

Appendix 2: Summary of Responses to 2013 Consultation

DRAFT

Derby City Local Plan - Part 1: Draft Core Strategy

Regulation 22 Statement of Consultation and Publicity

August 2014



Derby City Council

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Introduction

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.

The Derby City Local Plan Part 1: Draft Core Strategy¹ consultation ran for eight weeks, starting on Friday 25 October 2013 and ending on Friday 20 December 2013.

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

This statement has been prepared in accordance with Regulation 17 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, which requires a statement setting out:

- i. which bodies and persons were invited to make representations under Regulation 18;
- ii. how these bodies and persons were invited to make representations;
- iii. a summary of the main issues raised by those representations; and
- iv. how those main issues have been addressed in the DPD

The bodies and persons who were invited to make representations can be found in Appendix 2. These include all bodies and persons who have previously made representations in respect of previous consultation exercises and/or those whose

¹ <http://www.derby.gov.uk/environment-and-planning/planning/local-development-framework/#Draft-Core-Strategy>

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.

Public Events and Community Involvement

Previous consultation exercises undertaken were:

Date	Consultation Stage	Outline of content
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.
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
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.
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.
12 July to 30 September 2012 <i>Duration: 11 weeks</i>	Options for Housing Growth	The consultation document provided a number of scenarios for location of development across the Housing Market Area and various population projections.
1 October to 21	Preferred Growth	The consultation set out the aligned

Date	Consultation Stage	Outline of content
December 2012 <i>Duration: 12 weeks</i>	Strategy	approach for the delivery of housing across the Derby Urban Area.

How was the consultation carried out?

Appendix 1 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 Derby City Local Plan Part 1: Draft Core Strategy 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, 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 Appendix 1.

- **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 Appendix 1.

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 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.

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/Pearlree 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 affecting 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 Mickleover.

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 Mickleover 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 life 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 Council's 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
- cannot 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 changes 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 operates 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 – 1,500 sqm 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 2,500 sqm 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, 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

One person suggested that the policy should encourage outdoor swimming in local rivers and lakes. They highlighted that this is a fast-growing leisure activity and that the local authority has a duty to warn potential swimmers about the hidden dangers.

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's 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 schools are required in the City or South Derbyshire. They 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.

CP 24: 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 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 Sinfen 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 as 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 Sinfen 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 HA 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 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 Micklegate 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 Micklegate 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 Micklegate.

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. EA's comments were supported by 3 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 noted the allocation of this cross-boundary site but stated that in the previous consultation (Preferred Growth Strategy), both Derby City Council and South Derbyshire District Council considered that the site was unsuitable for development for a number of reasons.

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.

Response

See response to Derbyshire and Peak District Campaign for Better Transport above.

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 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 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: Micklegate 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 Micklegate 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, Micklegate 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 Micklegate 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/Radbourn 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.

Boulton and Chellaston

Note: A number of responses commented on the overall impact of development on the area. This section sets out these comments.

Comment

A Councillor considered that the urban extensions to the southwest of the City are too big and unviable. It was considered that the road network would not be able to cope and emissions will rise.

Response

Since the beginning of the plan preparation process a number of options have been explored and consulted upon and the Council considers that the current strategy is the most sustainable solution to meet Derby's housing needs. The current strategy is based on the revoked east Midlands regional plan which set out the broad-brush development strategy for the Derby Housing Market Area and has been guided by a number of constraints and informed by a variety of studies.

The creation of urban extensions will help meet the Council's economic and cultural aspirations for Derby. The amount of development proposed will also ensure that new and necessary infrastructure is provided to meet the demands of the new communities.

Comment

A member of the public at a drop-in event stated that Chellaston needs a bypass to the east.

Response

The comment has been noted. At this time, there appears to be no deliverable or

appropriate proposal that could achieve this aim.

Action

- No change is required.

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 it 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. 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 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 it 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

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 City of Derby Local Plan Review.

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 policies E18, E19, E20, E21 and E22 as suggested by English Heritage. These policies 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 'Saved'.

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.

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 agree 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, Sinfen (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.

Appendix 1: Consultation and Publicity Material

Letter/email to all contacts on the LDF database

Dear Sir/Madam

I am writing to you because you have previously expressed an interest in, or provided comments on, the Local Plan for Derby. The City Council is pleased to let you know that it is consulting on its draft 'Local Plan - Part 1: Draft Core Strategy'.

This is a key planning policy document that sets out the City's proposals for housing and employment growth in the City up to 2028. This expands on the consultation on the 'Preferred Growth Strategy' that took place last year.

For the first time, however, we are also presenting a large number of detailed policies that address such important topics as regeneration, climate change, design, transport, retail, leisure, education, the built and natural environments and policies for new infrastructure and community facilities. We would welcome comments on what you think about the draft policies.

We are welcoming comments on the following supporting documents. These are:

- Draft Sustainability Appraisal - this document considers the environmental, economic and social impact of the strategy
- Draft Infrastructure Delivery Plan - this outlines the infrastructure that will be required and possible funding streams to implement it
- Habitat Regulation Screening Report - this considers whether the Strategy has any impact on internationally important wildlife sites

All of these documents, and other parts of the Council's 'evidence base', can be downloaded from our website at:

<http://www.derby.gov.uk/environment-and-planning/planning/local-development-framework/#Draft-Core-Strategy>

Printed version of the 'Draft Core Strategy' will be available early next week at the Council House, Corporation Street, Derby, DE1 2FS, from local libraries or from your Neighbourhood Partnership Manager. If you would like printed copies of any of the consultation documents please contact us on 01332 640807.

The consultation will end on **Friday 20 December 2013**. We are encouraging people to respond to this consultation through our website at www.derby.gov.uk/yourcityyoursay or by emailing comments to derby.ldf@derby.gov.uk. Alternatively, comments can be sent to the following address:

Derby City Local Plan, Part 1: Draft Core Strategy Consultation
Derby City Council

FREEPOST
MID24259
Derby
DE1 2BR

As part of our consultation, we are proposing to run a number of drop-in events, the schedule below provides you with the dates and venues.

Day	Date	Time	Venue
Tuesday	12th November	3:00pm – 8:00pm	Littleover Methodist Church
Wednesday	13th November	3:00pm – 8:00pm	Memorial Hall, Chaddesden
Thursday	14th November	3:30pm – 8:00pm	Landau Forte Moorhead School, Allenton
Monday	18th November	3:30pm – 7:00pm	Sinfin Library
Wednesday	20th November	3:30pm – 8:00pm	Chellaston Academy
Thursday	21st November	4:30pm – 7:00pm	Mickleover Library
Wednesday	27th November	3.00pm – 7:00pm	Pear Tree Library

Please contact the Planning Policy Team on the above number if you require any further information.

Yours faithfully

Sheila Mitchell

Letter to Heads of Service

Dear Colleague,

I am pleased to inform you that we have now published the **Derby City Local Plan Part 1: Draft Core Strategy** for consultation.

This is an important planning policy document that sets out the City's proposals for housing and employment growth in the City up to 2028. This expands on the consultation on the 'Preferred Growth Strategy' that took place last year.

For the first time in this process, we are also presenting a large number of detailed policies that address such important topics as regeneration, climate change, design, transport, retail, leisure, education, the built and natural environments and policies for new infrastructure and community facilities. Once adopted, these policies will be used to determine all planning applications in the City. We would welcome any comments you have on the draft policies.

We are also welcoming comments on the following supporting documents:

- The 'Draft Sustainability Appraisal' - this document considers the environmental, economic and social impact of the strategy
- The 'Draft Infrastructure Delivery Plan' - this outlines the infrastructure that will be required and possible funding streams to implement it
- The 'Habitat Regulation Screening Report' - this considers whether the Strategy has any impact on internationally important wildlife sites

All of these documents can be downloaded from our website at:

<http://www.derby.gov.uk/environment-and-planning/planning/local-development-framework/#Draft-Core-Strategy>

I would like to thank those of you have helped prepare the draft policies and will look forward to receiving any comments you might have. If you have any queries or concerns about any of the draft Strategy's policies,

The consultation will run until **20 December** 2013.

Please let me know if you require any further information.

Kind regards

Letter to Councillors

Dear Councillor

I am pleased to inform you that we have now published the **Derby City Local Plan Part 1: Draft Core Strategy** for consultation.

This is an important planning policy document that sets out the City's proposals for housing and employment growth in the City up to 2028. This expands on the consultation on the 'Preferred Growth Strategy' that took place last year. For the first time, however, we are also presenting a large number of detailed policies that address such important topics as regeneration, climate change, design, transport, retail, leisure, education, the built and natural environments and policies for new infrastructure and community facilities.

