly agreed with the description of 'What Derby is like today'. Only 15% disagreed or strongly disagreed and 23% felt neutrally about it.

English Heritage suggested that more could be said about the City's distinctiveness, particularly its industrial heritage and landscape. A local group supported this view, commenting on the city being a gateway to the Derwent Valley Mills World Heritage Site and its importance to the textile industry.

At the Stakeholder Workshop, support was given to green wedges as a distinctive feature of the city. It was suggested that reference should be made to traffic flows, commuting patterns and to Derby's perceived weakness in areas such as performing and visual arts and higher education.

How strongly do you agree or disagree with the key challenges and issues we outline for the Core Strategy?



Most respondents who completed the questionnaire agreed or strongly agreed with the challenges and issues. 28% either disagreed or strongly disagreed.

The Government Office for the East Midlands (GOEM) commented that the spatial distinctiveness of the Strategy would benefit from being strengthened, for example by identifying neighbourhoods in need of revitalisation as a major strategic theme and by developing the proposed network of green spaced as a spatial tool. The transport strategy was identified as being particularly weak and that the plan's challenges could be ranked in priority order to give a sense of direction to the spatial strategy.

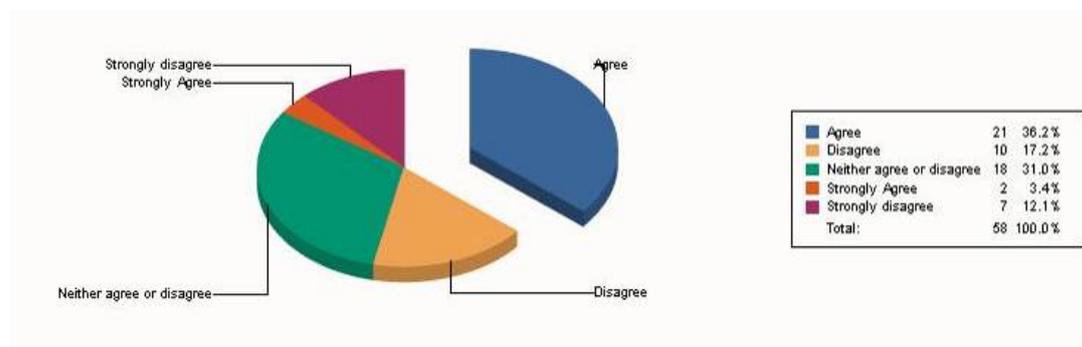
The point was made that some of the challenges contradict each other, for example providing 14,400 homes whilst protecting the environment and enhancing the city's historic character. A number of additional challenges were suggested:

- Resolving the imbalance between jobs and places of residence which is evidenced by increasing levels of out commuting from traditional towns to employment centres such as Derby. The focus should be on development around Derby's principal urban area rather than in other parts of the Housing Market Area.
- Greater focus on reducing car travel, tackling congestion and limiting the city's environmental footprint.
- Inadequate public transport.
- Resolving on-street parking problems relating to the loss of driveways and the inadequate parking at places such as the University and Hospital.
- Overcoming Derby as a transport bottleneck.
- Providing better direct public transport between neighbourhoods.
- Improved cycle only paths and cycle-friendly road layouts.
- Adopting good place making standards and creating a high quality public realm by setting high quality design standards, through the maintenance of places and through the provision of public art in strategic locations.

- Providing facilities in easily accessible locations to help reduce the need to travel.
- Achieving flexibility in the strategy to allow response to change.
- Achieving high standards, particularly for the strategic housing sites.
- Considering land values in the current economic climate and the impact of shrinking funding pots on the delivery of future development, including social housing.
- Ensuring that new dwellings are commercially viable and deliverable.
- Considering the growing gap between house prices and wages and the increasing household population.
- Releasing green wedge land in sustainable locations to meet future development needs without undermining their strategic function.
- Reviewing the actual function of green wedges.
- Addressing health and well-being needs across the City, including bringing forward the Kingsway Hospital Site.
- Revitalising and protecting Derby's historic character and assets and related tourism potential, in particular creating something unique/special to attract tourists to the City.
- Resolving the problems relating to the St Peters Quarter.
- Reducing the number of empty homes.
- Providing affordable housing in the more desirable areas.
- Protecting the character of existing communities.
- Providing new development which is sympathetic to character and heritage.
- Finding a way to enable communities and industry in the Derwent Valley corridor to develop whilst protecting the built heritage.
- Assessing the City's architectural heritage of the recent past.
- Making the best use of the City's waterways, including for leisure provision.
- Creating a city centre that appeals to all age groups, including a night time/leisure offer.
- Keeping the City compact, liveable and able to sustain its own food needs.
- Resisting the Government's population projections for Derby.
- Protecting the city's mature suburbs through the development of a mature suburbs strategy.
- Achieving the regeneration of Osmaston.
- Giving greater emphasis to biodiversity, including wildlife sites and the more sustainable use of open space by considering the natural environment as inherent to the well-being of residents.

- Improving the linkages between wildlife sites and corridors.
- Responding to the threat of extreme weather events (in addition to flooding).
- Providing for future retailing needs arising from growth in numbers of households and increase in expenditure per capita.
- Providing for the infrastructure needs of the strategic sites on the edge of the City.
- Satisfying the increasing demand to accommodate efficient telecommunications infrastructure across the City for both business and residential use.
- Bringing forward brownfield regeneration sites may be difficult if more easily developable greenfield, including green wedge, sites are identified.
- Maintaining the joint working within the Housing Market Area (HMA) including to achieve the agreed vision.
- Making the most of opportunities presented by new growth in terms of new facilities etc.
- Planning and building things to last.
- Designing the City to minimise energy demand and energy use, including moving rapidly to 'zero carbon' development, presuming against demolition and rebuilding and building to last, including using flexible designs which are suitable for different uses.
- Providing sufficient housing that is accessible to disabled people and their families.
- Finding a solution to some of the social and economic factors affecting the city that do not have a spatial dimension.
- Setting a direction of travel beyond 2026.

How strongly do you agree or disagree with the Derby Housing Market Area Emerging Spatial Vision?



A smaller majority of respondents who completed the questionnaire agreed or strongly agreed with the DHMA Spatial Vision. But it also generated the greatest proportion of strong disagreement (12.1%). Almost a third of respondents felt neutrally about it.

GOEM commented that the vision, objectives and policies lack spatial detail. Whilst the existing spatial concepts of the Derby Principal Urban Area (PUA), Swadlincote Regional Centre and the Market Towns are the building blocks of a spatial approach, they may not fully describe the structure of the Housing Market Area and consideration could be given to a Derby Fringe Sub-Market. One private individual also suggested the need for greater linkage between issues, vision and objectives.

The East Midlands Development Agency (EMDA) supported the Plan's ambitions to foster regeneration and provide for at least 36,600 new homes. However, one private individual questioned the vision's achievability and another suggested this would be difficult because of the scale of housing provision. EMDA suggested that greater emphasis be given to the transition to a low carbon economy. This view was shared by the National Trust who saw the vision as lacking an overt reference to climate change, in particular the level of emissions. EMDA also called for more emphasis on promoting a high-quality public realm and cultural life as this can help attract and retain graduates and young people. Derby Cityscape welcomed the aim of achieving the highest possible design standards, although this needs to be tempered with economic viability considerations.

Whilst a balance between growth, regeneration and protection of the environment and character was noted by one commercial organisation, another saw the need for greater balance as the vision failed to take account of the short and long term impact of the current economic climate. East Midlands Airport requested greater reference to economic development matters. A development company thought the vision fails to recognise the main economic drivers of the HMA; namely Derby City Centre, the University and the Airport which suggests focusing more development around the PUA to assist in reducing long distance commuting. The realism of funding the regeneration aspirations of the Plan were also questioned bearing in mind the lack of public and private sector investment.

The Highways Agency supported the focus of development being on the existing urban area of Derby, within the context of encouraging regeneration and providing new homes and employment. Conversely, a private individual questioned the need to build so many homes, particularly in view of the effects of the recession.

The Highways Agency asked for a specific mention to improving accessibility through investment in transport infrastructure, including the A38 junctions. But a developer questioned the delivery of these during the plan period. It was also felt that the themes of encouraging and maximising the use of sustainable modes of travel could also be drawn out within the emerging vision for the HMA. The need to move away from reliance on the car was acknowledged by a disability specialist, but commented that convenient access to a vehicle is key to independent living.

The National Trust felt that the vision doesn't give enough consideration to landscape character, including the influence of rivers and its historic character such as estate farmlands associated with Kedleston Hall. They felt that its

description of environmental assets with regard to historic buildings and biodiversity was light. They commented that new greenfield development should not adversely impact upon landscape quality and that opportunities for enhancement are recognised and realised. A private individual commented that the vision should support achieving greater food security for residents, including the protection of agricultural land.

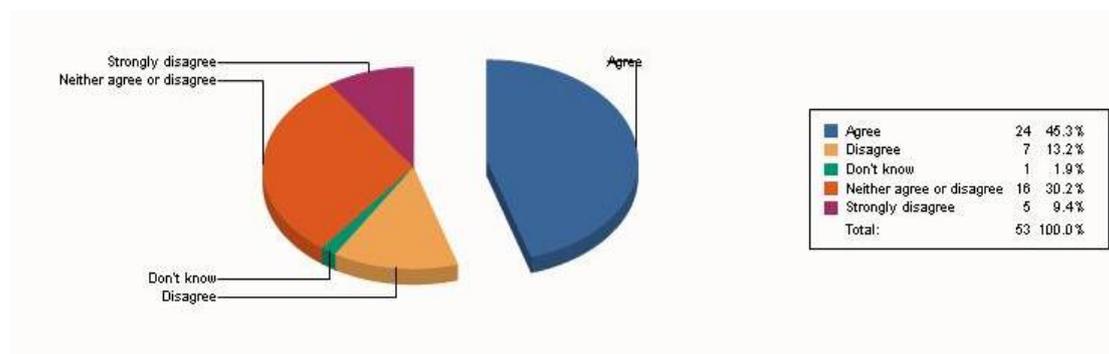
The vision’s time horizon was considered to be too short, largely relating to points made about the 15 year supply of housing land as addressed under the housing theme below. Also, the reliance on large scale peripheral housing sites was questioned by one agent, who commented that the principal of sustainable urban extensions was developed at a time of high land values, available public spending and economic prosperity. Since then, economic conditions have significantly worsened and it was felt that housing delivery is now unlikely to be achieved through schemes requiring extensive infrastructure. Instead, it was argued that emphasis should be on sites around Derby in accessible and sustainable locations which do not require significant major infrastructure provision. A private individual commented that the future is likely to mean greater rural employment which could suggest the need for greater dispersal of housing provision, particularly with regard to affordable housing.

The need to acknowledge the importance of the Green Wedge review was made by some developers and commercial organisations.

Release of land in both green wedge and green belt could enable opportunities to be realised from re-opening the canal.

One comment suggested that the Vision should acknowledge the importance of accommodating the HMA’s retail needs and expenditure within the HMA.

How strongly do you agree or disagree with our Derby City Emerging Spatial Vision?



45% of respondents agreed with it, although none strongly. 23% disagreed with it and 9% expressed strong disagreement.

A private individual saw the vision as being rather broad and unclear in terms of its growth intentions for the City. It needs to address the distinctive needs of

different neighbourhoods and recognise the positive role of new development in providing community facilities.

Some respondents supported the vision, including the priority it gave to green belt, green wedges and regeneration. But some residents questioned its realism, particularly taking into account the high levels of deprivation in some areas. A few comments were made, including by a commercial organisation, regarding the significance of the City remaining compact and liveable, enabling people to travel locally and for infrastructure provision to be made efficiently and effectively. Two individuals commented that the current growth proposals could have a negative impact on this. Another commented that the vision should emphasise the importance of flats and apartments to the overall strategy.

The emphasis on regeneration, including for Osmaston, was welcomed by a range of organisations including 'Places for People' who suggested that this approach should be supported by a flexible policy framework to support the market in the delivery of development. The focus on the city centre received a range of support including by one private individual who commented on its many run down areas, its domination by the student culture and the poor links to the train station. Another resident was concerned that the centre is a 'no-go' area at weekends. This view was reinforced at a Neighbourhood Board event held at the Revive Centre in Derwent ward on 1 July 2009 where the point was made that different activities are needed to be introduced to the city centre to help attract more and different people into it in evenings and at weekends.

Whilst Derby Cityscape called for more City Centre focus, one commercial company felt that the city centre focus did not accord with the balanced approach in the HMA vision. In order to introduce more balance, a greater focus on urban extension is needed.

Derby Cityscape also commented on the need for greater focus on the needs of communities, infrastructure and tourism. They recommend the principle of 'Good Placemaking' and called for emphasis on achieving a high quality public realm, revitalising the historic character, achieving a mix of uses, improving the night time and leisure offer of the city centre, providing car parking for commercial development, the provision of green infrastructure and maximising the offer of the riverside. CABE echoed the point about place making and design quality.

A number of comments were made about the City's economy, including the contribution made to it by tourism. Two private individuals thought the vision should focus on diversifying the employment opportunities away from relying on three dominant manufacturers and another commented on the need for Derby to find a way to make itself unique to attract investment and tourism. The Silk Mill and Derwent Valley Mill World Heritage Site were recognised by a commercial organisation as being attractors of tourists. However, the question was posed 'is there anything to attract visitors to the City?'. One respondent emphasised the need for an economic growth stimulus, arguing that without it regeneration attempts may be hindered.

There was support from a local group for strong local neighbourhoods and the provision of more local services which will reduce the need to travel. However, the likely negative impact of strategic extensions on the local communities in the City's peripheral suburbs was regarded by an agent as being inconsistent with the current vision.

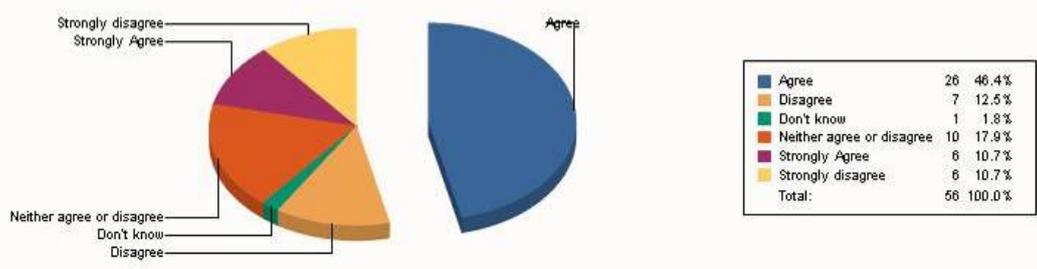
A private individual welcomed the protection afforded to the City's historic environment. English Heritage broadly agreed with the vision, although they called for clarification of what is meant by 'implementing the principles of sustainability'. Whilst not objecting to new development as such, they believe that greenfield development should be avoided where it would adversely affect the historic environment. The National Trust also called for careful integration of new development with old, including the identification of opportunities for heritage led regeneration. The distinctive features of the City, including its landscape setting, need to be identified to achieve this.

A private individual called for more emphasis on practical measures to improve and protect the historic and natural heritage of the City's green open spaces and their links. The National Trust thought the plan un-ambitious in terms of biodiversity and its ambitions for landscape character.

English Heritage commented that green infrastructure has more than just biodiversity benefits, for example through protecting the landscape. The National Trust commented that the improvement of the green infrastructure network, and an increase in its multifunctional benefits, should be recognised as forming part of an adaptation strategy to climate change. A private individual felt the vision needed to more strongly endorse the benefits of renewable energy as this would help realise new technologies, including water, wind, biomass and CHP.

The Highways Agency welcomed reference to developing an excellent sustainable transport system; including public transport, walking and cycling infrastructure. They supported objectives to strengthen the role of the city centre as the most suitable location for development. A private individual commented on how improving the mix of land uses, diversification of business and strengthening the role of local centres was an important part of the strategy to reduce transport demand.

How strongly do you agree or disagree with the Derby Housing Market Area emerging Strategic Objective? These objectives are numbered 1 to 12 in the Core Strategy Options Paper?



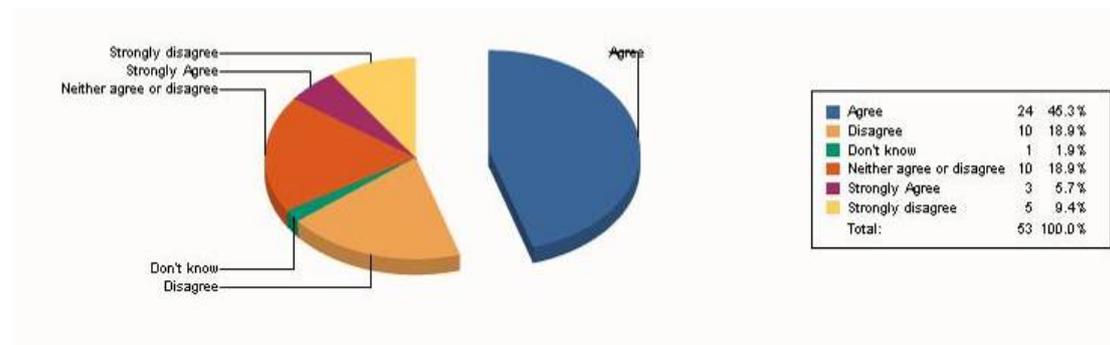
The majority of respondents who completed the questionnaire either agreed or strongly agreed with the HMA Objectives. Of the 23% who disagreed with the objectives, 11% expressed strong disagreement.

