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# Qu 1: Do you agree with the revised Vision for South Derbyshire?

|  |  |
| --- | --- |
| Duty to Cooperate Body / Statutory Consultee | 6 |
| National Organisation | 2 |
| Regional Organisation | 1 |
| Parish Council and other Community Group | 11 |
| Councillor | 0 |
| Landowner or Developer | 42 |
| Members of the public | 89 |

| **Response Id** | **Name** | **Organisation** | **Do you agree with the revised Vision for South Derbyshire?** | **Comment** | **Council Response** |
| --- | --- | --- | --- | --- | --- |
| **Duty to Cooperate Body / Statutory Consultee** | | | | | |
| 1242867 | Natural England | Natural England | No | Whilst Natural England generally agrees with the Vision we would like to see specific reference to the Nature Recovery Network, for example in the third paragraph: “the quality and diversity of the District’s wildlife habitats will have been improved and contribute to the wider Nature Recovery Network”.  The Nature Recovery Network is one of the specific aims of the Environment Act 2021 and will underpin the government’s approach to the enhancement of nature. | Agree - amend the vision.  Reference to the Nature Recovery Network will be included in the vision. |
| 1243643 | Sport England | Sport England |  | Sport England welcome the inclusion of ‘health’ within the vision. However, to fully take into consideration Section 8 of the National Planning Policy Framework (NPPF), particularly paragraph 97 it would be beneficial if reference is also given to providing existing and future communities with access to facilities for sports and physical recreation.  Sport England welcome and support the promotion of sustainable travel options. Sport England also welcome reference to the investment in leisure and recreation for Swadlincote.  Sport England would like to make the Council aware of our strategy, ‘Uniting the Movement’ which is our 10-year vision to transform lives and communities through sport and physical activity. As we adapt and rebuild from the huge disruption caused by the coronavirus pandemic, we need to collectively reimagine how we keep movement, sport and activity central to the lives of everyone. Because if we harness its power, we’ll be able to improve people’s lives in so many ways. We believe sport and physical activity has a big role to play in improving the physical and mental health of the nation, supporting the economy, reconnecting communities and rebuilding a stronger society for all. This strategy sets out how we need to change as a sector and an ecosystem, so that we can give people the opportunities they need now and in the future. More than anything, it seeks to tackle the inequalities we’ve long seen in sport and physical activity. Providing opportunities to people and communities that have traditionally been left behind, and helping to remove the barriers to activity, has never been more important.  Our five big issues are where we see the greatest potential for preventing and tackling inequalities in sport and physical activity are:  1. Recover and reinvent 2. Connecting communities 3. Positive experiences for children and young people 4. Connecting with health and wellbeing 5. Active environments  It is believed that the Local Plan offers the opportunity to help address these issues.  Within the vision, as well as supporting text due reference could be made to the role in which sport and activity can play in improving and transforming the health and wellbeing of local communities. Please see weblink for further information –  <https://www.sportengland.org/why-were-here/uniting-the-movement> | Agree - amend the vision.  Reference to ‘access to sports and physical recreation’ will be included in the vision.  The Council will consider where reference to the role in which sport and activity can play in improving and transforming the health and wellbeing of local communities within the vision and supporting text.  The Council notes Sport England’s Strategy and will consider this prior to the publication of the next draft of the Local Plan. |
| 1244753 | Canal and River Trust | Canal and River Trust |  | Chapter 3: Vision and Objectives for South Derbyshire  Within South Derbyshire, the Trust owns, operates and is Navigation Authority for some 25km of the Trent & Mersey Canal and 2.5km of the Navigable Upper Trent. The Trust considers that the canal network within South Derbyshire has the potential to contribute positively towards delivering many of the aims set out in the strategic objectives identified in paragraph 3.3 of the Plan, in particular, objectives 3,5, 7,8, 9,10.  The canal network is a multi-functional resources which can help to stimulate regional, sub-regional and local economics and can be used successfully as a tool in improving community health and wellbeing; in attracting and generating investment; in place making and place-shaping; and in the delivering wider public benefit. Inland waterways are acknowledged as significant green infrastructure, but they also function as blue infrastructure, serving as a catalyst for regeneration, a sustainable travel resources for commuting and leisure, a natural health service action as blue gyms and supporting physical and healthy outdoor activity an ecological and biodiversity resource; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape; a contributor to water supply and transfer, drainage and flood management, The waterway network also forms part of the historic environment, character, cultural and social focus of South Derbyshire. | Noted.  No suggested amendments to the vision. |
| 1243623 | Derbyshire County Council | Derbyshire County Council |  | The inclusion of climate mitigation and adaptation as a strong part of this vision is welcomed. | Noted.  No suggested amendments to the vision. |
| 1243661 | Derbyshire County Council Adult Health and Social Care | Derbyshire County Council Adult Health and Social Care | Yes | It could be strengthened by making more reference to:- • improving healthy life expectancy • reducing health inequalities within the district • good quality neighbourhood design that promotes community safety, healthy food environments, physical activity and improved mental wellbeing • opportunities for healthy and active travel that link work and home • good quality design to improve outcomes for local people | Agree in principle - amend the vision.  The vision will include reference to safe and healthy communities delivered by good quality design and active travel. |
| **National Organisation** | | | | | |
| 1235628 | Simon Richards | British Horse Society | No | I wish to see clear reference to the inclusion of equestrians and consultation with the British Horse Society with regard to active travel and vulnerable road users. | Noted.  Reference to active travel will be included in the vision.  Non-car modes of travel is already included in the vision (paragraph 1). |
| 1243542 | Home Builders Federation (HBF) | Home Builders Federation (HBF) |  | HBF agree that the vision for the South Derbyshire Local Plan should recognise the importance of new housing in helping to meet both open market and affordable housing needs. The HBF would also encourage the Council to consider the role that housebuilding plays in the local economy, both when the houses are under construction and when the houses are occupied as people’s homes.  HBF welcomes the Council’s clear commitment to ensuring the Housing Needs of South Derbyshire are met and full and seeking to make a contribution to meeting the needs of Derby. HBF would support further housing in South Derbyshire for a variety of reasons including addressing the current housing crisis, meeting housing need, providing affordable housing and supporting employment growth, as well contributing to help to meet the unmet need of Derby. HBF suggest that each of these reasons on its own could justify an increase in the housing requirement. HBF suggest the Council should consider planning for an additional amount of housing to address each reason in turn.  HBF would question if the end date of 2039 for the Plan is long enough. The NPPF states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take in account the likely timescale for delivery. In recognition of the time that it can take to progress a new Local Plan through all its required stages, HBF suggests that the Council should considers extending the Plan period to ensure that a 15-year period is provided post adoption of the Plan. It will also be important for the evidence base to be consistent with the Plan Period.  HBF note that the Council has declared both an Ecology Crisis and Climate Emergency, we would question if the Council has, or is intended to declare a Housing Crisis. HBF would support such a declaration, and the inclusion of this with in the vision.  The Vision is very long and reads more like a summary of the approach of the Plan than Vision. HBF suggest some editing and prioritisation of housing needs would be helpful. HBF would question if the role of the Green Belt is an integral part of the Vision, and as such should be specifically referred to. HBF would support a vision that focusing on meeting housing need. | Noted/ Agree in part.  The vision supports a growing economy with more jobs in a diverse business environment, it is not considered necessary to reference certain types of jobs in particular industries.  The housing requirement is considered further under question 3.  The Council will extend the plan period to 2041.  The Council has not declared a housing crisis and therefore this is not referenced in the vision. However, provision of sufficient numbers of high-quality affordable homes is included in paragraph 3.  The Council will amend the vision to include reference to the importance of the Green Belt. |
| **Regional Organisation** | | | | | |
| 1242640 | Derbyshire Association of Local Councils | Derbyshire Association of Local Councils | Yes | Yes in principle but we do have a few questions | Noted.  No suggested amendments to the vision. |
| **Parish Council and other Community Group** | | | | | |
| 1240947 | Barrow Upon Trent Parish Council | Barrow upon Trent Parish Council | Yes | In principle, We as a Parish Council agree with the proposed future for the area, but we have major concerns about our infrastructure, and the impact of the proposed developments without the appropriate sewers, roads, medical facilities, etc.  These should be available before the housing and industrial facilities are etc are built. We already struggle | Noted.  No suggested amendments to the vision.  The site-specific infrastructure requirements for the strategic sites will be considered further under questions 6,7 & 8. The plan will also be supported by an Infrastructure Delivery Plan which will detail the infrastructure requirements, costing and delivery. |
| 1239943 | Castle Gresley Parish Council | Castle Gresley Parish Council | Yes | The vision is a positive aspiration for the area of South Derbyshire. Tackling the need for housing and development, yet a balancing this with sustainability and considering the climate emergency. | Noted.  No suggested amendments to the vision. |
| 1242585 | Egginton Parish Council | Egginton Parish Council |  | Agree in part. Egginton PC acknowledges the enormous quantum of work in producing this draft local plan. Broadly, it agrees with the vision, but it does not see this translated to the proposals for development:   1. The housing numbers are too high – SDDC is accepting too much of Derby City’s unmet need (unevidenced). Tougher negotiation is required within the HMA in the interests of sustainability. 2. The proposed urban bolt-on 2500 housing/employment site on the outskirts of Mickleover does not reflect the vision. See full response at Q3. 3. The vision seems to be overly majoring in amenity improvements to Swadlincote. What about the town of Melbourne and our historic rural villages? 4. Employment references seem to rest in the majority in the Freeport development. Shouldn’t the vision be more encompassing to acknowledge the importance of the wider business community including small businesses and tourism etc. 5. There is a growing elderly population which merits greater emphasis within the vision. 6. The vision concentrates on growth. There is no mention of beauty | Noted  Points 1 & 2 have been considered under the consultation questions that these relate to (questions 4 & 5b respectively).  Disagree that the vision should be amended to include more reference to Melbourne and historic rural villages. Swadlincote attracts more text in the vision as it is the principal settlement within the District and is at the top of the settlement hierarchy. The level of text for other settlements is reflective of the hierarchy (and subsequent development expected within each area).  The vision already caters for these groups and issues and does not need amending. |
| 1244412 | Etwall Parish Council | Etwall Parish Council | Yes | The Parish Council are generally in agreement with the overall vision. It does not however appear to take into account the expansion of the Derby conurbation into the North of the area. This expansion appears to be disproportionately affecting South Derbyshire compared with other adjoining districts. | Noted.  No suggested amendments to the vision. |
| 1238750 | Hilton Parish Council | Hilton Parish Council | Yes | But it needs to go further and recognise the importance of agricultural land for food production and that productive agricultural land will be protected.  Singling out Melbourne seems odd when it is not the largest of the key service villages. Hilton, as the second largest settlement in South Derbyshire, needs recognition for amenities catch-up. | Noted.  Paragraph 3 includes reference to a range of protections that will cover Best and Most Versatile Lane under the distinct landscapes of the District. Best and Most Versatile Lane is strongly protected in the policies in the plan as a whole.  Infrastructure is dealt with in detail in the plan and no specific mention of other settlements is needed. |
| 1241732 | Melbourne PC | Melbourne Parish Council |  | Having considered the draft plan, Melbourne Parish Council notes that there is no obvious impact on Melbourne and King's Newton. Councillors are however concerned about the impact that the Isley Woodhouse proposed development will have on local infrastructure and traffic volumes and hopes that South Derbyshire District Council are working with North West Leicestershire District Council to address any concerns which would impact South Derbyshire and the immediate area. | Noted.  No suggested amendments to the vision. |
| 1236404 | Repton Parish Council | Repton Parish Council | No | Repton Parish Council response to SDDC Local Plan Consultation November 2024 The Repton Parish Council (RPC) wishes to support the new SDDC Local Plan and makes the following points to ensure that the revised Local Plan meets the requirements of the Parish.   1. The first comment is that the new SDDC Local Plan Part 1, out for consultation, does not contain any reference to the Neighbourhood Development Plans (NDP) that are currently in place and being undertaken in the District and their involvement in the Planning process. This is particularly important since the policies in an NDP take precedence over existing non-strategic policies in a local plan covering the neighbourhood area where they are in conflict. 2. The second concern is in section 6.8 explanation to the Local Plan Policy H1. This section states the settlement boundaries will be refreshed in the next phase of the plan making. This process is undefined in the context of any timescales or scale. The Parish Council would like to see the approach and methodology to be used in this process. It should be noted that the Repton and Milton NDP is quite explicit on the need for the two settlements to be separate from each other to retain their own different characters and forms a guiding principle in the NDP. 3. The Policy H1, Section 5, Rural Areas does not contain all the requirements of the existing Local Plan Part 2 Policy BNE5, nor contains a reference to Policy BNE5. It should be noted that the Repton and Milton NDP Policy H1 has a specific reference to Policy BNE5. 4. The RPC would propose that INF3 (Freeport) should include a criteria that states that transport developments in the area should take note of the impact of the Freeport to minimise workers traffic on nearby rural settlements, not just HGVs. 5. INF3 should also include the potential cycle link between Repton and Willington, as part of the Freeport infrastructure requirements (Repton and Milton NDP Policy T2) and in support of the Local Plan Policy BNE1 (Active Travel). 6. INF4 (Transport) should acknowledge the impact of the development of the Freeport (INF3) and under section C include the need to minimise the effect of workers journeys and traffic on nearby rural settlements on any major development. 7. The Swarkstone Bridge Bypass mentioned in INF4 would have a major effect on the level of traffic through the parish. We propose that this should be included as part of the Freeport infrastructure requirements due to the Freeport’s effect on the area’s transport, both HGV and employees. 8. It is noted that the map for INF3 Freeport Interchange has managed to convert the current railway track to the A5132. It is assumed that this is a mistake rather than a major policy change.   The above comments relate to the Local Plan Part 1 out for consultation. A major concern is the potential impact of the NPPF that is currently being updated and how the SDDC Local Plan process could be impacted by this on timescales and more importantly on the consultation process.  The Repton and Milton Parish Council also requests that a meeting of the relevant people in the RPC and SDDC is set up to understand the potential implications of the NPPF that is currently being updated, to discuss its link to the Repton and Milton Neighbourhood Development Plan (NDP), to ensure the NDP remains relevant. | Noted.  No suggested amendments to the vision.  All points raised will be considered under question 13 (point 1) and question 9 (points 2 – 8) in the consultation. |
| 1241376 | Rosliston Parish Council | Rosliston Parish Council | Yes | In principal yes. | Noted.  No suggested amendments to the vision. |
| 1243603 | SAVE (Save Aston & Weston Village Environment) | SAVE Aston and Weston Residents Group | Yes | The southwards expansion of Derby shown in the plan is limited by the A50, which needs to remain as a boundary with no strategic development to the south. The sections on the villages in the Trent Valley is welcome, provided the vision translates into reality. | Noted.  No suggested amendments to the vision. |
| 1242069 | Swifts Local Network: Swifts & Planning Group | Swifts Local Network: Swifts & Planning Group | Yes |  | Noted.  No suggested amendments to the vision. |
| 1242402 | Weston-on-Trent Parish Council | Weston-on-Trent Parish Council | Yes | This is a qualified yes, as the vision in vague and is open to interpretation. For example, the vision talks about the Ecological and Climate Emergencies, but also refers to the Freeport as a source of growth. The Freeport has the potential to be a massive source of CO2 emissions, as well as pollution, noise and congestion. The Plan needs to be clearer on how these contradictions will be managed. The southwards expansion of Derby is limited by the A50, which needs to remain as a boundary with no strategic development to the south. The sections on the villages in the Trent Valley is welcome, provided the vision translates into reality. | Noted.  No suggested amendments to the vision.  The policies contained within the plan aim to guide development in line with the vision. Site specific development proposals will need to be considered against the policies and balanced against the ambition for growth as part of the planning application process. |
| **Landowner or Developer** | | | | | |
| 1242643 | Andrew Large Surveyors Ltd & The Staunton Harold Estate | Andrew Large Surveyors Ltd & The Staunton Harold Estate | Yes | Broadly I agree with the vision statement, however beyond the housing target there are no directly measurable aims | Noted.  No suggested amendments to the vision. |
