

## **Kedleston Voice: Response to Mr Moore's Matters, Issues and Questions in respect of the Derby City Local Plan Part 1 Core Strategy, issued on 1 March 2016.**

### **1. Introduction**

- 1.1 Kedleston Voice (KV) is a non-political group of residents primarily from Quarndon in Amber Valley Borough (AVBC) and Allestree in Derby City Council (DCC) which was formed following the initial public meeting held by Catesby Estates to promote the development of land immediately west of Kedleston Road, which forms the boundary between the two authorities. Catesby's proposal was opposed by the vast majority of residents attending that meeting
- 1.2 KV has made detailed objections on behalf of some two thousand residents at every stage of the planning process involving this site. This has included two versions of AVBC's emerging Core Strategy and the outline planning application submitted on behalf of Catesby Estates, which was refused by AVBC in September 2015.
- 1.3 KV has been concerned about the length of time it has taken for the three Councils in the Derby Housing Market Area (HMA) to arrive at an agreed position regarding the amount of housing sites estimated to be required by the DCC that cannot be found within its existing boundaries and how this is to be apportioned between AVBC and South Derbyshire District Council (SDDC).
- 1.4 The fact that this joint working had to be requested by the two appointed Inspectors for the AVBC and SDDC Examinations rather than being offered by the three Councils before the Examinations began is also of concern to KV. This approach has considerably lengthened a process which is already difficult enough for residents to understand and to respond to.
- 1.5 Nonetheless it would now appear that two of the three Councils have reached a position where they are satisfied that their emerging plans are National Planning Policy Framework (NPPF) compliant and, of particular relevance to this Examination, Mr Moore will be able to deal with the issue of DCC's contribution to the unmet housing demand in the HMA fairly and effectively.
- 1.6 KV believe that a speedy adoption of this Local Plan in its current format is needed to bring some certainty for local residents and to ensure that strategic housing allocations are plan led and do not arise through the appeal process.
- 1.7 KV makes the following further contribution to this inquiry.

### **2. Legal Compliance**

- 2.1 Has the Council complied with the Duty to Co-operate?

KV believes that the protracted nature of the discussions over the requirements of the Derby HMA, referred to above, indicates that DCC has complied.

### **3. Matter 1: Overall Development Strategy**

- 3.1 Question (e) asks if the overall strategy is sufficiently flexible to respond to an unexpected change in circumstances. KV has consistently argued that there are sufficient brownfield sites within the City boundaries, some of which are vacant or in non-housing uses, capable of coming forward in the Plan period to deal with the HMA's housing requirement without the need to allocate sensitive greenfield sites in AVBC. That remains the case and KV believes that the strategy is sufficiently flexible to accommodate any such sites that do come forward.
- 3.2 In respect of question (f), KV has also argued that within the HMA as a whole the logical location for more housing is towards the south of the City centre to minimise the travel to work between proposed housing and existing and proposed employment sites. The occupiers of any new housing towards the north of the City who want to work in either the City centre or employment sites have only two routes south to travel, both of which are already heavily congested in the morning peak hours.
- 3.3 Question (i) asks if it is appropriate for the Local Plan to include Policy CP1 (b) relating to development outside the plan area. The policy specifically relates to "placemaking principles for cross boundary growth", This is supported by KV because it seeks to avoid the situation currently being faced with the two planning applications submitted by Catesby Estates in AVBC, where considerable numbers of dwellings are being proposed without supporting physical and social infrastructure. All the services currently to be found in Allestree are at capacity and this is a factor which has been given insufficient weight so far by AVBC.
- 3.4 KV believes that it is not appropriate for some indication of where growth should take place outside the City boundaries to be included in this policy, as suggested by Catesby Estates in the WYG letter of 23 October 2015. KV considers that this should not be within the remit of this Plan and is strongly opposed to this suggestion.

### **4. Matter 2: Housing**

- 4.1 KV notes that several housebuilders are lined up to appear at the Examination presumably to continue the theme advanced at the AVBC and SDDC Examinations that not enough sites have been allocated to meet housing need in the HMA. KV is opposed to a re-opening of this debate for a third time. The issues have been discussed ad nauseam in the two previous Examinations including the joint SDDC/AVBC session at which DCC was represented by the appropriate officers. SDDC is now moving ahead to adopt its Plan based on the figures discussed then. DCC should be allowed to do the same.
- 4.2 Question (h) asks if the withdrawal of the AVBC Local Plan Part 1 has any implications for meeting objectively assessed needs for the HMA. KV was disappointed that AVBC decided to pull out of the Examination at the "eleventh hour". However, this should not be an "obstacle" to progressing the DCC Plan. A call for sites has already gone out from AVBC and that consultation has now ended. AVBC continues to be committed to producing a Plan, albeit later than it should, and there is always the possibility that the government will intervene next year if progress is not being made as it should.
- 4.3 It is noted that question (i) asks about the retention of Green Belt boundaries. KV believes that this is a matter for the surrounding authorities and not the DCC. KV is

strongly supportive of the principle of Green wedges because they are felt to complement the aim of protecting valued greenspaces within and on the City boundary. KV has previously written in support of paragraph 3.17 in the Plan that “attractive landscapes and historic settings outside the city’s boundaries such as Kedleston Hall...will be protected and where possible enhanced whilst also being recognised for their own sake and for their role in making Derby a more desirable place to live and invest...”

**5. Matter 6: Natural and Built Environment**

- 5.1 KV is supportive of the thrust of CP20 and not the suggested alternative wording to be found in the WYG letter of 23 October 2015, which appears to suggest that development within the setting of a historic asset is acceptable provided it is designed “properly.”
- 5.2 KV wishes to bring a recent appeal decision in AVBC to Mr Moore’s attention. The appeal was at South Wingfield and has the reference APP/M1005/W/15/3006136; a copy is attached to this submission. The decision letter as a whole and the conclusion in particular is relevant to consideration of matter 6. Mr Moore is urged not to suggest any changes to the wording of the policies in this section which would dilute the protection of the historic and natural environment within the City boundary and the surrounding valued countryside.

**Dave Anderson  
Chair  
Kedleston Voice  
30 March 2016**