GOEM commented that they lacked measurable outcomes or statements of the direction of change sought. These sentiments were echoed by a commercial organisation who found them generic and not locally specific. For instance, what does 'sufficient housing' mean in terms of number and location. One development company described the objectives as being similar to those contained in other Core Strategies and suggested a narrower focus on a few key issues, including the city centre, previously developed land, the World Heritage Site, infrastructure provision and transport accessibility.

The following comments focus on specific concerns about the objectives:

- Objective 1 about sustainable development was supported, although East Midlands Airport emphasised that it must be about social and economic issues, as well as environmental.
- A local group wanted a reference to sustainable communities.
- A commercial organisation felt that Objective 5 should be amended to recognise that some greenfield sites are more sustainable than brownfield ones.
- A private individual raised a conflict between Objectives 1 and 6 as urban extensions mean that distances travelled will be increased and the potential for local food production will be diminished. A more sustainable approach would be to expand existing villages and towns.
- The Highways Agency felt that Objective 12 on transport needed greater clarity to enable the framing of spatially distinctive policies that are measurable and that are related to the key issues. A private individual added to this that there should be an objective to reduce the need to travel.
- Network Rail commented that Objective 9 should include the word 'refine' to increase the clarity that green wedges should be reviewed. However, the National Trust, Derbyshire Wildlife Trust and English Heritage welcomed the objective as currently worded. Both also suggested recognising the multi-functional benefits of green infrastructure.
- A private individual suggested that Objective 7 should give greater priority to providing larger houses to support the development of a mixed economy with high wage earnings living in the HMA.
- A developer commented that there an additional objective which commits the three HMA authorities to work positively together to ensure that the PUA extensions are delivered. This should be supported by a mechanism which shows how this will work.

How strongly do you agree or disagree with the emerging local objectives for Derby we have outlined to deliver to deliver our vision for derby? These objectives are numbered 13-26 in the Core Strategy Options Paper.



Just over 50% of respondents who completed the questionnaire either agreed or strongly agreed with these. Almost 30% disagreed with them, including 9% who strongly disagreement.

GOEM responded that the objectives need more development if they are to bring about measurable delivery of the vision. A commercial organisation also felt that they are too vague and need more spatial emphasis. Further, a private individual saw significant conflict between objectives about growth and climate change/the environment. Whilst there was support for a number of Objectives, the following commentary focuses on the concerns and suggestions raised:

- Objective 18, relating to attracting inward investment and supporting business start-ups, should be supported by an objective to support provision of good quality business land. It would also benefit from a more focussed statement setting out where the location of new employment land should be.
- The Environment Agency considered that the benefits of the Blue Corridor need reflecting in the Objectives, particularly in terms of the regeneration and river corridor enhancing benefits and the opportunities for sport and recreation.
- The Environment Agency requested greater emphasis be given to waste re-use and recycling opportunities as integral to new development.
- Places for People stressed that the approach to flood risk should be kept in balance and development should be permitted where mitigation is possible.
- Objective 14 about green wedges generated many comments from the development sector. The majority view was that it should reflect the need to review them to help meet the need for sustainable growth in locations where their role can be enhanced by development without undermining their function. This would be consistent with Spatial Option B. Some argued that the loss of green wedge land could be a much more sustainable option than either significant peripheral expansion or even some brownfield options. One developer also suggested that this approach should be extended to Green Belt. The view from private

individuals opposed that of the development industry and sought the protection of green wedges to protect existing community identity and their extension if the City expanded peripherally. A further comment was made that an emphasis on brownfield sites will help in green wedge protection.

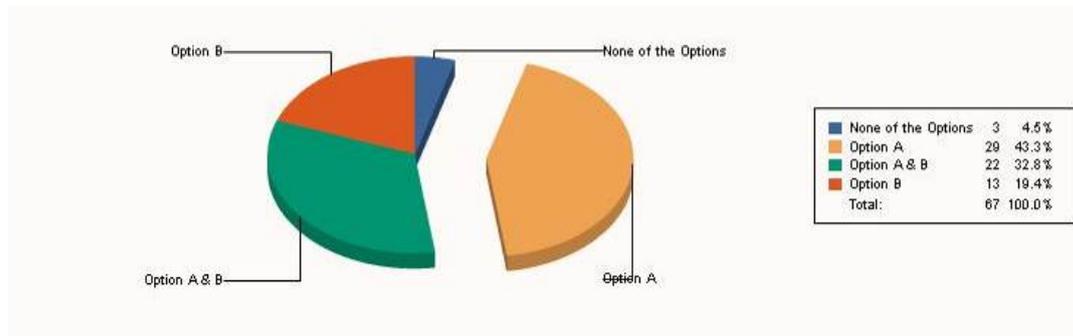
- An agent suggested an objective for greater public access to green open spaces.
- With regard to Objective 17, it was suggested that Derby should aim to be a key regional centre and the top priority should be to achieve economic success.
- One development organisation saw the need for an objective that recognises the importance of retail provision across the City rather than just in the city centre.
- There were many comments relating to the need to get people out of the cars and using alternative forms of transport, including improving public transport links, cycling provision and traffic calming.
- A few objections were received from private individuals about the number of homes being proposed in Objective 13, although the majority of concerns about this were about the housing growth option itself. One person considered that the objective should refer to the provision of appropriate community infrastructure and links to public transport.
- One person considered that Objective 19 should have regard to upgrading parks to provide a broader spectrum of usage.
- It was argued that Objective 20 should be supported by a proactive strategy to conserve and enhance the built heritage, including the preparation of development briefs to set the context for funding applications.
- Objective 21 could reinforce the importance of improvements to the public realm to encourage people to participate in physical activities.
- A resident commented that Objective 23 should refer to cultural and voluntary sector facilities.

Which option do you prefer?

Question 12 sought views on the following spatial locations for development:

- **Option A – Concentrate development in the urban area. To locate all new development, apart from sites already committed or allocated, within the existing urban area on previously developed land.**
- **Option B – Regeneration with Greenfield expansion. To regenerate deprived parts of the city centre with less emphasis on high density redevelopment in the city centre and neighbourhoods. There would however be a need for development on Greenfield land on the edge of the City**

- **A combination of Options A & B**
- **None of the options**



Option A received the greatest support (43%) from respondents who completed the questionnaire. This was followed by almost 33% of respondents favouring a mix of Option A and B and only 19% favouring Option B on its own.

GOEM commented that once the balance between urban concentration and greenfield expansion has been decided upon, the resulting strategy will need expressing at the neighbourhood level and the strategic sites related to the local neighbourhoods or local housing market areas.

Both options are about accommodating growth and this has generated significant objections. Many respondents see the level of growth as unsustainable and beyond the physical and environmental capacity of the City. Two private individuals suggested a completely different HMA strategic approach to focus growth on smaller communities to support local facilities and, if needed, local food production. Expansion of the Derby PUA as proposed was considered to be totally contrary to climate change and energy preservation objectives.

One private individual proposed a strategy that would mean locating high footfall generating developments in central areas and around transport interchanges, but dispersing smaller scale facilities across the city within walking distance of local communities and incorporating provision for cyclists.

The National Trust considers that further research/assessment is required to inform a spatial strategy option to assist in the balancing of issues such as the realistic capacity of sites, between Greenfield and brownfield, impact on landscape and townscape and historic character and the role of green wedges. Their opinion was that the likely outcome is expected to be an approach somewhere between Option A and B which balances out the impact on character and distinctiveness of the urban area and the loss of green open space and impact on the wider landscape. This kind of informed approach was supported by a private individual who was concerned to avoid Option A being taken to the extreme, resulting in damage to the townscape.

An agent advocated the identification of smaller 'strategic' sites because the recession now means that the delivery of large urban extensions is questionable.

This view accorded with a local resident who saw the merits of concentrating development onto smaller sites around the City and focussing efforts on reducing vacancies. EMDA favoured urban extensions to the south of the PUA, where the best use could be made of under-utilised infrastructure. Regardless of concerns about the current viability of the large strategic sites, the principle of sustainable urban extensions received wide support from the development industry who promoted their benefits in terms of providing the opportunity to achieve sustainable mixed use schemes supported by a range of services and facilities. But this needs to be balanced with significant public opposition to this approach, especially from communities potentially most affected by them.

Option A comments

EMDA supported Option A with its focus on regeneration and brownfield sites. This was echoed by two commercial organisations who saw the benefits of directing growth into existing centres, including the maintenance of Derby as a Regional Centre.

At the Neighbourhood Board event held in Derwent Ward on 1 July 2009 the Regeneration thrust of this Option was supported and the view was held that regeneration proposals involving the demolition and rebuilding of housing was a positive way of delivering new housing in a way which benefits the community. There was a general view that parks and public open spaces should be protected from housing development, that housing should be dispersed around the City and that empty properties should be brought back into use.

Support for this Option was echoed by Natural England and the Environment Agency. The latter particularly welcomed the opportunity to remove potential water resource contaminants from the ground through brownfield redevelopment and the protection afforded by it to green infrastructure. However, some concern was raised by the Council's Land Drainage Officers regarding accommodating water attenuation storage for extreme rainfall events within this Option, and a hybrid Option A/B approach was suggested instead. Further support for Option A, came from Mackworth Parish Council, The Campaign for Better Transport and a number of private individuals.

Perceived benefits included improved accessibility to jobs, making better use of existing buildings and land, regeneration and protecting agricultural land and green open areas, especially green wedges.

The County Council saw the protection afforded to green open areas by this Option as its key advantage.

There was some support for reusing surplus employment sites for housing where related to existing centres or established retail uses.

The Highways Agency welcomed focussing growth within the existing urban area which they saw as a sustainable approach which should help reduce the need to travel and maximise the use of public transport, walking and cycling.

Option A also generated a number of concerns. There was wide concern from private individuals and a local society about the potential loss of back gardens and this was echoed by Derbyshire Wildlife Trust. English Heritage also saw this

option as having unacceptable implications for urban character and historic assets and called for a townscape assessment to inform the final option.

Concerns were raised from the development industry and the Derby Hospital NHS Trust that Option A was unrealistic in terms of overall numbers, timings, type and quality of housing. The NHS Trust commented that the DRI site may not deliver the number of dwellings envisaged. Many thought that the Option relied too greatly on complicated sites, including, in some cases, complicated land acquisition processes (such as Osmaston) and the supply of housing from back garden sites can no longer be relied upon. Also the Option is considered to be insufficiently flexible to adapt to changing circumstances as required by PPS12. The SHMA identifies a shortage of larger family houses, which is not compatible with the high densities envisaged in Option A. Further, in the current economic climate, it is not deliverable. A private individual was concerned about putting more people at increased risk from flooding. Another expressed concern over the negative impacts of over intensification and as a consequence supported Option B.

Option B comments

This Option received wide support from the development industry, particularly the principle of releasing land from green wedges. It was seen as providing a good balance between enabling regeneration and achieving growth. The industry argued that it offers a balance between green and brownfield land, enables the delivery of a wider mix of house types, including larger houses for higher wage earners, provides much greater flexibility and certainty regarding the delivery of sites, protects the supply of employment land, provides the opportunity to secure better green infrastructure and access to the GI network. One commentator argued the release of green wedges will help promote connectivity between different land uses.

The selective release of Greenfield sites was supported by Network Rail where the sites are either close to the city centre or on established transport corridors. Derbyshire Wildlife Trust supported this site by site assessment approach taking into account their green infrastructure and biodiversity value. They did, however, point out that a substantial amount of development in green wedges would conflict with Objective 19. Only areas of low biodiversity value should be considered, maybe even including land within Green Belt.

Agents representing Rolls-Royce questioned the realism of overly relying on any delivery of housing from the redevelopment of Osmaston. Cityscape were concerned to retain a regeneration focus and suggested an approach which prioritised brownfield sites and held back greenfield sites as 'fall back options' if delivery is not considered satisfactory. This approach was supported by EMRA who advised that the loss of green wedge and Green Belt should be avoided to encourage regeneration. The County Council were concerned to avoid detrimental impact to the landscape character around the edge of the City, including around Kedleston Hall and the northern edge of the City.

The Highways Agency objected to this Option, stating that peripheral development would result in increased trip length and vehicle trips resulting in

higher levels of congestion and emissions. However, the Derby Hospitals NHS Foundation Trust considered that the Option could still achieve minimised journey lengths and reduce reliance on non-sustainable modes of transport if the strategy included selective peripheral expansion as part of a sustainable urban extension.

Further concern about Option B came from the Council's Land Drainage Officers who commented that the potential loss of green wedge land would be contrary to the Trent Catchment Flood Management Plan which seeks to sustain and increase the amount of BLAP habitat in the catchment by opening up green spaces within the built environment. They also considered Option B to be contrary to Objective 9 and supported a hybrid Option A/B approach. A hybrid approach was also supported by a private individual who suggested that the focus should still be on re-allocating some employment sites for housing and building at high density where appropriate. Another suggested adopting a lower density approach in Osmaston.

General Comments on Options

The Highways Agency commented that for both options, the potential impact on the Strategic Road Network needs to be taken into account especially on the A38 prior to the completion of the A38 Junctions Scheme and in the longer term. Maintaining the highway assets is a priority and it would be helpful if options refer to transport challenges, area specific problems and implications of growth. The assessment should also refer to potential outcomes in terms of strategic objectives and deliverability.

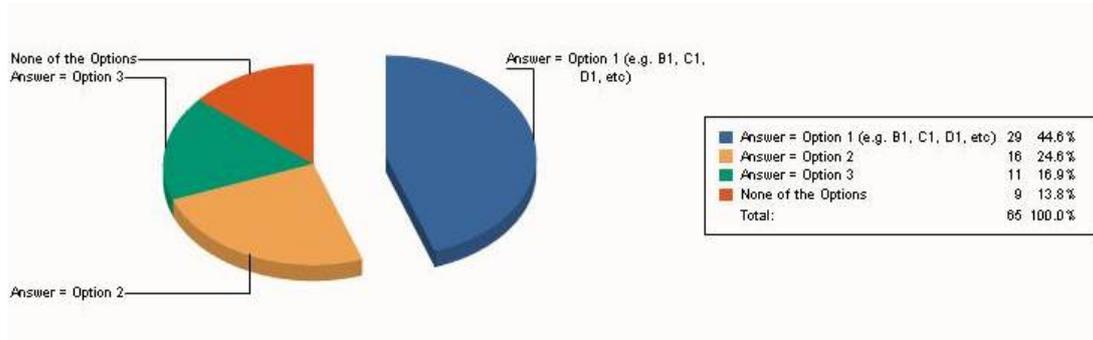
Many different suggestions were made about where the focus of growth should be. These were largely justified on transport grounds as well as provision of social infrastructure. One private individual saw the land to the south of the A50 as less valuable whilst another saw potential to the east of the City in the Green Belt to provide housing for people who commute towards Nottingham. There was no overall favoured option so many other locations were put forward. One individual commented on the need for large scale employment and services/facilities to be located centrally to enable greater use of public transport, walking and cycling. Another expressed a preference for Option A, stating that transport issues should determine where development takes place. A view was expressed that the location of employment sites causes the biggest transport problems in the City.

Consequently, development should be located to the west to ease the overall flows, for example, around Toyota and Kirk Langley. Another resident suggested focusing growth around the A38 and A50 intersections to assist commuting. And another argued that growth to the south and west should be avoided as it would only aggravate congestion.

How much housing growth should there be in Derby?

- **A1 – Make provision for the Regional Plan's requirement for 2006-2026 for 14,400 homes**
- **A2 – Anticipate the review of the Regional Plan and extend the end date of the Core Strategy to 2031**

- **A3 – Make provision for an amount in excess of the Regional Plan’s requirement and plan for more than 14,400 dwellings**
- **None of the options**



Almost 45% of respondents who completed the questionnaire favoured a housing provision of 14,400 with almost 17% favouring a higher figure. Almost 25% thought it would be advisable to extend the housing provision period to 2031 and 14% favoured none of the options presented.

This response needs to be considered in context though. Many of the respondents who completed the questionnaire represented land interests. Conversely, many respondents objecting to the strategic housing options did not fill this in. The question also reflected the fact that the Regional Plan established a minimum housing target but also included scope to plan for more than this. At the time of consultation, the Regional Plan Partial review was being prepared and considering extending the plan making period and increasing overall targets.

GOEM have stated that the 14,400 houses are derived from need and demand assessment and that provision should therefore be for at least this number and EMDA echoed this view. There was wide support from the development industry, commercial representatives, Network Rail and a private individual to increase the housing numbers within Derby’s boundaries beyond the RSS minimum or at least to provide flexibility to allow for this. Reasons included higher population and household projections, supporting economic growth, the need for flexibility to allow for sites not coming forward, meeting local affordable and market housing needs and providing infrastructure. An agent argued that, due to the recession, a flexible range of sites should be provided for in order to allow the market to respond quickly to economic recovery. A private individual commented that houses will only be built if there is a demand for them. There is a difference between local and more widely generated demand, and one respondent commented that the approach should be responsive to local demand only.

EMRA’s submission was that the 14,400 took account of the urban capacity that the city was thought to have at the time the RSS was prepared. This view was supported by a range of interests including Derby Cityscape, a developer and the National Trust who in view of the status of the RSS partial review position considered it premature to consider higher numbers. Some private individuals and Derbyshire Wildlife Trust were also concerned about the environmental capacity implications of any increased provision. The National Trust emphasised

the importance of considering any increase above the 14,400 on an HMA wide basis.