| 1242137 | Bellway Homes | Bellway Homes Ltd | No | Plan period Paragraph 22 of the NPPF requires strategic policies to look ahead for a ‘minimum’ of 15 years from adoption. The plan period proposed in the LPP1 review is 2022-2039, a total of 17 years. However, the current plan period does not accord with national policy, and should be revisited accordingly.  According to the Environment & Development Services Committee held on 19 September 2024, the Council intend to submit the LPP1 review for examination before 30 June 2025. We think this timeframe is entirely unrealistic are somewhat sceptical of this timeframe, given the draft LPP1 review consultation only finishes in December 2024. The Council will need to analyse the representations made on the draft LPP1. They will also need to address the upcoming changes to the standard method which will lead to an increase in the housing need for the Council that hasn’t been accounted for in the LPP1 review. They will then need to make any necessary modifications to ensure the LPP1 is soundly-based and seek approval from Members for those modifications. Finally, they will need to consult on the pre-submission version (under Regulation 19), all of which must be carried out prior to submission for examination. On this basis, we would expect the final (Reg 19) version of the LPP1 to be submitted potentially before the end of 2025, with adoption sometime during 2026 or even in 2027.  In order that the LPP1 review is sound and in accordance with national policy, the LPP1 should needs to look ahead to 2041 as a minimum. This is at least an extra two years’ worth of growth that should be met in the LPP1 review. This is entirely possible, given the reasonable alternative site options available to meet this growth; including the Land at Sandcliffe Road Swadlincote (site ref. 045) which has been assessed as a suitable site for development and one of the few locations deemed suitable in the Derby Growth Options Study.  We therefore object to the plan period in the LPP1 review as currently proposed.  Vision  Question 1. Do you agree with the revised Vision for South Derbyshire?  Paragraph 15 of the NPPF makes clear that plans should provide a ‘positive vision’ for the future of the area. This includes a ‘framework for meeting housing needs’. The vision for the draft LPP1 review is set against a number of key issues facing the District. These includes:   * Housing unaffordability and the longer-term trend in a growing gap between average earnings and house prices in the District * Increasing pressure on existing employment sites to be developed for housing * The need to attract greater investment into Swadlincote.   The vision sets out various aspirations for Swadlincote up to 2039, notably: “*Swadlincote will have become firmly established as a vibrant town in a high-quality retail, residential, commercial, leisure and shopping environment*”. These are clearly pressing issues that are impacting on local communities in South Derbyshire now and will continue to in the future. However, the focus of the LPP1 review is heavily almost exclusively skewed towards addressing the unmet needs of Derby, and not enough/barely any focus is placed on addressing local issues facing South Derbyshire.  Furthermore, the LPP1 review is predicated on simply rolling forward existing strategic and non-strategic site allocations (by saving LPP2 site allocations) and does not identify any additional land for housing in the District (and no new sites at Swadlincote) to help address these local issues, in particular the likely increase in housing need which will come into force under proposed changes to the standard method calculations. There will also undoubtedly be reasons why so many existing allocations have not yet come forward, potentially issues relating to deliverability of specific sites, or changes in broader market conditions at certain locations. Given the LPP1 was adopted over eight years ago, the Council should not/cannot simply assume that these allocations will come forward as previously anticipated without an up-to-date assessment of the deliverability of the existing allocations.  The key issues outlined above and the vision for South Derbyshire (in particular Swadlincote) should be addressed now, rather than delaying investment that Swadlincote so badly needs for at least the next five years as part of a subsequent plan review.  Based on this, we object and contend that the LPP1 review strategy should be more closely aligned with the local issues underpinning the vision, as highlighted above. | Noted.  No suggested amendments to the vision.  Comments relate to Policy S1 and the housing strategy and will be considered under questions 9 & 3. |
| 1242615 | Carney Sweeney on behalf of Peveril Homes Ltd and Kingsmere Holdings Ltd | Carney Sweeney on behalf of Peveril Homes Ltd and Kingsmere Holdings Ltd |  | In part yes. We welcome the revised Vision which addresses comments provided at the previous Issues and Options consultation stage, and now sets out the aspirations for the District over the plan period and covers the range of topics that the draft Local Plan Part 1 Review (referred to as the ‘draft Local Plan’ hereafter) seeks to address.  It is also noted that the Vision now includes reference to the level of housing delivery, with a specific reference to the need for ‘major sustainable urban extension’ to meet the needs not only of the District, but also the City of Derby.  However, the reference to meeting the needs of the ‘City of Derby’ does not take into account any other needs arising from within and outside the Derby Housing Market Area (referred to as the ‘Derby HMA’ hereafter). For example, whilst the proposed changes to the Standard Method approach in the draft National Planning Policy Framework consulted upon in 2024 (referred to as the ‘draft NPPF’ hereafter) is not applicable at this time for this plan-making process, the proposed changes would see an increase in the overall housing need for the Derby HMA. The Vision therefore should seek to accommodate need arising from within and outside the Derby HMA area to allow for any changes in circumstances during the life of the plan-period – this already forms part of Strategic Objective 13, which states as follows:  “To ensure growth in South Derbyshire is co-ordinated with development in adjoining areas both within and outside the Derby HMA.” [Source: Strategic Objective 13 of the Draft Local Plan Part 1 Review consultation document, Page 22]  The proposed Vision should also reflect the strategic scale of development proposed to meet the housing needs of the District and the Derby HMA in accordance with Paragraph 22 of the National Planning Policy Framework December 2023 (referred to as ‘the Framework’ hereafter), which states “…Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”  It is noted that the proposed plan period for the draft Local Plan is currently 2022-2039, so circa 17 years. The Council should review the plan period in advance of any subsequent consultation stage to ensure that the draft Local Plan covers the correct period, but also complies with the provision of Paragraph 22 of the Framework – this may require the plan period to be re-based but also extended. | Disagree / Agree in part.  The vision incorporates ‘the strategy for growth’ with regards to new homes and also ensuring that ‘the District’s housing stock is better aligned to the needs of – and available to – everyone, irrespective of their stage of life, income, health or circumstances’. There is also reference in the vision for the plan to ‘meet the expanding housing needs of the City of Derby and South Derbyshire.  The vision also makes reference to the ‘major sustainable urban extensions to Derby’...to meet the expensing housing needs of Derby and South Derbyshire.  The Council will amend the plan period to 2041. |
| 1243582 | CBRE Ltd on behalf of Land Project UK (LPUK) | CBRE Ltd | No | No. The importance of a clear and concise Vision for the borough should not be understated as it has the ability to guide development and set the direction for future strategic development. LPUK are broadly supportive of the Vision as drafted, however would advise this should go further. For example, it is disappointing to see no specific reference to the terms “employment” or “Freight and Logistics” within the Vision. Given the Boroughs strategic geography within the Midlands to the rest of the UK, and its appeal to occupier supply chains, we advise the omittance of such terms is an oversight and this should be included.  Furthermore, employment needs should be planned for in the same manner as housing as the two are intrinsically linked (as proposed by the draft NPPF (2024). Growth should also not rely on urban extensions “in particular”, with growth focused around the borough and on sites that are demonstrated as suitable and can provide a mix and balanced type of warehouse space. | Disagree.  The vision includes reference to a growing economy ‘with more jobs in a more diverse business environment supported by a more skilled, diverse workforce’. Reference to the importance of agricultural employment and employment growth associated with the Freeport are all included.  The Employment Land Review has identified in quantative terms that we have an oversupply for the district. In qualitative terms the unmet demand within the District is for small and ‘grow-on’ employment units within close proximity to residential areas which the plan is looking to address. Where there are local employment issues that need to be addressed this can be done through the Part 2 Local Plan / Full Plan review process. |
| 1244437 | CBRE on behalf of Labcorp | CBRE on behalf of Labcorp |  | We generally support the revised vision as set out on pages 19-21 of the consultation document in terms of achieving sustainable growth for the area’s needs and to accommodating growth for the unmet housing needs of the City of Derby/ The revised 2024 draft of the National Planning Policy Framework (NPPF) includes a change of rules and requirements for Local Plans, whereby within this is the proposed changes to the Standard Method (SM) for calculating housing needs. Transitional arrangements within the revised Framework will provide a bridge between the current SM and the SM for Local Planning Authorities (LPAs). As such based on the stage of the Local Plan LPAs can continue to be examined under the December 2023 National Planning Policy Framework (NPPF) and current housing standard method if they fulfil one of the following criteria (Draft NPPF Paragraph 226, adopted expected December 2024/January 2025).  *a) ''The emerging annual housing requirement in a local plan that reaches or has reached Regulation 19 (pre-submission stage) on or before [publication date + one month] is no more than 200 dwellings below the published relevant Local Housing Need figure; b) The local plan is a Part 2 plan that does not introduce new strategic policies setting the housing requirement unless the relevant Local Plan Part 1 has been prepared applying the policies in this version of the Framework; c) The local plan is or has been submitted for examination under Regulation 22 on or before [publication date+ one month]."*  South Derbyshire District Council will need to reapply this calculation to a reviewed consultation document (assuming it is adopted in the new National Planning Policy Framework, expected December 2024 / January 2025) prior to reaching Regulation 19 stage and therefore we would encourage the LPA to revisit this policy in this context. We also consider that the vision should acknowledge in detail areas that are most appropriately located where people can live, whilst being well connected to the City of Derby for employment purposes. This means that new residential development should consider proximity to existing functional relationships as well as public transport, local service centres and places for recreation, health and wellbeing.  We suggest that additional wording is added to the fourth paragraph of the Draft Vision to address this point :  *'To accommodate growth, brownfield land and disused buildings will be brought back into beneficial use and major sustainable urban extensions to Derby will have been developed, providing a wide range of accommodation to meet the expanding housing needs of the City of Derby and South Derbyshire. The growth potential of Derby and these new urban extensions in particular, will have been unlocked through transport and other key infrastructure improvements. Such growth to meet the unmet demand of The City of Derby will be prioritised in locations with key functional relationships to the City of Derby. alongside being well-connected through sustainable modes of transport and in compatible and cohesive locations to enable people to have access to living opportunities and able to thrive*." | Noted / Disagree.  The housing requirement is considered further under question 3.  It is not considered necessary to include the proposed additional text as this is detailed further in the strategy for delivering the vision and therefore is not required in the vision itself. |
| 1242112 | Cushman & Wakefield (on behalf of E.ON UK plc) | Cushman & Wakefield on behalf of E.ON UK plc | Yes |  | Noted.  No suggested amendments to the vision. |
| 1243190 | David Lock Associates on behalf of Hallam Land | David Lock Associates | Yes | The Vision is broadly supported but requires greater emphasis on the strategic importance of housing delivery.  Please note these representations are specific to Hallam Land’s land interests at Infinity Garden Village. | Disagree.  The plan as a whole is the strategic element of the Development Plan and therefore doesn’t need to emphasise the strategic importance of specific elements. |
| 1242592 | Dean Lewis Estates | Dean Lewis Estates | No | 2.2.2 The scope the Partial Review of the Local Plan the vision should set out exactly what housing unit numbers and employment provision is to be delivered specifically at the Strategic Locations STA1 and STRA2.  2.2.3 At the very outset of the Local Plan, it is confirmed that, “This review updates Part 1 of the South Derbyshire Local Plan to deal with the critical issue of meeting unmet housing need arising from the Derby Urban Area. This issue has become a pressing requirement since the adoption of the Part 1 strategic plan in 2016”.  2.2.4 The Vision should acknowledge this fact and identify that 4,500 new homes arising as a consequence of Derby City’s unmet need shall be delivered within SDDC at STA1 and STRA2.  2.2.5 The Vision should also acknowledge the important roles that the supporting tole that sustainable Key Service Settlements such as Linton play in accommodating sustainable growth that compliments the strategic role that Swadlincote plays as key market town within the district.  2.2.6 The Vision should also acknowledge the strategic role that sustainable Key Service Settlements such Hatton play in the western part of the district providing new homes, employment and essential community infrastructure along the A50 and A511 corridor.  2.2.7 The Vision should also be confined to that of the Derby City Growth only. South Derbyshire New Local Plan – Issues and Options Consultation Reg 18b (October-December 2024) | Disagree.  The housing strategy and specific allocations in combination detail how the vision will be delivered.  Within the context of meeting unmet need from Derby in the most sustainable way (i.e. within close proximity to where the need arises) the Key Service Settlements do not play a strategic role in the delivery of houses within this plan. |
| 1243664 | Deloitte LLP on behalf of Church Commissioners for England | Deloitte LLP on behalf of Church Commissioners for England |  | 2.1.1. The Church Commissioners for England support the principal contents of the South Derbyshire Vision which seeks to draft a Local Plan that provides the mechanisms and policies needed to ensure that South Derbyshire continues to be an attractive district to live, visit and invest, whilst also facilitating necessary growth and development.  2.1.2. The Commissioners support the notion of establishing an appropriate distribution for sustainable housing and economic growth in order to respond to climate impacts, but also to reflect the needs of the district, notably that “the District's housing stock [will be] better aligned to the needs of – and available to - everyone, irrespective of their stage of life, income, health or circumstances. This will help to meet the needs of present and future generations housing requirements.” The Commissioners consider the importance of establishing this at the forefront of the Local Plan, cognisant of both the rural and urban areas of the district. It is important that housing and employment land continues to reflect the needs of this district through both the Vision, but also subsequent objectives and strategic policies.  2.1.3. Further to the above, the Commissioners support reference to the role of the villages of South Derbyshire, particularly with respect to the historic and environmental identity of South Derbyshire as a whole, as well as their role in supporting diverse local communities. Despite this being an update to Part 1 of the Local Plan only, as it will supercede the Vision that covers the entirely of the plan, the Commissioners consider that the Vision should be prepared with consideration for all areas of the district, and the opportunities that these areas provide. Therefore the Commissioners support that Vision that “sustainable living and working environments throughout the remainder of the villages and other rural parts of the District will have been maintained through local scale development in keeping with their size, role and character”.  2.2. Growth Levels 2.2.1. The Church Commissioners for England recommend that the Vision contains clear aspirations to achieve ambitious levels of growth over the new plan period, in order to attract increased inward investment, as well as satisfying the aims of the distribution of housing and employment growth. In doing so, the Vision will “be prepared positively, in a way that is aspirational but deliverable” in line with National Planning Policy Framework (‘NPPF’) Paragraph 16b.  2.2.2. Cognisant of the function of the Local Plan Part 1 Review, which is in part to support the delivery of some of Derby City’s housing need, it will be important to provide as much housing stock within the HMA as possible to provide for residents of not only South Derbyshire, but also the residents of Derby City.  2.2.3. The Vision provides a revised housing figure that the strategy for growth will deliver by the end of the plan period, increasing from 12,618 between 2011-2028 to at least 14,483 between 2022-2039, an increase from 742 dwellings per annum to at least 851 dwellings per annum. The Commissioners support the increase in housing delivery in general, however highlight the importance of ensuring that the revised housing figure bolsters economic growth, supports the wider needs of the Derby HMA, and is underpinned by robust evidence that speaks to the deliverability of these additional houses, specifically with regards to STRA 1 – Infinity Garden Village and STRA 2 – Land South of Mickleover, which are to provide 2000 and 2500 houses over the plan period respectively.  2.2.4. In addition, despite SDDC noting that it has agreed to publish this plan for consultation, with the expectation that it is likely to need to be amended in some respects by the new Framework and NDMPs following the 2024 consultation on NPPF reforms, the Commissioners stress the importance of ensuring that the Local Plan Part 1 considers the potential 20% uplift in the proposed Standard Method for South Derbyshire. The Local Plan should be prepared positively, in line with NPPF paragraph 16b, which the Commissioners understand as including consideration for assisting Derby City in meeting their unmet need, but also ensuring that growth can be bolstered in South Derbyshire in its own right. Further iterations of the Local Plan Part 1 Review should consider the impacts of the potential NPPF Reforms when drafting the Vision, as well as subsequent Objectives and Strategic Policies. | Noted/ Agree in part  The Council will consider the implications of the new NPPF. In the event of the Local Plan being published by the 12th March 2025 the transition arrangements will be in place. |
| 1242071 | Green 4 Development | Green 4 Development | No | The vision could be more ambitious to try and capitalise on the opportunities that the Freeport may bring. | Noted.  Until the Freeport development proposals are more advanced the Council is unable to capitalise on the opportunities that it may bring. This will be considered further as part of a full plan review in the future. The freeport is proposed as a specific allocation in this Local Plan to secure long term benefits. |
| 1243217 | Harris Lamb on behalf of Talland Capital Ltd | Harris Lamb |  | Vision TCL generally welcome the Vision that is set out within the Plan of meeting the aims of achieving sustainable growth, renewal and opportunity and highlighting the benefits of economic growth, the creation of jobs and attracting a more skilled, diverse workforce to the District. The strategy highlights the need to deliver new homes to meet the housing needs of existing residents but also to attract those of working age and also to meet the needs of the elderly population. The Vision also acknowledges the need to deliver sustainable living and working environments for the remainder of the villages and other rural parts of the District having regard to the scale of development, their size, role and character. | Noted.  No suggested amendments to the vision. |
| 1243182 | Hawksmoor on behalf of I Foster | Hawksmoor |  | Whilst the Vision for South Derbyshire over the period from 2022 up to 2039 with sustainable growth, housing, green space and opportunity etc., is duly supported, further consideration should be given by the Council towards the Plan period to meet a minimum of 15 years, as required by the NPPF. Along with allocating additional smaller parcels of land which can deliver housing completions, available to everyone, in need more quicky.  A query is expressed in the Council’s own timetable for a forecast Final Approved Plan in the winter of 2025, versus the minimum required 15 year Plan period.  Representations were previously submitted in June 2023 to South Derbyshire’s Call for Sites for land at Tawney Hay Farm, Hatton and subsequently given a SHELAA site reference number 235 (alongside adjoining land as owned by the Diocese referenced 110). These two owners are now actively collaborating, have undertaken intrusive ground investigations to clarify earlier queries and will shortly be identifying a development partner to aid proposed site delivery. Joint pre-marketing activities are now at an advanced stage.  The subject site was concluded to be available, achievable and suitable (subject to mitigation) for 251 dwellings, vs. the intimated 300 dwellings proposed. Similarly, the Diocese land was concluded to be available, achievable and suitable (subject to mitigation) for 69 dwellings, vs. the intimated 80 dwellings proposed. The sites could be developable in less than the minimum of 6 years as initially identified by the Council.  The subject site lies within an approximate 20 minute travel time by car to the western edge of Derby City and a 13 minute travel time by train from Hatton railway station to Derby City railway station (source Google Maps) and development would further boost local economies in Hatton. | Noted / Agree in part  The Council will amend the plan period to 2041  The primary purpose of this plan review is to address the unmet need arising from Derby City. The Council will consider allocating smaller parcels of land in the future Part 2 Local Plan/Full plan review.  Omission sites are considered further in question 13. |