We would welcome comments on what you think about the draft policies.

We are also welcoming comments on the following supporting documents:

- The 'Draft Sustainability Appraisal' - this document considers the environmental, economic and social impact of the strategy
- The 'Draft Infrastructure Delivery Plan' - this outlines the infrastructure that will be required and possible funding streams to implement it
- The 'Habitat Regulation Screening Report' - this considers whether the Strategy has any impact on internationally important wildlife sites

All of these documents can be downloaded from our website at:

<http://www.derby.gov.uk/environment-and-planning/planning/local-development-framework/#Draft-Core-Strategy>

A copy of the document has also been placed in the Members rooms. If you would like a printed copy, please let me know.

As part of our consultation, we are proposing to run a number of drop-in events, the schedule below provide you with the dates and venues.

Day	Date	Time	Venue
Tuesday	12 November	3:00pm – 8:00pm	Littleover Methodist Church
Wednesday	13 November	3:00pm – 8:00pm	Memorial Hall, Chaddesden
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Monday	18 November	3:30pm – 7:00pm	Sinfin Library
Wednesday	20 November	3:30pm – 8:00pm	Chellaston Academy

Thursday	21 November	4:30pm – 7:00pm	Mickleover Library
Wednesday	27 November	3.00pm – 7:00pm	Pear Tree Library

If you have any questions, queries or require more information, contact me or one of my team in Spatial Planning. The consultation will run for 8 weeks until **20 December 2013**.

Kind regards

Reminder letter sent on the 27 November 2013

Dear

You may recall that I wrote to you at the end of October about the Council's 'Draft Core Strategy'. This is a key planning policy document that sets out the City's proposals for housing and employment growth up to 2028 and a range of detailed policies addressing a number of important topics, including those for transport, detail and infrastructure. You still have until **Friday 20 December 2013** to make comments.

The Draft Core Strategy can be downloaded from our website or can be viewed at the Council House, local libraries or from your Neighbourhood Partnership Manager. If you would like a printed copy of the strategy, or any of the other consultation material, please contact us on the number above.

We have already carried out a number of 'drop-in' sessions across the City where residents have had an opportunity to speak to officers. A further opportunity to find out more about the Strategy has now been organised for the **4 December 2013** in the Council House Reception on Corporation Street. Officers will be available between **9.30am and 5pm**

We are encouraging people to respond to this consultation through our website at <http://ow.ly/qorGP> or by emailing comments to derby.ldf@derby.gov.uk. Alternatively, comments can be sent to the following address:

Derby City Local Plan, Part 1: Draft Core Strategy Consultation
Derby City Council
FREEPOST
MID24259
Derby
DE1 2BR

Please contact the Planning Policy Team on the above number if you require any further information.

Poster publicising the consultation



Derby City Council

Derby City Local Plan - Part 1: Draft Core Strategy

Come and talk to us about what Derby will look like by 2028 at ...

- Tuesday 12 November, 3pm - 8pm
Littleover Methodist Church, Constable Drive, Littleover
- Wednesday 13 November, 3pm - 8pm
Memorial Hall, Chaddesden Lane, Chaddesden
- Thursday 14 November, 3.30pm - 8pm
Landau Forte Moorhead Academy, Brackens Lane, Allenton
- Monday 18 November, 3.30pm - 7pm
Sinfen Library, Sinfen District Centre, Sinfen
- Wednesday 20 November, 3.30pm - 8pm
Chellaston Academy, Swarkestone Road, Chellaston
- Thursday 21 November, 4.30pm - 7pm
Mickleover Library, Holly End Road, Mickleover
- Wednesday 27 November, 3pm - 7pm
Peartree Library, Peartree Road

Documents and forms are available from the Council House, Corporation Street and at local Libraries. You can also get copies from www.derby.gov.uk
Comments to be received by Friday 20 December 2013.

derby.lcf@derby.gov.uk
www.derby.gov.uk



Briefing Note to the Neighbourhood and Diversity Forums

CONSULTATION LAUNCHED ABOUT DERBY'S CORE STRATEGY

Following on from last year's consultation on the scale and location of new housing sites in Amber Valley, Derby City and South Derbyshire, Derby City Council is launching their latest consultation about their Draft Core Strategy.

Every local authority in the Country is being required to provide land for more housing and employment to cater for a growing population. This means having to make, difficult decisions about where new growth will be located. The Council's strategy is to allocate a mixture of brownfield and greenfield sites that will deliver 12,500 new dwellings and significant opportunities for new jobs. Importantly, no Green Belt sites have been identified for development.

But this consultation is not just about housing sites. The Core Strategy contains a number of detailed policies for subjects as diverse as regeneration, the natural and historic environment, retailing, transport and car parking, the provision of leisure and community facilities and how to address the impact of climate change. It is these policies which will, when adopted, inform all planning decisions up to 2028.

The consultation began on Friday 25 October 2013 and will run for eight weeks until Friday 20 December 2013. The draft Core Strategy and a number of supporting documents will be available on the Council's website (<http://www.derby.gov.uk/environment-and-planning/planning/local-development-framework/>) and local libraries.

Details of the Draft Core Strategy will be presented at drop-in sessions organised across the city in November:

- Tuesday 12 November, 3pm to 8pm at Littleover Methodist Church, Constable Drive, Littleover, Derby DE23 6EP
- Wednesday 13 November, 3pm to 8pm at Chaddesden Memorial Hall, Chaddesden Lane, Chaddesden, Derby DE21 6LN
- Thursday 14 November, 3:30pm to 8pm at Landau Forte Academy Moorhead, Brackens Lane, Alvaston, Derby DE24 0AN
- Monday 18 November, 3:30pm to 7pm at Sinfon Library, District Centre, Arleston Lane, Sinfon, Derby DE24 3DS
- Wednesday 20 November, 3:30pm to 8pm at Chellaston Academy, Swarkestone Road, Chellaston, Derby DE73 5UB
- Thursday 21 November, 4:30pm to 7pm at Mickleover Library, Holly End Road, Mickleover, Derby DE3 0EA.
- Wednesday 27 November, 3pm to 7pm at Pear Tree Library, Pear Tree Road, Derby DE23 8NQ



Core Strategy Briefing Note

Following on from last year's consultation on the scale and location of new housing sites in Amber Valley, Derby City and South Derbyshire, Derby City Council is launching their latest consultation about their Draft Core Strategy.

In addition to housing and employment allocation to meet the City's needs for the next fifteen years, The Core Strategy contains a number of detailed policies for subjects as diverse as regeneration, the natural and historic environment, retailing, transport and car parking, the provision of leisure and community facilities and how to address the impact of climate change. It is these policies which will, when adopted, inform all planning decisions up to 2028.

This pack contains the following:

- The Derby City Local Plan, Part 1: Draft Core Strategy
- Draft Infrastructure Delivery Plan
- Summary Leaflet
- Comments Form
- Publicity Poster

Due to limited resources, a number of supporting documents will only be made available on-line. However, if there is a high demand for these documents we will print a hard copy. In addition, members of the public can request a printed version. The following are relevant:

- The **Draft Sustainability Assessment**. This tests the impact of the Core Strategy on a number of social, economic and environmental criteria.
- The **Habitats Regulations Screening Assessment**. The HRA is required to evaluate the likely significant effects of the Core Strategy on internationally important wildlife sites.

The consultation will begin on Friday 25 October 2013 and will run for eight weeks until Friday 20 December 2013. The draft Core Strategy and a number of supporting documents will be available on the Council's website (<http://www.derby.gov.uk/environment-and-planning/planning/local-development-framework/>). Library staff may be expected to help people access the relevant documents.

Responses can also be made on-line and again, library staff may be required to assist people in accessing the on-line form.

Details of the Draft Core Strategy will be presented at drop-in sessions organised across the city in November:

- Tuesday 12 November, 3pm to 8pm at Littleover Methodist Church, Constable Drive, Littleover, Derby DE23 6EP
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- Wednesday 27 November, 3pm to 7pm at Pear Tree Library, Pear Tree Road, Derby DE23 8NQ

Contacts

If you require any additional documents or need further information, please contact the Spatial Planning Team on 01332 64 0807 or derby.ldf@derby.gov.uk

Email sent to all Neighbourhood Partnership Members

Dear Forum Member

Following on from last year's consultation on the scale and location of new housing sites in Amber Valley, Derby City and South Derbyshire, Derby City Council is launching their latest consultation about their draft Core Strategy.