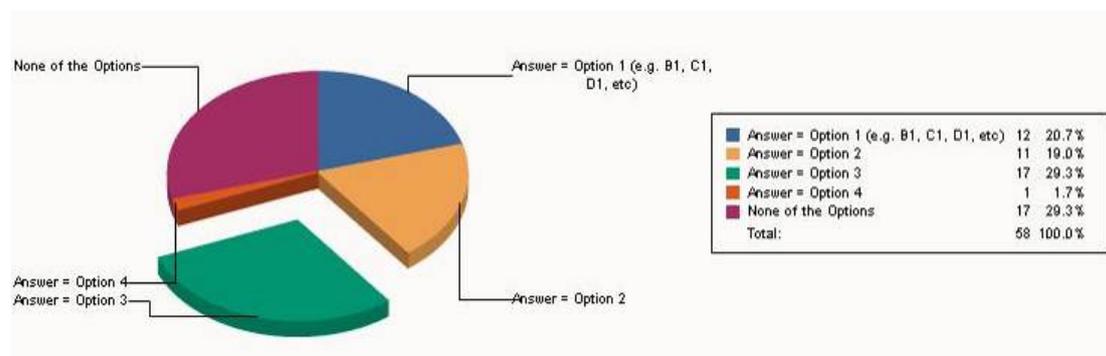
A great many private individuals objected to the scale of provision and called for a significant reduction in the numbers, justified on the basis of an overestimation of need, reflecting the effects of the recession, to maintain a balance of jobs and homes taking into account recent job losses and the number of empty properties that are evident across the City.

The development industry commented that in order to provide for at least 15 years housing land supply from adoption, the plan would need to look beyond 2026. A number of developers, Derby College and the Derby Hospitals NHS Trust supported the concept of looking beyond 2026. But others questioned the accuracy of longer term housing need estimates. English Heritage supported this extended timeframe approach as long as the focus was brownfield first. The development industry, Derby College and the Derby Hospitals NHS Trust suggested that the overall provision figure should be raised to at least 18,000 to make additional provision for the period 2026 – 2031.

Other comments included a request to reduce the threshold of strategic sites to below 1,000 dwellings and to group the figures into five year bands.

How can we deliver more affordable homes in Derby?

- **B1 – Reduce the affordable housing site threshold below 15 dwellings based on the recommendations of the Strategic Housing Market Area Assessment**
- **B2 – Seek an increased proportion of affordable housing on appropriate sites based on the recommendations of the Strategic Housing Market Area Assessment**
- **Both of Options B1 and B2**
- **None of the options**



The respondents who completed the questionnaire were split on this. Almost 30% favoured an approach which combined a reduced threshold and an increased proportion of affordable housing through S106 negotiations, almost 30% disagreed with all of the options presented in the Options Paper. 21% favoured the introduction of a reduced site threshold only and 19% favoured an increased proportion of affordable housing only.

GOEM commented on the importance of viability as a factor and the variability of different site circumstances across the City. This is likely to generate different challenges across neighbourhoods as the viability will vary depending on the type, nature and location of the site. The contribution made by housing sites to the supply of affordable housing was acknowledged by many developers. But most of them also commented on the importance of site viability and the need to set realistic affordable housing requirements based on a robust viability assessment. This is considered to be the biggest gap in the evidence base at the moment.

Whilst a clear view has emerged on the matter of viability, views were mixed in relation to Options B1 (reducing the size threshold of sites required to provide affordable housing) and B2 (seeking an increased proportion of affordable housing on appropriate sites). Some respondents considered that reducing site thresholds for providing would discourage small sites and as a consequence reduce the overall housing supply. Others commented that this would have less effect on viability than an overall increase in the amount of affordable housing being sought. The Derby Hospitals NHS Trust suggested a flexible approach to affordable housing which recognises viability issues rather than relying on simplistic percentages.

Others expressed a preference for Option B2, but with concern that arbitrary city wide targets do not take account of either site viability or local needs. Localised targets should be set across different neighbourhoods, supported by robust evidence and treated flexibly. At the Neighbourhood Board event held at the Revive Centre in Derwent Ward a view was put forward that a higher target should be set in some of the more desirable areas where affordable housing is extremely difficult to access and where communities are not balanced. Comments were also made about the current economic climate and the difficulty in bringing forward sites and examples of other authorities reducing their targets were cited.

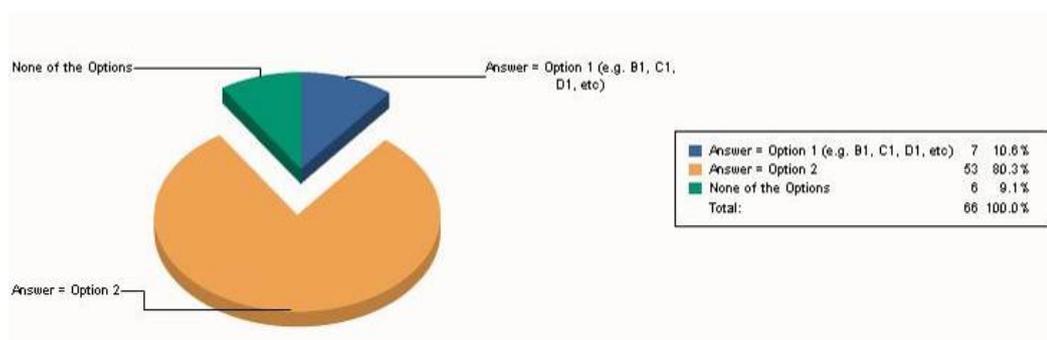
A number of comments were submitted around the more general matter of increasing the provision of affordable housing. The greater viability of larger greenfield sites was pointed out by one respondent and a developer suggested that increasing the housing land supply was the best way of improving affordability. This approach was supported by a local interest group who was concerned about the formation of ghettos. A more innovative approach between public and private housing providers was also suggested involving Compulsory Purchase Orders, joint venture agreements, gap funding and through the provision of support to smaller, inexperienced, developers. Fiscal measures were suggested, including the idea that the Council should seek to reinvest capital receipts from land sales in affordable housing and consider obtaining low interest loans to build its own affordable homes and/or match funding developer contributions.

There were a number of comments on the distribution of affordable housing, including the need for this to be addressed in the Core Strategy. The impact on community balance and the difficulties of mixing top end private market and

social housing drew some attention and the point was made that whilst some areas, sometimes the more desirable areas, have very little provision, other areas have a significant concentration which may need rebalancing. The lack of housing for middle to higher wage earners was also raised as an issue in need of consideration. The focus should be on providing for the needs of individual neighbourhoods which would assist in strengthening community identity. On a more specific note, suitable locations for affordable housing were considered to be those which are well located in relation to services and facilities, for example, around the city and district centres.

What density should new housing be built at in Derby?

- **C1 – Establish a minimum density across the City**
- **C2 – 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**
- **Neither of these options**



80% of respondents who completed the questionnaire form favoured the option of varying housing density targets between different neighbourhoods. Only 10% favoured the retention of a minimum density and 10% favoured none of the options.

The variability of densities across neighbourhoods as a result of varying needs, demands, house types and urban design was commented on by GOEM. Attention was drawn to the impact of densities on local character by a number of statutory and non-statutory organisations, including the National Trust and English Heritage. There was some support, including from EMDA, for the adoption of a more prescriptive approach to density, along the lines of Option C2. However, it was seen as overly complicated and others preferred a more flexible policy which enables a more site specific approach based around character criteria. There were several requests for the production of a ‘mature suburbs strategy’ as part of the evidence base for either approach.

Higher density development was regarded by some respondents as appropriate to the central area and possibly around district centres associated with good public transport/cycling provision but not necessarily in the suburbs where back gardens should be protected. Others commented on the failure of high density schemes evidenced by the number of empty properties in and around the central

area and the lack of family homes. The Derby Hospitals NHS Trust, commented that the apartment market in the City was non-existent and so relying on high density development in the city centre would be a mistake. Derby Cityscape’s view was that high quality high density development could be accommodated in some lower density areas without being damaging to local character.

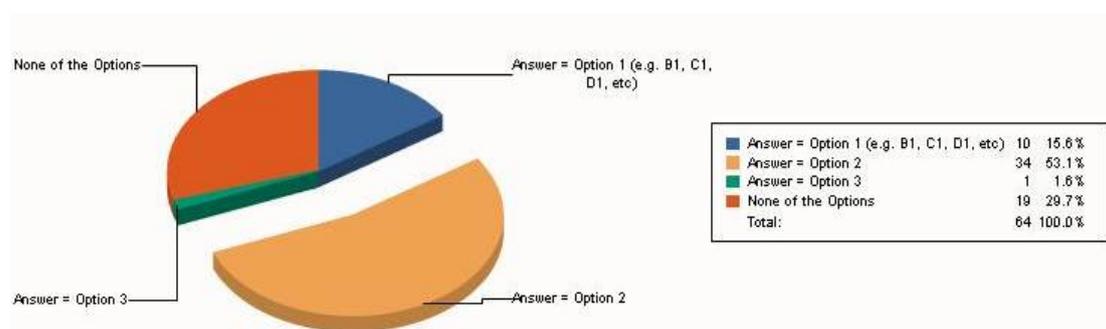
The retention of a minimum density across the City received several objections on the grounds that this approach provides insufficient flexibility to respond to varying local character. A site by site approach to density was regarded more favourably taking into account local character, housing demand and site viability. If such an approach was chosen, the minimum target should be sufficiently low to provide the larger homes that are recognised as being needed and to enable development to be in keeping with character. It was also suggested that a clause should be included about complementing existing character. One housing developer commented that it would be difficult to deliver 4+ bedroom houses that are needed if a minimum density was established at 35 dwellings per hectare.

Another respondent suggested a maximum density, emphasising the negative effects of higher density developments including the loss of and lack of provision of gardens.

A criteria based policy approach was suggested by two respondents as being an appropriate way forward accompanied by informed guidance.

What type of houses should we build in Derby?

- **D1 – Set a City-wide policy establishing the proportions of different house types sought on large sites.**
- **D2 – Set policies establishing the proportions of different house types to be sought on large sites in different parts of the City**
- **Neither of these options**



Over 50% of respondents who completed the questionnaire form favoured Option D2 (establishing housing mix targets for large sites on a site by site basis. Almost 30% favoured neither option and only 16% Option D1 (establishing a city wide policy for large sites.)

Supporters of D2, included Derby Cityscape, EMDA, English Heritage and a number of private individuals. They viewed this approach as allowing local character and needs to be taken into account. One supporter commented that

this approach needs to be flexible to enable response to changing needs over time. Another commented that market forces don't necessarily work, as illustrated by the large numbers of vacant properties in and around the city centre.

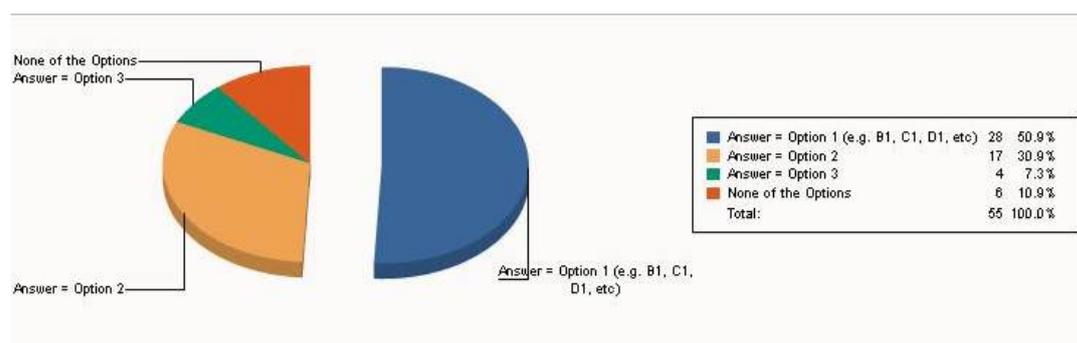
A significant proportion of respondents including many developers, commercial agents and a local interest group supported neither options. These largely felt that the market needed to dictate house types and that a prescriptive policy would be contrary to paragraph 22 of PPS3. Several respondents suggested the inclusion of a general policy guiding the mix of housing, but which enabled each proposal to be considered individually taking into account factors such as the Strategic Housing Land Availability Assessment (SHLAA), market demand, site size, viability and local character. Some of this could be addressed through development briefs. The robustness of the evidence base to be used to determine house types on a site by site basis was also questioned.

In terms of more specific comments, concern was raised regarding the negative impact of high density housing on local character, although it was considered appropriate to the city centre. The need for balanced communities was recognised by a number of individuals and there was one comment that there is a lack of high quality larger housing within Derby to attract and retain the medium to higher paid workers. Several comments argued the need for increased options for elderly people, including retirement properties and bungalows. Also, lifetime homes needs. The Derby Gypsy Liaison Group commented on the failure of the Options Document to address the scale, form and locational needs of Gypsies, Travellers and Travelling Showpeople.

At the Neighbourhood Board event at the Revive Centre in Derwent Ward on 1 July 2009 there was a wide concern from representatives from across the City about the inappropriateness of flats, particularly the more high-rise types which were unpopular with many lying vacant and because of their negative impact on character. At the same event the lack of 3 and 4 bedroomed houses was also highlighted.

How much new shopping floorspace should be provided in Derby?

- **E1 – Lower growth option**
- **E2 – Medium growth option**
- **E3 – Higher growth option**
- **None of these options**



In terms of the respondents who completed the questionnaire, about 51% favoured Option E1 (low growth), 31% Option E2 (medium growth) and only 7% Option E3 (higher growth).

Overall, a number of respondents made general comments about the overall retail strategy. GOEM suggested the need for an HMA perspective which set out the hierarchy of centres across the HMA giving greater clarification to the relative status of district centres within Derby and the Market Towns and their relationship with other centres.

The majority of private individuals who responded suggested that the strategy should concentrate on filling vacant units within the city centre (particularly the Cathedral Quarter), before new floorspace is provided. The recession, internet trading and the impact of Westfield were cited as reasons for the number of vacant units in the city centre. These comments can generally be considered as support for the lower growth option. This option was also supported on the basis of sustainability and living within environmental limits, whilst Westfield Shoppingtowns Ltd, Campaign for Better Transport and English Heritage also broadly supported the lower growth option.

The medium growth option was supported in principle by the Derby Hospitals NHS Trust (in support of their proposals for the DRI site) although they suggested a number of caveats based on their own analysis of retail growth and capacity. They suggested that the Core Strategy should specifically identify that Derby city centre has a number of weaknesses and that future growth should help to address them. The Trust submitted a considerable amount of evidence to support its own retail capacity figures in response to the Council's own retail capacity study.

The medium growth option was also supported by EMDA and Derby Cityscape, who also suggested that priority should be given to the city centre, whilst the retail needs of new housing developments such as Castleward Urban Village also need to be considered.

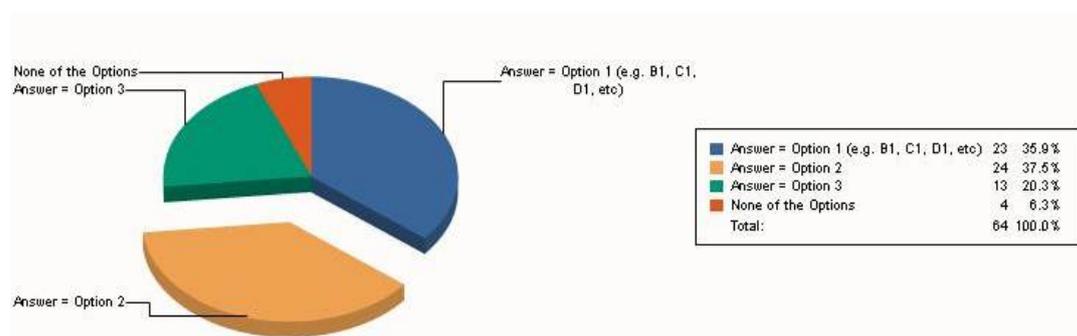
The higher growth option was supported by two of the major supermarket operators, on the basis of the potential population growth in the Derby area, whilst one of the budget operators identified the local centres as areas of potential growth.

GOEM made an additional suggestion that future floorspace requirements should be broken down into 5 year blocks, whilst other comments from external organisations touched on issues such as the need for flexibility to account for changes in demand and the need to consider other town centre uses.

One agent suggested that there is insufficient evidence to make a judgement on these issues.

Distribution of town centre uses and the roles of centres in Derby. Which option do you prefer?

- **F1 – Meet the needs for major comparison/non-food retail floorspace, leisure, office and cultural development in the city centre**
- **F2 – If needs can not be met in the city centre, then consider the dispersal of some of this growth into district centres**
- **F3 – If needs can't be met in the city centre or in improved/enlarged district centres, then accept more development in out-of-centre locations**
- **None of these options**



In terms of the respondents who completed the questionnaire, 37% favoured Option F2 (dispersal to district centres if needs can't be met in the city centre), 36% Option F1 (meeting all major needs within the city centre) and 20% F3 (accepting more development in out-of-centre locations).