| 1243636 | Marrons on behalf of Ainscough Strategic Land | Marrons on behalf of Ainscough Strategic Land |  | 2.4 VISION & STRATEGIC OBJECTIVES  2.4.1 The draft Vision at paragraph 3.2 is generic and not locally distinctive. In our view, it does not set out a clear framework for the spatial development of the District over the Plan period, which as we have set out above, does not cover the minimum time horizon required by the NPPF. The draft Vision makes reference to the Climate Emergency declared by the Council, but does not acknowledge the Housing Emergency, despite the below statement in the Interim Sustainability Appraisal that in South Derbyshire:  “Insufficient affordable dwellings have been delivered in recent years to meet local need and has often been below the target of 30% per annum. Average household size in the District is decreasing. A typical house costs more than 12 times a typical salary making housing unaffordable for many and there is a significant need for multiple types of housing provision.” [Emphasis Added]  2.4.2 The Vision lacks a clear commitment to tacking this affordability problem through boosting the supply of affordable homes and housing more generally. As set out below, the Plan’s housing requirement in addition to not meeting all of Derby’s unmet needs with the Plan period, will also not be sufficient to secure delivery of sufficient affordable homes to meet objectively assessed needs.  2.4.3 For the reasons set out below, the Plan’s housing requirement of 14,483 will be insufficient to support an ambitious economic growth strategy; will not provide enough affordable homes over the Plan period nor will it address unmet housing needs; or meet the needs of older people; or the requirements for custom and self-build housing; or provide sufficient specialist housing types and tenures. | Noted / Agree in part  The Council will amend the plan period to 2041  A housing emergency has not been declared by the Council and hence that’s why there is no reference to it. The vision supports the delivery of new homes that is better aligned to the needs of, and available to, everyone.  The housing requirement is considered further under question 4. |
| 1243226 | Marrons Planning on behalf of Redrow Homes | Marrons Planning |  |
| 1243209 | Marrons Planning on behalf of Wain Estates | Marrons Planning |  |
| 1243594 | Marrons on behalf of 2012 Partnership Homes Ltd | Marrons on behalf of 2012 Partnership Homes Ltd |  | As above with the additional paragraph below  2.4.4 As might be expected given the Plan’s restricted scope, which has predetermined the manner in which Derby’s housing needs will be addressed, there is little meaningful description within the Vision of the role and function of other settlements or categories of settlements, including the District’s larger and more sustainable villages and Swadlincote. The generalised aspirations listed for these locations do not set out the role of settlements outside of Derby within the Plan reviews’ growth strategy, which is not appropriate given the geographical scope of the Plan, which is the District of South Derbyshire. | As above.  Disagree.  The Councils Vision in relation to the other settlements within the District is reflective of the settlement hierarchy contained within the plan, the purpose of the plan to assist with meeting the unmet need of Derby and the planned growth expected across the District. |
| 1243650 | Marrons on behalf of Davidsons regarding their Melbourne Site | Marrons on behalf of Davidsons regarding their Melbourne Site |
| 1243658 | Marrons on behalf of Davidsons regarding their Newton Solney Site | Marrons on behalf of Davidsons regarding their Newton Solney Site |
| 1243202 | Marrons Planning on behalf of William Davis Homes | Marrons Planning |
| 1243213 | Marrons Planning on behalf of Northern Trust | Marrons Planning |
| 1243616 | Marrons Planning on behalf of Miller Homes | Marrons Planning |
| 1243653 | Marrons on behalf of Brackley Properties (Burnaston Cross) | Marrons on behalf of Brackley Properties (Burnaston Cross) |  | 2.4 VISION & STRATEGIC OBJECTIVES  2.4.1 The draft Vision at paragraph 3.2 is generic and not locally distinctive. It does not set out a clear framework for the spatial development of the District over the Plan period, which as we have set out above does not cover the minimum time horizon required by the NPPF. The draft Vision makes reference to the Climate Emergency declared by the Council, but does not acknowledge the need to address matters such as economic competitiveness, despite the statement in the Interim Sustainability Appraisal that in South Derbyshire:  *“South Derbyshire has a shortage of B2/B8 premises of all sizes, and of office space. Development is inhibited by rising construction costs and a shortage of readily available employment land.”*  2.4.2 The Interim Sustainability Appraisal also references a high dependence on the manufacturing industry. Despite the above, there is no clear commitment to addressing the District’s economic competitiveness and the market failure in providing sufficient levels of commercial floorspace within the Vision. There is no indication within the Plan or its evidence base how it will address the link between homes and jobs to ensure sustainable patterns of growth.  2.4.3 As might be expected from the Plan’s restricted scope, there is little meaningful description within the Vision of the role and function of other settlements or categories of settlements, including the District’s larger and more sustainable villages such as Willington. The generalised aspirations listed for these locations do not set out the role of settlements outside of Derby within the Draft Plan’s growth strategy, nor do they refer to locations which the Plan’s own evidence base acknowledges as locations critical to the District’s economic competitiveness, such as the A50 corridor. | Agree in part/ Disagree  The Council will amend the plan period to 2041  The vision includes the support for diversification of the business environment and jobs and supports its growth. The plan includes employment allocations to provide a surplus of employment land beyond the need identified in the Employment Land Review. The allocations are flexible in terms of the type of employment use and size of unit required to respond to the market.  The Councils Vision in relation to the other settlements within the District is reflective of the settlement hierarchy contained within the plan, the purpose of the plan to assist with meeting the unmet need of Derby and the planned growth expected across the District. |
| 1242570 | Nineteen47 on behalf of Hallam Land (land at Blackwell Lane) | Nineteen47 on behalf of Hallam Land (land at Blackwell Lane) | No | Notwithstanding the overarching recommendations presented herein, the principles of the overarching vision for the District are understood and broadly supported, in particular the recognised importance of new housing to address need. The updated vision seeks to address the following issues in the District.   * South Derbyshire has the fastest growing population in Derbyshire and market needs suggest that a considerable number of additional homes will be needed by 2039. * The District’s population is growing, ageing and diverse in its needs. * The cost of housing is unaffordable for many and the longer-term trend is a growing gap between average earnings and house prices. * The District will need a more diverse economic base. * The causes and effects of climate change will need to be addressed through energy and water management. * As many residents work outside the District we need to ensure there are opportunities to both live and work in the District. * Levels of deprivation and skills vary through the District with particular pockets within the Swadlincote urban area. * There is increasing pressure on existing employment sites to be developed for housing. * Three quarters of the District is in agricultural use, but farmers and those in related businesses are facing increasing pressure to consider diversification. * New development will need to be accompanied by a wide range of infrastructure, services and facilities to address future and existing deficiencies. * Swadlincote has a growing retail, leisure and commercial role but needs to attract inward investment to remain vibrant. * Public transport provision in some parts of the District, particularly in villages in and rural communities, is poor. * Local shops and services are becoming under increasing pressure in many rural communities. * The District has many historic, cultural, landscape and archaeological qualities which require protection and enhancement. * Much of the District lies within areas known to be at significant flood risk.   Specifically, the Vision seeks ‘to ensure the District's housing stock is better aligned to the needs of – and available to - everyone, irrespective of their stage of life, income, health or circumstances. This will help to meet the needs of present and future generations housing requirements’.  In order to achieve this aim, it must be acknowledged that calculations of housing need based on the standard method and even uplifted housing requirements to recognise growth aspirations and address neighbouring housing need, represents a minimum starting point for the delivery of housing.  Within this context and with the Vision’s stated aims in mind, we are concerned that a partial review of a two part Local Plan, which seeks to introduce only two large strategic housing sites on the very edge of the District, does not go far enough to achieve the Vision. The approach addresses only one element of the housing need and skews proposed allocations towards one part of the District only. The logic for this is that other areas are sufficiently addressed through existing smaller allocations within the Part 2 Local Plan. However, given the time elapsed since that plan was adopted and the potential impact of the proposed approach in skewing new development towards Derby (through the provision of serviced plots of land within a master-planned urban extension, the plan will be unlikely to address the aspirations of the Vision to tackle the above issues in the short to medium term.  In particular matters of affordability and range of suitable housing stock for all parts of the population within existing settlements will not be addressed through reliance on 1-2 urban extensions whose links with South Derbyshire are effectively severed by the A50. To the contrary, this approach is likely to be detrimental to the vitality of existing settlements.  For this reason, we object to the approach to a partial update of the Part 1 plan only and recommend that the housing target is uplifted and if necessary a wholescale review of the Local Plan is undertaken. This review should be based on a comprehensive update of the evidence base, which takes account of the needs of the District as a whole, and the potential additional needs of neighbouring authorities. | Noted / Disagree.  The housing requirement is considered further under question 4 .  The council is permitted to undertake a two-part plan process currently and this remains an effective way of planning for the District with over 1000 homes delivered each year on average for the previous five years. The Council will progress with either a Part 2 Local Plan or a full plan review very quickly after adoption of this plan. In either case it is intended to submit this Local Plan by Autumn 2025 ensuring cross boundary housing needs continue to be met in full.  The plan itself allocates housing sites and there are current commitments (planning permissions) which will deliver growth and meet needs within the rest of the District. The plan includes a settlement hierarchy which supports development at urban areas and key service villages within the settlement boundaries and in the case of exception sites adjoining settlement boundaries for urban areas. |
| 1243534 | Pegasus Group on behalf of Cameron Homes Limited-Land s of Cauldwell Road Linton | Pegasus Group |  | Chapter 3. Vision and Objectives for South Derbyshire  2.10. The Vision states that “*the strategy for growth will have delivered at least 14483 new homes between 2022 and 2039 and ensured the District's housing stock is better aligned to the needs of – and available to - everyone, irrespective of their stage of life, income, health or circumstances. This Vision sets out that this will help to meet the needs of present and future generations housing requirements*.”  2.11. This Vision is supported however, as we set out in this representation, the Plan will not provide the minimum level of need, and the Vison will not be achieved. The Council needs to reflect seriously on representations to the consultation and revise its strategy for housing provision. | Noted.    The housing requirement is considered further under question 3. |
| 1243546 | Pegasus on behalf of Cameron Homes Land at Moor Ln Aston on Trent | Pegasus on behalf of Cameron Homes Land at Moor Ln Aston on Trent |
| 1244535 | Pegasus on behalf of Harworth Group Cadley Lane | Pegasus on behalf of Harworth Group |  | 3. Vision and Objectives for South Derbyshire  2.9. The Vision states that: “*The strategy for growth will have delivered at least 14483 new homes between 2022 and 2039 and ensured the District's housing stock is better aligned to the needs of – and available to - everyone, irrespective of their stage of life, income, health or circumstances. This will help to meet the needs of present and future generations housing requirements.”*  2.10. We support the Vision to ensure the housing stock is better aligned to the needs of everyone, however there is a very significant disconnect between the Vision and spatial strategy for new homes that is set out within the Local Plan. As we set out in this representation, the Plan is not positively prepared and will not provide the minimum level of need, let alone anything more ambitious that is alluded to within the Vision.  2.11. If the Council is serious and truly committed to delivering its stated Vision, then it will take stock of this and similar representations, and revise its strategy for growth. | Noted.    The housing requirement is considered further under question 3. |
| 1243233 | Pegasus on behalf of Harworth Group Land at Site D Cadley Park | Pegasus on behalf of Harworth Group Land at Site D Cadley Park | Yes |
| 1243222 | Pegasus on behalf of Harworth Group Land at Site E Cadley Park | Pegasus on behalf of Harworth Group Land at Site E Cadley Park | Yes |
| 1243668 | rg-p on behalf of Lovell Partnerships Ltd | rg-p on behalf of Lovell Partnerships Ltd | Yes |  | Noted.  No suggested amendments to the vision. |
| 1242100 | RPS on behalf of Bellway and Clowes (Thulston Fields) | RPS on behalf of Bellway and Clowes (Thulston Fields) | No | Paragraph 22 of the NPPF requires strategic policies to look ahead a ‘minimum’ of 15 years from adoption. The plan period proposed in the LPP1 review is 2022-2039, a total of 17 years. However, the current period does not accord with national policy, and should be revisited.  According to the Environment & Development Services Committee held on 19 September 2024, the Council intend to submit the LPP1 review for examination before 30 June 2025. We are somewhat sceptical of this timeframe, given the draft LPP1 review consultation only finishes in December 2024. the Council will need to analyse the representations made on the draft LPP1. They will need to address the upcoming changes to the standard method which will lead to an increase in the housing need for the Council that hasn’t been accounted for in the LPP1 review. They will then need to make any necessary modifications to ensure the LPP1 is soundly-based and seek approval from Members for those modifications. Finally, they will need to consult on the pre-submission version (under Regulation 19), all of which must be carried out prior to submission for examination. On this basis, we would expect the final (Reg 19) version of the LPP1 to be submitted potentially before the end of 2025, with adoption sometime during 2026 or even in 2027.  In order that the LPP1 review is in accordance with national policy, the LPP1 should look ahead to 2041 as a minimum. This is at least an extra two years’ worth of growth that should be met in the LPP1 review. This is entirely possible, given the reasonable alternative site options available to meet this growth; including the Land at Thulston Fields (site ref. 046) which has been assessed as a suitable site for development and one of the few locations deemed suitable in the Derby Growth Options Study. Paragraph 15 of the NPPF make clear that plans should provide a ‘positive vision’ for the future of the area. This includes a ‘framework for meeting housing needs’. The new local plan vision states that: “*To accommodate growth, brownfield land and disused buildings will be brought back into beneficial use and major sustainable urban extensions to Derby will have been developed, providing a wide range of accommodation to meet the expanding housing needs of the City of Derby and South Derbyshire*.”  We support the overarching vision in respect of the intention to contribute towards Derby’s unmet need. However, the draft vision does not make it clear that South Derbyshire is assisting Derby in meeting the unmet needs from the City, and so is not sufficiently ‘positive’ in this regard. We suggest that this is clarified by way of appropriately worded modification inserted into the next iteration of the vision. | Noted.  The Council will amend the plan period to 2041  The vision is already ambitious to meet cross-boundary housing needs and the Council has entered into a Statament of Common Ground across the HMA and this will be updated to cater for this point. |
| 1242854 | Stantec on behalf of Caddick Land in relation to Land North of Ashby Road, Woodv | Santec on behalf of Caddick Land in relation to Land North of Ashby Road, Woodville | Yes |  | Noted.  No suggested amendments to the vision. |
| 1243556 | Stantec on behalf of Parker Strategic Land South of Mickleover | Stantec on behalf of Parker Strategic Land South of Mickleover |  | 4.2 The Council’s Vision  4.2.1 Section 3 of the Local Plan Part 1 consultation document focuses upon the vision and objectives of South Derbyshire. The vision for South Derbyshire has been updated to reflect the proposed changes to the Plan Period and general textual changes to align with policy amendments. We have the following comments to make on the updated vison.   * Housing Delivery and Unmet Need: Whilst the vision sets out the overall housing need figure between 2022 and 2039, it should also be more explicit in the critical role that South Derbyshire will play in the delivery of sustainable strategic growth, particularly in meeting the unmet need of Derby City. Further to this, the unmet need should be addressed in close proximity to the city itself. * Design: Whilst local people should have a role in shaping the new major residential urban extensions, the design also needs to be led in a robust technical way and based on professional experience of delivering high-quality development. This is critical as the Site Opportunity Review at Appendix B and the associated Technical Notes have shown at Appendices C – H for the STRA2 Site illustrative masterplan. Technical experts have been able to demonstrate that the Council’s illustrative masterplan in support of the draft policy for STRA2 falls short of realising key opportunities and outcomes across a range of different matters. This includes active travel, transport, drainage and ecology. The key to delivering the highest quality outcomes is active participation of all stakeholders in the design process supported by a robust technical evidence base, as provided by PSL through this submission. | Noted.  The vision is already ambitious to meet cross-boundary housing needs and the Council has entered into a Statament of Common Ground across the HMA and this will be updated to cater for this point.  Site specific comments relating to the strategic allocations will be considered further under question 7. |
| 1243215 | Trent and Dove Housing Association | Trent and Dove | Yes | The vision fits to the growth of the District and is linked to Derby City. It is great to see that rural areas are being included but there will be a reliance upon third parties to provide services (such as public transport) to the rural areas, and some policies might work against this provision.  For example, the affordable housing policy H21, says that rural exception sites will only be permitted where conveniently accessible from the site by means other than private car. If rural public transport is not provided in an area, an exception site might not be delivered or at least objectors can use H21 to argue against the delivery of a much-needed scheme. Villages will become ever more unviable and unsustainable if we have strict stipulations about things such as “accessible from the site by means other than private car”. These type of unnecessary stipulations will impede the development of rural exception sites. | Noted.  No suggested amendments to the vision. |