Every local authority in the country is being required to provide land for more housing and employment to cater for a growing population. This means having to make difficult decisions about where new growth will be located. The Council's strategy is to allocate a mixture of brownfield and greenfield sites that will deliver 12,500 new dwellings and significant opportunities for new jobs. Importantly, no green belt sites have been identified for development.

But this consultation is not just about housing sites. The Core Strategy contains a number of detailed policies for subjects as diverse as regeneration, the natural and historic environment, retailing, transport and car parking, the provision of leisure and community facilities and how to address the impact of climate change. It is these policies which will, when adopted, inform all planning decisions up to 2028.

The consultation began on Friday 25 October 2013 and will run for eight weeks until **Friday 20 December 2013**. The draft Core Strategy and a number of supporting documents, including a useful summary, are available on the Council's website <http://www.derby.gov.uk/environment-and-planning/planning/local-development-framework/#Draft-Core-Strategy>. The documents are also available from the Council House, Corporation Street and at local libraries.

You can comment online on Your City Your Say - please follow this link <http://ow.ly/qorGP>

You can also find out more and comment on the draft Core Strategy at any one of the drop-in sessions organised across the city in November. Please come along to any one of the drop-in sessions for a face to face discussion.

- Tuesday 12 November – 3pm to 8pm – Littleover Methodist Church, Constable Drive, Littleover
- Wednesday 13 November – 3pm to 8pm – Memorial Hall, Chaddesden Lane, Chaddesden
- Thursday 14 November -3.30pm to 8pm - Landau Forte Academy Moorhead, Brackens Lane School
- Monday 18 November – 3.30pm to 7pm – Sinfon Library, District Centre, Arleston Lane, Sinfon
- Wednesday 20 November -3.30pm – 8pm – Chellaston Academy, Swarkestone Road, Chellaston
- Thursday 21 November – 4.30pm to 7pm – Mickleover Library, Holly End Road, Mickleover
- Wednesday 27 November – 3:00pm to 7pm – Pear Tree Library, Pear Tree Road

Please share details of these drop-in sessions with friends and family. You can help advertise the drop-in events by displaying the attached poster. If you are able to display a poster and would like a printed version, please provide your postal address and one will be sent to you.

For more information you can email derby.ldf@derby.gov.uk

Regards

Spatial Planning Team

Reminder email sent to Neighbourhood Partnership Members on 25 November 2013

You will recall the email dated 11 November about the Council's 'Derby City Local Plan, part 1 Draft Core Strategy'. This is a key planning policy document that sets out the City's proposals for housing and employment growth up to 2028 and a range of detailed policies addressing a number of important topics, including those for transport, detail and infrastructure. You still have until **Friday 20 December 2013** to make comments.

The Draft Core Strategy can be downloaded from our website or can be viewed at the Council House or local libraries. If you would like a printed copy of the strategy, or any of the other consultation material, please contact us on the number above. We have already carried out a number of 'drop-in' sessions across the City where residents have had an opportunity to speak to officers.

A further opportunity to find out more about the Strategy has now been organised for the **4 December 2013** in the Council House Reception on Corporation Street. Officers will be available between **9.30am and 5pm**.

We are encouraging people to respond to this consultation through our website at <http://ow.ly/qorGP> or by emailing comments to derby.ldf@derby.gov.uk. Alternatively, comments can be sent to the following address:

Derby City Local Plan, Part 1: Draft Core Strategy Consultation
Derby City Council
FREEPOST
MID24259
Derby
DE1 2BR

Please contact the Planning Policy Team on 01332 64 0807 if you require any further information.

Regards
Spatial Planning Team

Core Strategy and the impact on Oakwood.....Your chance to comment

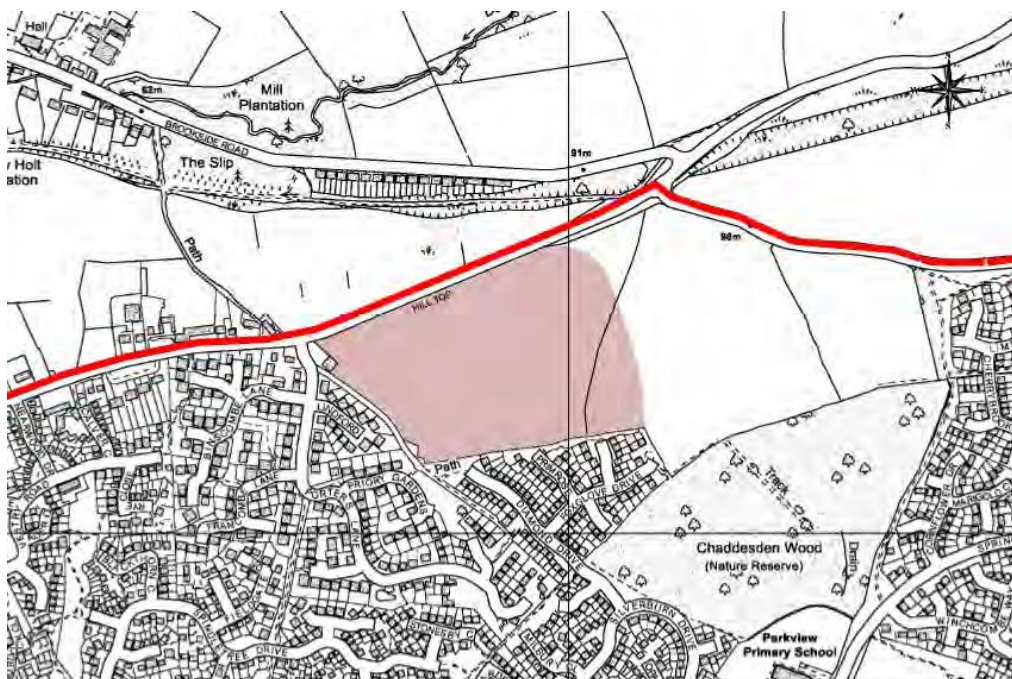
The Council has approved the next round of consultation on the Core Strategy, now known as the Draft Derby Local Plan, Part 1. The Council will use this new draft policy to guide development in the City including on the land in Oakwood to the western half of the land to the north of Chaddesden Wood. This policy has been informed by the Green Wedge strategy, a number of other background studies and feedback from the community from 2011 onwards. It is worth noting that the site does not extend as far east as Limesdale Avenue and there is a proposal to change the name of the site to "Land South of Mansfield Road" (See the map and draft policy below).

The Council is arranging a series of drop-in events to allow residents to find out more and comment on the detailed policy such access, drainage, open space and contributions towards education provision. Full details of all the drop-in events in the City will be available on the Council website soon and at your local library. Also all of the consultation documents will be available online, at the Council House reception and in local libraries for you to look at.

Consultation starts on 25 October until 20 December 2013. The closest drop in event for Oakwood residents to find out more and comment is:

Wednesday 13 November from 3pm to 8pm at the Memorial Hall, Chaddesden Lane, Chaddesden, DE21 6LN,

Please use Oakwood facebook (www.facebook.com/oakwoodDerby) and twitter and Oakwood C & C for further details.



The draft plan includes the following text: *The Council will require:*

- a) *new development to embrace high design standards and reflect the sensitivity of the location, in particular the topography of the site, its prominence and its relationship with the nearby Green Belt, Green Wedge and open countryside*
- b) *comprehensive landscaping throughout the scheme to help mitigate the urbanising impact of the development on the remaining areas of Green Belt, Green Wedge and open countryside to the north. A green corridor along the western boundary of the site will be required to act as a buffer between the new development and the Green Wedge, providing a link between Chaddesden Wood and the open countryside*
- c) *that the site is accessed from the A608 and will be designed to reflect the sensitivity of the greenfield location*
- d) *improved pedestrian and cycle links into the existing residential areas, the Green Wedge and Chaddesden Wood*
- e) *that the principle of the Oakwood Green Wedge is maintained, allowing open countryside to penetrate into the built area.*
- f) *that development will contribute to the expansion, enhancement and on-going maintenance of Chaddesden Wood.*
- g) *the provision of publicly accessible recreational green space*
- h) *a comprehensive surface water management schemes to be implemented.*

- (i) contributions towards both primary and secondary School provision in the local area.*
- j) The layout and design of the development will need to integrate with the existing townscape and create a seamless extension to the current built development in this area.*
- k) Development along the eastern boundary should be sensitively laid out to mitigate the visual impact of the development and take account of the nature conservation interest of the Green Wedge and Chaddesden Wood LNR.*
- l) As part of the development, the Council will require comprehensive landscaping to mitigate the*
- m) urbanising effect on the Green Wedge to create new defensible boundaries, especially along the eastern boundary of the site.*
- n) Development should minimise the impact on the mouth of the Green Wedge and facilitate the delivery of qualitative improvements to both the wedge and Chaddesden Wood.*
- o) Vehicular access will be from a ghost island on Mansfield Road.*
- p) Additional pedestrian & cycle access points will also be created to link the development with the surrounding residential area to the east and south, the Green Wedge and Chaddesden Wood.*
- q) Flooding has been experienced in Breadsall, located to the north, and at the junction of Mansfield Road and Lime Lane. The Council therefore, will expect development to include measure to reduce and manage surface water run-off.*



Derby City Council

Derby City Local Plan, Part 1: Draft Core Strategy Consultation Form

We would like your views and comments about the content of our Draft Core Strategy for Derby.