A local property agent raised a number of concerns about the vitality and viability of the city centre. The main issues revolve around the 'exodus' of shops and businesses from the city centre and the decline of pedestrian footfall in the Cathedral Quarter. A number of reasons were put forward for the current situation, including overly restrictive planning policies, particularly for parking, and blight caused by regeneration proposals that have not come forward. A range of actions were suggested, including relaxing parking standards, developing new car parks in the Cathedral Quarter, improving the built environment and suggestions for licensing and advertising policies.

Some respondents supported continued investment in the city centre, particularly in areas outside of Westfield, on the basis that it is highly accessible. English Heritage supported this approach provided that it involves the re-use of existing buildings, where appropriate to character. They also noted that major new build offices should be located on the edge of the city centre, where it can be served by public transport. EMDA supported Option F1 and F2, but suggested that retail uses should be better integrated with office and residential.

Westfield Shoppingtowns Ltd pointed out that new floorspace should be located to ensure that the focus of the city centre is not shifted. A high street bank also pointed to the importance of having a diverse city centre that is not purely reliant on A1 uses. Derby Hospitals NHS Trust, in the context of their proposals on the

DRI site, supported option F1 provided that developments are able to address the qualitative weaknesses of the city centre offer.

A number of individuals and organisations supported the role and function of local centres, in terms of providing local shopping facilities. However, some pointed out that some of the local centres need investment and possible expansion to make them more attractive and a more sustainable alternative to out of centre retail parks. At the Neighbourhood Board event held at the Revive Centre in Derwent Ward on 1 July 2009, the decline in the vitality of some local centres was discussed. The increase in the proportion of takeaways within centres, which results in some being deserted during the day time, was identified as an issue. EMRA commented that an HMA retail hierarchy should be developed to help understand the role of all the different centres within the hierarchy.

A major supermarket operator suggested that some of the out of centre retail parks that contain foodstores provide the role and function of district centres and should be recognised accordingly. Another registered their interest in providing new retail facilities in growth areas, particularly in the south west of the city. The provision of local centres as part of urban extensions was also promoted by EMRA.

The National Trust noted that in planning for new retail development in the city centre and district centres, the local character of areas should be considered alongside the form of the proposed development to avoid unduly large or tall developments that could adversely affect the attractiveness of centres.

Westfield Shoppingtowns commented that the Core Strategy should have flexible policies to help stimulate development in the city centre.

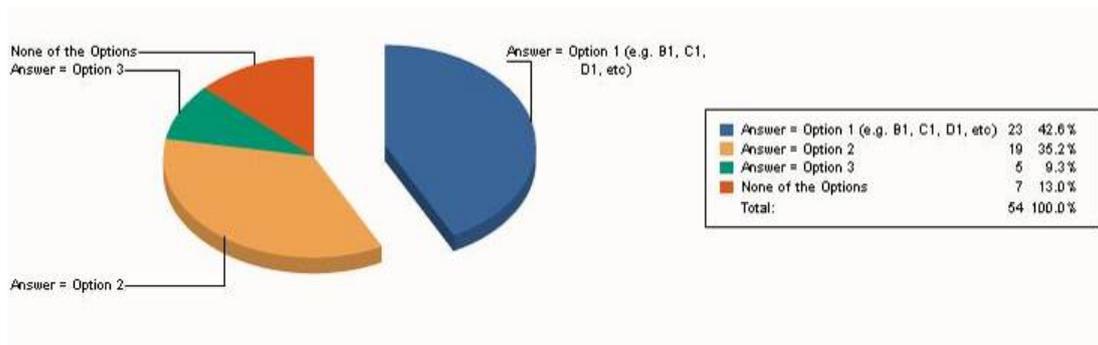
Out of town developments (F3) received less support than Options F1 and F2. However, Network Rail promoted F3 (including the refurbishment of the larger off centre locations) and one of the major supermarket operators also gave support to F3. The owners of one of the out of centre retail parks promoted F3 and noted that out of centre retail parks are less constrained than identified centres, particularly for bulky goods operators. They also noted that out of centre retail parks provide opportunities for linked trips. A local agent pointed out that F3 may be the most realistic of the options whilst GOEM pointed out that option F3 is contrary to national policy.

A local property agent felt that applications to expand non-food activities of supermarkets on the edge of the city centre will seriously damage the vitality of the centre and lead to more closures.

How much new employment land should be provided across the Housing market Area?

- **G1 – Provide a total amount of new employment land across the Housing Market Area in line with the recommendations of the employment land review**

- **G2 – Provide a total amount of new employment land across the Housing Market Area below that recommended in the employment land review or a reduction in the overall supply**
- **G3 – Provide a total amount of new employment land across the Housing Market Area above that recommended in the employment land review**
- **None of these options**



About 43% of respondents who completed the questionnaire favoured Option G1 (providing employment land in line with the recommendation of the Employment Land Review). 35% favoured Option G2 (providing less than that recommended in the ELR) and only 9% Option G3 (providing more than that recommended in the ELR).

GOEM recognised that Option G1, which is based on historic take up rates, should be the starting point. However, they also suggested that consideration should be given to how non 'B' uses can be factored into policy, pointing out that the EMDA job forecasts are a good starting point. EMDA, English Heritage, East Midlands Airport and a number of individuals also supported G1. However, English Heritage also supported option G2 and suggest that the rest of the HMA could take advantage of Derby's oversupply.

A development company suggested that the ELR is flawed and that a review is needed. This view is supported by Derby Cityscape Ltd. Network Rail supported Option G2 as the ELR identifies an oversupply of land. Therefore, the reallocation of sites is supported, including parts of Chaddesden Sidings.

The Campaign for Better Transport supported a small reduction, provided that surplus land is used for residential purposes. Individuals have pointed out that less land will be needed due to trends in working from home and the growth in support services which traditionally require less land than manufacturing industries.

One of the major land owners in the south of the city promoted Options G1 and G3 which is an increased supply option. They added that G3 provides the most flexible approach that would provide the widest range of sites to help meet the plan's vision and objectives. Other stakeholders, including EMDA, also promoted a flexible approach. The development industry has generally suggested a market

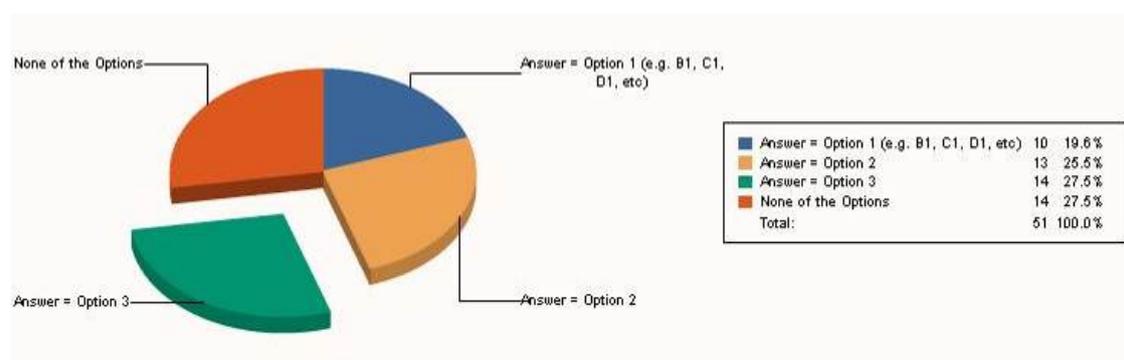
led approach, with a wide portfolio of sites that are not constrained by rigid policies.

The responses generally indicate a view that no matter how much land is set aside, Derby still needs to be made an attractive place to invest. EMDA noted that the quality of the employment land supply is influenced by the proximity of a skilled workforce, ICT connectivity, market attractiveness and deliverability.

Other individuals and agents have pointed out that employment uses should be focussed onto brownfield sites and that employment land provision should be based on the provision of new housing.

How should employment land be divided across the Housing Market Area?

- **H1 – Divide provision based on the existing distribution of supply**
- **H2 – Divide provision based on employment land review distributions**
- **H3 – Divide provision based on the provision of new housing**
- **None of these options**



27% of respondents who completed the questionnaire favoured Option H3 (based on the distribution of new housing), 25% H2 (based on recommendations of the Employment Land Review) and 20% H1 (based on existing distribution). However, some 27% supported none of these options.

GOEM said that it may be necessary to consider the strengths of different areas within the HMA, when determining the distribution of employment development.

Some development industry respondents and a number of individuals suggested that the distribution should be driven by the market to ensure that viable sites are brought forward. They also suggested that distribution should be linked to that of new housing, as set out in Option H3, providing more sustainable mixed use developments. An individual has also suggested that windfall sites within existing residential areas should be considered for employment development to help rebalance the distribution of supply in the city.

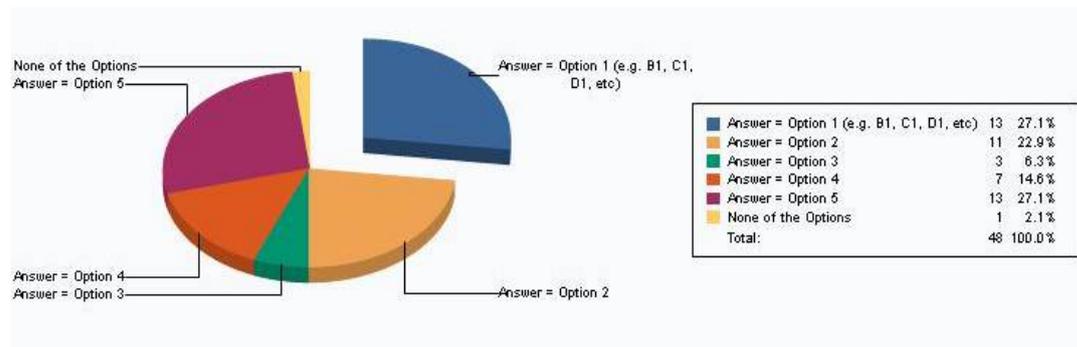
A local interest group supported H1 which they consider would consolidate development in Derby without adding to the oversupply.

A national developer has pointed out that the ELR is flawed and there is an imbalance in employment land. They therefore believe that Options H1 and H2 which rely on it are not appropriate. They comment that Option H3 would be the most sustainable.

A major landowner in the south of the city supported Options H2 and H3 and commented that a hybrid option of the two would be preferable, considering need and housing growth. It was suggested that Option H2 would provide a slightly higher distribution within South Derbyshire, which is sensible given the access to the A50.

How should Strategic Distribution (logistics) Facilities be accommodated across the Housing Market Area?

- **I1 – Allocate land at the A38/A50 junction with access to the Derby-Crewe railway line.**
- **I2 – Allocate land at the former Willington power station site with access to the Derby-Birmingham railway line**
- **I3 – Allocate land at the former Drakelow power station site with access to the Burton-Leicester railway line**
- **I4 – Allocate land at Sinfin Moor, including Chellaston Business Park, with a spur providing access to the Derby-Birmingham railway line**
- **I5 – Do not allocate sites within the Derby Housing Market Area**



27% of respondents who completed the questionnaire favoured Option I1 (allocating land at the A38/A50 junction), 23% I2 (allocating land at the former Willington power station), 15% I4 (allocating land at Sinfin Moor), 6% I3 (allocating land at the former Drakelow power station) and 27% I5 (no sites in the Derby HMA).

The comments on this topic area were submitted before the publication of the EMDA funded Strategic Distribution Study, which has subsequently identified sites at the junction of the A38/A50, Markham Vale and Castle Donington as potentially appropriate. The Highways Agency, GOEM, EMDA, EMRA and English Heritage have all noted that the Strategic Distribution Study will be a key piece of evidence that will inform the eventual strategy.

The development industry generally suggested that if any site is selected, it should be the land at the junction of the A50 and the A38. This has been supported by some members of the public, who have pointed out the importance of securing Toyota's cooperation in bringing this site forward.

The Sinfin Moor option was particularly criticised by the development industry due to access and viability issues, although members of the public supported it due to its links with Rolls-Royce. An agent has also noted that there are more appropriate sites in other HMA's.

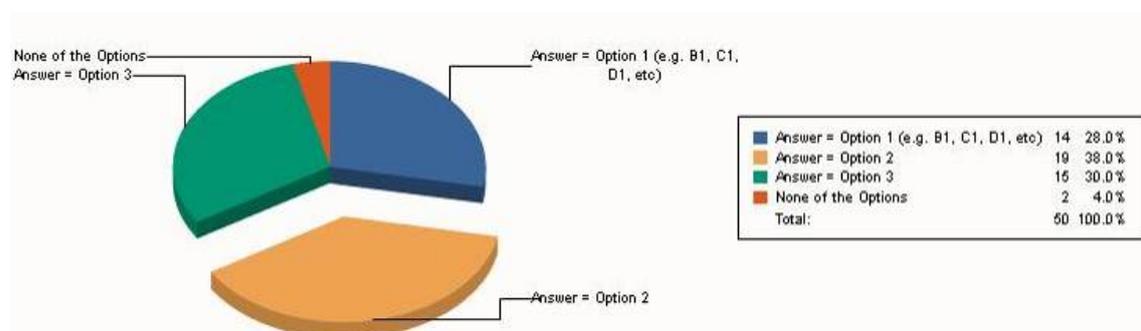
Network Rail supported the principle of an SDS facility in the HMA as it will help to achieve modal shift. They pointed out that rail access should be along the less congested Derby to Stoke railway line, which would suggest support for the A38 / A50 option.

A number of organisations commented that issues such as wildlife sites, flooding and the historic environment need to be taken into account.

The Campaign for Better Transport have questioned the need for a SDS facility in the HMA, particularly given the likelihood of higher oil prices in the future. On the other hand, Derby Cityscape suggested that additional brownfield sites within the city could be considered for strategic distribution uses.

How can we make buildings more sustainable across the Housing Market Area?

- **J1 – Use the changes in Building Regulations requirements as local targets for sustainable construction**
- **J2 – Set targets for sustainable construction in advance of the changes to Building Regulations**
- **J3 – Expect all new buildings to meet the standards set out in Option J1 but also identify strategic sites where standards can be exceeded and environmental sustainability exemplified**
- **None of these options**



Of the respondents who completed the questionnaire, 38% favoured Option J2 (setting targets for sustainable construction in advance of the changes to the Building Regulations), 30% favoured Option J3 (setting standards in line with J1 but also setting higher standards for selected strategic sites) and 28% favoured

Option J1 (using the incremental increases planned through the Building Regulations).

The development industry, EMDA and one individual supported J1, whilst private individuals generally supported higher standards than these. An individual gave examples of innovative forms of housing development which could assist the city's ambition to become a 'City of Innovation'. Derby Cityscape supported setting targets in advance of changes to Building Regulations, but pointed out that it should be flexible for site specific issues and recognise that subsidy may be necessary for viability. GOEM supported J3 because best accords with the intentions of PPS1. They also comment that any departure from Building Regulations standards will need to be supported by evidence. Derbyshire County Council and a commercial organisation both also support J3. The commercial organisation also commented that greenfield sites enable higher targets to be achieved.

A number of organisations made comments in their particular areas of expertise. Derbyshire Constabulary stated that Designing out Crime should be adopted as policy and that 'Safer Places' and 'Secured by Design' should be essential requirements of all new development. They suggest an example of good practice. English Heritage commented that impact of wind turbines and other structures on the historic environment needs to be taken into account.

The Environment Agency supported the principle of setting a code for sustainable buildings and that it should include a maximum score on water related criteria. Standards for industrial development should also be considered. They also consider that sustainable building is about more than just design and construction. The maximisation of waste reuse and recycling should be integrated into all types of development, especially in large developments and innovative schemes could be considered. It should also be considered in relation to future repair and demolition.

What priorities should be given to the different ways of addressing transport in the Housing Market Area? Please rank these options in your preferred order with 1 being the most important and 4 being the least important.

- **K1 – 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**
- **K2 – 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**
- **K3 – Measures to increase use of alternatives to the car: Accommodate travel demand generated by new and existing development by focussing on public transport and improvements for pedestrians and cyclists**
- **K4 – Major works: Accommodate travel generated by new and existing development by focussing on improved road infrastructure**

- **None of these options**

Congestion and parking related problems were raised by people and organisations across the City and were frequently raised at drop in sessions and the Neighbourhood Boards event held at the Revive Centre in Derwent Ward on the 1st July 2009.

The Highways Agency generally agrees with the statements contained in the introduction to the options for addressing transport across the HMA. Any new development in the area needs to take account of the impact on the Strategic Roads Network. Any development proposals should be supported by a robust evidence base and appropriate transport policies focused on minimising future traffic growth and encouraging sustainable modes of travel. However, they consider that the options set out in Section K do not appear to represent possible strategies for transport and it is not evident what their outcomes may be.

GOEM indicate that at HMA level the core transport networks should be set out alongside major improvement schemes and major cross boundary transport interventions such as park and ride networks. At local authority level, detailed spatial transport strategies will be needed to support the growth strategy. A private individual considered that the strategy should focus on improving the connections from the suburbs to the city centre and providing adequate short term parking, particularly in association with local shops. One individual asserted that a tram system should be considered as part of the transport strategy.

EMDA make the point that the findings and the response to Delivering a Sustainable Transport System (DaSTS) for the East Midlands (pending), should inform the preparation of the preferred policy options. A good transport system is essential to economic growth. They also mention the Regional Economic Strategy (RES) and its importance in promoting a modal shift approach to more sustainable modes of transport necessitating improvements to public transport infrastructure.