| 1242865 | Turley on behalf of Hallam Land | Turley on behalf of Hallam Land | No | 3.21 Hallam Land support the overarching principles of the emerging Vision for South Derbyshire combining “sustainable growth, renewal and opportunity”.  3.22 The specific reference to meeting the “expanding housing needs of the City of Derby and South Derbyshire” is also welcomed. However, given the strategic importance of housing delivery, it is suggested that this is included earlier in the Vision text. We comment in the following sections on the strategic growth options included in the plan and as set out in the Vision.  3.23 Opportunities for development in Key Service Villages, such as Overseal and Repton, should be encouraged in the Vision set out by the Plan, given the potential they present for improving and supporting existing facilities and services. This is supported by Paragraph 90 of the NPPF which establishes that planning policies should “recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites” (Paragraph 90, part f). Although it is noted that the Vision makes reference to the settlements of Swadlincote and Melbourne, it should make reference to other settlements, including Key Service Villages, as they provide an important function in South Derbyshire and should therefore be identified for appropriately scaled growth. | Noted  The Council vision should be read as a whole and is not ordered in priority.  The Councils Vision in relation to the other settlements within the District is reflective of the settlement hierarchy contained within the plan, the purpose of the plan to assist with meeting the unmet need of Derby and the planned growth expected across the District. |
| 1243606 | TWB Town Planning Consultants Ltd on behalf of Mr. G. Roe & Mr. J Warren | TWB Town Planning Consultants Ltd | No | The vision states it is one of “sustainable growth, renewal and opportunity” yet it lacks support for the principal settlement in terms of focusing any new housing allocations to support growth and renewal in the Swadlincote urban area. Similarly, although it refers to “living and working environments throughout the remainder of the villages and other rural parts” the vision fails to have acknowledged the potential of organic growth adjoining these settlements to meet the future housing needs of the district and local people. There is a clear over reliance on old allocations that have not delivered and creating 4500 dwellings on the edge of Derby, which although will help meet the unmet need from Derby does not benefit the wider district or help support Swadlincote, or sustain and rejuvenate the other settlements within the district. | Noted.  The purpose (and hence the focus) of the plan is to address the unmet need within the Housing Market Area arising from Derby. Swadlincote remains the principal urban area within the District within the settlement hierarchy and development within the settlement boundary is supported. Swadlincote currently has a high number of commitments and it is not considered that further allocations area required now. Should this change then the Council can address this through the Part 2 local Plan/Full Plan Review.  The Councils Vision in relation to the other settlements within the District is reflective of the settlement hierarchy contained within the plan, the purpose of the plan to assist with meeting the unmet need of Derby and the planned growth expected across the District. |
| 1243628 | Define Planning on behalf of Bloor Homes Ltd | Define Planning on behalf of Bloor Homes Ltd | Yes | The draft vision in the document builds on themes in the adopted Local Plan and sets out a strategy for growth between 2022 and 2039. It seeks to develop major sustainable urban extensions to Derby to address its unmet housing need. Whilst Bloor Homes Limited (BHL) acknowledge and support the vision to address Derby City’s unmet housing needs, this should not be solely through the allocation of sustainable urban extensions on the fringe of Derby City.  Sustainable urban extensions of the scale proposed often require long lead in times before delivery of housing begins. Therefore, the Councils vision to address the Derby City unmet need could go unrealised without a mix of sites, as required by NPPF paragraphs 60 and 69, to meet demand in the short to medium term. The vision continues to recognise that Swadlincote is South Derbyshire’s principal settlement given its sustainability, which is justified given the level of service provision and is supported.  The sustainability of settlements and their ability to assist towards meeting Derby City unmet need should be further reviewed through the evidence base work to support the Review. This should identify and assess other sites that could be allocated, such as BHL’s site ‘Land West of Castle Gresley’. Representations to this consultation, namely to question 13, set out why the site should be allocated and how it supports the vision for South Derbyshire. | Noted.  The Councils Vision in relation to the other settlements within the District is reflective of the settlement hierarchy contained within the plan, the purpose of the plan to assist with meeting the unmet need of Derby and the planned growth expected across the District.  Omission sites are considered further in question 13. |
| 1242645 | Emery Planning on behalf of Strategic Land Group Ltd | Emery Planning on behalf of Strategic Land Group Ltd | No |  | Noted.  No suggested amendments to the vision. |
| 1242408 | Lichfields (on behalf of St Philips Land Ltd) | Lichfields |  | Maybe.  St Philips considers that, overall, the Vision for what South Derbyshire will be like in 2039 is correct. St Philips supports the Councils vision of sustainable growth and welcomes the ambition to deliver new housing which meets the needs of present and future generations.  Notwithstanding the above, St Philips notes that the vision states that “the strategy for growth will have delivered at least 14,483 new homes between 2022 and 2039”. St Philips has set out concerns regarding the proposed plan period and housing provision under the response to Question 3. | Noted.  The housing requirement is considered further under question 3. |
| 1242126 | Lichfields on behalf of Goodman UK | Lichfields | Yes |  | Noted.  No suggested amendments to the vision. |
| 1243634 | Lichfields on behalf of St Modwen - Land south of Station St Castle Gresley | Lichfields on behalf of St Modwen - Land south of Station St Castle Gresley | No | St Modwen considers that the Vision for what South Derbyshire will be like in 2039 is broadly correct. St Modwen is supportive of the Council's vision of sustainable growth and also welcomes the ambition to deliver new housing to meet the needs of present and future generations.  2.2 However, St Modwen notes that the vision sets out that “the strategy for growth will have delivered at least 14,483 new homes between 2022 and 2039”. St Modwen has concerns regarding the proposed plan period and housing provision; these concerns have been outlined in further detail later within these representations | Noted.  The housing requirement is considered further under question 3. |
| 1242632 | Lichfields on behalf of St Modwen (Egginton Rd Hilton) | Lichfields on behalf of St Modwen (Egginton Rd Hilton) | No | St Modwen considers that, overall, the Vision for what South Derbyshire will be like in 2039 is correct. St Modwen supports the Council's vision of sustainable growth and welcomes the ambition to deliver new housing which meets the needs of present and future generations.  2.2 Notwithstanding the above, St Modwen notes that the vision states that “the strategy for growth will have delivered at least 14,483 new homes between 2022 and 2039”. St Modwen has set out concerns regarding the proposed plan period and housing provision in further detail below. | Noted.  The housing requirement is considered further under question 3. |
| 1248322 | Oxalis Planning on behalf of Chesshire Partnership | Oxalis Planning on behalf of Chesshire Partnership |  | We agree with the approach to delivering sustainable development, developing brownfield sites, meeting new housing need requirements, and meeting some of Derby City’s housing needs. We do not agree that the new employment land targets are ambitious, and the approach to new employment by simply ‘growing the economy’ is unspecific.  We strongly support the proposed strategic site STRA2, but do not support the proposed area of the allocation due to it excluding a parcel of land west of the Findern Interchange. | Noted.  The vision includes the support for diversification of the business environment and jobs and supports its growth. The plan includes employment allocations to provide a surplus of employment land beyond the need identified in the Employment Land Review. The allocations are flexible in terms of the type of employment use and size of unit required to respond to the market, many of which have already been granted planning permission and which are being rolled forward as part of the Local Plan Review and other unimplemented or partially implemented planning permissions. Almost all these sites are already served by necessary infrastructure. |
| **Members of the public** | | | | | |
| 1235572 | Lisa Marie Roberts |  | No | No  Mickleover has already taken more than its fair share of housing growth near the ward/city boundary. The proposed development south of Mickleover will impact on the current infrastructure which is already strained with increase traffic and facilities.  Up to 40% of the housing will be social, yet SDDC civic offices are 12 miles away in Swadlincote. This again will impact on travel arrangements.  Green space is already limited due to the housing development in the area.  Sustainability Assessment for housing and the traveller community wasn't published until after the consultation. | Noted.  Site specific comments relating to the strategic allocations have been considered further under questions 5a, 5b, 5c, 6, 7 & 8.  The housing requirement is considered further under question 3.  National Policy requires the Council to consider the significance of assets such as wildlife or heritage when determining planning applications (with the most significant being given the most protection). The Council would not be able to protect all wildlife sites from development.  The vision simply states the ambition for the District by the end of the plan period, the policies contained within the Development Plan aim to deliver the vision. Therefore issues such as climate change will be addressed through a arrange of planning policies throughout the plan and it is not considered necessary to detail these in the vision. |
| 1232861 | Jack O’Connor |  | No | Mickleover is over crowded and unacceptable to put more dwellings in place |
| 1243173 | Trevor Yeomans |  |  | 3. Secton 3 – Vision 3.1. Page19 – Paragraphs 3.2 3.1.1. The third sub-paragraph refers to delivery of 14,483 new homes within the period 2022 to 2039. I question this figure for reasons given later in this statement. |
| 1232852 | Angus Chan |  | No |  |
| 1232857 | Teri Licence |  | No | This area of Derbyshire has already taken a significant amount of development in recent years. Particularly arounf Mickleover.  The area proposed for development around the edge of Micklover is required for agricultural farming, is a needed end to the urban sprawl and a home to an abundance of nature. We have seen wildlife reduce considerably since development has occured in recent years around Mickleover.  The area in and around Mickleover have become overcrowded, congested and overpopulated. You cannot get a doctors appointment, the schools are over subscribed (John Port is verging towards dangerous in regards to student numbers) and there is no parking available at any of the village facilities.  The increase in traffic in the last 6 years has been unprecedented. The roads cannot cope. The A38 Kingsway junction and Markeaton Island requires significant upgrades prior to any further development in the area. The road conditions are also far below a safe standard and I building even more housing is going to bring the area to breaking point.  South Derbyshire should be celebrating its open green and agricultural space and not earmarking it for further housing or infrastructure development. |
| 1232863 | Lauren Ryan |  | No | Placing yet more houses on the Mickleover, derby city border is ridiculous!  Amenities are already too stretched and the road network cannot cope.  The suburb has seen so many new developments in recent years which has ruined what once was a lovely place to live.  40% social housing and a travellers site! Think I’ll start looking for somewhere else to live!! I didn’t pay a premium to live in Mickleover to be surrounded by this!  My daughter is at a nursery on Staker lane and this development makes me very nervous about sending her there if it goes ahead. |
| 1232876 | Claire Woodward |  | No | Mickleover has already taken more than its fair share of housing growth close to or on the Ward / City boundary and the area is already very busy. |
| 1232904 | Holly Robinson |  | No | Busy roads Crouded schools Mickelover has already been extended massively over the past few years and I’m sure there are still lots of available houses as it stands without ruining more Green land |
| 1232909 | Stuart Orr |  | No | Too many houses are planned adjacent to derby city boarder. Boundary should be extended for the city so the impact and any taxes etc can be accounted for by the city. |
| 1232922 | Maureen Shenton |  | No | SDDC is planning to develop an already over populated area which has neither local facilities or road links to cope. There has not been adequate consultation on the effect this will have locally. SDDC have abundant land away from the borders of Derby City Council which would be more suited to large scale development. |
| 1232937 | Margery Morgan |  | No | Already too much south Derbyshire housing development on the edge of Mickleover without any corresponding increase in services or facilities e.g. doctors surgeries and schools. |
| 1232938 | Martin Turner |  | No | It is wrong to build such a large percentage of South Derbyshires allocation of new housing on the Derby City boundary. The current estates built on the border are like completely different worlds to those inside the Derby boundary. Poor GP services, access to schools, public transport etc |
| 1232940 | Jon Arnott |  | No | Mickleover has only recently taken ~2000 new homes down one full side of the village, with nowhere near enough infrastructure to cater for the increase in population.  Local public services are creaking, a villagers ability to get a GP appointment almost impossible, traffic congestion at an all time high, local supermarket overcrowded, local schools over subscribed.  How on earth can you consider this area for more homes, and on this scale?  And then there are the commitments for gypsy pitches, 40% social housing! You will destroy a happy, thriving, peaceful community |
| 1232946 | Rosemary Whitehouse |  | No | The plan would place unacceptable strain on already stretched public services in the area eg Doctors practice plus additional problems caused by extra vehicles |
| 1232962 | Chris Munn |  | No | We don’t have the infrastructure in Mickleover to support this. The doctors, schools and facilities are already at breaking point. The road network is also far to busy at peak times |
| 1232988 | Leigh Fearon |  | No | Failure to implement sufficent infrastructures. Roads, pathways, lighting, services which are all over subscribed with constant delays and excuses. While pushing more developments only in benefit to developers. While excuses are made and often projects unfinished or sufficient quality.  Issues raised with planning by myself have been given no more than lip service and deliberate ignorance in a hope we go away and give up. From planning mistakes, incomplete kerbs, lack of bins, lack of parking causing paths to be blocked, poorly spaced social housing causing disturbances, nearly no lighting along perimeter paths which is just unsafe, unsafe access of New House Farm estate of which we’ve had a car accident amongst many others living here. Paths and fences falling away, many trees died, water works already often being opened up to unblock as unsuitable.  A 2 mile journey to get my child to nursery should not take upto 45mins along the proposed 2500house new development. Whenever the A38 has an issue the traffic chaos is horrendous, to ignore this is very deliberate and it’s concerning all documents are not for public view and issues are not addressed. Being on the boarder of Derby City is very much used as an excuse.  Housing is needed but better consideration and distribution needs to be made, infrastructure needs to be vastly improved to great space before developments. Track records do not work so far and just going around recent developments prove they are not of high quality, green space is minimal, bus routes do not exist and relay heavily on car transport. Being near an overly busy hospital and main transport hub is being underestimated. |
| 1233131 | Mariah Senaa |  | No | I do not agree with the revised vision for South Derbyshire. While it emphasises sustainable growth and improving the quality of life for residents, the proposed development near The Hollow conflicts with this vision. It threatens to harm the natural landscape, increase traffic congestion, strain infrastructure, and negatively impact the environment. The plan also fails to adequately address concerns around preserving community character and mitigating environmental risks like flooding. Overall, the development compromises the sustainability and liveability goals that the vision claims to prioritise. |
| 1233241 | Russell Licence |  | No | Current amenities and infrastructure cannot handle existing capacity.  I cannot get a doctors appointment for my child let alone an adult in Mickleover.  There are multiple brownfield sites in Derbyshire that are wasted opportunities.  The councils keep approving building on farm land. Where do you and the government expect food to be produced, green spaces to ramble and wildlife to flourish? |
| 1233313 | Rae Louis |  | No |  |
| 1233332 | Ameila Hunt |  | No | It appears you are shifting all housing etc to the outskirts of your area with the hope that other councils infrastructures will pick up the lack of schools, GPs etc. There is no real plan for how south Derbyshire is sorting out it's own infrastructure such as senior schools, GPS and dentists |
| 1233334 | Harvey Heldreich |  | No | Sddc has now far exceeded the development of its boundaries with derby city, this development with cause major issues with transport in the area, the infrastructure is already at breaking point with the development off ladybank road, and bone Hill, and Amber Valley development of radbourne Rd, not to mention the Hackwood estate, Mickleover has had more of its fair share of development, also this is tearing up greenbelt when Sddc has plenty of other brown sites closer to home prime for redevelopment. Mickleover says no. |
| 1233335 | Ian Molyneux |  | No | Mickleover already has 1000's of new houses (across the back of Ladybank, Hackwood Farm, Station Road etc in last few years). I've just been to the planning meeting at the Mickleover Court Hotel (14th Oct) and the planning officer I spoke to could not give me the number which I thought was not acceptable. The infrastructure simply cannot cope and without doubling the size of the village centre it never will be able to with this proposal. There is one road running through it's centre, very limited parking and no matter how much people are attempted to be persuaded to walk, cycle, use public transport people still drive less than a mile to Tesco's etc. That's just a fact that needs to be built into this and not circumvented by someone who has a theory that adding a walkway or a bus route will make it all OK. From what I can see there are also no plans to improve the access by road into Mickleover with Staker Lane and Haven baulk the only route into the village. It's clear that whoever came up with this plan has not studied the traffic both at school start/finish and rush hour. Staker Lane is always backed up very badly - not to mention the fact it is badly affected by flooding.  I cannot believe there are not better places around Derby/Derbyshire that could handle this better than Mickleover (which as I have said has already increased massively over the past few years with the promise of improved services that have not been delivered. |
| 1233743 | Matt Hunt |  | No | If sustainable transport was being taken seriously the Burton to Leicester railway would be funded immediately along with Stenson Fields station and pushing for electrification from Lichfield TV HL to Derby to provide sustainable frequent services for the communities.  Also the new junction for the A50 to serve the garden village should be constructed by now not still in draft plans.  People living in these areas are suffering because of the councils lack of 'just get on and do it' and instead spending millions on reviews and consultations. |
| 1233824 | AYeomans |  | No | Mickleover has had too many housing developments in recent years and the area and local community are at breaking point.  It is impossible to get a doctors appointment, therefore putting the health of local residents at risk.  Local schools are struggling to manage the needs of pupils.  The roads and infrastructure are not suitable for the current residents, yet alone suitable for more!  It is outrageous that you are proposing that 40% of the dwellings are social housing, yet the local council offices and support required by future residents is 12 miles away in Swadlincote. If there is a requirement for such significant numbers of social housing, these should be built much closer to the offices and the support services. Perhaps South Derbyshire Council could better invest the funding into supporting the existing pupils (particularly SEND pupils) in Mickleover Primaries and secondaries instead of bringing more challenges by enrolling more children.  Additionally, proposing 2500 houses is not a sustainable nor appropriate development in an area already overrun with new build developments and lack of green space. There are other, more suitable areas in South Derbyshire.  Furthermore, SDCC are rushing their plan to local plan process. The Government are currently reviewing national policy and the future of the A38 junction scheme: SDCC should have waited for clarity on both of these. |