Please respond to as many or as few issues as you wish. This may relate to the Draft Core Strategy itself, the Draft Sustainability Appraisal, the Draft Infrastructure Delivery Plan or the Habitats Regulations Assessment.

Please complete all of the questions you are comfortable answering. Please fill in a separate response form for each comment you wish to make. You can complete this form online at www.derby.gov.uk/yourcityyoursay. All comments should be submitted by **Friday 20 December 2013**.

Please contact the Policy Team at Derby City Council on 01332 640807 with any questions, to request hard copies of the documentation or for further information. You can also email us at, derby.ldf@derby.gov.uk, or write to us using the Freepost reply envelope or Freepost address shown on the last page of this questionnaire, you don't need a stamp.

If you prefer to give your comments by email or letter, please state clearly that you are commenting on the **Derby City Local Plan, Part 1: Draft Core Strategy** and indicate which section, paragraph, policy, diagram or table your comment relates to. If you feel your comments would be best discussed in person we will be holding a series of events, which you can attend. Please contact us for more details about these events or visit our website at www.derby.gov.uk/yourcityyoursay.

How we will use the information you give

We will produce an overall report on the results of this consultation which will not link your name with the comments that you have given or any other personal information that you give. We may attribute comments given by organisations, developers and their agents when reporting, unless you tell us you do not want this to happen.

Where you make a comment about a site located within the area administered by Amber Valley Borough Council or South Derbyshire District Council, a copy of your completed response will be sent to the Planning Teams within each of these Councils. Amber Valley and South Derbyshire may link your name to any comments that you give in public documents.

We will use all responses to this consultation to help develop the Core Strategy for Derby. Only anonymised comments will be published apart from those made by organisations, developers and their agents, unless you have told us you do not want this to happen.

Your name, contact details and comments will only be used by the Independent Planning Inspector to check that we have considered, taken account of and responded to all comments given. As a part of this process the Independent Planning Inspector may contact you, unless you tell us you do not want this to happen.

1. Would you like us to let you know when the next phase of the consultation on the Core Strategy will be taking place? Please ☒ one option.
- ☐ Yes ☐ No



All information provided will be treated in confidence in accordance with the Data Protection Act 1998. It will be used for the purpose of validating comments you have made as a part of this consultation. Any comments you have given will not be linked to your name in documents that we publish. The results of this consultation will help to shape the Core Strategy for Derby.

Your contact details - please complete this section if you're happy for us to hold your personal details.

2. Are you responding to this consultation as ... Please ☒ all that apply.

- ☐ a resident of Derby?
- ☐ a representative of a public sector organisation?
- ☐ a representative of a private sector organisation?
- ☐ a representative of a community / voluntary organisation?
- ☐ an agent responding on behalf of your client?
- ☐ other?

3. Name

4. If you are responding as a representative of an organisation, please tell us which organisation this is.

5. If you are responding as a representative of an organisation, please tell us your role within this organisation.

6. Address*

7. Postcode*

8. e-mail address*

9. Telephone number*

* We only need this information if you are happy for us to contact you in this way.

Your feedback - please select the document you are commenting on and tell us which section, paragraph, policy, diagram or table your comment relates to. Please tell us whether you support or object to this aspect of the Draft Core Strategy followed by your comment.

10. Which document are you commenting on? Please ☒ one option.

- ☐ The Derby City Local Plan, Part 1: Draft Core Strategy
- ☐ The Draft Sustainability Appraisal
- ☐ The Draft Infrastructure Delivery Plan
- ☐ The Habitats Regulations Assessment

11. Please tell us which section, paragraph, policy, diagram or table your comment relates to.

12. Do you support or object to this part of the strategy? Please ☒ one option.

- ☐ Support
- ☐ Object

13. Please give your comment on this part of the strategy.

Please continue on a separate sheet if necessary.

If you have raised an issue, concern or question which requires a response we will only pass on your name and contact details, if you have given this information, to the relevant Council department so that they can respond.

If you are making multiple comments on our documents, you only have to complete the “About You” section once.

About you

If you are responding as a resident, please answer the next few questions. Even if you've not given any personal contact information, please complete this section which will not identify you.

We are interested in your views whatever your age or background, the next few questions are about you. This will help us to understand how representative the response we receive is of people living in Derby as well as the views of different groups of people.

14. Please tell us your postcode.

15. What was your age on your last birthday? Please give your age in years.

16. Are you... Please ☒ one box only.

☐ Male

☐ Female

17. Do you consider yourself to be a disabled person? Please ☒ one box only.

☐ Yes

☐ No

18. To which group do you consider you belong? Please ☒ one box only.

☐ Asian or Asian British - Indian

☐ Dual Heritage - White and Black African

☐ Asian or Asian British - Pakistani

☐ Dual Heritage - White and Asian

☐ Asian or Asian British - Bangladeshi

☐ Any other Dual Heritage background

☐ Asian or Asian British - Chinese

☐ White - English / Welsh / Scottish / Northern Irish / British

☐ Any other Asian background

☐ White - Irish

☐ Black or Black British - African

☐ White - Gypsy or Irish Traveller

☐ Black or Black British - Caribbean

☐ Any other White background

☐ Any other Black background

☐ Other ethnic group - Arab

☐ Dual Heritage - White and Black Caribbean

☐ Any other ethnic group

If you have selected one of the 'Any other background' options, please give further details.

Thank you for taking the time to fill in this form.

Please return your completed form using the Freepost reply envelope provided, you don't need a stamp. You can also return your completed form to us using your own envelope addressed to:

Derby City Local Plan, Part 1: Draft Core Strategy Consultation

Derby City Council

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MID24259

DERBY

DE1 2BR

Press Release

25 October 2013

CONSULTATION LAUNCHED ABOUT DERBY'S CORE STRATEGY

Following on from last year's consultation on the scale and location of new housing sites in Amber Valley, Derby City and South Derbyshire, Derby City Council is launching their latest consultation about their draft Core Strategy.

Every local authority in the Country is being required to provide land for more housing and employment to cater for a growing population. This means having to make, difficult decisions about where new growth will be located. Our strategy is to allocate a mixture of brownfield and greenfield sites that will deliver 12,500 new dwellings and significant opportunities for new jobs. Importantly, no Green Belt sites have been identified for development.

But this consultation is not just about housing sites. The Core Strategy contains a number of detailed policies for subjects as diverse as regeneration, the natural and historic environment, retailing, transport and car parking, the provision of leisure and community facilities and how to address the impact of climate change. It is these policies which will, when adopted, inform all planning decisions up to 2028.

The consultation will run for eight weeks and end on Friday 20 December 2013. The draft Core Strategy and a number of supporting documents will be available on the Council's website (<http://www.derby.gov.uk/environment-and-planning/planning/local-development-framework/>) and local libraries.

Details of the Draft Core Strategy will be presented at drop-in sessions organised across the city in November:

- Tuesday 12 November – 3pm to 8pm – Littleover Methodist Church
- Wednesday 13 November – 3pm to 8pm – Memorial Hall, Chaddesden
- Thursday 14 November -3.30pm to 8pm - Landau Forte School
- Monday 18 November – 3.30pm to 7pm – Sinfyn Library
- Wednesday 20 November -3.30pm – 8pm – Chellaston Academy
- Thursday 21 November – 4.30pm to 7pm – Mickleover Library
- Wednesday 27 November – 3:00pm to 7pm – Pear Tree Library

Councillor Asaf Afzal, Cabinet Member for Planning, Environment and Public Protection, said, "We know people are likely to have concerns about the scale and location of new development in and around Derby. However, there is a national need to provide more housing and we have to make sure we can meet our needs in the long term. For a variety of reasons Derby is an attractive place to live and work and as such we have to ensure that everyone has access to housing, employment and the facilities that people need for a high quality of life. This is your chance to comment on the policies which will help this to happen."