Derbyshire County Council comment on the emerging Spatial Vision which refers to the A38 junctions in the context of accessibility being improved, congestion reduced and safety enhanced through investment in functional transport infrastructure, including the A38 junctions. In view of the evidence submitted to the con-joined Public Inquiry in South Derbyshire, construction of these junctions is likely to be pre-requisite to the delivery of the PUA housing in there. A private individual further emphasised the need for adequate transport infrastructure to support strategic development sites.

The Campaign for Better Transport comment that the chosen options need to include aspects of all options, including demand management and smarter choice measures. They note that even small projects which unblock pinch points can have very successful impacts. One private individual also made the point that IT initiatives and development to aid home working could also assist in reducing the need to travel.

Both the Environment Agency and English Heritage drew attention to the need to respect features of the historic and natural environment by measures to reduce transport demand and provide alternatives to the car.

Derby Cityscape point out that priority should be given to improving public transport and sustainable transport options rather than improving and expanding the road network. Consideration should be given to park and ride, electric car charging points and car clubs, amongst other measures.

An individual commented that if development is permitted in areas to the south of the city, major improvements to the road network will be needed. They also commented that there are no adequate roads to connect the southern suburbs and the city centre between the A38 in the west and the A6 in the east. A further junction onto the A50 would be required between the A38 and A6 junctions.

There was positive feedback about the 'T-Bus' concept to link Chellaston across the city, through its centre to Mackworth and across to Kirk Langley. It was felt that it would form a sustainable transport concept, supported by park and ride facilities, linking housing with industrial and cultural/leisure locations and acting as a regeneration stimulus. Overall, many private individuals sought greater focus on improving public transport including the links between the suburbs and the city centre and an expanded bus station. Whichever option is selected the view is that substantial highway investment will be required.

Infrastructure Priorities

Views on infrastructure requirements and priorities were varied. A local resident commented that identifying priorities will depend on what community facility deficiencies an area has, with a view to ensuring each District/Neighbourhood Centre contains basic community services (GP surgery/dentists/library/community centre).

At the Neighbourhood Board event held at the Revive Centre in Derwent Ward a common view from community representatives from across the City was that communities need to be involved in any discussions about S106 contributions and community priorities. Whilst the need for additional local shops and community facilities was recognised in many areas, the specific nature of these varies between communities. Some, for example have inadequate resources for youth activities, whilst others need more support for the elderly. In addition, a common view was that greater use needs to be made of existing and proposed school facilities which at present are considered to be restricted in their availability. Communities would, therefore like to be directly involved in the negotiations with developers on planning applications.

A development company claimed that there is a danger in assessing the localised impact of new, strategic development at the urban edge in relation to only its nearest Neighbourhood. They argue that an urban extension, in any of the potential locations, will represent an extension to Derby as a whole and should be viewed in this way.

Lightspeed Derby commented that the Core Strategy should include a requirement for all new large-scale housing developments to include a well-designed fibre optic network as part of the overall design. This point is echoed by a resident as greater IT connectivity enables home working and reduction of the need to travel.

Camland Development suggested that a holistic approach to infrastructure and place creation is needed. They say that social cohesion and integration works when people feel an attachment to an area and a sense of place. A private individual commented that contributions should be focused where they can have the greatest direct impact on people's quality of life, such as school provision, parks, landscaping, tree planting and public art. The need for more consultation with communities with regard to infrastructure priorities was important.

A Development Agent emphasised that S106 requirements can only be judged on a site by site basis related to the necessary and reasonable needs arising from the proposed development. If local infrastructure levies are introduced, these must take account of site viability and the timing of infrastructure implementation. Derby Cityscape commented that a partnership approach to the S106 process should assist in achieving mutually beneficial outcomes taking into account the quality of a development. Sport England commented that the Core Strategy should provide the basis for specific sport and recreation policies, particularly on sports pitches. It should also provide evidence for sport related infrastructure requirements, through CIL and the Infrastructure Delivery Plan.

The Environment Agency considered that a policy is needed on the conservation, quality and efficiency of watercourse systems which ensures protection and enhancement through development. This could address the opening up of culverted watercourses, enhancing sustainable drainage solutions and the positioning of development. Any updates to the Waste Management policy should emphasise the relationship with the County Council and what is expected of new development. A development company highlighted how the Water Cycle Study outlines potential problems in relation to the sewerage system south of the River Derwent in Derby. Any such problems, if not mitigated, could potentially affect the ability of the HMA authorities to provide the required amount of development. Therefore a Detailed Water Cycle Study may be needed.

English Heritage commented that Infrastructure Delivery Plans should include financial packages to preserve historic buildings and spaces, including public realm improvements.

Neighbourhood Spatial Issues

There was some support from private individuals to proposals to regenerate the city centre, Osmaston and the DRI site. However, substantial concerns were raised to the options for urban extensions, particularly to the south of the city at Mickleover, Sinfyn and Chellaston. There was a feeling that decisions had already been made without proper public involvement and a lack of ownership of a strategy based on the Regional Plan which set out the broad strategy and scale of growth. In particular, the adverse impact of such large scale development on local infrastructure such roads, schools, medical and community facilities were

identified as was a concern over impact on countryside and green spaces. Concern was expressed by a number of residents that the Council Tax from future residents of the schemes would go to South Derbyshire. There was also a view that the housing projections the Plan is based on are overestimated.

Comments by Neighbourhood are summarised below:

- Abbey

At a Neighbourhood Board, concerns were expressed about the Friar Gate Goods Yard site in terms of its long term vacancy and related anti-social behaviour. Disappointment was expressed at the failure of plans for the regeneration of the Rowditch area. The ward is noted as having high proportions of residents on welfare benefits and there are no plans for a library. There were also concerns about the negative impact of local listing of buildings which prevents useful redevelopment.

At a city wide Neighbourhood Board event held at the Revive Centre in Derwent Ward, the significant numbers of vacant and derelict properties in this ward were noted alongside concerns about overcrowding.

- Allestree

At a Neighbourhood Board meeting, parking was raised as a major concern relating to the University and the Hospital which were both viewed as having insufficient parking. There was also some concern that the Ward is lacking some services and facilities, particularly a day care centre for the elderly and those with dementia.

The Board meeting also supported the principle of re-using brownfield land and protecting Greenfield sites. However, there are significant concerns in this ward about the impact on the area's character resulting from inappropriate and over intensive development, particularly on suburban garden land.

A number of residents expressed concern during the Options consultation over the potential for development of land in Amber Valley to the north of Memorial Road. This land was not proposed as a strategic option, but is being promoted by the land owner through the strategic housing land assessment.

An individual respondent expressed concern about proposals to build on land around at Allestree in the valley between Kedleston Road and the A52. This was mainly due to potential flooding problems and the likely negative impact of development on local schools, shops and roads which are all inadequate to accommodate further development.

- Alvaston

At a Neighbourhood Board meeting, concern was raised about the loss of the Boulton Moor Green Wedge in terms of the negative impact it

would have on the existing local community. Comments were also made about the high proportion of affordable housing in the ward.

- Arboretum

At a Neighbourhood Board meeting, the view was expressed that use should be made of existing old buildings before developing Greenfield sites. Concern was also expressed about the over concentration of social housing in the ward which must not be exacerbated by the redevelopment of the DRI site.

A resident raised concerns about over crowding, too much social housing, too many absentee landlords, congestion on Osmaston Road, pollution, health and poverty problems. These issues need to be taken into account when considering the future of the DRI site.

A resident suggested that Castleward should not be used just as a 'sustainable urban village', but should primarily be used for purposes that would attract journeys from the city and beyond. Major tourism and employment uses with significant footfall would be ideal. It was also suggested that the area should contain services that serve people from across the city, such as the possible new leisure complex.

A local property agent was concerned about the loss of sustainable employment opportunities in the Castleward area, if this were to be redeveloped for housing.

- Boulton

At a Neighbourhood Board meeting, concerns were raised about the impact of additional housing development at Boulton Moor.

- Blagreaves

A number of individuals expressed strong opposition to any building on the proposed City Park. This land is being promoted by the owner as a strategic housing site.

- Chellaston

At a Neighbourhood Board meeting, concern was expressed that Chellaston is full and has no capacity for significant new growth. There were also concerns about the adequacy of the District Centre to meet existing needs and the main road is already under a lot of pressure. The view was that if there were to be additional housing development then the infrastructure improvements need implementing prior to the new houses being completed.

This view was supported by a resident who raised concern over traffic congestion and particularly to existing traffic problems from Parkway. This is now the main route to the A514 for the new west Chellaston estate. The point was made that any new development should not have access to the existing estate, if development were to expand further to the west of Chellaston.

- Chaddesden
The Neighbourhood Board questioned the accuracy and source of the housing provision figures. Concern was raised regarding the amount of empty office space in the city and about the impact of further development on Derby's heritage. The potential for the canal to make a positive contribution to any new development was discussed, particularly in respect of potential development opportunities at the Derwent Triangle.

A resident commented that there is little opportunity for development apart from infill.

Lafarge commented that any future development proposals around Chaddesden should take into account, yet not compromise, the operation of their aggregate recycling facility on Chaddesden Sidings.

- Darley
At a Neighbourhood Board meeting, views were expressed that Option B may impact less on transport congestion and school provision. It was also felt that housing provision adjacent to Mackworth could have an influence on plans for an underpass at Markeaton Island.
- Derwent
A master planning exercise for Derwent was promoted at a Neighbourhood Board meeting. Concern was raised about the high level of vacant properties across the city and the need for smaller properties to accommodate the growth in younger and older households. Comments were also made about the large numbers of properties with extensive gardens which could often not be maintained satisfactorily and the suggestion was made that better use could be made of this land in accommodating development needs.
- Littleover
At a Neighbourhood Board meeting a number of concerns were raised:
 - The RSS housing targets are too high.
 - Some of the Derby PUA growth should be redirected to Ashbourne, Melbourne and Findern, especially as the proposed urban extensions would impact on Derby's infrastructure and services whilst Council Tax would go to South Derbyshire.
 - The City Park must not be lost to development as it a much valued area of public open space and green wedge

An individual respondent reflected that Littleover maintains some separate identity from inner city Derby by the barrier provided by the ring road. The neighbourhood's limited opportunities for expansion were emphasised, especially as open space is already in short supply.

Concern was raised regarding a potential site between Moorway Lane and Boylestone Road which residents are aware is currently identified as a proposed 46 hectare city park. A number of private individuals also raised concerns about the potential negative impact of housing growth on schools and infrastructure. In light of this, the view was that significant improvements would be needed in the locality for medical, social and recreation facilities.

An individual commented that if further growth occurs around Heatherton, this would result in an enlarged community, the integrity of which needs to be recognised. It was pointed out that at present there is no primary school to the west of Rykneld Road and emphasis was given to the importance of maintaining and creating community identity across local authority boundaries.

A commercial agent indicated that the 'Poyser' parcel of land should be considered for early development in isolation to the rest of the site.

- **Mackworth**
A Neighbourhood Board meeting identified congestion and 'ratrunning' as problems to both car and bus users. The area lacks a secondary school and there is no easily accessible public transport to the school at Mickleover. It was also noted that the area lacks allotments, shops and similar services and healthcare facilities for both existing residents and the future residents of the Radbourne Lane site. The overall view was that significant future housing development would generate the need for more infrastructure.

The main issue highlighted by residents is the poor transport links to other parts of Derby and pressure on transport infrastructure. It was felt that there is little opportunity for local employment and if the college were to be redeveloped for housing these opportunities would be further reduced. Some respondents commented that the proximity of Mackworth Brook to the urban area of Mackworth suggests a potential flood risk.

- **Mickleover**
A large number of comments expressing concerns over options for new housing were received by both Derby City and South Derbyshire District Councils. Options for urban extensions of the city into South Derbyshire were particularly controversial.

Highways issues were raised in most representations. Local roads are considered to be over capacity and in poor condition. Links to major roads are considered to be congested. Congested areas highlighted included the District Centre, the Royal Derby Hospital, the former University campus being redeveloped for housing, along Station Road and its junction with Radbourne Lane and the routes along the Mackworth Estate and the A38 West junctions. Concerns were also raised over the poor links of roads off Ladybank Road to potential

housing land to its west. There was a feeling that improvements to public transport are needed.

A significant proportion of responses commented that alternative brownfield locations should be considered across the HMA and that no Greenfield land should be released until it is clear that there is insufficient capacity to meet housing needs. Many respondents felt that it is important to keep the neighbourhoods of Mackworth and Mickleover distinct and separated by green open areas. Comments were made about how growth would substantially alter the character of the neighbourhood in terms of its size and relationship with the countryside. There was a general view that the countryside around Mickleover contributes towards its character as well as being an important resource which residents enjoy for its walking and landscape value.

Many comments were received about the capacity of local services and facilities to accommodate further growth, especially of dentists, doctors, shops and schools. Some of these were already considered to be at or over capacity.

Some respondents queried the basis of the proposed scale of housing growth and the role of the Regional Plan in setting targets. Concerns were also raised over how new housing relates to job provision as there were considered to be few employers within the neighbourhood. The impacts of commuting were highlighted as a problem with poor bus service provision to major employers.

A resident commented that if the decision was made that additional housing provision was necessary, then the Mickleover (A) site would be preferable for reasons of access to Station road, topography which means that flooding is less likely and the more limited road noise impacts.

A petition of 232 signatories has been received from private individuals in the Mickleover/Mackworth and Littleover areas. This raises objections to the potential for significant housing development around the area. The issues raised were:

- The development would result in the loss of beautiful, peaceful and productive countryside.
- Congestion will be increased and the risk of accidents will be raised.
- Green open space, including in Green wedges, will be lost having a negative impact on health and reducing the opportunity for food to be grown locally.
- There would be increased pressure on already inadequate local services.

- Pollution levels would increase.
- The character of the areas would be affected as the relationship with the countryside is important to them.
- The strategy should be to achieve a housing and employment balance.
- It should be brownfield before greenfield. The focus should be on brownfield sites in the inner city to achieve regeneration.
- The impact of the housing recession on housing need should be considered.
- Vacant housing should be re-used before new housing is built.
- There is already inadequate parking.
- Any development would have a detrimental impact on historic landscape character and biodiversity value. Badgers and glow worms are known to exist.
- The land is used for recreation and provides access to cycle paths.
- Social housing is needed.
- The expansion of villages should be considered as an alternative to peripheral expansion of the urban area.
- Private individuals should be involved in decisions about infrastructure improvements. Such improvements need to be comprehensive rather than focussing around small bits of public open space.
- There is risk of flooding, especially because the sewer system is so old.
- Derby is already too big.

Similar concerns were raised at a meeting of both the Neighbourhood Board and Forum, particularly about the impact of additional development on the road network and about the adequacy of services and facilities.

- Normanton
Concern was expressed at a Neighbourhood Board meeting concern about losing the allotments which are considered to be an important local resource.

At the city wide Neighbourhood Board event held at the Revive Centre in Derwent Ward, the significant numbers of vacant and derelict properties in this ward were noted alongside concerns about overcrowding.

- **Oakwood**
Concern was raised at a Neighbourhood Board meeting over congestion and the need for more direct bus services to the city centre. It was felt that new houses should be built close to facilities to help create communities. The neighbourhood was felt to be relatively well provided for in terms of public open space and the view was that the existing provision should be protected. Any proposals for development on green wedge land would generate a high degree of community interest.
- **Sinfin**
Concern was expressed at a Neighbourhood Board meeting about the proposed Incinerator, the impact of the Osmaston regeneration proposals on the local community and the need for a strategic approach to planning for Gypsies and Travellers. Concerns were also raised at the city wide Neighbourhood Board event held at the Revive Centre in Derwent Ward on 1 July 2009 about the treatment of the Sinfin area, particularly around Osmaston, as a dumping ground for land uses not wanted elsewhere. The ward was considered to have the highest incidence of social housing in Derby and the highest proportion of young people. The focus on regeneration in this area was welcomed if it could help to create a more balanced community as long as none of the open space would be lost. In one of the workshops at the Derwent event, the regeneration of Osmaston was identified as the top priority for the City in terms of housing delivery.

Residents gave some support to a combination of strategic Options A and B. The view was that the focus should be on providing accommodation, including bungalows for elderly people to try and provide a better social mix and to provide for local housing needs. Objections were, however, raised to further housing around Sinfin which is felt to already have too much pressure on existing services. One respondent expressed the need for more community orientated cultural/leisure facilities including meeting rooms. It was felt that Sinfin already has sufficient industrial areas.

- **Spondon**
Concerns were raised at a Neighbourhood Board meeting over congestion on the main road through the village and the need for a relief road. Concerns were also raised about poor access to health provision, the need for more sports facilities and issues around an ageing population.

At the drop in session in the Library and at the city wide Neighbourhood Board event held in the Revive Centre in Derwent Ward, concerns were also raised over congestion through the village, which is aggravated by the large numbers of HGV's which have to pass through it. There was some discussion about the potential for releasing green belt land to the east of Spondon as way of delivering a bypass to help address this problem.

Area or Site Specific Comments

Allan Avenue, Littleover

A development company commented that the residential development potential of land to the north of Allan Avenue and Andrew Close, Littleover should be recognised and an appropriate Core Strategy policy framework put in place. It was proposed that the release of this site could facilitate the provision of public open space and provide about 120 dwellings.

Boulton Moor

Land in the Boulton Moor Green Wedge is being promoted by a development company as a Strategic Development Opportunity. An analysis of green wedges is included with the representation. It is argued that as part of a strategic housing allocation, the remaining green wedge land could be improved in terms of its green infrastructure.