| 1234080 | Nick Pope |  | No | Complete lack of existing infrastructure within Mickleover. New homes being built in SDDC on the edge of Mickleover boundaries but with no new school, drs or general provisions. A lack of new public transport links suggested. Already an influx of traffic through Mickleover if A38 north shuts. The area itself is prone to huge flooding and has power cable network running right above it. Disruption from future A38 plans at markeaton roundabout will mean this is truly crazy. I would be looking to sell and leave Mickleover if this is approved |
| 1234311 | Ian Fox |  | No | Regards STRA2.The area is already full and overcrowded.The existing services can not support the existing number of dwellings.Adding additional dwellings can not be accommodated without FIRSTLY, WITH NO EXSCUSE OR DELAY adding a better road system for all the area, New schools for all ages being built and places made available, New Doctor surgeries manned with additional Doctors and trained Medical personnel .More shops and supermarkets are required now additional dwellings will increase the number required. The Highways will not cope with the volume of new traffic. All the additional requirements listed above should be in place before any new dwellings are built. |
| 1234342 | Julia Bather |  | No | The area around the edge of Mickleover, Etwall and Hilton has been heavily built on over the last 5 years. There has been no investment in improved infrastructure, roads, health centers, secondary school,mobile phone signals etc. The traffic is becoming intolerable, you cannot get a dr appointment, have to call 111, John Port School causes issues in Etwall at school start , finnish times, parking is dangerous, blocking access for Emergency vehicles. No more new houses in S Derbyshire until, A38 is improved, Swarkestone Bridge is replaced and more Secondary school place where the existing new estats have been build, Dr Surgery built in either Etwall or new estate on outskirts of Mickleover |
| 1234363 | Julie Eason |  | No | I do not agree with the Mickleover plan. Not enough green space as a division on the mickleover side. Too much house building already on the mickleover boundary. Infrastructure is unable to cope with current housebuilding let alone more. Traffic queues , lack of additional Dr's Dentists. It seems that south derbyshire are shifting their responsibilities to Derby City who will pick up the fallout. Putting a travellers site there is a bit like not in my backyard. Again Derby city will have to deal with the fallout. |
| 1234532 | Michelle Garnham |  | No | Mickleover is already severely over populated for the community resources (schools, GPs etc.) available. As someone who lives in "South Derbyshire" but is reliant on Mickleover for these services, it is abundantly clear the community cannot take further strain. You cannot get a GP nor do they want to register you because you are 100m outside of the agreed limit of Mickleover (I.e. Pastures estate). The road infrastructure for that area is also poor, Staker lane regularly floods - there is only 1 route into Mickleover from there via Staker Lane which is a junction that backs up due to the school and it being the only accessible road to Littleover without going to the hospital. The infrastructure is not there to place this volume of housing. The estate on the A516 should have brought some of these resources yet we are still to see any future out of the promised GP surgery. |
| 1235132 | Frazer Murphy |  | No | Mickleover has received so much development in recent years. As an owner of a terrace house with no drive, the increase in population in the area has had a massively negative impact on my ability to park near my own house, on top of this the traffic coming to and from Mickleover is already bad along with the constant road works, without potentially another few thousand cars on the road. it’s not just a just a green space and congestion issue, air quality is a massive concern. On top of this the police rarely patrol around Mickleover as there currently isn’t as much of a need too and also being at one of the furthest points in derby from a station - building an extra 2500 homes on the border, 1000 of which will be social housing will inevitably cause an increase in crime in the area, long story short, local infrastructure cannot handle 2500 homes being built in this proposed area. |
| 1235279 | Gerald Arthur Bowker |  | No | Mickleover has already taken more than its fair share of housing growth near the Ward/City boundary. The proposed development south of Mickleover lacks "breathing space" or green space buffer for established city communities. This proposal is not sustainable or appropriate when there is land available elsewhere in South Derbyshire. |
| 1235316 | Geoff Lewins |  | No |  |
| 1235357 | Lorna Hodgetts |  | No | No provision made for a Doctor or Dentist surgery, additional shops or schooling. The area is already overdeveloped and the road infrastructure overused with traffic queues tailong back at peak times. |
| 1235411 | Andrew Norman |  | No | Mickleover has already taken more than its fair share of housing growth near the Ward/City boundary. The proposed development south of Mickleover lacks ‘breathing space’ / green space buffer for established Derby City communities. Proposing 2,500 more homes as an urban extension to Mickleover is neither sustainable nor appropriate development, especially with ample land available elsewhere in South Derbyshire. Up to 40% of the housing will be social, yet SDDC offices are 12 miles away in Swadlincote. This housing should be closer to SDDC services. There's also no reason to place SDDC Gypsy & Traveller pitches near Derby when suitable land exists in South Derbyshire. The government is reviewing national planning policy and the future of the A38 Derby junction upgrade. SDDC should wait for clarity on both. Staker Lane is currently used extensively as a short cut between Mickleover and the A38. It is unsuitable as an access route to a large housing development. Mickleover already provides most of the public infrastructure for new developments located outside of the Derby City boundary and has its own difficulties particularly with access to healthcare. This proposed development will place a further burden on overstretched infrastructure. |
| 1235713 | Rob M |  | No | I object strongly to the proposed development around the Mickleover area. The Mickleover area is already crowded, busy and lacking in amenities. It does not have the necessary transport infrastructure to support more residents nearby, nor does it have enough schools, doctor's surgeries, dentists, or even shops to cope with existing residents, thanks to extensive developments over recent decades which have not addressed these issues. The proposed development would site those accessing social housing and gypsy and traveller pitches a long distance away from SDDC offices in Swadlincote, which would be inconvenient and troublesome for these people when they need support. There is no valid reason why this development should be sited so close to Derby and Mickleover where it will have significant detrimental effects on the quality of life of people already here who have already been adversely affected by numerous house building projects. The proposed development has also not considered the sustainability and environmental aspects fully, IE there will be no "breathing space" or green space buffer for the existing communities that this will affect. There is ample land which would be better suited for this purpose elsewhere in SDDC's area. Finally, the local plan process is being rushed and the Sustainability Assessment report, critical for evaluating the impact of housing and gypsy and traveller site choices was not published until after the consultation had begun, which has undermined the entire process. This project must not go ahead. |
| 1236247 | Anthony Overton |  | No | Local roads and amenities are already strained to breaking point. Not sustainable development without at least doing the A38 junction upgrades and building more doctors, schools and supermarket. This development for south derbyshire could be built where there is more land available, and not wedged in were it is currently proposed. The social housing percentage at 40% is inappropriate and should be closer to south derbyshire services. The mickleover and littleover areas are not appropriate for gypsy pitches, nobody wants them around, move it where they can have their own space. The sustainability report is invalid as it was published before the gypsy site was included in the plan. Disgrace |
| 1236474 | Alan Dixon |  | No | Do not agree with the proposal for housing south of Mickleover Already enough new housing near Mickleover Ward/City boundary. There is plenty of land available elsewhere in South Derbyshire, and should be nearer Swadlincote because of the 40 percent of social housing. |
| 1236731 | Ewan Thompson |  | No | There is a presumption that South Derbyshire will be one of the fastest growing areas in the country. Has this been tested to verify it is actually in the best interests of the region of the country as a whole? For instance should encouragement and policies at a national level favour more development in more deprived areas? Much of the content on the local plan depends on the presumption a certain rate of development is necessary and desirable |
| 1238069 | Alan Burrell |  | No | On page 19 section 3.2 of 'The Vision' it says '. New development will reflect and reinforce the District’s many distinct landscapes and will protect the integrity of our most sensitive wildlife sites, landscapes and heritage assets.' My comment was that it is not just our most sensitive wildlife sites, but that all wildlife sites should be protected. I suggest that 'most sensitive' is removed to say that the vision is to protest the integrity of our wildlife sites. |
| 1238115 | Fiona Bevington |  | No | It is near impossible to get a doctor appointment, a specialist appointment at the nearest hospital takes months, the local schools are over subscribed - especially secondary schools, John Port is already far too big and their site must be near capacity, the local roads are gridlocked regularly and the local shops are difficult to park near at weekends (never mind Christmas). Using Staker Lane for access to such a large site is problematic as the road was never meant to take that kind of capacity, is already unsafe and frequently floods. It also gridlocks if there are problems with either the A38 or A50 (this is a regular occurrence). Ambulances will struggle to get to Royal Derby Hospital with any increase in traffic. The impact on nature will be catastrophic; there are various breeds of owls on the site, bats and badgers to name a few. South Derbyshire is yet again shouldering what should be Derby City’s responsibility (like New House Farm etc.). It feels very much like easy money; building in Mickleover to get the best profit from new housing. |
| 1238657 | Clare Wood |  | No | It does not go anywhere near far enough in the fight against climate breakdown and mitigating against the effects of climate change. Although climate change is discussed, it is not prioritised as it should be. The wrong homes are being built in the wrong places because developers are being given free rein to choose the most profitable sites, regardless of whether that increases flooding risk, carbon emissions and pollution and destroys wildlife habitats. We need to drastically reduce carbon emissions and pollution and protect nature. Building thousands of car-dependent houses on green spaces will do the exact opposite. |
| 1238942 | Mr Brian J Harrison |  | No | The land proposed on Staker Lane was originally rejected due to flooding and traffic congestion issues |
| 1240252 | Ian McHugh |  | No | The "vision" may be a commendable document, including vision statement platitudes such as  "The growth potential of Derby and these new urban extensions in particular, will have been unlocked through transport and other key infrastructure improvements." "To accommodate growth, brownfield land and disused buildings will be brought back into beneficial use" "The design of all major residential urban extensions will have been shaped by local people"  However, variations of this vision have been promoted in previous Local Plans, and sadly the implementation of road, health, education, cultural infrastructure improvements have not lived up to the "vision". As such the Vision statement is not credible.  Therefore the DLP P1 review "vision" is flawed due to 1) Not acknowledging or addressing past infrastructure delivery leading to a backlog of outstanding issues to be resolved prior to moving forwards. 2) No synchronised "vision". The other HMA participants have not published reviews at this time. 3) Mistimed due to the impending Government changes to NPPF |
| 1240863 | Amardeep Bhopal |  | No | The Mickleover area of Derby has seen extensive housing developments built over the last few years. This has come at the detriment of the local services and transport links. Repeated commitments to building additional essential services as schools and GPs surgeries have been withdrawn. There is nothing about this development which will be any different based on previous developments. The local road network has not been improved and we're already seeing traffic congestion on staker lane which will only be exacerbated further with this development.  Furthermore more, South Derbyshire are building housing miles away from the local office. Clearly this is being done so Derby city have to pick up bill for servicing these new house owners.  Any traveller sites or local housing should be built near the South Derbyshire offices and not in Mickleover miles away from staff who would be able to help these people. |
| 1240880 | Rebecca Buckley |  | No | Are more doctors and dentists going to be built with quicker appointments available?  Are more and quicker appointments going to be available at the Derby Royal hospital?  Are more schools going to be built, both infant, junior and senior?  Can the roads around Mickleover and Littleover cope with a new estate? They can't cope with the amount of traffic now, with constant queues/tailbacks at rush hour/school times/if the A38 is blocked.  Are more bus routes going to be available and actually running or is extra parking going to be made around the shops in Mickleover?  Serious consideration needs to be done around the infrastructures already in place, as to how much more traffic/ people it can take.  With regards to the traveller site, fly tipping, anti social behaviour and general security will be compromised. Will they be paying council tax, like the employed hard working residents of Mickleover and Littleover? |
| 1241058 | Stephen Alcock |  | No |  |
| 1241240 | Jonathan Watson |  | No | Mickleover has already taken more than its fair share of housing growth near the Ward/City boundary. The proposed development south of Mickleover lacks ‘breathing space’ / green space buffer for established Derby City communities.  Proposing 2,500 more homes as an urban extension to Mickleover is neither sustainable nor appropriate development, especially with ample land available elsewhere in South Derbyshire.  Up to 40% of the housing will be social, yet SDDC offices are 12 miles away in Swadlincote. This housing should be closer to SDDC services. There's also no reason to place SDDC Gypsy & Traveller pitches near Derby when suitable land exists in South Derbyshire.  SDDC is rushing the local plan process. The government is reviewing national planning policy and the future of the A38 Derby junction upgrade. SDDC should have waited for clarity on both.  The Sustainability Assessment Report, critical for validating housing and traveller site choices, wasn't published until after the consultation began, which undermines the process.  The new plans don't include any form of sustainable transport, e.g. for cycling. Staker lane is already dangerous, any new development must make cycling these areas easier, the best solution being, suitable off-road cycle paths to encourage this sustainable travel.  There is not enough thought given to the needs of a new community, Doctors, shops, schools, dentists etc. They will just become a burden on already stretched services. The track record is not good, lots of things were planned for the Cotchett village site, but none have happened. |
| 1241682 | Sue Glover |  | No | I feel that Mickleover has had more than it's fair share of development over the last few years. The infrastructure can not cope with any extra pressure/burdens ie Doctors surgeries, schools, roads, shops, local parking etc. The local roads are a lot busier than they used to be. |
| 1241773 | Joanna Ayres |  | No | I do not agree that South Derbyshire DC needs to accommodate 5609 dwellings to meet Derby City Council's "unmet need" and concentrate all the development on Derby City's border. I pay my Council Tax to Derby City Council and I expect that Council to have control over where housing developments are sited and that they benefit the local area of Mickleover without turning it into a concrete jungle. |
| 1241860 | Innes Mary |  | No | Too many houses being built in Mickleover with no increase in infrastructure. Traffic is unbearable with jams throughout the village, although it is no longer a village. I have no objection to council houses as they are definitely needed. However I don't think that a travellers pitch should be within residential housing. |
| 1241873 | Hilary Lomas |  | No | I am particularly troubled by the proposed 2500 houses etc around Staker Lane. The infrastructure is not there to accommodate this amount of dwellings and it will be Derby that will suffer not South Derbyshire. Traffic is already at gridlock in rush hour. Schools , doctors and dentists are full to bursting for existing residents. |
| 1241910 | Nigel Bentley |  | No | The ‘vision’ as it specifically relates to the areas bordering Chellaston & Mickleover is absolutely nothing to do with South Derbyshire in the broader sense….. both areas are too remote from the SDDC heartland to be considered true parts of South Derbyshire - most potential residents will in all likelihood identify with Derby City instead. |
| 1241947 | Sarah Glover |  | No |  |
| 1241955 | David Stockwell |  | No | The VISION states : The growth potential of Derby and these new urban extensions in particular, will have been unlocked through transport and other key infrastructure improvements.  There is no evidence that these infrastructure improvements will take place, infact the Government has declined to fund such improvements |
| 1241973 | Graham Keith Sanders |  | No | Infrastructure (Doctors,Shops,Schools,Roads,Utilities) will not cope ! Councils inability to fulfill obligations (Refuse,Drains,Paths,Roads,Trees,Grass cutting) |
| 1241985 | Shirley Jackson |  | No | Massive influx of individuals, with No new infrastructure to accommodate them. There is currently pressure on GP services with frequent posts/complaints that existing residents cannot get appointments. The schools are equally full. Can't also see how the current roads can take upto a further 3000-5000 cars. Poorly thought out scheme, the numbers are massive. Think it through with your little grey cell pleas |
| 1241989 | R Coxon |  | No | There are bot enough service provisions to cater for the current housing within Mickleover. Namely schools and GP surgeries. Despite the number of developments over the past few years, there have been no additional services provided and this development will contribute to the problem. Traffic congestion is already an issue around the site, and this development will contribute to further decline of this. |
| 1241995 | Donna Shacklock |  | No | I oppose the decisions to build backing on to the greenfield surrounding Mickleover! |
| 1242063 | Laura Massey-Pugh |  | No | The expansion of the housing in Mickleover has been supported by an expansion local services. Doctors surgery's are overwhelmed causing welfare and safety issues for the residents who are unable to get appointments and provision has nor been made for the house already and currently being built. The greenfield location is a poor choice not just from an environmental point of view (we have owls and rare species of birds living in the green space which would be destroyed behind us) but also for the new residents: there are just not the facilities to support the groups proposed, especially travellers who will have more complex socioeconomic needs. The loss of another farm which is a part of the local community with a farm shop etc is a travesty. The traffic infrastructure is not sufficient and more accidents and fatalities will happen due to the overloading of traffic networks, provision for active travel is minimal enough already and increasing traffic volume will restrict this further. I'm sure the homes will sell but the financial costs of the problems caused and long lasting repercussions will be irreversible. |
| 1242108 | Chris Wilson |  | No | Mickleover has had far more than its fair share of new housing over the last 25 years. It is as if you are trying to create a new town. Urban sprawl is happening here at an alarming rate. Promised infrastructure, schools, medical centres (can’t get doctors appointments now. Not enough doctors to fill surgeries.) The inclusion of a permanent gypsy site is laughable. We pay extortionate amounts of council tax already - is this now going fund the gypsy site who will not be paying anything for services. The permanent sites at Church Broughton and Hilton have caused issues for residents and local businesses - The Sunar Gow has stopped serving alcohol due to trouble caused by gypsies, impacting their business and enjoyment for others. Where we lived previously and gypsies moved in, we had things stolen from our doorstep including a car (later found on a gypsy site smashed to pieces. The police were powerless to charge the culprits). What effect is this going to have on local residents. There is planning in progress for hundreds more houses over A516 where traffic is already an issue. There seems to be some collusion between Derby City Council and South Derbyshire Council that is ignoring the needs of the community. Mickleover was a very pleasant place to live hence our high council tax bills. Not so nice now. |