-ENDS-

FOR FURTHER INFORMATION CONTACT:

Dal Guram - Communications Officer

01332 643485

dal.guram@derby.gov.uk

Press Release

29 November 2013

OPPORTUNITY TO COMMENT ON PLANS FOR THE FUTURE SHAPE OF DERBY

Residents are being urged to comment on Derby's draft Core Strategy before this stage of consultation finishes this month.

Derby City Council launched the consultation in October and invited people to comment on the policies that make up the draft Core Strategy for Derby. The consultation ends on 20 December and many people have already taken part in the various consultation events held across the city. There will be a final drop in session on Wednesday 4 December at the Council House foyer, Corporation Street, between 9.30am and 5.00pm where Council officers will be available to talk to people interested in passing on their views.

Every local authority in the country is being required to provide land for more housing and employment to cater for a growing population. This means having to make, difficult decisions about where new growth will be located. Our strategy is to allocate a mixture of brownfield and greenfield sites that will deliver 12,500 new homes and significant opportunities for new jobs. Importantly, no Green Belt sites have been identified for development.

But this consultation is not just about housing sites. The Core Strategy contains a number of detailed policies for subjects as diverse as regeneration, the natural and historic environment, retailing, transport and car parking, the provision of leisure and community facilities and how to address the impact of climate change. It is these policies which will, when adopted, inform all planning decisions up to 2028.

The draft Core Strategy and a number of supporting documents are available on the Council's website (<http://www.derby.gov.uk/environment-and-planning/planning/local-development-framework/>), the Council House reception and local libraries.

Councillor Asaf Afzal, Cabinet Member for Planning, Environment and Public Protection, said, “We know people are likely to have concerns about the scale and location of new development in and around Derby. However, there is a national need to provide more housing and we have to make sure we can meet our needs in the long term. For a variety of reasons Derby is an attractive place to live and work and as such we have to ensure that everyone has access to housing, employment and the facilities that people need for a high quality of life. This is your chance to comment on the policies which will help this to happen.”

-ENDS-

FOR FURTHER INFORMATION CONTACT:

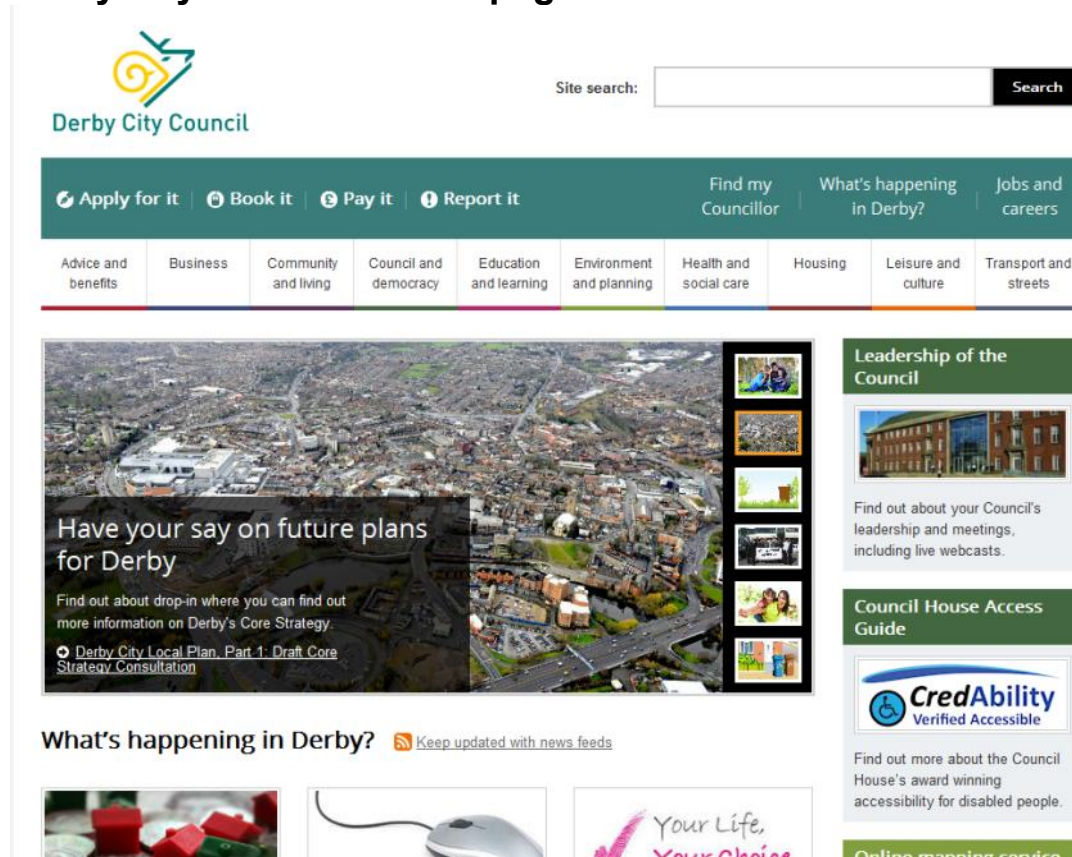
Cassandra Carruthers

Communications Officer

01332 643488

cassandra.carruthers@derby.gov.uk

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Have your say on future plans for Derby

Find out about drop-in where you can find out more information on Derby's Core Strategy.

[Derby City Local Plan Part 1 Draft Core Strategy Consultation](#)

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Internal AV Screens

Derby's Draft Core Strategy How will it effect your service?

Over the next 15 years the Core Strategy plans to deliver:

- Over 12,500 new homes
- New flood defences, shops, roads and schools
- 199 ha of new employment land

The consultation runs until 20 December 2013

For more information, visit
www.derby.gov.uk



Public Facing AV Screens

Have your say on future plans for Derby

Tell us what you think about changes which may effect areas such as retail, climate change and transport.

Visit our website to find out about drop-in events where you can find out more and have your say.

www.derby.gov.uk



Mickleover 'would lose character if 370 homes are built'

Derby Telegraph [Follow](#)

Monday, October 14, 2013

By chris.mallett@derbytelegraph.co.uk

The debate over where thousands of homes should be built in and around Derby is about to be reignited. Chris Mallett reports.

ONE reason Richard Temple moved with his family to his newly-built edge-of-Derby home was the countryside on their doorstep.



A view across the land at Hackwood Farm.

Before the move six years ago to Crystal Close, Mickleover, he remembers being told there was potential for a development around the corner. But the scale of what has been applied for at Hackwood Farm has angered him - a 370-home development with a centre featuring new shops and services.

And, even if this planning application is rejected, Derby City Council is set to consult on a proposal that the patch of land is included in its strategy for where future homes could be built.



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The authority has said that this would "in theory" improve the chance of a developer getting permission to build there.

Mr Temple, 49, said: "People around here have tried to sell their houses and quite a few of them have taken them off the market because I think people are getting wind of what's going to happen here.

"One of the reasons we moved here was because it's on the edge of nice countryside on the edge of Derby. I do a lot of running and I can use the fields. I'm worried that will be spoilt."

Like others in the area, he says his biggest concern is the extra traffic that would come from the new site.

His near neighbour, Carol Hood, said the proposed access point for the development would be just round the corner from her house.

The 49-year-old said: "The traffic is just going to get more frequent, more dangerous and getting out of here on to Station Road in the morning is already a nightmare."

It looks unlikely that the council's strategy for the future of development in Derby - its "core strategy" - will be finalised before its planning committee makes a decision on Miller Homes' current planning application for Hackwood Farm.

But it illustrates the kind of heated debate that reaching a final decision on where thousands of homes could be built in and around the city is likely to cause.

In September last year, the council completed Government-ordered [work](#) to come up with its own housing targets and plans.

Article continued overleaf

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The authority had been left to decide how many homes the city and surrounding area needed between 2008 and 2028 - so its figures included some homes already built.

At the time, the assessment found 33,700 new homes were needed in the Derby Housing Market Area (DHMA), which also covers parts of South Derbyshire and Amber Valley.

Now, a draft version of the core strategy for the development of Derby up to 2028 has been completed.

It includes much more than housing, for example proposed policy for office, tourism, culture, and leisure developments.