Celanese, Spondon

Two private individuals propose that the Celanese site in Spondon could be used to create new housing development. The site was considered to have good access to the road and rail network. It would also help meet housing needs in the east of the City as the majority of new housing sites being promoted are in the south and west.

Chellaston Business Park and Raynesway

Large employment allocations at Raynesway and Chellaston are supported by development companies. A case was made to extend the Chellaston Business Park allocation into South Derbyshire to include a new junction with the A50 as part of a mixed use sustainable urban extension at Sinfin. It was considered that this may assist in providing employment land flexibility for the HMA.

Castleward

A resident considers that Castleward should not be used just as a 'sustainable urban village' but should primarily be used for purposes that will attract journeys from the city and beyond. Major tourism and employment uses with significant footfall would be ideal, and services that serve people from across the city, such as the possible new leisure complex.

Heatherton

One individual resident makes the point if further potential growth occurs this will result in an enlarged community, the integrity of which needs to be recognised. At present there is no primary school to the west of Rykneld Road. They go on to say how important it is to maintain/create a community identity for an area that crosses local authority boundaries.

Inner City Derby – (Morley to Normanton)

An individual raised concerns about the changes to the character of this area which have occurred as result of infill development. The result has been a loss of the traditional mix of land uses resulting in increased levels of travel to access jobs and services. It was suggested that further loss in the mix of uses should be

avoided and that open space in the area also needs protecting from development.

Land between Stuart Street and Phoenix Street

The development of land between Stuart Street and Phoenix Street was promoted by a commercial organisation. This land was considered to be well located and brownfield and thus an important sustainable development opportunity that should not be constrained by inflexible environmental policies.

Rykneld Road

A commercial agent indicates that the 'Poyser' parcel of land should be considered for early development in isolation to the rest of the site.

Hackwood Farm

A development company commented that this site could deliver a sustainable urban extension to the west of Derby in an area of high demand. Because of its location, it would have access to high frequency public transport routes into the city centre, to employment and retail opportunities as well as to the Royal Derby Hospital. It was also argued that the site has the potential to form part of a wider urban extension to the west of Derby together with land to the west within South Derbyshire District Council. This could facilitate the delivery of additional local facilities and services.

English Heritage however, raised a number of significant concerns regarding this option. They commented that development in this location would have adverse impacts on the landscape of the area. It is considered to be a sensitive landscape with respect to historic character, biodiversity, tranquillity and visual intactness which has been identified by the County Council as an 'Area of High Environmental Value'. More specifically the impact would be on Radbourne Hall and Park and other listed buildings and their setting including Silverhill Farm and Potlocks Farm.

Derby College, Mackworth

A planning agent promoted the development of land in and around the Derby College site at Prince Charles Avenue. It was argued that this could be undertaken in a sustainable way without affecting the function and effectiveness of the Mackworth/Mickleover green wedge. Much of it is already developed and the existing buildings could be replaced by buildings of a lesser scale. It is considered to be well related to existing housing to the north and bounded by a former railway line to the south - which has been designated as a pedestrian/cycle route. It is described as being in a sustainable location with schools, health facilities, Mackworth's District Centre and Knightsbridge Park within walking distance.

Land north of Hall Pastures Farm

A landowner promoted this green wedge land for housing. It is argued that this could create the potential to incorporate additional land into an expanded city park and create the opportunity to provide the right mix of houses to meet needs at the right density to be in keeping with the locality.

A development company also promoted this site, arguing that development would provide an opportunity to significantly improve green infrastructure and deliver sustainable housing in Littleover. It is considered that a re-appraisal of the green wedge would help the Council's desire to expand the adjacent Millennium Wood Park whilst retaining the strategic function of the wedge.

A local resident raised concerns about the loss of this land and argued for an extension of the green wedge between Littleover and Mickleover to prevent coalescence, to protect the land for agricultural use and to provide leisure opportunities. Development of this land would be visually intrusive in the landscape, would exacerbate flooding problems, intensify existing road noise issues and affect the historical value of Dewsbury Court. This area is also not well related to services and facilities.

Derbyshire Royal Infirmary

The Derby Hospitals NHS Trust have promoted the former DRI site for a mixed-use development that would include a new supermarket and a mixture of residential and commercial uses. The Trust's submission makes a detailed case for retail development, focussing on suggested weaknesses in the city centre 'offer', the 'need' that exists and the need for retailing to make the site viable. It also suggests that a much lower density of housing development on the site should be considered in light of current market conditions, proposing that the expectation should be for around 40 dwellings per hectare.

Land on the north side of the A52

A development company suggested concentrating more development on the edge of the Derby PUA on the north side of the A52.

Lime Lane, Oakwood

A commercial agent commented that there are substantial pockets of green wedge, such as at Lime Lane, Oakwood, which already benefit from good access to the local road network, public transport and local facilities. It is argued that detailed master planning work has been provided to the Council which demonstrates that it can blend in successfully with the local environment and have minimal impact on the existing community.

Land to East of Acorn Way and North of Derby Road, Spondon

A Planning Agency has promoted, for housing development, 6.7 hectares of land in the green wedge off Acorn Way, Spondon. The site is considered to be well related to an existing settlement, well connected to services and facilities and it is argued that development of the site will not undermine the function of the green wedge. The site is considered to be deliverable and a flexible opportunity to provide a balance of house types and to make most of renewable energy opportunities.

Evidence Base Documents

A number of comments were made about work that forms part of the evidence base or relating to gaps that have been identified within it:

- Natural England commented that a Sustainability Appraisal of options needs to be carried out before a preferred option is selected. This should be informed by experts, for example, wildlife experts and local landscape character experts.
- English Heritage suggested that the evidence base should be broadened to address issues relating to landscape, historic and townscape environment.
- A commercial organisation raised concerns with the methodology used in the employment land review relating to sample size, data age and the 25% buffer.
- A private individual pointed out that there are contradictions between the Roger Tym Retail study and the Caci study regarding the retail potential of the Becket Well area.
- Detailed comments about expenditure data in the Retail Study were submitted by a commercial organisation.

Other Comments

A number of other comments were submitted that do not fall into the categories identified above. These are:

- The relevance of the Core Strategy needs to be explained to disabled people and their children.
- The full document and questionnaire were too long and complicated and something more simple should be considered for future consultations with questions based on a summary document
- Opportunities need to be made for local food production by making better use of open space.
- Incentives are needed to encourage sustainable construction
- Charging points for mobility scooters and electric modes of transport should be included in housing schemes and at major destinations and daily car hire rental schemes should be investigated.
- Options should be explored for shared accommodation to ease housing demand.
- Waste management should evolve to a philosophy of resource management.
- Greater focus is needed on land drainage matters including the location of large sites, sustainable drainage, surface water management and catchment flood management and flood hazard mapping. Note that Green Wedges are an important flood attenuation resource.
- The demographic assumptions behind the housing provision figures are not clear.
- There is a feeling that South Derbyshire District Council is trying to 'dump' their development needs on the boundary of Derby without providing the necessary infrastructure.

- Greater consideration needs to be taken of what local communities want for their neighbourhoods. This view was echoed in the event organised at the Derwent Revive Centre.
- The quality of design needs much greater emphasis, especially in the city centre, if objectives are to be achieved.
- The Environment Agency comments that the Core Strategy needs to be explicit that infrastructure includes sewers and treatment facilities, and the capacity of the system in the southern part of the system needs reflecting as a constraint.
- Derby College recognise the environmental importance of green wedges and state that the concept should not be abandoned.
- GOEM comment on the need for an HMA perspective on green wedges, especially in terms of their GI value which is cross boundary and intrinsic to the form and function of the urban extensions.
- Promote the use of 'urban squares'; areas of grass and landscaping within a built-up environment.

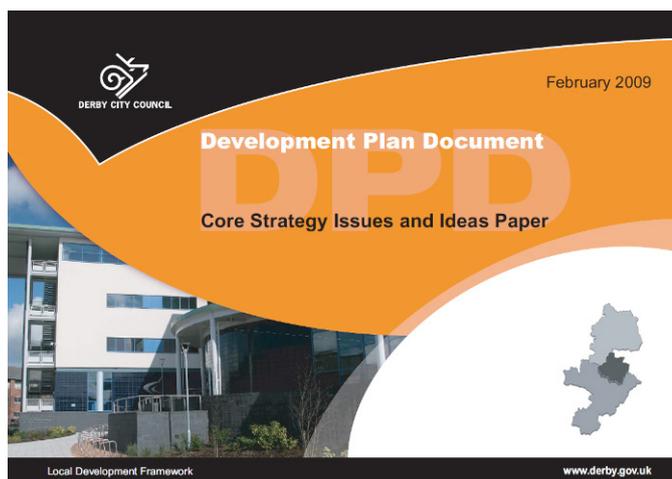
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**Summary of representations
made pursuant to the Issues
and Ideas Consultation**

The consultation began on 2 March 2009 and ran until the 31 May 2009.

The Council consulted all Specific and General consultees as required by the regulations and all of those persons or bodies contained within its consultee database at the time.

The consultation was carried out in accordance with the Council's adopted Statement of Community Involvement. Therefore, we engaged with the Neighbourhood Boards, Diversity Forums, members of the community and internal officers.



How was the consultation carried out?

The Issues and Options document was the first document we produced in the development of the Core Strategy. It provided a high-level assessment of the City and asked some general questions about the issues facing Derby.

At this, the Issues and Ideas Stage, we did not carry out a full public consultation exercise. To reiterate, Regulation 25 of the Planning and Compulsory Purchase Act 2004 states that we must consult with '*general consultation bodies as the local planning authority consider appropriate*'.

The document contained our thoughts on the general, overarching issues facing the City over the next fifteen years. Because of the general nature of its content we feel that our consultation should be initially limited to agencies, organisations, businesses and stakeholder groups who operate in, or have an interest in the City. As these ideas become more refined, and concentrate on more definite proposals, we will open up our consultation to the general public.

A copy of all the publicity material is contained in the Compendium of Publicity Material. The following is a brief description of the methods we used to engage with interested parties.

- **Mailshot to interested parties**
A number of targeted consultees were contacted informing them of the Issues and Ideas consultation. The Issues and Ideas Newsletter was included with the letter.
- **Issues and Ideas Workshop**
To tie in with the Issues and Ideas consultation we ran a workshop to discuss issues facing part of, or the entire City. It also gave invitees the opportunity to help us develop our overarching vision for the Core Strategy.

The workshop also gave us the opportunity to meet representatives from local community groups, businesses, organisations and strategic bodies.

- Community Groups
As part of our Issues and Ideas consultation we arranged meetings with the 17 Neighbourhood Forums and the following Diversity Forums:
 - Older Peoples Forum
 - Voices in Action
 - Disabled People's Diversity Forum
 - Minority Communities Diversity Forum
 - Gender Diversity Forum
- Website
Our website (www.derby.gov.uk) was updated to contain information about the Issues and Ideas consultation. The webpage included the Issues and Ideas document, comments form, newsletter and contact details. The webpage also contained a link to an on-line consultation form.

Residents, organisations and other interested parties can register with 'Your City, Your Say'. This is an online service provided by the City Council to help anyone find out about the latest consultation being undertaken. Those who register will be able to tailor their alerts to learn about:

- new consultations based on subjects, consultation methods or by ward
- the results and outcomes of a consultation when they become available.
- Everyone who registered with this service was notified about the Issues and Ideas consultation.
- Deposit documents
As part of the Issues and Ideas consultation the document, consultation forms and newsletter was made available at our offices and local libraries. All of our documents were available in large print, Braille and in alternative languages.
- Internal Consultation
The implementation of the Local Development Framework will impact on all aspects of our service delivery. We informed key internal officers about the consultation and sought their thoughts on the content of the document.

What were the main issues?

In total we received and recorded 496 comments made either in writing or on-line and verbally. The following is a summary of those comments.

- Climate change and renewable energy

Generally, it was considered that the Core Strategy is the ideal vehicle to promote energy efficiency, address the impact of climate change and reducing the amount of waste generated which has to be disposed of. It was considered that the Code for Sustainable Homes should be incorporated into the Core Strategy. Many respondents thought that policies should be included to help deliver a greater amount of renewable energy, especially wind and solar power. It was also recognised that a balance is required between respecting the character of the city's listed buildings and conservation areas and ensuring that they meet modern standards of energy efficiency. The use of decentralised energy was suggested in all new developments.

- **Economy**

The comments made by respondents generally fell into four categories – the role of the city centre, the location of employment sites, the location of new office development and the retail offer in Derby. It was considered that the Core Strategy should look to create conditions for balanced and sustainable economic growth and make provision for new sites as well as modernising and redeveloping existing sites to meet the needs of the market.

It was considered that the scale of employment provision should be based on robust evidence and reflects the anticipated increase in population and the resultant demand.

Respondents considered that employment allocations should be located on sites which are easily accessible by modes of transport other than the car. It was suggested that the existing allocations along the A52 and to the south of the City should be safeguarded. In addition it was suggested that small and medium businesses should be located near residential areas.

It was thought that a strategic rail facility should be located adjacent to East Midlands Airport and not in the Derby HMA. This will ensure that it is ideally located to serve Derby, Nottingham and Leicester and provide the long-term potential to transfer freight from the airport to the rail network. Large office developments should be in the city centre, small offices should be directed to the district and neighbourhood centres. In contrast it was considered that office development outside the city centre should not be constrained if this would stifle economic prosperity.

- **Retail**

Generally, the comments we received commented on the role of the city centre and the district centres.

Reflecting the views given previously, it was stated that the city centre needs revitalising and should be the focus of future office and retail development. The overarching retail strategy should allow for a range of retail formats to enhance the city centre and ensure its long-term

competitiveness. It was also recognised that policies need to promote Derby's evening economy.

In contrast, it was thought that the role and function of Derby's district centres needs to be enhanced to ensure that local communities have access to retail and services; it was thought that by improving the role of the district centres would reduce the need to travel by car. A number of respondents were concerned about the high number of takeaways in the district centres.

The role of Derby's retail parks was considered by some respondents. It was recognised that they play an important role in terms of the overall retail offer but planning policy needs to be flexible to allow new retail operators and retail development to go to retail parks.

- **Green Infrastructure and the Natural Environment**
Overall the comments we received indicated that respondents wanted to see the protection, expansion and enhancement of Derby's green infrastructure.

Policies in the Core Strategy should safeguard and enhance existing assets and improve the ecological value of open spaces. In addition, opportunities should be sought to improve the natural environment through habitat buffering, creation and enhancement and habitat linkages throughout the city. It was recognised that future growth is likely to have an impact on the natural environment but a holistic approach to co-ordinating housing, jobs and the associated infrastructure can help to deliver benefits for the natural environment.

It was suggested that Derby's waterways could be utilised to improve the natural environment and provide new leisure opportunities. It was also highlighted that the restoration of the Derby and Sandiacre Canal is an important environmental objective.

A number of responses stated that development on open space and green wedges should be resisted. Although some comments suggested that development could occur on green wedges if their role and function aren't prejudiced and improvements could be made to the remaining wedge.

Finally, it was suggested that green roofs and semi-permeable hard surfacing should be used in new developments.

- **Sport and Leisure**
All respondents recognised that the provision of sport and leisure facilities should be incorporated into the Core Strategy. It was felt that the overarching vision should maximise opportunities for sport across the City. The vision should also recognise the important contribution sport and leisure makes to sustainable communities, reducing the need to travel, leading regeneration and improving economic health. It was also considered that there needs to be more facilities for teenagers and young

people. The views on the location of future sporting facilities split respondents as some thought they should be situated in the city centre while others thought they should be spread across Derby.

- **The historic and built environment**
Respondents stated that future policies should continue to protect and enhance the City's historic buildings and conservation areas. A number of respondents considered that there was a need to protect Derby's character, especially its mature suburbs, to ensure that any new development enhances the city. This could only be done effectively by carrying out a study which considered how the City developed and analysing its character. It was stated that links between Derby's historic buildings and features should be protected and links to the World Heritage site improved. It was also recognised that a balance needs to be struck between reducing the impact of climate change and the impact on historical assets. Policies need to address the harmful impacts adaptation and mitigation can have on the historic environment.
- **Housing**
Comments received generally fell into three categories – general comments, broad locations for development and site specific comments.

The provision of new residential development can strengthen existing neighbourhoods by meeting housing needs and supporting existing facilities. There were opposing comments regarding building densities. Many thought that high densities should be encouraged; others felt that high density schemes should be encouraged while some considered that the character of the surrounding area should influence the density, especially in the City's mature suburbs. It was recognised that necessary infrastructure is needed to support new housing, especially education facilities. It was also stated that all new housing should be high quality and sufficiently flexible to respond to peoples changing needs; also it was thought that new housing should reflect the City's changing demographics. Finally, it considered that the Core Strategy should not include a criteria-based policy for the provision of sites for Gypsies and Travellers but it is highlighted that the Government requires that sites should be designated.

We received a number of comments regarding the general location of future housing. Some considered that a key objective of the Core Strategy should be the use of previously developed land; it was recognised however that an applicant must demonstrate that an employment site is surplus to requirements before it is released for redevelopment. In contrast, some considered that green belt policy should be relaxed, and the role of the green wedges reassessed, and land to the south of the City should be used to create urban extensions. Land to the west of the City, around Mickleover and Mackworth was also suggested for development. Rather than building large estates, one representation suggested that smaller developments should be considered across the City.