| 1242119 | George Selby |  | No | It is irresponsible to persistently build on the edge of your jurisdiction. Placing undue pressure on facilities for which you are not primarily responsible.  As a public authority it reflects poorly on you to prosecute your plans with this so transparent to see. |
| 1242130 | Samantha Furniss |  | No | The proposed site is barely in South Derbyshire. |
| 1242135 | Matt Coxon |  | No | Mickleover has had many developments created over the last few years with more already coming. There is already a development falling under SDC which is on the A516. This is far away from any other SDC facilities so the residents use DCC provided services.  There has been a huge influx of social housing on each development as it is which has bought a steep rise in anti-social behaviour in the local area. some of the families located into these are from far away and so don't care about the local community or maintaining it. A traveller site would bring even more, not necessarily from its occupants but when others come to visit/ stay as witnessed on other places. The huge increase in local traffic is also a concern with routes in and out of Mickleover now becoming already swolen and bottlenecked.  The safety and wellbeing of the people who already occupy this are should be the first priority when planning these new developments. NOT dragging the area down with huge social housing clusters and traveller sites. TERRIBLE IDEA.  This new section of development is also under a different council to Mickleover. This would mean that people from the new estates would be using the Derby City councils facilities such as doctors and the local schools which are already at breaking point. |
| 1242138 | Tiran Sahota |  | No | I feel that the areas highlighted in this review have already had enough new housing built. We can't continue building on green belt land in areas where the services are already significantly overwhelmed. |
| 1242325 | Tracy and Gordon Harrison |  | No | On Page 19 & 20 of the plan its stated – “The Council has declared an Ecological Emergency and a Climate Emergency and made a commitment to work to achieve carbon neutrality before the Government target of 2050.” There are areas that I mention later from the MAGIC map (attached) and mentioned on other documents adjacent to Staker Lane that are Countryside Stewardship (middle tier). It’s confusing that you’ve declared an emergency and then propose building on these (protected?) areas. Surely, you’d want to consolidate ecological gains and improve upon them? Isn’t that the vision?  Redeveloping existing built on areas are mentioned – “To accommodate growth, brownfield land and disused buildings will be brought back into beneficial use” There are two notable failures of this in the local area, I’m sure there are others, but I’ll detail these two later.  It's also stated – “In tandem, the rich heritage, historic assets and distinctive character of our towns, villages and hamlets will continue to be respected and enhanced.” With respect to STRA2: Land south of Mickleover I don’t see how building houses etc all around will respect or enhance the character of Mickleover Country Park. We bought our house there in 1999 and liked when we bought (and still enjoy) the semi-rural nature of where we live. If houses are built around with shops etc then it’ll just get swallowed up and become just another characterless estate of Derby. |
| 1242367 | Grace McCullouch |  | No | There is a presumption that South Derbyshire will be one of the fastest growing areas in the country. Has this been tested to verify it is actually in the best interests of the region of the country as a whole? For instance should encouragement and policies at a national level favour more development in more deprived areas? Much of the content on the local plan depends on the presumption a certain rate of development is necessary and desirable |
| 1242574 | Christian Murray-Leslie |  | No | Doesn't address Climate Emergency. Please general comment. |
| 1243552 | Jim Froggatt |  | No | It’s far too long for a vision. Almost everyone will find some detail that they don’t agree with |
| 1243592 | Christine Allen |  | No | My two or perhaps three main issues are flooding transport network, especially from the railway hub at Egginton Chellaston and Swarkestone Bridge at peak times are almost at a standstill. |
| 1233359 | Sukhdev Bangar |  | Yes | Agree there needs to better use of brownfield land however these need to selected based on those that will have maximum economical benefit and minimal negative impact to existing residents (overcrowding, removal of green spaces and increased traffic in already congested roads). Bringing back to life of dis-used building not improves the area it also retains the character of these buildings |
| 1239219 | Anne Heathcote |  | Yes | In principle, I agree with the proposed future for the area, but I have concerns about our infrastructure, and the impact of the proposed developments without the appropriate sewers, roads, medical facilities, etc. These should be available before the housing and industrial facilities are etc are built. |
| 1239872 | Daniel Robertson |  | Yes |  |
| 1241473 | Amy Simes |  | Yes | We support STRA 2: Draft Land South of Mickleover Mixed Use Allocation |
| 1241956 | Andrew Lee |  | Yes |  |
| 1242052 | Susan Marshall |  | Yes | The southwards expansion of Derby shown in the plan is limited by the A50, which needs to remain as a boundary with no strategic development to the south. The sections on the villages in the Trent Valley is welcome, provided the vision translates into reality. |
| 1243600 | Geoffrey Tubey |  | Yes | Skilled and diverse workforce needs opportunities, mental and physical welfare must be protected along with environment.  Green spaces and farming land must be untouched. Flooding will be reduced by keeping green open spaces. |
| 1240150 | Ian Turner | - | Yes |  |
| 1241749 | Mark Hoptroff | N/A | No | I live on Staker Lane and the plan with respect to the 2500 houses to the South of Mickleover only takes into account residents of Burnaston and the Pastures estate and does not have any regard for the actual residents of Staker Lane. There is no consideration as to what effect this will have on the road going into Mickleover, especially at the top of Havenbaulk Lane that already cannot cope with the traffic due to the proximity of the school at the top of the road. unless cooperation with Derby City Council is achieved there is no possible way this development can go ahead. |
| 1241987 | Patrick Munro | N/A | No | There's already been a lot of development (and it continues) to the west of Derby around Mickleover and Mackworth. There's been very little investment infrastructure aside from one primary school. The roads are a nightmare. As a family we used to enjoy walking to Mickleover village shops to do our errands on the weekend. We can no longer do that due to the volume of traffic. It feels unsafe, you can taste the traffic fumes. There's been no investment in sustainable transport solutions, so unsurprisingly, all the people in the new developments jump in their cars and drive to Mickleover to do their groceries. Enough is enough. |
| 1242116 | Jonathan Nutman | N/A | Yes | Reluctant 'Yes' as I believe much of the development (particularly housing) is likely to be in vast housing estates with very few (if any) local amenities and encouraging dependance on the car |
| 1241975 | Paul Hopkin | None | No | SDDC have already built on green space land adjacent to Mickleover without any meaningful contribution towards the infrastructure of the village. This has lead to excessive traffic and an unacceptable strain on local resources. You have plenty of land elsewhere in your area but are just trying to minimise your costs whilst maximising council tax revenues. |
| 1242055 | Mr Eddie Pickering | resident | Yes | Yes we agree with the focus on providing homes for everyone irrespective of their stage of life, income, health or circumstances. This will help to meet the needs of present and future generations housing requirements. |
| 1236005 | Richard Larder | Retired | No | Mickleover has seen too much in the way of housing development in recent years and the existing infrastructure such as roads , schools, GP surgeries , water , sewage and power supplies are under intolerable strain and in my view the prospective plans should be cancelled immediately. |
| 1241890 | Edward Stupple | Retired | No | Derby is set to expand at an unsustainable rate in the area around Mickleover, The thousands of houses built on the boundary of Mickleover a in recent years have not been provided with the necessary road improvements, extra doctors surgeries, dentists, schools provision, bus routes which were promised as part of the previous planning permissions granted. This Draft Local Plan will compromise the existing aleady over-stretched facilities and infrastructure. The traveller and gypsy sites proposed are disconnected from South Derbyshire services (12 miles away!) and identity and therefore places over reliance on Derby City services. This is impossible to properly assess because there is no detail provided. Social and affordable housing should be placed closer to Swadlincote where access to SDDC services will be much more accessible |
| 1232906 | Steve Wilson | Home owner | No | Mickleover & Littleover have so much new housing, it can't cope with much more let along another 2,500. |
| 1241896 | Margaret Holmes | I do not represent an organisation but own land together with my brother Mr Richard Holmes |  | Largely, yes. It is important that the rural communities are recognised and valued in order to minimise feelings of isolation that some of those people might experience. That improved transport links might be able to play an important part in this in many and sometimes unforeseen ways - visits, health appointments, work, just the possibility of meeting other people on that transport etc. Encouragement to develop small businesses, diversification and the possibility of encouraging the re-use of buildings that are not in use for whatever reason can only have a positive impact HS1 seems to have a positive approach to village environs |
| 1241993 | Alan Mercer Jones | Individual | Yes | Yes but the response envisaged in the Draft Plan to the climate and ecological emergencies declared by the Council is limited and reactive rather than looking for opportunities deal with these issues. |
| 1241686 | John Moore | John Moore | No | STRA2 is too big and unbalanced. Local infrastructure is already stressed to the limit following years of constant and continuing development. Transport capacity is full and unable to cope with this level of further development. This is an unsustainable development which uses up irreversible greenfield land. |
| 1241986 | Andrea Thompson | Local resident | No | . Over populated . Lack of amenities and infrastructure . Increase calls for service with the emergency services . Major disruption during construction to already busy roads. . Disruption of rural nature . Floods already causing issues . Environment disaster . Local residents around this area will suffer a reduction in house prices next door to a travellers site. . More ASB and environmental issues with having a travellers site, exactly as to this occurring elsewhere in Derbyshire |

# Qu. 2: Do you agree with South Derbyshire’s Objectives?

|  |  |
| --- | --- |
| Duty to Cooperate Body / Statutory Consultee |  |
| National Organisation |  |
| Regional Organisation |  |
| Parish Council and other Community Group |  |
| Councillor |  |
| Landowner or Developer |  |
| Members of the public |  |

| **Response Id** | **Name** | **Organisation** | **Do you agree with South Derbyshire’s Objectives?** | **Comment** | **Council Response** |
| --- | --- | --- | --- | --- | --- |
| **Duty to Cooperate Body / Statutory Consultee** | | | | | |
| 1244753 | Canal and River Trust | Canal and River Trust |  | Chapter 3: Vision and Objectives for South Derbyshire Within South Derbyshire, the Trust owns, operates and is Navigation Authority for some 25km of the Trent & Mersey Canal and 2.5km of the Navigable Upper Trent. The Trust considers that the canal network within South Derbyshire has the potential to contribute positively towards delivering many of the aims set out in the strategic objectives identified in parga. 3.3 of the Plam, in particular, objectives 3,5, 7,8, 9,10.  The canal network is a multi-functional resources which can help to stimulate regional, sub-regional and local economics and can be used successfully as a tool in improving community health and wellbeing; in attracting and generating investment; in place making and place-shaping; and in the delivering wider public benefit. Inland waterways are acknowledged as significant green infrastructure, but they also function as blue infrastructure, serving as a catalyst for regeneration, a sustainable travel resources for commuting and leisure, a natural health service action as blue gyms and supporting physical and healthy outdoor activity an ecological and biodiversity resource; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape; a contributor to water supply and transfer, drainage and flood management, The waterway network also forms part of the historic environment, character, cultural and social focus of South Derbyshire. | Noted.  No suggested amendments to the objectives. |
| 1243623 | Derbyshire County Council | Derbyshire County Council |  | The County Council recognises that the objectives of the plan are primarily around strategic provision of additional housing and employment locations and that standards for housing are covered through the NPPF and therefore outside of the scope of the local plan. However, the scale of development proposed and the subsequent additional demand for energy and materials means that it is vital to ensure that these are planned and delivered in the most environmentally efficient way, and maximising interlinkages such as active travel. It is therefore good to see that these elements are referenced throughout. The plan makes good reference to climate mitigation and adaptation throughout. However, although flooding is referenced extensively, there are less references to adapting to high temperatures and over-heating except in the domestic context. The inclusion of climate mitigation / adaptation and sustainable living, working and transport within the objectives are welcomed. | Noted.  No suggested amendments to the objectives. |
| 1243661 | Derbyshire County Council Adult Health and Social Care | Derbyshire County Council Adult Health and Social Care | Yes |  | Noted.  No suggested amendments to the objectives. |
| 1243580 | Historic England | Historic England |  | Strategic Objective 9, we would support having a separate objective for heritage and the natural environment as their needs and solutions are not always compatible with one another | Noted.  The objective of protecting heritage and the natural environment is clear and would not be enhanced with a re-wording as requested. |
| 1242867 | Natural England | Natural England | No | Whilst Natural England generally agree with the objectives, we suggest that the need to connect habitats and contribute to the wider Nature Recovery Network should also be included within objective 9 e.g. “"Protection and enhancement of the natural environment making connections between natural habitats to contribute to the wider Nature Recovery Network.” | Agree.  The Council will amend the objectives to include reference to the wider Nature Recovery Network. |
| 1243643 | Sport England | Sport England |  | Sport England welcome and support the inclusion of strategic objectives 5, 7, 8 and 12. Again, in accordance with Section 8 of the NPPF, in particular paragraph 97 Sport England would welcome specific reference to ‘sports and physical recreation’ within the strategic objectives, which would in turn would emphasise their importance in improving the physical and mental health of the district, supporting the economy, reconnecting communities and rebuilding a stronger society for all | Agree.  The Council will include reference to ‘sports and physical recreation’ in the objectives. |
| **National Organisation** | | | | | |
| 1235628 | Simon Richards | British Horse Society | No | I wish to see more reference to Active travel which includes equestrians. | Agree.  The Council will include reference to ‘active travel’ in the objectives. |
| 1243542 | Home Builders Federation (HBF) | Home Builders Federation (HBF) |  | HBF would request that the Council considers the standard method calculations as only the minimum starting point and fully considers all of the issues that may result in a need for a higher housing requirement. This includes the need to provide a range and choice of sites, the need for flexibility, viability considerations and whether higher levels of open-market housing are required in order to secure increased delivery of affordable housing. It is not just the unmet needs of Derby that may require the housing number to be increased.  HBF considers that it is appropriate for the Council to identify housing, and the maintenance of the five-year supply as an objective for the Plan. | Noted/Disagree.  The Housing Requirement is considered further under question 3.  It is not considered necessary for the Council to include a specific requirement relating to the five-year land supply in the plan as this is a requirement of National policy which the Local Plan does not need to duplicate. |
| **Regional Organisation** | | | | | |
| 1242640 | Derbyshire Association of Local Councils | Derbyshire Association of Local Councils | Yes | Yes in principle | Noted.  No suggested amendments to the objectives. |
| **Parish Council and other Community Group** | | | | | |
| 1240947 | Barrow Upon Trent Parish Council | Barrow upon Trent Parish Council | Yes | All of the objectives would be difficult to disagree with, if Question 1 is addressed in full as indicated. | Noted.  No suggested amendments to the objectives. |
| 1239943 | Castle Gresley Parish Council | Castle Gresley Parish Council | Yes | The objectives are positive and if followed would provide developement appropriate to the local area, considering current infrastructure and new requirements to fully support new and current residents. | Noted.  No suggested amendments to the objectives. |
| 1242585 | Egginton Parish Council | Egginton Parish Council |  | The PC agrees in part but with reservations concerning excessive development around Mickleover, as described above and in relation to Q7. Also, the District floods unsustainably and the objectives should recognise this to meet sustainability criteria. Flooding is not mentioned in the objectives. There should be an emphasis on blue as well as green infrastructure | Agree.  The Council will include reference to flood risk and blue infrastructure in the objectives. |
| 1244412 | Etwall Parish Council | Etwall Parish Council | Yes | Whilst in agreement with the objectives, we are concerned that point 13 does not discourage excessive development on the border with Derby due to Derby’s inability to meet its needs. | Noted.  Objective 13 relates to the need to work with neighbouring authorities (as required by the Duty to Cooperate) rather than the location of new development. |
| 1238750 | Hilton Parish Council | Hilton Parish Council | Yes | But an objective on protecting good agricultural land needs to be added | Agree.  The Council will include reference to protecting the Best and Most Versatile Agricultural Land. |
| 1243158 | Melbourne Civic Society | Melbourne Civic Society | No | Nothing about the importance of agriculture in terms of both food production and the £150bn contrition to the Economy and also its contribution to the landscape and well being. Mention of green corridors is all very well but the setting of our housing greatly depends upon the character of the countryside which surrounds it. This is more important than planting trees to vainly try to prevent climate change | Noted.  Objective 3 does not seek to identify certain types of employment, simply support economic growth and resilience. It is not therefore considered necessary to reference agriculture here.  It is considered that objective 9 sets the clear aim for the plan in respect of balancing natural assets with development pressures faced by the District. |
| 1241376 | Rosliston Parish Council | Rosliston Parish Council | Yes | In principal yes. | Noted.  No suggested amendments to the objectives. |
| 1243603 | SAVE (Save Aston & Weston Village Environment) | SAVE Aston and Weston Residents Group | Yes | The Vision and Objectives both mention the HMA. SAVEs view is that the HMA based on a north/south axis is wrong, as transport links are weaker in this axis and stronger on an east/west axis. The HMA should include overflow from Derby to the east and west where transport links are better. | Noted.  The Derby HMA Boundary Study confirms that the HMA is the appropriate area to plan for. |
| 1242069 | Swifts Local Network: Swifts & Planning Group | Swifts Local Network: Swifts & Planning Group | Yes |  | Noted.  No suggested amendments to the objectives. |
| 1242402 | Weston-on-Trent Parish Council | Weston-on-Trent Parish Council | Yes | Again, this is a qualified yes, as the Objectives are also vague and open to interpretation. The Vision and Objectives both mention the HMA. Our view is that the HMA based on a north/south axis is wrong, as transport links are weaker in this axis and stronger on an east/west axis. The HMA should include overflow from Derby to the east and west where transport links are better | Noted.  The Derby HMA Boundary Study confirms that the HMA is the appropriate area to plan for. |
| **Landowner or Developer** | | | | | |