But it will surely be the vision of where homes could go that will attract the most attention, and the figure for how many are needed has now been increased to take into account recent census figures.

This new figure is 35,354, with a need identified for 12,500 in Derby City Council's area, up by 500, 13,454 in South Derbyshire District Council's, up by 754, and 9,400 in Amber Valley Borough Council's, up by 400.

In Derby, it is the Hackwood Farm site that the city council proposes could provide the bulk of the extra 500 homes needed.

The council is at pains to point out that the next step is for its cabinet to confirm on Wednesday that a public consultation on the proposed development strategy will go ahead.

Asked what difference the Hackwood Farm site being included in the strategy would make, Councillor Asaf Afzal, cabinet member for planning, environment and public protection, said that "if a site is allocated for development in an adopted local plan, it is considered to be acceptable for that development in principle, provided it meets the requirements of the policy".

He said: "Being allocated in a local plan will, in theory, improve the chance of a site securing planning permission. However, the applicants must still meet the requirements of the policy and adequately address any issues arising through the more detailed planning application process."

He said a consultation on the draft plan of the core strategy was an opportunity for people to comment and that those comments would be taken into account.

Of the 12,500 homes needed in Derby, 2,396 have already been built and 1,344 already have planning permission. Smaller sites capable of holding another 1,010 homes will be identified in a future plan, which will also be consulted on.

This leaves 7,210 homes for which the council has identified 16 potential larger sites. Some of these are already the subject of planning applications and some have planning permission.

Many of the sites identified within the South Derbyshire District Council area straddle the south of the city, with the potential for thousands of homes - 1,950 in Wragley Way, Stenson Fields, for example.

Council tax from residents would go to the district council, not the city, despite it being expected that new residents would use [schools](#) and other services in Derby.

Back in September, the then cabinet member for planning, Hardyal Dhindsa, said this supported his argument for the city boundary to be extended.

He said: "Derby is bulging at the seams and boundary change is something we would like to consider."

As a result of needing to identify space for another 754 homes, South Derbyshire District Council has suggested sites in villages including Etwell, Repton, Hilton, and Aston on Trent.

It has also identified the potential for a further 290 homes adjacent to the Hackwood Farm site.

A district council spokesman said residents could have a say on its own draft strategy proposals until November 15, with planning officers going to community venues to answer queries.

The housing strategy is controversial but city council leader Paul Bayliss said it was clear there was a need for the new homes as more people were drawn and retained as residents by what is a "successful city".

He said: "There is no doubt that it is a great challenge for us to be able to fit in that number. Population growth has always out-stripped housing growth."

The city council is planning to begin its public consultation on its core strategy this month, if the move, as expected, is given the go-ahead on Wednesday.

People will be able to view the document on the local development framework page of the council's website www.derby.gov.uk. Paper copies will be available in the Council House and in libraries.

Mr Bayliss said: "What I want people to understand is this is their chance to have their say."

"If people don't say 'I don't want a housing development at the end of my road', or 'I don't want a factory development in my street' then they will have missed out because this is the point at which these decisions are made."

For Mr Temple, there is no doubt about his thoughts on both the current application for the

He said: "I just don't think Mickleover can cope. I know it's part of Derby but I think of it as a village - it has its own character. That could be lost."

Campaigner starts his sixth battle to block homes being built



Derby Telegraph



Wednesday, October 16, 2013

By CHRIS MALLETT

A CAMPAIGNER battling against proposals to earmark land across the south of Stenson Fields for hundreds of homes says a development would make his parish eight times larger, transforming its character for the worse.

Tony Eley, 68, said his latest objection to a homes proposal for land off Wragley Way would be his sixth.



Tony Eley is campaigning against proposals for homes off Wragley Way, Sinfin.

There is no planning application currently submitted for the land, which mostly falls into South Derbyshire District Council's remit.


But the authority is proposing including the site as a potential housing plot in its plan for the development of the district over the next 15 years.


Article continued overleaf

But the authority is proposing including the site as a potential housing plot in its plan for the development of the district over the next 15 years.



By 2028, the council says it needs to find space for thousands of houses in its area to keep up with need and wants to earmark the area south of Wragley Way for 1,950.

Derby City Council is in the same boat and is set to consult on including a patch of land off the road, where it believes 180 could go, in its plan for [the future](#) .

There is an application in for that part of the land from developer Hallam Land [Management](#) .

Mr Eley's objection, as a resident of Barrow on Trent, is to the district council's proposal, on which it is now also consulting. He said it was his sixth objection to a homes proposal on the land, having fought past planning applications and commented on previous versions of a development plans.

Mr Eley said: "In their present form, the proposals would mean a population of about 4,000 being added to the parish of Barrow on Trent - current population just over 500.

"People living in a new development would be looking at the city for all their services and would have completely different concerns to people in the village.

"I can't imagine any parish council where 90% of people live in an urban area, and the rest in a rural village, functioning properly."

A district council spokesman said the aim of its plan was "to help South Derbyshire continue to thrive over the next 15 years while protecting and enhancing the qualities that are making more and more people want to live, work and visit here".

He said: "This consultation, running until November 15, is an important opportunity for communities and residents to influence how the district will develop. That's why we encourage everyone to look at the proposals and submit their comments and ideas.

"Planning officers are attending community venues to answer any queries."

The proposals can be seen at www.south-derbys.gov.uk.

Derby Evening Telegraph – 28 October 2013

Derby Telegraph

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Public can have their say on plan for city's future

By [Derby Telegraph](#) | Posted: October 28, 2013

Comments (2)

DROP-IN sessions will be held across Derby for people to find out about plans for how the city should develop.

In September last year, the city council completed Government-ordered work to come up with its own housing targets and plans.

Now a draft version of the "core [strategy](#)" for the development of Derby up to 2028 has been completed.

It includes how the authority would aim to [deliver](#) 12,500 homes without encroaching on to green-belt sites, along with policies for the city's historical environment, shops, transport and parking. The consultation will run for eight weeks and end on December 20.

Drop-in sessions will be at Littleover Methodist Church, on Tuesday, November 12, from 3pm to 8pm; the Memorial Hall, Chaddesden, on Wednesday, November 13, from 3pm to 8pm; and Landau Forte Academy Moorhead, Brackens Lane, Alvaston, on Thursday, November 14, 3.30pm to 8pm.

The following week, they will be held at Sinfin Library on Monday, November 18, from 3.30pm to 7pm; Chellaston Academy on Wednesday, November 20, from 3.30pm to 8pm, and Mickleover Library on Thursday, November 21, from 4.30pm to 7pm. The final session will be at Pear Tree Library on Wednesday, November 27, from 3pm to 7pm.

The draft core strategy is available to view at www.derby.gov.uk.



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MORE NEWS

HS2 may hit buffers if Labour wins next election, claims MP

Al-Madinah governors rapped for no-show at community meeting

Cancer victims denied chance to die at home

Ex-Household Cavalry man pounds Poppy Run course for old comrades

TV star Christine Bleakley goes off beaten track in Derbyshire

MORE NEWS HEADLINES

Derby County's Jamie Ward on target but frustrated by result...

Masked crusaders on a Derby mission to save badgers

Hundreds of events for Derwent Discovery Days festival

Ripley bar owner fined for playing music without licence

'Moments of madness' as drunk thugs beat up man in taxi


CLASSIFIEDS

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Train to be a Gas Engineer
£40,000

Train to be a Gas Engineer
£40,000 WFQ

Derby Evening Advert – 11 November 2013



Derby City Council

Derby City Draft Core Strategy Consultation

Comments are invited on the Council's Draft Core Strategy.

The 'Core Strategy' is the key planning policy document within the Local Plan. It will guide future development in the city up to 2028. Once adopted, this Local Plan will set the basis for deciding individual planning applications and will provide certainty as to how and where development will take place over the next 15 years.

Documents are available for inspection at:

- Council House Reception
- Local libraries
- The Council's web page (www.derby.gov.uk)
- By contacting your Neighbourhood Partnership Manager

Come and talk to us at the following events:

- Tuesday 12 November, 3pm to 8pm at Littleover Methodist Church, Constable Drive, Littleover, Derby DE23 6EP
- Wednesday 13 November, 3pm to 8pm at Chaddesden Memorial Hall, Chaddesden Lane, Chaddesden, Derby DE21 6LN
- Thursday 14 November, 3:30pm to 8pm at Landau Forte Academy Moorhead, Brackens Lane, Alvaston, Derby DE24 0AN
- Monday 18 November, 3:30pm to 7pm at Sinfen Library, District Centre, Arleston Lane, Sinfen, Derby DE24 3DS
- Wednesday 20 November, 3:30pm to 8pm at Chellaston Academy, Swarkestone Road, Chellaston, Derby DE73 5UB
- Thursday 21 November, 4:30pm to 7pm at Mickleover Library, Holly End Road, Mickleover, Derby DE3 0EA
- Wednesday 27 November, 3pm to 7pm at Pear Tree Library, Pear Tree Road, Derby DE23 8NQ

We would like to know your views on the content of the Draft Core Strategy.