The following sites were suggested for future housing development:

- Sinfin Lane Industrial Estate
 - Pastures Hall Farm
 - Boulton Moor
 - Thulston Fields
 - Brook Farm, Chaddesden
 - Land at Forester Park, Osmaston Park Road
 - The existing employment site at Osmaston should be re-developed for housing and community uses
 - Residential development should be encouraged along the lines of the Cityscape Masterplan (Castleward/Friar Gates Goods Yard).
 - The Celanese site, when cleared, would make an ideal traveller site
- **Landscape and Townscape**
Representations stated that policies in the Core Strategy should recognise Derby's local character. A Spatial portrait should help portray the overall form of the City and give more emphasis to distinctiveness in terms of landscape character, environmental assets, built heritage and archaeology. Without such an understanding it is not possible to derive policy which seeks to protect and reinforce our resources. In addition, the Core Strategy can strengthen neighbourhoods by understanding how they work, their architecture and function and reinforce strengths/eliminate weaknesses.
 - **Physical Infrastructure**
It was recognised that the appropriate infrastructure is necessary to support future development. It was also acknowledged that there is a need to improve the city's flood defences, improve drainage, widen the cycle network and create a safer environment for pedestrians.
 - **Social Infrastructure**
A number of comments focussed on school provision in the City. It was recognised that some schools in the City were at capacity. It was also highlighted that future development needs to be supported by improved education and higher education provision. It was also suggested that new schools need to be built in South Derbyshire and this would stop pupils commuting into the City. It was also considered that the role of Derby University should be strengthened.

It was considered that future development needs to be supported by a wide range of facilities. Reflecting the comments regarding retail provision, it was considered that the local centres should meet the needs of the local community.

There was concern regarding the current lack of mental health facilities in the City and steps should be taken to ensure that provision increases over

the plan period. It was also thought that large medical facilities should be discouraged in favour of smaller, local facilities.

- Sustainable Development

Many of the comments we received in this section have been covered previously, for example the need to ensure that new homes meet requirements of the Code for Sustainable Homes, the City Centre should be the focus for new office and retail development and the protection of Derby's green infrastructure.

However, it was recognised that policies should strengthen the role of neighbourhoods by helping to meet the needs of residents and promoting social cohesion.

It was also stated that new development should be carried out in a coherent way and that we should work with Amber Valley and South Derbyshire to ensure that urban extensions are integrated into the City.

It was considered that water efficiency measures such as rainwater harvesting, grey water recycling, sustainable urban drainage systems and water neutrality should be promoted. In addition new developments should aim for carbon neutrality, although one respondent considered that only 10% of any new development should aim to achieve this.

Policies in the Core Strategy should promote good design and offer the opportunity to reduce crime.

- Transport

Generally, it was considered that public transport in Derby needs to be improved and integrated with better links between the railway station and the city centre and ensuring that people don't use their cars can only be achieved by improving public transport, improving the cycle network and providing safe routes for pedestrians. In addition, better links to the airport should be provided.

The current level of congestion in Derby was highlighted and there was a general concern that future development would exacerbate the situation.

Current car parking policies were criticised by a number of respondents. It was considered that reducing the amount of car parking in new developments is not an effective method of stopping people using their cars. It was generally thought that motorists simply park in the surrounding area.

It was stated that the development of brownfield land would reduce the need to travel by car and maximise the use of public transport.

Two locations for a Strategic Rail Facility were suggested; the first was on the Celanese site and the second was the Severn Trent land near Toyota on the A50/A38.

It was requested that the current Local Plan allocation for the construction of a new road access - Wilmore Road, south of Chellaston is retained (Policy T12).

- Water and Flooding

It was highlighted that the River Derwent is an important natural feature and more needs to be done to integrate the river into the city by establishing more cafes and restaurants.

The core strategy should reflect the requirements of the Blue Corridor in terms of providing a strong focus for redevelopment, significant opportunities for increasing recreational opportunities in the heart of the City as well as environmental and biodiversity improvements.

The impact of flooding was raised by a number of respondents and the importance of the emerging Strategic Flood Risk Assessment in the planning process was highlighted. Many thought that it was essential that measures were put in place, such as SuDS and more open space, to ensure that would help reduce the impact of flooding. Again the Blue Corridor was highlighted as an ideal opportunity, through the creation of open space and new habitats, to reduce the impact of flooding.

The improving quality of the River Derwent was highlighted and concerns were raised about the impact future development would have on the river's water quality.

Appendix 1: The bodies, organisations and people informed of the regulation 18 consultation

Bodies invited to make representations

23 Skidoo Ltd

2 Cities Planning

73rd Allestree Derby (Allestree) Scout Group

A consortium of: Rolls-Royce & Harper Crewe Estate

Addleshaw & Goddard Solicitors

Age UK Derby and Derbyshire

Aldi

Allestree Preservation Group

Alliance Planning

Amber Valley Borough Council

Antony Aspbury Associates Ltd

ARK Capital

Arley Homes Ltd

Arriva

Aston-on-Trent Parish Council

B B & J

Banks Developments

Barclays Bank

Barratt Homes

Barrow-on-Trent Parish Council

Barton Willmore

Bellway Homes East Midlands

Bellway Homes Ltd

Blue Room Properties

Bombardier Transportation

Bovis Homes

Boxall Brown and Jones

Boxgrove Corporation N.V.

Boyer Planning

Breadsall Parish Council

BREEAM Technical Consultant

British Geological Survey

British Telecom

Burnaston Parish Council

Cala Homes

Camland Developments Ltd

Campaign for Better Transport

Canal & River Trust

Castle Nursery School

Castlefields Church

Cathedral Quarter Bid

CB Richard Ellis

Cedar House Investments

Celanese

Central Networks

Cerda Planning

CGMS Consulting

Charles Church

Chellaston Residents Association

Chetwoods

Christ Church

Church Commissioners

Citigroup (Egg)

Citizens Advice Bureau

Civil Aviation Authority

Clowes Developments (UK) Ltd

Clowes/Bellway

Clowes/William Davis/Barratt

Colliers CRE

Commercial Estates Group

Commission for Racial Equality

Compendium Living

Confederation of Passenger Transport	Derby Homes
Connexions Derbyshire Ltd	Derby Hospitals NHS Foundation Trust
Co-operative Estates	Derby Police Commissioner
Councillor R J Wood	Derby Racial Equality Council
Countryside Homes Ltd	Derbyshire & Nottinghamshire Chamber
Countryside Properties (Special Projects) Ltd	Derbyshire Alternative Technology Association
Countryside Properties Ltd	Derbyshire Constabulary
CPRE	Derbyshire County Council
Crest Nicholson	Derbyshire County Cricket Club
Cross Country Trains	Derbyshire Economic Partnership
D2N2	Derbyshire Fire and Rescue
Dale Abbey Parish Council	Derbyshire Historic Buildings Trust
David Lock Associates	Derbyshire Mental Health Services NHS
David Wilson Homes (East Midlands)	Derbyshire Police
David Wilson Homes (North Midlands)	Derbyshire Sport
DCC Corporate & Adult Services	Derbyshire Wildlife Trust
Department for Transport	Derwent Living
Depol Associates	Design Council (CABE)
Derby City Council	Disability Direct
Derby & Derbyshire Local Access Forum	DLP Consultants
Derby & Sandiacre Canal Trust Ltd	DPDS Central Region
Derby & South Derbyshire Friends of the Earth	DPDS Consultants
Derby City NHS	DPP
Derby City Partnership	Drivers Jonas
Derby City PCT	DTZ
Derby City Primary Care Trust	Duffield Parish Council
Derby Civic Society	Durose Estates
Derby College	East Midlands Airport
Derby Common Purpose	East Midlands Ambulance Services NHS Trust
Derby County Football Club	Elvaston Parish Council
Derby CVS	EMDA
Derby Cycling Group	English Churches Housing Group
Derby Gypsy Liaison Group	

English Heritage (East Midlands)
Environment Agency
EON
Erewash Borough Council
Eversheds LLP
Faber Maunsell
Fairhurst
FCH Housing and Care
Fields in Trust
Findern Parish Council
Firs Estate Allotment Holders
Association
Fisher German
Flint Bishop LLP
Forestry Commission East Midlands
Office
Forums for Faith for Derby
Fox Land & Property
Freeth Cartwright
Friends Families & Travellers
Fusion Online Limited
Futures Housing Group
G L Hearn
Gala Coral Group
Gerald Eve LLP
GL Hearn
Gladman
Goodmans
GP Partners, Mickleover
Groundwork Derby & Derbyshire
Hallam Land Management
Harris Lamb
Harron Homes
Hawksmoor
Help the Aged
Henderson Global Investors

Henry Boot Developments
Highways Agency
Holmes Antill
Home Builders Federation
Homes & Communities Agency
Howard Sharp & Partners
Igloo
Indigo Planning
Innes England
Irish Traveller Movement in Britain
Ivy Grove Developments
J S Bloor (Measham) Ltd
JB Planning Associates
JGP Properties Ltd
Job Centre Plus
John Martin & Associates
Jones Lang Laselle
JVH Town Planning Consultants Ltd
JWPC Limited
Kedleston Estates
Kier Partnership Homes
King Sturge LLP
Kirkwells
Knight Frank LLP
Lace Market Properties
Lafarge Aggregates Ltd
Lambert, Smith Hampton
Land Drainage
Langtree Group Plc
Lathams
Lidl UK GmbH
Lighspeed Derby
Little Eaton Parish Council
Littleover Neighbourhood Board
Liversage Trust

Living Streets	Persimmon Homes (North Midlands)
Lovell	Peter Brett & Associates
Lowland Derbyshire & Nottinghamshire Local Nature Partnership	Peter Wigglesworth Planning Ltd
LPC Living	Peveril Homes
Mackworth Parish Council	Peveril Homes/Mr Tim Parnell
Malcolm Arnold-Foulkes	PI Ltd
Marketing Derby	PJ Livesey
McCarthy and Stones Retirement Lifestyle Ltd	Places for People
Metropolitan Housing Trust	Planning & Environmental Services Limited
Michael Goodall Homes	Planning Aid
Mickleover Neighbourhood Board	Planning and Design Group
Miller Homes	Planning Design Practice Ltd
Milner McCrea	Planning Potential
Mobile Operators Association	Planware Limited
Morley Parish Council	Powergen UK Plc
Nathaniel Lichfield and Partners	Prime Construction Services Ltd
National Federation of Gypsy Liaison Group	Prysmian Cables & Systems Ltd
National Grid	Quarndon Parish Council
National Grid - Network Strategy	Radbourne Parish Council
National Grid UK Transmission	Radleigh Group
Nattrass Giles	Radleigh Homes
Natural England	Raglan Housing Association
Network Rail	Raybould & Sons - Commercial
Network Rail Property	Redrow Homes (Midlands) Limited
NFU East Midlands	Riverside
NHS England	RNIB East Midlands & East
Norseman Holdings Limited	Road Haulage Association
Nottingham City Council	Roger Humber
Ockbrook Parish Council	Rolls Royce PLC
Oxalis Planning	Rosemound Developments Ltd
Pegasus Planning Group LLP	Royal Crown Derby
Persimmon Homes	Royal Mail
	RPS
	RPS Planning

RPS Planning & Development
RSPB
Ryan MacDonald
Safer Derbyshire
Sainsburys PLC
Sanderson Weatherall
Save the Pub Campaign
Savills
Savills (Nottm)
Scott Wilson
Severn Trent Water
Shire Consulting
Showmen's Guild of Great Britain
Sight Support
Signet Planning
Simon Foote Architects
Smith Gore
South Derbyshire District Council
Spawforths
Spirita Limited
Sport England - East Midlands
SSA Planning
St John Ambulance
St Modwen Properties Plc
Stenson Fields Parish Council
Stewart Ross Associates
Strata Homes
Strutt and Parker
Sustrans (East Midlands)
Talavera Estates Ltd
Taylor Wimpey East Midlands
The Barton Willmore Partnership
The British Wind Energy Association
The Coal Authority
The Crown Estate

The Guinness Trust
The Gypsy Council
The Health and Safety Executive
The Inland Waterways Association
The Lawn Tennis Association
The National Trust
The Planning Bureau Limited
The Ramblers Association
The Theatres Trust
The Woodland Trust
Toyota Motor Manufacturing (UK) Ltd
Trent Barton
Trentham Enterprise Inns
Turley Associates
Twyford and Stenson Parish Council
United Reform Church
University of Derby

Persons invited to make representations

Mrs Denise Ablott
Ms C Adams
Mr Martin Aldred
Mr Mike Allen
Ms Cynthia Allen
Mr & Mrs R Allison
Ms Sarah Allsop
Mr & Mrs Allum
Mr Sean Andrews
Mr Robert Apsey
K Armitage
Mr Donald Armstrong
Rob & Linda Aspey
Mr Phillip Astill
Mr Martin Aten
Mr Thomas Back
Mrs Lisa Backler

Mr Simon Bacon
Ms Susan Badham
Mr & Mrs Bains
Mr David Ball
Ms Karen Banks
Mr Steven Bannister
Mr & Mrs J Barker
Mr J. C. Barker
Mr John Barker
Mr P M Barnes
Mr Mike Barnett
Mr Tim Barrett
Mrs Sandra Barrett
Mr & Mrs Barwick
Ms Judi Bateman
L Beecham
Mr Stuart Begg
Ms Catherine Begg
Mrs Bence
Mr D Bennett
Mr Christopher Bentley
Ms Carol Berwick
Ms Jennifer Bexson
Mr P Billson
Ms Stella Birks
Mr Chris Boam
Mr Malcolm Boon
Mrs Susan Boon
Mr & Mrs Bosworth
Mr Richard Bottomley
Mr David Bowers
Ms Carole L Bradley
Mrs M Bradshaw
Mr Steve Brake
Mr James Brown

Mr Jason Brown
Ms W Buchan
Mr & Mrs L Bull
Mr G Burke
Mr & Mrs M Butler
Mr Alan Caborn
Ms Claire Cammidge
Mr James Campbell
Mr Gordon Campbell
Mr Glyn Cantrill
Mrs Lucy Care
Mr Michael Carlisle
Mr Robert Carnell
Mr Mike Carr
Mrs B Carver-Smith
Mr Edwin Case
Ms Linda Cassidy
Mrs Jo Cave
R T Cavill
Mr Wing Chan
Mr Steve Churchhouse
Mr David Clasby
Ms Angela Clayton
Mr & Mrs Clements
Mr Brian Clementson
Mr Chris Collison
Ms Claire Compton
Mr David Cook
Ms Mandy Cooling
D Cooper
Mr Norman Cooper
Ms Maggie Cooper
Mr Ian Cotter
Mr Nick Cottrill
Ms Julie Craig

Mr Gary Crisp
Mr Crofts
Mr John Cunningham
Mr Philip Cunningham
Mrs Joan D'Arcy
Ms Sue Darling
Ms Maureen Dawson
Ms Penny De abreu
M Deacy
Mr Guy Deakin
Ms Janet Dean
Mrs M Deeley
Mr Jonathan Deeming
Mr John Dicken
Mr P C Dicks
Mr & Mrs Clifford Dobson
Mr Steve & Mrs Angie Donaldson
Mr David Dovinson
Ms Christine Dreuitt
Miss Becky Dutton
Mr David Duxbury
Mr Anthony Eagers
Mr Philip Edwards
K Elliott
Mr William Elliott
Mr Sean Ellis
Mr Chris Elmore
Mr M J Embleton-Smith
Ms Jean Emery
Mr Brian English
Mr & Mrs Andrew Everett
Mr Andy Findlay
Mrs Moira Findlay
Mr Bryan Fleay
Reverend Dr Alan Flintham

Miss N Foran
Mr Clayton Ford
Mr & Mrs Darren Fox
Mrs Molly Fox
Ms Katy Freeman
Mrs French
J Froggatt
Mr Guy Gandsbadham
Mr Mark Gaskill
Mr Tom Genway
Mr Arthur Germany
Mr Paul Gibbons
Mr David Gibson
Mr Michael Gilbert
Mrs Lynn Gilbey
Ms Julie Gill
Ms Julie Gill
Mr K Goddard
Mr Derek Golson
Mr V Goodhead
Ms Andrea Gray
Mr Saul Green
Mr Mark Gregory
Mr & Mrs J Griffin
Mr John Griffin
Mr V Grimley
Ms Alison Grimley
Charli Hadden
D J Hale
Mr David Hall
Mr Peter Hall
Mr Richard Hall
Ms Lisa Hall
Dr David Hanson
Mr G A Hanson

Mr John Hanson
Mr Philip Hanson
Mr Harry Harrison
Mr M G Harrison
Mr Lee Harrold
Mr & Mrs T Harrop
Mr & Mrs Hartle
Mr Derek Hathaway
Mr & Mrs Hawkins
Mr J Hawkins
J Haynes
L Haynes
Mr Philip Haynes
Ms M Haynes
Ms S J Heard
Ms Ruth Heldreich
Ms Joan Henchcliffe
Mr David Higginbotham
Mr Roger Higgins
Mr John Hill
Mr Roger F Hill
Ms Felicity Hirst
Mr & Mrs H Hithersay
Mrs Doris Hogan
Mrs M K Holmes
Mrs Margaret Holmes
Ms Michelle Holmes
Mr & Mrs Peter Hopkins
Darren Horne
Mr Malcolm Hunt
Mrs Beverly Hunter
Mr & Mrs Hurn
Mr John Huskins
Mrs Sue Huskins
Ms Su Illingworth