| 1243628 | Define Planning on behalf of Bloor Homes Ltd | Define Planning on behalf of Bloor Homes Ltd | Yes | The strategic objectives remain unchanged. These are broad objectives and given the narrow scope of the Review; to allocate additional sites to accommodate Derby City’s unmet need, it is appropriate to keep the same strategic objectives. However, the new Plan should be prepared afresh with the strategic objectives reviewed and reflective of the key priorities for the area moving forwards, which should include support for growth and investment directed where it is needed and it is sustainable.  ‘Land West of Castle Gresley’ would deliver against these objectives by providing a high quality and sustainable development set within a vibrant neighbourhood, providing much needed homes along with essential community services such as a primary school, community hub, retail space and public realm. It will strive towards carbon neutrality, improving biodiversity and preserving the historic character of the area. | Noted.  It is considered that the objectives do support growth and investment in a sustainable manner.  Omission sites will be considered further under question 13. |
| 1242643 | Andrew Large Surveyors Ltd & The Staunton Harold Estate | Andrew Large Surveyors Ltd & The Staunton Harold Estate | Yes |  | Noted.  No suggested amendments to the objectives. |
| 1242137 | Bellway Homes | Bellway Homes Ltd | No | Paragraph 3.33 of the draft LPP1 review says that, “…given the partial nature of this Local Plan review they remain relevant and therefore a firm basis for this amended Local Plan 1..”. As a result, the Council has decided to roll forward the plan objectives from the adopted LPP1 without any proposed modifications or updates.  Objective 12 proposes: “To enhance and develop the role of Swadlincote town centre and its wider urban area as a focus for living, working, shopping and leisure” (emphasis)  We broadly support in principle this overarching plan objective and the wider aspirations for Swadlincote. Swadlincote remains the principle settlement in the settlement hierarchy and the primary foci for growth in the future. It is important that the LPP1 review plans effectively for the future needs of Swadlincote over the new plan period (to 2039 at the earliest). The inclusion of this specific plan objective that recognises the future needs of Swadlincote town is clearly justified and so must be delivered.  However, the draft LPP1 review is not adequately insufficiently aligned with the plan objectives (and thus the vision) which plans to ‘enhance and develop the role of Swadlincote and its wider urban area for living…’ as it does not present any updated strategy to enable any such enhancement or development (for those living in Swadlincote) to 2039 (at the earliest) in line with the objective beyond that which is achievable on the existing plan allocations which should be delivered by 2028, which is the end date of the adopted LPP1 and LPP2. As highlighted in our response to the two-stage plan review process under Policy REV1, the Council proposes to delay the update to the planning framework for Swadlincote for at least the next five years.  Consequently, the draft LPP1 review would fail to achieve its objectives and should be modified so that is plans effectively for the future of Swadlincote up to 2039 (we say 2041) in line with objective 12; this includes identifying and allocating sufficient land to meet the housing needs of the District in full. | Disagree.  Objective 12 will be delivered through policies in the plan including the settlement hierarchy which supports residential development within the settlement boundary of Swadlincote. There are significant existing commitments within Swadlincote and any further requirements will be of small scale which can be delivered as part of a future Part 2 Local Plan/full plan review. |
| 1242615 | Carney Sweeney on behalf of Peveril Homes Ltd and Kingsmere Holdings Ltd | Carney Sweeney on behalf of Peveril Homes Ltd and Kingsmere Holdings Ltd | Yes | At this stage, we have no specific comments on the Strategic Objectives but may wish to comment during the course of any subsequent consultation stages. | Noted.  No suggested amendments to the objectives. |
| 1243582 | CBRE Ltd on behalf of Land Project UK (LPUK) | CBRE Ltd | No | No. As set out in our response to Question 1, we would request that specific reference is made to “employment” or “Freight and Logistics” within the emerging Local Plan’s Objectives. Given the renewed emphasis from the Labour Government on this sector, we advise reference should be included.  Furthermore, we advise that the Objectives should be forward thinking and include direction around the needs of power and ecological mitigation to facilitate development. As drafted, it is unclear how the Council will seek to manage these vital components that underpin growth over the plan period. For example, will the Council seek to create Habitat Banks for Biodiversity Net Gain requirements? | Noted.  Objective 3 does not seek to identify certain types of employment, simply support economic growth and resilience. It is not therefore considered necessary to reference freight and logistics here.  The Council considers that the objectives are forward thinking and that objective 1 addresses the ambition for the plan to ensure that development is resilient to climate change. Details of the requirements are included within the policies in the plan and not within the objectives. |
| 1242112 | Cushman & Wakefield (on behalf of E.ON UK plc) | Cushman & Wakefield on behalf of E.ON UK plc | Yes |  | Noted.  No suggested amendments to the objectives. |  | Castle Gresley Parish Council | Yes | The objectives are positive and if followed would provide developement appropriate to the local area, considering current infrastructure and new requirements to fully support new and current residents. | Noted.  No suggested amendments to the objectives. |
| 1243190 | David Lock Associates on behalf of Hallam Land | David Lock Associates | No | The objectives listed are broadly supported, but there is no reference to boosting the supply of homes. This should be included as one of the highest objectives.  Please note these representations are specific to Hallam Land’s land interests at Infinity Garden Village | Noted.  Objective 4 includes reference to ‘provision for all’ and therefore it is not considered that ‘boosting the supply’ of housing is required. |
| 1242592 | Dean Lewis Estates | Dean Lewis Estates |  | 2.3.1 The Local Plan Objectives remain largely unchanged from the adopted Local Plan. As the only material change in policy relates to the strategic growth of Derby City’s unmet housing need and the redevelopment of Drakelow Power station the Objectives should be updated to deal specifically with STRA1, 2 & 3. | Disagree.  As a strategic Plan the document needs to set the Strategic vision for the whole District for the plan period. |
| 1243664 | Deloitte LLP on behalf of Church Commissioners for England | Deloitte LLP on behalf of Church Commissioners for England |  | 3.1.1. The Commissioners support the principal contents of the South Derbyshire Objectives which seeks to support a Local Plan that provides the mechanisms and policies needed to ensure that South Derbyshire continues to be an attractive district to live, visit and invest, whilst also facilitating necessary growth and development.  3.1.2. Most notably, the Commissioners support the notion of establishing an appropriate distribution for sustainable housing and economic growth in line with Objectives 1 and 6, as well as ensuring that “the District’s housing stock is decent, suitable and affordable, there is provision for all, it meets community need and is balanced with access to employment opportunities” in line with Objective 4. The Commissioners note the alignment of these Objectives with the Vision of the Local Plan, which will assist in ensuring development both the rural and urban areas of the district.  3.1.3. The Commissioners note Objectives 11 and 12 note that the Local Plan will “make optimum use of previously developed and under-used land and bring empty and derelict buildings into reuse” and “enhance and develop the role of Swadlincote town centre and its wider urban area as a focus for living, working, shopping and leisure”. However, there are no other specific reference to addressing need in other areas of the district within the Objectives. The Commissioners note the important role of the villages of South Derbyshire, particularly with respect to the historic and environmental identity of South Derbyshire as a whole, and their role in supporting diverse local communities.  3.1.4. The Commissioners consider that the Objectives should include reference to the importance of these villages in delivering much needed housing across the district, and look to note the benefits of focussing development at locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes, building on Objective 7 | Disagree.  The Council considers that objective 4 does support the Plan to meet need elsewhere in the District by stating that housing development should ‘meet its community need’. |
| 1242645 | Emery Planning on behalf of Strategic Land Group Ltd | Emery Planning on behalf of Strategic Land Group Ltd | No |  | Noted.  No suggested amendments to the objectives. |
| 1242071 | Green 4 Development | Green 4 Development | Yes | On the whole the objectives are ok but again they could be more ambitious and seek to capitalise on the freeport and housing and employment opportunities in that area. | Noted.  The objectives as a whole do not make reference to specific development opportunities as these would be addressed through the policies in the plan. Notwithstanding, this the Freeport is not a Local Plan allocation as it’s a central government initiative. |
| 1243217 | Harris Lamb on behalf of Talland Capital Ltd | Harris Lamb |  | TCL generally support the strategic objectives that have been identified particularly the need to deliver new housing stock to meet the needs of all within the community with access to employment opportunities. In addition, the need to reduce the need to travel and to encourage sustainable modes of travel providing access to jobs, shopping, leisure, services and facilities for all parts of the District are also supported | Noted.  No suggested amendments to the objectives. |
| 1243182 | Hawksmoor on behalf of I Foster | Hawksmoor | No | Given the proposed reforms under the NPPF to the Local Housing Need, as pasted below and the change in housing numbers from 507 (current method) to 606 homes (proposed method) annually, we urge the Council to consider revisions to the proposed housing need.  To address the unmet needs for Derby City plus South Derbyshire, it is recommended a full and comprehensive review is undertaken instead, to include updated housing targets over a 15 year Plan. | Noted.  No suggested amendments to the objectives.  The housing requirements are addressed in question 3.  The approach to undertaking a two part plan is considered under question 1. |
| 1242038 | Calum Reford | Inspire Design & Development | Yes |  | Noted.  No suggested amendments to the objectives. |
| 1242126 | Lichfields on behalf of Goodman UK | Lichfields | Yes |  | Noted.  No suggested amendments to the objectives. |
| 1242408 | Lichfields (on behalf of St Philips Land Ltd) | Lichfields | Yes | St Philips broadly agrees with the proposed objectives for South Derbyshire. St Philips especially welcomes objective 4, which recognises the need to “ensure the District’s housing stock is decent, suitable and affordable, there is provision for all, it meets community need and is balanced with access to employment opportunities” (emphasis added). This objective clearly aligns with the Councils vision of ensuring that local communities within South Derbyshire have sufficient access to housing which meets their needs. | Noted.  No suggested amendments to the objectives. |
| 1243634 | Lichfields on behalf of St Modwen - Land south of Station St Castle Gresley | Lichfields on behalf of St Modwen - Land south of Station St Castle Gresley | No | 2.3 St Modwen broadly agrees with the objectives for South Derbyshire. Whilst St Modwen is generally supportive of Objective 4, which recognises the need to “ensure the District’s housing stock is decent, suitable and affordable, there is provision for all, it meets community need and is balanced with access to employment opportunities”, St Modwen has some concerns in relation to the Council’s proposed housing requirement and spatial strategy.  2.4 St Modwen is concerned that the Council is not actually addressing its own indigenous housing needs by seeking to direct all new housing growth to the edge of Derby. In this regard, there is a risk that the Council’s approach will not deliver its Vision or Objectives. St Modwen has discussed this matter further in the response to draft Policy S4 (Housing Strategy). | Noted.  No suggested amendments to the objectives.  Housing requirement has been considered further under question 3. |
| 1242632 | Lichfields on behalf of St Modwen (Egginton Rd Hilton) | Lichfields on behalf of St Modwen (Egginton Rd Hilton) | No |
| 1243668 | rg-p on behalf of Lovell Partnerships Ltd | rg-p on behalf of Lovell Partnerships Ltd | Yes |  | Noted.  No suggested amendments to the objectives. |
| 1242100 | RPS on behalf of Bellway and Clowes (Thulston Fields) | RPS on behalf of Bellway and Clowes (Thulston Fields) | No | 3.6 RPS consider that objectives 3 and 4 could be more effectively worded. Both objectives relate to housing, communities, and economic growth.  RPS consider that the Council may wish to insert some additional objectives to make it more explicit for what the Plan will achieve.  RPS propose the following draft objectives:  Economic Success   * To facilitate development that focuses on improving the area's economic prosperity, delivering new jobs, retaining key employers and maximising high value employment opportunities through the right employment sites.   Housing and Communities   * To deliver sufficient new homes to meet the full needs of local communities that will help support economic growth * To provide a balanced mix of house tenures and types, including extra care provision, to satisfy the full range of housing needs and help create active / inclusive / sustainable / healthy communities and to sustain rural communities * To maximise opportunities to deliver high quality affordable housing * To allocate most development in locations where there is good access to local services and where transport choice is maximised | Noted  It is considered that objective 3 supports economic growth.  The council do not consider that the existing housing objective 4 needs to be expanded and split into additional points. The Council considers that objective 4 is succinct and in combination with the other objectives will achieve the same outcomes as the proposed objectives. |
| 1242854 | Stantec on behalf of Caddick Land in relation to Land North of Ashby Road, Woodv | Santec on behalf of Caddick Land in relation to Land North of Ashby Road, Woodville | Yes |  | Noted.  No suggested amendments to the objectives. |
| 1242865 | Turley on behalf of Hallam Land | Turley on behalf of Hallam Land | No | 3.24 Reflecting on the objectives set out at paragraph 3.3, it is noted that there is no reference to boosting the supply of homes in South Derbyshire. This is a critical requirement for any Local Plan and reflects the national agenda to significantly boost the supply of homes (Paragraph 60, NPPF). As such, this should be included as the number one objective of the emerging plan.  3.25 Second to this objective should be the coordination with the HMA on housing needs and other strategic matters. A loosely worded objective is currently included as number thirteen, on a list of thirteen objectives. Given this is directly related to housing growth and will ultimately be critical to delivering the unmet needs of Derby City, this objective should come much higher up the list of priorities and naturally follows on from the first objective to boost the supply of homes. It is also essential for the Council to demonstrate that they have met their legal Duty to Cooperate and as such, should be recognised as a high priority for the plan. | Noted.  Objective 4 includes reference to ‘provision for all’ and therefore it is not considered that ‘boosting the supply’ of housing is required.  The Council agrees that working with neighbouring authorities under the Duty to Cooperate is of key importance. However, the objectives are not listed in terms of priority and therefore it is not considered necessary to re-order them. |
| 1242570 | Nineteen47 on behalf of Hallam Land (land at Blackwell Lane) | Nineteen47 on behalf of Hallam Land (land at Blackwell Lane) | No | 3.10 The objectives set out in the plan broadly respond to the issues and resultant Vision considered in question 1. On this basis, our response to question 1 and the recommendation set, also applies to the South Derbyshire draft objectives, which should be comprehensively reconsidered as part of a new combined Local Plan | Noted.  Please see response to question 1. |
| 1243215 | Trent and Dove Housing Association | Trent and Dove | Yes | However, as a district with Urban areas growing faster than the rural parts, there is a potential that some of the objectives will work against the rural areas and perhaps need to be more rural proofed. Growth in urban areas should not be at the expense of rural areas | Noted.  The plan includes a settlement hierarchy which supports development inline with the significance/appropriateness of the place within which it is located. |
| 1248322 | Oxalis Planning on behalf of Chesshire Partnership | Oxalis Planning on behalf of Chesshire Partnership | No | We do not agree with the objectives as employment growth and development is not featured, and therefore implies that economic growth is constrained by these overarching objectives. | Disagree  Objectives 1 and 3, which do not specifically identify certain types of employment, do support economic growth and resilience. It is not therefore considered necessary to directly reference employment in the objectives. |
| **Members of the public** | | | | | |
| 1235572 | Lisa Marie Roberts |  | No | No  Mickleover has already taken more than its fair share of housing growth near the ward/city boundary. The proposed development south of Mickleover will impact on the current infrastructure which is already strained with increase traffic and facilities.  Up to 40% of the housing will be social, yet SDDC civic offices are 12 miles away in Swadlincote. This again will impact on travel arrangements.  Green space is already limited due to the housing development in the area.  Sustainability Assessment for housing and the traveller community wasn't published until after the consultation | Noted.  Site specific comments relating to the strategic allocations have been considered further under questions 5a, 5b, 5c, 6, 7 & 8.  The Plan will be accompanied by an Infrastructure Delivery Plan which will detail the infrastructure required, costings and the delivery of it. |
| 1232861 | Jack O’Connor |  | No |  |
| 1232852 | Angus Chan |  | No |  |
| 1232857 | Teri Licence |  | No | These objectives need revisiting to be aligned with the feelings of those who live there. |
| 1232863 | Lauren Ryan |  | No | It is too close to an already saturated suburb of derby city. I am sure suitable land can be found elsewhere in south Derbyshire. |
| 1232876 | Claire Woodward |  | No | Proposing 2,500 dwellings as another urban extension to Mickleover is not sustainable or appropriate development, especially when suitable and abundant land is available elsewhere in South Derbyshire. |
| 1232904 | Holly Robinson |  | No |  |
| 1241686 | John Moore | John Moore | Yes | There is always a need for well thought out and sustainable developments in order to bring prosperity to local communities. However, as already experienced in the Mickleover area, a large proportion of this South Derbyshire plan is actually totally dependant on Derby City infrastructure. |
| 1232909 | Stuart Orr |  | No | Too many houses are planned adjacent to derby city boarder. Boundary should be extended for the city so the impact and any taxes etc can be accounted for by the city. |
| 1232922 | Maureen Shenton |  | No | I agree that provision of housing including social housing is needed. I do not agree with providing such housing including social housing in areas that do not have provision and/or facilities for the residents of these properties |
| 1232937 | Margery Morgan |  | No | South Derbyshire should be building houses close to South Derbyshire facilities NOT deliberately trying to take advantage of Derby City facilities by building on the city boundaries. |
| 1232938 | Martin Turner |  | No | It is wrong to build such a large percentage of South Derbyshires allocation of new housing on the Derby City boundary. The current estates built on the border are like completely different worlds to those inside the Derby boundary. Poor GP services, access to schools, public transport etc |
| 1232940 | Jon Arnott |  | No | Build more homes? Make a contribution to plug the gap left by Derby City?  Yes - then do it in an area that hasn’t already recently seen a huge volume of new housing |
| 1232946 | Rosemary Whitehouse |  | No | Not valid objectives |
| 1232962 | Chris Munn |  | No | We do not need more housing in this area. |
| 1232988 | Leigh Fearon |  | No | See above as it’s a more general overview. But in essence SDDC haven’t shown sufficient skill in planning and also holding builders to account while ignoring the locals issues. Spread of ongoing building is very much unequal. |