Please contact the Policy Team at Derby City Council on 01332 640807 with any questions.

You can also email us at, derby.ldf@derby.gov.uk, or write to us at

Derby City Local Plan, Part 1: Draft Core Strategy Consultation
Derby City Council
FREEPOST, MID24259, DERBY, DE1 2BR

The closing date for comments is the 20 December 2013

Housing plans will 'destroy' Mickleover, argue residents

By Derby Telegraph | Posted: November 23, 2013 By Paul Whyatt



Caption in here

Article continued overleaf

MORE NEWS HEADLINES

150 new jobs come to Derby as shop The Range gets ready to open...

Monday: Traffic updates for Derby and Derbyshire

VIDEO: Heather is fattening up Derbyshire hedgehogs to keep them...

Derby County midfielder Kalifa Cisse in hospital drama over toe...

Delight for Derby County's Craig Forsyth after assist and clean...

Comments (20)

PEOPLE in Mickleover say they are worried about the future after learning more about the need for 26,000 homes in Derby and South Derbyshire.

Derby City Council must build 12,500 homes in the city, while South Derbyshire District Council must find room for 13,454 properties.

To help meet the need – caused by a growing population – land between Mickleover and Mackworth has been earmarked for 421 homes, while a further 290 homes could be built at nearby Hackwood Farm.

Last night, local people were able to have their say on the proposals at a consultation event at Mickleover Library. Among those who went along was Hedingham Way resident Gill Wharmby.

RELATED ARTICLES

£20m school planned to cope with new homes

Mickleover 'would lose character if new homes are approved'

Plans to build 370 homes on farm site considered again

The 58-year-old said she was worried about the housing need.

She said: "We're being told that all these new homes are needed because the population is growing. More people are being born than are dying, and more people are living alone and living longer.

"People are saying they are worried about how much greenbelt land will be developed and the impact all the new homes will have on traffic.

"I'm worried about that too, though what people aren't thinking about is how the country will cope with a larger population.

"Technology is replacing so many jobs these days. You can build more

8+1 0

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MORE NEWS

Derby Uni academic to explore Harry Potter crime and justice

Finalists in Derby Telegraph's £15,000 Win A Wedding...

Derby Telegraph editor Neil White: What heritage should we leave...

Christmas events in Derbyshire

Who's been in the courts?

CLASSIFIEDS

Jobs Directory Property Cars



Purchasing / Procurement Specialist
Negotiable

Automotive Buyer
£35k - £40k pa

Area Sales Engineer x3
£38,000 basic £43,000 OTE

VOUCHER DEALS



**SOCIAL BALLROOM
DANCING 8.15PM ST.
NICHOLAS ALLESTREE**

Article continued overleaf

"We're letting in more and more immigrants, too. I'm just worried there won't be enough jobs in years to come and millions of people will be living in poverty."

Nigel Ferret, 51, said he was worried about the scale of new housing developments.

The Ladybank Road resident said: "Mickleover is a lovely place to live but it doesn't look like it will be for long.

"We chose to live here because you're close to countryside and also not far from the core parts of Derby. You get the best of both worlds.

"But if they build up the surrounding parts of Mickleover, the area will lose its appeal. It will be no better than living in London, where it's just housing and buildings everywhere you go – no fields or wildlife havens. It will destroy Mickleover."

Amanda Phillips, of Western Road, said she was not happy at where the council was proposing to place new houses.


She said: "There is green land east of Derby in Erewash. That's allowed to be protected from development but not other areas. I don't understand that at all."

Last night's event was the sixth of seven consultation evenings being held across Derby this month.


The final one will take place at Pear Tree Library next Wednesday from 3pm to 7pm.

Councillor Asaf Afzal, cabinet member for planning, environment and public protection, said people's comments during the consultation would be taken into account.


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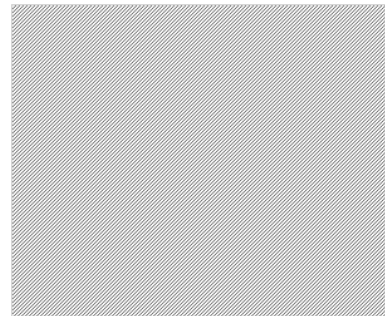
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In-Touch Article – 28 October 2013

Have you say on Derby's core strategy

The Planning Policy team has launched the latest phase of consultation on the scale and location of new housing sites in Amber Valley, Derby City and South Derbyshire. The draft Core Strategy Local Plan Part 1, for Derby, also outlines policies for regeneration, the natural and historic environment, retail, transport and car parking, leisure and community facilities and how to address the impact of climate change. The consultation is open until Friday 20th December. A number of drop events have been arranged – see our [website](#) for full details.

In-Touch – 25 November 2013

Have your say on budget proposals and city's 'local plan'

Don't forget to take part in two major public consultations:

- The [budget consultation for 2014/15 to 2016/17](#) – the deadline is 16th December 2013
- [Part one of the Derby City Local Plan – the draft Core Strategy](#) – the deadline is 20th December 2013.

All the latest public consultations are listed on the [Your City, Your Say pages](#) of our website.

In-Touch Articles – 2 December 2013

Final drop-in session this Wednesday about plans for future shape of Derby

Every local authority in the country has to provide land to cater for a growing population, resulting in difficult decisions about where new growth will be located. Our strategy, detailed in our draft Core Strategy, is to allocate a mixture of brownfield and greenfield sites that will deliver 12,500 new homes and significant opportunities for new jobs. No Green Belt sites have been identified for development.

Come and find out more and ask questions at the final drop-in session on Wednesday 4th December in the Council House foyer, between 9.30am and 5.00pm. Or view [part one of the Derby City Local Plan – the draft Core Strategy](#) – on our website and have your say before 20th December 2013.

Have your say on important consultations

Don't forget to take part in the following public consultations, and encourage your customers and neighbours to do the same:

- Proposals to [increase the size and admission numbers of 11 primary schools](#) from September 2014 as a result of increasing pupil numbers – the deadline is Friday 13th December
- The [budget consultation for 2014/15 to 2016/17](#) – the deadline is 16th December 2013
- [Part one of the Derby City Local Plan – the draft Core Strategy](#) – the deadline is 20th December 2013. (See the news item above.)

All the latest public consultations are listed on the [Your City, Your Say pages](#) of our website.

In-Touch Article – 9 December 2013

Have your say on important consultations

Don't forget to take part in the following public consultations, and encourage your customers and neighbours to do the same:

- Proposals to [increase the size and admission numbers of 11 primary schools](#) from September 2014 as a result of increasing pupil numbers – the deadline is Friday 13th December
- The [budget consultation for 2014/15 to 2016/17](#) – the deadline is 16th December 2013
- [Part one of the Derby City Local Plan – the draft Core Strategy](#) – the deadline is 20th December 2013.

All the latest public consultations are listed on the [Your City, Your Say pages](#) of our website.

Extract from the Derby Cathedral Quarter newsletter – January 2014

CQ BID and Business News E-bulletin

Issue No 184 January 2014



BID NEWS AND UPDATES

CATHEDRAL QUARTER

DERBY

CQ Saturdays Towers, Tunnels & Tales

Derby City Council Core Strategy Consultation



DERBY CITY COUNCIL









The Cathedral Quarter Project team have been liaising with Derby City Council over the next Derby City Local Plan - Draft Core Strategy.

The Cathedral Quarter features heavily as a key retail area, the main focus of the evening economy and the hub of the Central Business District for professional services.

This was a very positive dialogue that will continue to develop the Cathedral Quarter as a destination for premium retail, quality leisure and respected professional services.