Mr David Inger
F Jackson
Ms Janette Jackson
Ms Judith Jameson
Mr Alan Jamieson
Mrs Davina Jamieson
Mr Paul Jeffels
Mr Keith Jenkinson
Mrs C Johnston
Mrs Hilary Jones
Mrs Judith Jones
Ms Laura Jones
Saroj Joshi
Kass
Mr Alasdair Kay
Mr Clive Keble
Mr John Kelleher
Mr Roy Kelman
Mr John Kelsey
Mr Andrew Kennedy
Mr R A Kenworthy
Mr & Mrs Kiddie
Ms Linda King
Ms Kiranpal Kaur Dhanda
Mr R A Kitchen
Mr Mark Knight
Mr Peter Knight
Ms Helen Lakin
Mr David Lalor
Mr & Mrs W Lamb
Ms Edith Lang
Mr Martin Langsdale
Mrs Linda Lavercombe
Mr David Lawer
Mr Kenneth Lawes

Mr Peter Lawrence
Mr Andrew Lee
Mr & Mrs Lewis
Mr Kenneth Lewis
Ms Christine Lifter
Mr Michael Lillie
Mr Peter Lockhart
Mrs Hilary Lomas
Ms B Longworth
Ms Kerry Lowes
Dr W F Lythgoe
Ms S Macarthur
Mr D C MacDonald
Ms Jean Macdonald
Ms Gillian Macpherson
Mr Shane Madzima
Mr M A B Mallender
Mr Andrew Maloney
Mr Geoffrey Marler
A Marshall
Mrs Sheila Marshall
Ms Alison Martin
Ms Kath Marvill
Mr Paul Mason
Mr A P Mather
Ms Katharine Matthews
Mr & Mrs David Maynard
PM McCahey
Mr & Mrs McGiven
Mr Des McKenna
Mr F Mee-Bishop
Mr A Meehan
Ms Charlotte Meek
Mr & Mrs V K Memmory
Mr Simon Miller

Mr I D Molyneux
Mr & Mrs A Moore
Mr & Mrs C Moore
Mr Bryan Moore
Ms Anne Morgan
Mr & Mrs D Morley
Mr & Mrs S Morley
Ms M Morley
Mr M J Morton
Mr Ian Mosley
Mr John Moss
Mr Steven Mott
Dr Nicola Mount
J R Muir
Ms Mairead Murphy
N.J.P Wraith & J A Paulson
Mr C Narrainen
Mr Paul Nelson
Mr & Mrs Graham Neville
Mr Rod Nuth
Ms Deborah O'Brien
Ms Carol Ogan
Mr John Ollerenshaw
M Eaton & P Stevenson
Mr Steven Pantling
Mr Steve Parker
Ms Jeanette Parkin
Mr Tim Parnell
Dr Matthew Pathrose
Ms Jayne Pearce
Mr Steve Peat
Mr Mark Peberdy
R Peberdy
Mrs Pendlebury
Mr Brian Penn

Mrs B Pennington
Mr Brian Pereiral
Mr W Pigg
Ms Beverley Pilbeam
F Pionidou
Mr John Pitt
Mrs B R Pooley
Mrs Judith Pratt
Mr P J Price
Mr Geoff Prince
Mr & Mr G Prosser
Mr Graham Pugh
Mr David Purdy
Viraj Raut
Mr John Reaveley
Mr M Redfern
Mr Geoff Rhodes
Mr & Mrs N Richards
P Richardson
Mr & Mrs D J Riddett
Mr John Riley
A Roberts
Mr Richard Robinson
Mrs I Robinson
Mr & Mrs Robotham
Mr Tony Roelich
Mr Kevin Rogers
Mr Nigel Rogers
Mr Mike Rogocki
Mr Richard Rogowski
Ms Emily Rolley-Parnell
Mr James Rose
Mr Anthony Ross
Ms S Rosso
Mr & Mrs DJ Rostron

Mr Paul Sandford
Mr Brian Seager
Mr M J Shardlow
Ms Elizabeth Sharman
Mr J Sharpe
Mr R A Sharpe
Mr Christopher Sharratt
Mr & Mrs AJ Shaw
Mr & Mrs M Shaw
Mr James Shaw
Ms Anne Shaw
Mr David Sheppard-Jones
Mrs Sue Shore
Mr Tim Silvester
Mr & Mrs J Simmons
Mr D M Simpson
Mr John Simpson
Ms Ruth Skelton
Ms Jean Slack
K Smith
Leanne Smith
Mr Ben Smith
Ms Karen Smith
Mr S G Smout
Mrs P Snape
RE Southworth
Miss S Sparham
Ms Karen Sparkes
Mr John Spencer
Mr Peter Steer
Mr Paul Stevens
Mr Graham Stevenson
Mr Christopher Stone
Mrs I Stone
Mr Tom Strachan

Ms Suzanne Strange
R A Strange
Mr R Straw
Mr & Mrs Anne and Peter Sumpton
Mr Jeffrey Taylor
Mrs Pamela Taylor
Ms Dorothy Taylor
Ms Jane Temple
Mr Robert Thomson
Mr E H Timmins
Mr Mark Tittley
Ms Eleni Tracada
Mr & Mrs D L Trickey
Mr Andy Truman
Mr Tubbs
Mr T Tullet
Ms Lauraine Tuplin
Mr & Mrs Turner
Mr Wayne Twigg
Mr Nicholas Tyler
Mr & Mrs Colin Underhill
Ms Clare Vintner
Ms Deborah Waite
Mr & Mrs Walker
Mr Leslie Walker
Ms Beverley Walker
Mr Jamie Wallace
Mr Robert Walmsley
Ms Karen Walsh
Ms Karen Walsh
Ms Leanne Wareham
Mr Joe Warrington
Mr A Waterhouse
Mr & Mrs Watson
Mr Rauvae Watson

Mr & Mrs A Weaver
Mr & M Mrs Webb
Mr Michael Wellbourne
Mr & Mrs Wells
Mr John West
Mr Chris White
Mr Keith Whitehurst
Ms Sarah Whitehurst
Mrs M Whittaker
Ms Michelle Whittaker
Mr Richard Wilber
Mr P G Wilcock
Mr M.G Wileman
Mr Jon Williams
Mr Tony Williams
Mr Tony Williams
Ms Kate Williams
Mr Stephen Willoughby
Mr Andrew Wilson
Mr David Wilson
Mrs MargaretWilson
Mr Michael Wingfield
Mr Kevin Winson
Mr John Wood
Ms Eleanor Woodings
Mr Bill Woodrow
J Wootton
Mr & Mrs Wright
Mr Ken Wright
Mr Peter Wright

Appendix 2: Conformity with the Statement of Community Involvement

The following matrices provide an indication of how each consultation method uses in the various Core Strategy consultations have met the requirements of the Council's adopted Statement of Community Involvement.

Derby City Local Plan Part 1: Draft Core Strategy Consultation

25 October to 20 December 2013

Consultation Task	Derby City Council's Statement of Community Involvement									
	Workshop and/or Seminar	Contact by Letter	Face-to-Face Meetings	Email Circulars	Consultation aimed at hard-to-reach groups	Poster in libraries and other Council buildings	Statutory Press notice	Press release and/or advert	Website	Public exhibition or surgery
Press release								✓		
Political sign-off and member engagement			✓							
Email/letters to Statutory Bodies, organisations, agents, developers and interested members of the public on the LDF database		✓								
Update DCC website									✓	
Drop-in events across the City			✓							✓
Consultation material at council offices and local libraries						✓				
Posters publicising the consultation						✓				
E-shots and articles in In-Touch				✓						
Engage with neighbourhood partnerships and Diversity forums		✓		✓	✓					

Consultation Task	Derby City Council's Statement of Community Involvement									
	Workshop and/or Seminar	Contact by Letter	Face-to-Face Meetings	Email Circulars	Consultation aimed at hard-to-reach groups	Poster in libraries and other Council buildings	Statutory Press notice	Press release and/or advert	Website	Public exhibition or surgery
Internal consultation			✓							
Presentation and discussion with local groups	✓		✓							

Preferred Growth Strategy Consultation

1 October to 21 December 2012

Consultation Task	Derby City Council's Statement of Community Involvement									
	Workshop and/or Seminar	Contact by Letter	Face-to-Face Meetings	Email Circulars	Consultation aimed at hard-to-reach groups	Poster in libraries and other Council buildings	Statutory Press notice	Press release and/or advert	Website	Public exhibition or surgery
Joint press release								✓		
Political sign-off and member engagement			✓							
Joint drop-in events			✓							
Email/letters to Statutory Bodies, organisations, agents, developers and interested members of the public on the LDF database		✓								
Launch new HMA website									✓	
Update DCC website									✓	
Joint stakeholder events	✓		✓							
City Centre drop-in events			✓							✓
Consultation material at						✓				

Consultation Task	Derby City Council's Statement of Community Involvement									
	Workshop and/or Seminar	Contact by Letter	Face-to-Face Meetings	Email Circulars	Consultation aimed at hard-to-reach groups	Poster in libraries and other Council buildings	Statutory Press notice	Press release and/or advert	Website	Public exhibition or surgery
council offices and local libraries										
Posters and roller banners						✓				
Engaging through schools		✓		✓	✓					
Article in Your Derby, e-shots and In Touch				✓	✓					
Consultation advertised through Your City Your Say				✓	✓					
Engage with neighbourhood partnerships, planning and transportation sub-groups and diversity forums	✓			✓	✓					

Three Topic Consultation

24 February to 26 March 2012

Consultation Task	Derby City Council's Statement of Community Involvement									
	Workshop and/or Seminar	Contact by Letter	Face-to-Face Meetings	Email Circulars	Consultation aimed at hard-to-reach groups	Poster in libraries and other Council buildings	Statutory Press notice	Press release and/or advert	Website	Public exhibition or surgery
Press release								✓		
Political sign-off and member engagement			✓							
Email/letters to Statutory Bodies, organisations, agents, developers and interested members of the public on the LDF		✓			✓					

Consultation Task	Derby City Council's Statement of Community Involvement									
	Workshop and/or Seminar	Contact by Letter	Face-to-Face Meetings	Email Circulars	Consultation aimed at hard-to-reach groups	Poster in libraries and other Council buildings	Statutory Press notice	Press release and/or advert	Website	Public exhibition or surgery
database										
Update DCC website									✓	
Consultation material at council offices and local libraries						✓				
Consultation advertised through Your City Your Say				✓	✓					
Engaging through schools				✓	✓					
Engage with neighbourhood partnerships, planning and transportation sub-groups and diversity forums		✓		✓	✓					
Internal consultation			✓							
Presentation to interested local groups			✓							
Publicise through the Cathedral Quarter and St Peter's Quarter Business Bulletins			✓	✓						

Options for Housing Growth Consultation

12 July to 30 September 2012

Consultation Task	Derby City Council's Statement of Community Involvement									
	Workshop and/or Seminar	Contact by Letter	Face-to-Face Meetings	Email Circulairs	Consultation aimed at hard-to-reach groups	Poster in libraries and other Council buildings	Statutory Press notice	Press release and/or advert	Website	Public exhibition or surgery
Joint press release								✓		
Political sign-off and member engagement			✓							
HMA developer and business workshop	✓									
Email/letters to Statutory Bodies, organisations, agents, developers and interested members of the public on the LDF database		✓								
Press articles and advertisements								✓		
Update DCC website									✓	
Consultation advertised through Your City Your Say				✓	✓				✓	
Attend Planning and Transportation Sub-Group meetings			✓							
City Centre drop-in events			✓							✓
Consultation material at council offices and local libraries						✓				
Posters and roller banners						✓				
Informed the Diversity Forums					✓					

Consultation Task	Derby City Council's Statement of Community Involvement									
	Workshop and/or Seminar	Contact by Letter	Face-to-Face Meetings	Email Circulars	Consultation aimed at hard-to-reach groups	Poster in libraries and other Council buildings	Statutory Press notice	Press release and/or advert	Website	Public exhibition or surgery
Engage with neighbourhood partnerships, planning and transportation sub-groups and Diversity Forums	✓		✓		✓					

Your Neighbourhood Consultation

16 February to 31 May 2011

Consultation Task	Derby City Council's Statement of Community Involvement									
	Workshop and/or Seminar	Contact by Letter	Face-to-Face Meetings	Email Circulars	Consultation aimed at hard-to-reach groups	Poster in libraries and other Council buildings	Statutory Press notice	Press release and/or advert	Website	Public exhibition or surgery
Joint press release								✓		
Political sign-off and member engagement			✓							
Email/letters to Statutory Bodies, organisations, agents, developers and interested members of the public on the LDF database		✓								
Attend Neighbourhood Forum meetings			✓							
Update DCC website									✓	
Consultation material at council offices and local libraries						✓				

Core Strategy Options Paper Consultation

15 January to 28 May 2010

Consultation Task	Derby City Council's Statement of Community Involvement									
	Workshop and/or Seminar	Contact by Letter	Face-to-Face Meetings	Email Circulars	Consultation aimed at hard-to-reach groups	Poster in libraries and other Council buildings	Statutory Press notice	Press release and/or advert	Website	Public exhibition or surgery
Press release and magazine articles								✓		
Political sign-off and member engagement			✓							
Neighbourhood Forum Workshops	✓									✓
Email/letters to Statutory Bodies, organisations, agents, developers and interested members of the public on the LDF database		✓								
Attend Neighbourhood Forum meetings			✓							
Attend Diversity Forum Meetings			✓		✓					
Update DCC website									✓	
Consultation advertised through Your City Your Say				✓	✓				✓	
Public Drop-in Events										✓
Consultation material at council offices and local libraries						✓				
Posters and roller banners						✓				
Engaging local groups			✓							
Article in Your				✓				✓		

Consultation Task	Derby City Council's Statement of Community Involvement									
	Workshop and/or Seminar	Contact by Letter	Face-to-Face Meetings	Email Circulares	Consultation aimed at hard-to-reach groups	Poster in libraries and other Council buildings	Statutory Press notice	Press release and/or advert	Website	Public exhibition or surgery
Derby, e-shots and In Touch										
Internal discussions			✓	✓				✓		

Issues and Ideas Consultation

2 March to 31 May 2009

Consultation Task	Derby City Council's Statement of Community Involvement									
	Workshop and/or Seminar	Contact by Letter	Face-to-Face Meetings	Email Circulares	Consultation aimed at hard-to-reach groups	Poster in libraries and other Council buildings	Statutory Press notice	Press release and/or advert	Website	Public exhibition or surgery
Meeting with the Neighbourhood Forums			✓		✓					
Meeting with the Diversity Forums			✓		✓					
Issues and Ideas Workshop	✓									✓
Political sign-off and member engagement										
Email/letters to Statutory Bodies, organisations, agents, developers and interested members of the public on the LDF database		✓								
Update DCC website									✓	
Consultation advertised through Your City Your Say				✓	✓					
Consultation material at council offices						✓				

Consultation Task	Derby City Council's Statement of Community Involvement									
	Workshop and/or Seminar	Contact by Letter	Face-to-Face Meetings	Email Circulars	Consultation aimed at hard-to-reach groups	Poster in libraries and other Council buildings	Statutory Press notice	Press release and/or advert	Website	Public exhibition or surgery
and local libraries										
Internal discussions			✓			✓				

We can give you this information in any other way, style or language that will help you access it. Please contact us on: 01332 64 0807
Minicom: 01332 640666

Polish

Aby ułatwić Państwu dostęp do tych informacji, możemy je Państwu przekazać w innym formacie, stylu lub języku.

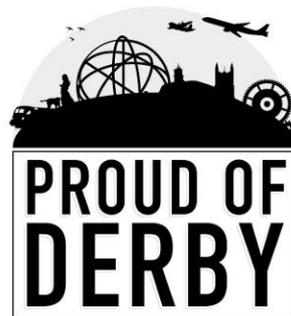
Prosimy o kontakt: 01332 640807 Tel. tekstowy: 01332 640666

Punjabi

ਇਹ ਜਾਣਕਾਰੀ ਅਸੀਂ ਤੁਹਾਨੂੰ ਕਿਸੇ ਵੀ ਹੋਰ ਤਰੀਕੇ ਨਾਲ, ਕਿਸੇ ਵੀ ਹੋਰ ਰੂਪ ਜਾਂ ਬੋਲੀ ਵਿੱਚ ਦੇ ਸਕਦੇ ਹਾਂ, ਜਿਹੜੀ ਇਸ ਤੱਕ ਪਹੁੰਚ ਕਰਨ ਵਿੱਚ ਤੁਹਾਡੀ ਸਹਾਇਤਾ ਕਰ ਸਕਦੀ ਹੋਵੇ। ਕਿਰਪਾ ਕਰਕੇ ਸਾਡੇ ਨਾਲ ਟੈਲੀਫੋਨ 01332 640807 ਮਿਨੀਕਮ 01332 640666 ਤੇ ਸੰਪਰਕ ਕਰੋ।

Urdu

یہ معلومات ہم آپ کو کسی دیگر ایسے طریقے، انداز اور زبان میں مہیا کر سکتے ہیں جو اس تک رسائی میں آپ کی مدد کرے۔ براہ کرم 01332640807 منی کام 01332 640666 پر ہم سے رابطہ کریں۔



Derby City Council

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