Postings on Twitter and Facebook



Scheduled Tweets (DerbyCC)	
	Created by DerbyCC Sending at 2:15pm, Nov 13, 2013 Come to Landau Forte Academy Moorhead tomorrow from 3.30pm to 8pm to have a say on #DerbyUK future plans. More info: http://ow.ly/qLE6i
	Created by DerbyCC Sending at 8:30am, Nov 14, 2013 Come to Landau Forte Academy Moorhead today from 3.30pm to 8pm to have your say on #DerbyUK future plans. More info: http://ow.ly/qLF13
	Created by DerbyCC Sending at 2:00pm, Nov 17, 2013 Come to Sinfin Library tomorrow from 3.30pm to 7pm to have your say on #DerbyUK future plans. More info: http://ow.ly/qLFo6
	Created by DerbyCC Sending at 8:30am, Nov 18, 2013 Come to Sinfin Library today from 3.30pm to 7pm to have your say on #DerbyUK future plans. More info: http://ow.ly/qLFBd
	Created by DerbyCC Sending at 2:00pm, Nov 19, 2013 Come to Chellaston Academy tomorrow from 3.30pm to 8pm to have your say on #DerbyUK future plans. More info: http://ow.ly/qLFFv
	Created by DerbyCC Sending at 8:00am, Nov 20, 2013 Come to Chellaston Academy today from 3.30pm to 8pm to have your say on #DerbyUK future plans. More info: http://ow.ly/qLGLF
	Created by DerbyCC Sending at 2:00pm, Nov 20, 2013 Come to Mickleover Library tomorrow from 4.30pm to 7pm to have your say on #DerbyUK future plans. More info: http://ow.ly/qLGWL
	Created by DerbyCC Sending at 8:00am, Nov 21, 2013 Come to Mickleover Library today from 4.30pm to 7pm to have your say on #DerbyUK future plans. More info: http://ow.ly/qLH9Q


Created by DerbyCC
 Sending at 2:00pm, Nov 26, 2013
 Come to Peartree Library tomorrow from 3pm to 7pm to have your say on [#DerbyUK](#) future plans.
 More info: <http://ow.ly/qLHjl>


Created by DerbyCC
 Sending at 8:00am, Nov 27, 2013
 Come to Peartree Library today from 3pm to 7pm to have your say on [#DerbyUK](#) future plans.
 More info: <http://ow.ly/qLHt0>


Sent Tweets
 (DerbyCC)


Come to the Council House foyer tomorrow from 9.30am to 5pm to have your say on [#DerbyUK](#) future plans for the city
ow.ly/rpaWv


2 retweets



Sent Tweets
 (DerbyCC)


DerbyCC
 8:00am via HootSuite
 Come to the Council House foyer today from 9.30am to 5pm to have your say on [#DerbyUK](#) future plans for the city
ow.ly/rpc57


4 retweets


Mentions
 (DerbyCC)
[#ProudofDerby](#)


derbyarchitect
 2:02pm via Web
 Just been to the to take a look at the Draft Core Strategy. Don't forget to have your say!
tinyurl.com/ph6w22w [#Derby](#) @DerbyCC


SpotOnLtd
 1:27pm via Web
 FC Cartons secures government funding via Derby Enterprise Growth Fund (DEGF)
 @DerbyCC @PackNews bit.ly/1baF0vP


BBCChrisD
 7:05am via Twitter for Android
 @DNCC_Newsroom says there could be dangers in trying to introduce a levy on large shops. Hear from @DerbyCC shortly.
 2 retweets


Raj_Restaurant
 Dec 3, 10:49am via Web


Sent Tweets
 (DerbyCC)

DerbyCC
 2:40pm via HootSuite
 RT @UTCDerby: RT @derbyquad: We are proud of Derby because of its Diversity, Friendliness and its brilliant arts scene!
[#proudofderby](#)

DerbyCC
 2:38pm via HootSuite
 RT @SpotOnLtd: FC Cartons secures gvt funding via Derby Enterprise Growth Fund
 @DerbyCC @PackNews bit.ly/1baF0vP [#ProudofDerby](#)

DerbyCC
 2:37pm via HootSuite
 RT @derbyarchitect: Just been to take a look at the Draft Core Strategy. Don't forget to have your say! tinyurl.com/ph6w22w [#Derby...](#)
 1 retweets

Appendix 2: Persons and bodies invited to make representations under Regulation 18

Bodies invited to make representations

23 Skidoo Ltd

2 Cities Planning

73rd Allestree Derby (Allestree) Scout Group

A consortium of: RR, 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

Boyer Planning

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
Connexions Derbyshire Ltd
Co-operative Estates
Councillor R J Wood
Countryside Homes Ltd
Countryside Properties (Special Projects) Ltd
Countryside Properties Ltd
CPRE
Crest Nicholson
Cross Country Trains
D2N2
Dale Abbey Parish Council
David Lock Associates
David Wilson Homes (East Midlands)
David Wilson Homes (North Midlands)
DCC Corporate & Adult Services
Department for Transport
Depol Associates

Derby City Council
Derby & Derbyshire Local Access Forum
Derby & Sandiacre Canal Trust Ltd
Derby & South Derbyshire Friends of the Earth
Derby City NHS
Derby City Partnership
Derby City PCT
Derby City Primary Care Trust
Derby Civic Society
Derby College
Derby Common Purpose
Derby County Football Club
Derby CVS
Derby Cycling Group
Derby Gypsy Liaison Group
Derby Homes
Derby Hospitals NHS Foundation Trust
Derby Hospitals NHS Foundation Trust
Derby Police Commissioner
Derby Racial Equality Council
Derbyshire & Nottinghamshire Chamber

Derbyshire Alternative Technology Association
Derbyshire Constabulary
Derbyshire County Council
Derbyshire County Cricket Club
Derbyshire Economic Partnership
Derbyshire Fire and Rescue
Derbyshire Historic Buildings Trust
Derbyshire Mental Health Services NHS
Derbyshire Police
Derbyshire Sport
Derbyshire Wildlife Trust
Derwent Living
Design Council (CABE)
Disability Direct
DLP Consultants
DPDS Central Region
DPDS Consultants
DPP
Drivers Jonas
DTZ
Duffield Parish Council

Durose Estates
East Midlands Airport
East Midlands Ambulance Services
NHS Trust
East Midlands Regional Assembly
Elvaston Parish Council
EMDA
English Churches Housing Group
English Heritage (East Midlands)
Environment Agency
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
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
Lafarge Aggregates Ltd
Lambert Smith Hampton
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
Lovell
Lowland Derbyshire & Nottinghamshire
Local Nature Partnership
LPC Living
Mackworth Parish Council
Malcolm Arnold-Foulkes
Marketing Derby

McCarthy and Stones Retirement
Lifestyle Ltd
Metropolitan Housing Trust
Michael Goodall Homes
Mickleover Neighbourhood Board
Miller Homes
Miller Homes
Miller Homes
Milner McCrea
Mobile Operators Association
Morley Parish Council
Nathaniel Lichfield and Partners
Nathaniel Lichfield and Partners
National Federation of Gypsy Liaison
Group
National Grid
National Grid - Network Strategy
National Grid UK Transmission
Natrass Giles
Natural England
Network Rail
Network Rail Property
NFU East Midlands

NHS England
Norseman Holdings Limited
Nottingham City Council
Ockbrook Parish Council
Oxalis Planning
Pegasus Planning Group LLP
Persimmon Homes
Persimmon Homes
Persimmon Homes (North Midlands)
Peter Brett & Associates
Peter Wigglesworth Planning Ltd
Peveril Homes
Peveril Homes/Mr Tim Parnell
PI Ltd
PJ Livesey
Places for People
Planning & Environmental Services
Limited
Planning Aid
Planning and Design Group
Planning Design Practice Ltd
Planning Potential
Planning Potential

Planware Limited
Powergen UK Plc
Prime Construction Services Ltd
Prysmian Cables & Systems Ltd
Quarndon Parish Council
Radbourn Parish Council
Radleigh Group
Radleigh Homes
Raglan Housing Association
Raybould & Sons - Commercial
Redrow Homes (Midlands) Limited
Riverside
RNIB East Midlands & East
Road Haulage Association
Roger Humber
Rolls Royce PLC
Rosemound Developments Ltd
Royal Crown Derby
Royal Mail
RPS
RPS Planning
RPS Planning & Development
RSPB

Ryan MacDonald
Safer Derbyshire
Sainsburys PLC
Sanderson Weatherall
Save the Pub Campaign
Savills
Savills
Savills
Savills (Nottm)
Scott Wilson
Severn Trent Water
Severn Trent Water
Shire Consulting
Showmen's Guild of Great Britain
Sight Support
Signet Planning
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 & Parker
Strutt and Parker
Sustrans
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
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 Dreuit
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
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Hindi

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Derby City Council
August 2014