| 1233131 | Mariah Senaa |  | No | I am strongly opposed to the proposed development near The Hollow, as it significantly undermines several key objectives outlined in South Derbyshire’s Local Plan. The development will disrupt the local character and natural landscape, detracting from the rural setting and harming the area’s distinct beauty. Additionally, despite the plan’s focus on sustainability, this development will contribute to increased carbon emissions, environmental degradation, and strain on local biodiversity. There is also a serious concern that the existing infrastructure—such as transport, schools, and healthcare—will be unable to support the increased population, leading to overcrowding and congestion. The plan claims to reduce travel and promote sustainable transport, yet this development will likely result in increased traffic and noise, making The Hollow less safe and less peaceful. Furthermore, there is a heightened risk of flooding in the area, which may worsen with additional construction. Overall, this development threatens to erode community cohesion, increase environmental risks, and create an overdeveloped area that detracts from the quality of life for existing and future residents. |
| 1233241 | Russell Licence |  | No | I disagree entirely with the objectives to build more houses on green belt land.  I disagree with the objectives of building more houses around already over populated suburbs |
| 1233313 | Rae Louis |  | No |  |
| 1233332 | Ameila Hunt |  | No |  |
| 1233334 | Harvey Heldreich |  | No | Mickleover can't cope with the demand, where are the kids going to school? What about doctors? Their isn't scope for this development,. |
| 1233743 | Matt Hunt |  | No | Objectives are easy to write, fulffing the objectives are what matters. |
| 1233824 | AYeomans |  | No | Mickleover does not need any more housing.  It is outrageous that you are proposing that 40% of the dwellings are social housing, yet the local council offices and support required by future residents is 12 miles away in Swadlincote. If there is a requirement for such significant numbers of social housing, these should be built much closer to the offices and the support services.  Additionally, proposing 2500 houses is not a sustainable nor appropriate development in an area already overrun with new build developments and lack of green space. There are other, more suitable areas in South Derbyshire.  Furthermore, SDCC are rushing their plan to local plan process. The Government are currently reviewing national policy and the future of the A38 junction scheme: SDCC should have waited for clarity on both of these. |
| 1234080 | Nick Pope |  | No | It's complete madness |
| 1234311 | Ian Fox |  | No | The new dwellings are targeted at already over populated areas. All the new services identified in question one, need to be built and put in place before any new dwelling build commences. This should be a go / no go decision for the South Derbyshire Objectives. |
| 1234342 | Julia Bather |  | No | see above  Response to question 1: The area around the edge of Mickleover, Etwall and Hilton has been heavily built on over the last 5 years. There has been no investment in improved infrastructure, roads, health centers, secondary school,mobile phone signals etc. The traffic is becoming intolerable, you cannot get a dr appointment, have to call 111, John Port School causes issues in Etwall at school start , finnish times, parking is dangerous, blocking access for Emergency vehicles. No more new houses in S Derbyshire until, A38 is improved, Swarkestone Bridge is replaced and more Secondary school place where the existing new estats have been build, Dr Surgery built in either Etwall or new estate on outskirts of Mickleover |
| 1234363 | Julie Eason |  | No | Making out they are helping Derby is not what the local councillors feel is being done |
| 1234532 | Michelle Garnham |  | No | I agree with the green space and the vision of resources to be implemented but only if the schools and GP practice was brought forward so the infrastructure is there earlier. |
| 1235132 | Frazer Murphy |  | No | See above  (Response to Question 1: Mickleover has received so much development in recent years. As an owner of a terrace house with no drive, the increase in population in the area has had a massively negative impact on my ability to park near my own house, on top of this the traffic coming to and from Mickleover is already bad along with the constant road works, without potentially another few thousand cars on the road. it’s not just a just a green space and congestion issue, air quality is a massive concern. On top of this the police rarely patrol around Mickleover as there currently isn’t as much of a need too and also being at one of the furthest points in derby from a station - building an extra 2500 homes on the border, 1000 of which will be social housing will inevitably cause an increase in crime in the area, long story short, local infrastructure cannot handle 2500 homes being built in this proposed area.) |
| 1235279 | Gerald Arthur Bowker |  | No | SDDC is rushing the local plan process. The government is reviewing national plan process and the future of the A38 Derby junction upgrade. SDDC should wait for clarity on both. |
| 1235316 | Geoff Lewins |  | No |  |
| 1235357 | Lorna Hodgetts |  | No | Lack of foresight re the infrastructure |
| 1235411 | Andrew Norman |  | No | SDDC are using the location as an attractor to locate housing away from other areas within its boundaries. It is widely believed that ample land is available elsewhere in South Derbyshire. Up to 40% of the housing will be social, yet SDDC offices are 12 miles away in Swadlincote. This housing should be closer to SDDC services. |
| 1235713 | Rob M |  | No | This development is in no way " locally distinctive and environmentally, socially and economically sustainable". How will point 3 be enabled when adjoining, pre-existing areas such as Mickleover already lack shops, amenities and infrastructure? Point 4, the "access to employment opportunities" will be adversely affected by this development due to increased competition for jobs and current lack of businesses in the area. 5. The existing lack of employment and business in the area will lead to deprivation and likely cause some residents to become inactive, some will likely turn to crime which will adversely affect pre-exisiting communities around the area. Point 6, the lack of nearby employment prospect will mean that many people in the area will be forced to commute, placing more pressure on transport infrastructure and increasing pollution, wo is hardly "sustainable" Point 7 bears this out, since you say people people would require to travel significant distances to access support, retail, employment etc. Point 8: As I have already pointed out, the development will have signifcant adverse environmental impacts for everyone in the adjoining areas. Point 9: You are showing no respect whatsoever for the "varied character, landscape, cultural, heritage and natural environment" of the existing districts and communities adjoining this development. The remaining points are equally as specious and do not stand up to scrutiny. |
| 1236247 | Anthony Overton |  | No | Placing the burden and impact of this development on the dootstep of the derby city roads, infrastructure, services, and amenities is cynical. Why not build it closer to Swadlincote. Mickleover has seen enough housing growth |
| 1236474 | Alan Dixon |  | No | As answer 1.  Question 1: Do not agree with the proposal for housing south of Mickleover Already enough new housing near Mickleover Ward/City boundary. There is plenty of land available elsewhere in South Derbyshire, and should be nearer Swadlincote because of the 40 percent of social housing |
| 1238115 | Fiona Bevington |  | No | No clear plan on how to provide services. |
| 1238657 | Clare Wood |  | No | I do not agree that growth in South Derbyshire should be "co-ordinated with development in adjoining areas both within and outside the Derby HMA".  Mickleover has seen much more than its fair share of housing as a result of opportunistic land grabbing by developers. Much of the new housing has not sold and prices reduced, yet new homes are continuing to be built. The result of this excessive, car-dependent housing around Mickleover, which South Derbyshire will add to further, is heavily congested roads in Mickleover, particularly around rush hour and school drop-off and pick-up times, and around schools and shops; more pollution and reduced air quality; noisier roads as a result of the increased traffic; less active travel (as most of the housing requires a car to get to the nearest local amenities) which contributes to health problems and obesity and therefore impacts local GP surgeries and hospital services; fewer green spaces for people to exercise and/or to walk their dogs and less space for nature to thrive; more dangerous roads which results in fewer people feeling safe enough to walk or cycle to work/school/the shops. It is also impossible to get an appointment with a GP. The housing planned by South Derbyshire will make this even worse. |
| 1238942 | Mr Brian J Harrison |  | No | The land between Mickleover Country Park (which was a redevelopment of an existing site) and Littleover was removed from the original local plan. The land on the boundary of the A516 / Mickleover village boundary was developed instead. |
| 1240252 | Ian McHugh |  | No | Similar to "vision" answers, at face value the Objectives may be sound. However they are based on repeating previous missteps. The implementation of promises of road, health, education, cultural infrastructure improvements have not lived been delivered/been watered down.  The DLP P1 review objectives are flawed due to 1) Not acknowledging or addressing past infrastructure delivery leading to a backlog of outstanding issues to be resolved prior to moving forwards. 2) Not synchronised with the other HMA participants - AVBC/DCC have not published reviews at this time. 3) Mistimed due to the impending Government changes to NPPF |
| 1240863 | Amardeep Bhopal |  | No | There is plenty of land closer to your offices. Why are you choosing specifically to use the derby housing need as a way building near the city in an area of Derby which has already seen extensive housing developments which have not seen any improvements to the local infrastructure. |
| 1240880 | Rebecca Buckley |  | No | It's all about money and not people |
| 1241240 | Jonathan Watson |  | No | The broad objectives and principles are ok, it is just the effective implementation is nigh on impossible, hence these objectives need to be changed from broad words into effective actions. We can't do everything, so pick the important ones and explain why. |
| 1241682 | Sue Glover |  | No | 2,500 dwellings is a hell of a lot to stick on the edge of Mickleover an already burgeoning suburb of Derby. Locally we have had enough. |
| 1241773 | Joanna Ayres |  | No | SDDC have plenty of land to accommodate all this development. It is just easier for them to site housing developments away from their centres of population so that they do not have to deal with objections from their own residents. |
| 1241860 | Innes Mary |  | No | For the reasons given above. |
| 1241873 | Hilary Lomas |  | No | Why consider this development so close to Derby impacting on the city and it’s suburbs rather than in less developed areas in South Derbyshire? |
| 1241910 | Nigel Bentley |  | No | It is absolutely plain to see, insofar as the Chellaston & Mickleover draft plan proposals are concerned, that SDDC is seeking to maximise it’s revenue streams via council tax whilst having minimal outlay on provision and maintenance of the supporting infrastructure required for these developments. |
| 1241955 | David Stockwell |  | No | I agree that increased housing is important and there are Government targets to meet but I don't believe the "South of Mickleover Mixed Use Allocation" is an appropriate site as it is at risk of flooding  2.17 Several major watercourses cross the District including the Rivers Trent, Dove, Mease and Derwent and the Trent and Mersey Canal, with approximately one fifth of the land area is within areas at risk of flooding.  The errors in these statements show the rushed and ill-conceived nature of the Plan.... 2.5 The right amount and types of housing will need to be provided in the future to meet people’s House prices remain unaffordable for many in the District and recent house price rises are likely to increase the number of people unable to afford to buy or rent a home in the District. 2.1 South Derbyshire is a rural district in central England covering an area of over 112 square miles. It adjoins and is heavily influenced by the City of Derby to the north, Burton upon Trent to the west and Ashby-de-la-Zouch to the The town of Swadlincote, in the south of the District, is the main urban centre with a population of around 41,800[1] . |
| 1241973 | Graham Keith Sanders |  | No | Infrastructure (Doctors,Shops,Schools,Roads,Utilities) will not cope ! Councils inability to fulfill obligations (Refuse,Drains,Paths,Roads,Trees,Grass cutting) |
| 1241985 | Shirley Jackson |  | No | Unfortunately once again it is a poorly thought out project by the planning department . Can understand the builders but not the professional planners with such short sightedness |
| 1241989 | R Coxon |  | No |  |
| 1241995 | Donna Shacklock |  | No | No consideration given to green space, infrastructure, facilities, and feelings of residents. |
| 1242063 | Laura Massey-Pugh |  | No | I do, but the actions of the council in progression the new housing propo6are contradictory and not in line with their own objectives. |
| 1242108 | Chris Wilson |  | No |  |
| 1242119 | George Selby |  | No | Apply them in the heart of South Derbyshire. |
| 1242130 | Samantha Furniss |  | No |  |
| 1242135 | Matt Coxon |  | No | Poor infrastructure, local travel links, doctors and roads should be addressed before considering adding more housing to the area.  All proposed SDC dwellings should be close enough to SDC faciities that this is the most practical use instead of leaning on all neighboring areas facilities. The dwelling boardering Mickleover is a prime example of a poor decision. |
| 1242138 | Tiran Sahota |  | No | I feel that South Derbyshire's objectives for building more housing are too focused on key areas which are in close proximately to the city of Derby. As a resident living in Stenson Fields, near where one of the housing developments is being proposed, I know how the area has already been impacted by recent developments. The roads are very congested, particularly at busy times, there is currently a four year waiting list to be seen by the local dentists. How can we continue overwhelming services which are currently overstretched? I feel that other areas in South Derbyshire should be considered for housing development, and you should consider the impact that building so many houses, in a few concentrated areas on the edge of South Derbyshire, is going to have on the local community.  You really need to consider spreading the developments out across the county because there are too many new houses being proposed near Derby city where infrastructure and services are hugely overstretched. |
| 1242325 | Tracy and Gordon Harrison |  | No | On page 21: Point 1 it states – “To ensure future development is locally distinctive and environmentally, socially and economically sustainable….” With respect to STRA2: Land south of Mickleover how does building houses etc around Mickleover Country do that? It’s already locally distinctive and building around it will detract from that.  Point 11 states – “To make optimum use of previously developed and under-used land and bring empty and derelict buildings into reuse subject to wider sustainability considerations.” I don’t believe this has been done rigorously enough nor will it in the future and will make the point later.  Point 13 states – “To ensure growth in South Derbyshire is co-ordinated with development in adjoining areas both within and outside the Derby HMA.”  I’m not sure how developing Derby into a “university” town has helped that. There has been a lot of student accommodation built in Derby along with, I’m sure, private landlords offering accommodation. There are, according to an internet search, 34,000 students. Even if 20% need accommodation that’s 6,800 people needing somewhere to live. How has that been factored in to the natural population increase and the local populations growth needs?  The answer is found on page 101 – “6.52 The LHNA does not identify a need to develop a specific policy for the housing needs of students or service personnel in the District”. Why is that ignored when it’s taking up land & housing resource? It seems at odds with Point 13 quoted? |
| 1242574 | Christian Murray-Leslie |  | No | Doesn't address necessities of the climate emergency. Please see general comment. |
| 1233335 | Ian Molyneux |  | Yes | I understand we need more housing but strongly believe it is complete madness to consider adding more houses to the Mickleover area |
| 1233359 | Sukhdev Bangar |  | Yes | Strongly agree that efforts must be made to ensure our communities continue to be safe, clean, vibrant, active and healthy. It is a major attraction for those who live in the area. |
| 1236731 | Ewan Thompson |  | Yes |  |
| 1239219 | Anne Heathcote |  | Yes | All of the objectives would be difficult to disagree with, if Question 1 is addressed as indicated. |
| 1241058 | Stephen Alcock |  | Yes | Yes but not the location. |
| 1241473 | Amy Simes |  | Yes |  |
| 1241947 | Sarah Glover |  | Yes |  |
| 1241956 | Andrew Lee |  | Yes |  |
| 1242052 | Susan Marshall |  | Yes | The Vision and Objectives both mention the HMA. SAVEs view is that the HMA based on a north/south axis is wrong, as transport links are weaker in this axis and stronger on an east/west axis. The HMA should include overflow from Derby to the east and west where transport links are better. |
| 1242367 | Grace McCullouch |  | Yes |  |
| 1243552 | Jim Froggatt |  | Yes |  |
| 1243592 | Christine Allen |  | Yes | In principle because housing is needed desperately, provided it is mainly social housing.  The roundabout at Chellaston on and from the A50 cannot sustain more traffic from the number of housing suggested. Woodville High Street cannot take more lorries from another hub. |
| 1243600 | Geoffrey Tubey |  | Yes | Central position must be utilised. Sustainable living must be achieved.  Developers must not be allowed to renege on affordable housing agreements.  Transport links must be assured. Swadlincote town centre is terrible (compared to Belper) Few shops, unsafe underfoot, very scruffy polarised by position of supermarkets very little footfall. |
| 1240150 | Ian Turner | - | Yes |  |
| 1232906 | Steve Wilson | Home owner | No | You should stop using Mickleover as a easy way to got you housing numbers up. The amount of new builds your council have build is making it very dangerous to walk around as so many cars that come with new build. |
| 1242083 | Marian Elizabeth Graves | Homeowner | No | In the Mickleover area these are not to the well being of the residents. |
| 1241896 | Margaret Holmes | I do not represent an organisation but own land together with my brother Mr Richard Holmes |  | 2.12 Agree with the vision of encouraging small businesses. The fact that transport would in most cases - especially in rural areas - be necessary and if more public transport were to be provided it would not only be of benefit to those businesses/workers but also to the rural community as a whole going some way to help with getting to health care facilities etc Workshops/premises for businesses might be provided in some part by buildings currently out of use or derelict etc Mobile coverage would also help where so often consultations take place by phone - though it should be borne in mind that not everyone has technical devices. Workshops/premises for businesses might be provided in some part by buildings Would the encouragement of growth in Swadlincote High Street rely solely on attracting well known brands |
| 1241993 | Alan Mercer Jones | Individual | Yes |  |
| 1241986 | Andrea Thompson | Local resident | No | There are so many houses being built in our village and this is becoming more over crowded by the day. It's a challenge leaving the village travelling to work and returning. Can't get appointments with our local surgeries already. More overcrowding will cause absolute chaos |
| 1241749 | Mark Hoptroff | N/A | No | Much more detail is required on the actual plans for the infrastructure amendments are required. |
| 1241987 | Patrick Munro | N/A | No | South Derbyshires objective is to put as much housing as they can on the fringes of Derby, therefore relying on the facilities for Derby residents and minimise investment meanwhile not developing housing in the many villages in South Derbyshire. |
| 1242116 | Jonathan Nutman | N/A | Yes | See above |
| 1241975 | Paul Hopkin | None | No | Objectives are not being met with this plan you are just trying to shift the burden to Derby City and in particular, Mickleover. You would expect the intention of the plan to provide housing and all associated support from your headquarters. However placing the development as far as you possibly can away from your offices makes it more likely the residents will turn to using overcrowded education, healthcare etc resources within the Derby City boundary. |
| 1242055 | Mr Eddie Pickering | resident | Yes | We agree that we need to meet the needs of an ageing population and to make optimum use of previously developed and under-used land |
| 1236005 | Richard Larder | Retired | No | Please see the answers to question 1. The present infrastructure in Mickleover cannot cope with any further development.  Question 1 response: Mickleover has seen too much in the way of housing development in recent years and the existing infrastructure such as roads , schools, GP surgeries , water , sewage and power supplies are under intolerable strain and in my view the prospective plans should be cancelled immediately. |
| 1241890 | Edward Stupple | Retired | No | The main objective appears to be to move the affordable/social housing and gypsy/traveller community population away from Swadlincote to reduce their reliance on SDDC services while collecting their council tax and placing a high dependency on Derby City |

# Qu. 3: Do you agree with the Plan’s Strategy?

|  |  |
| --- | --- |
| Duty to Cooperate Body / Statutory Consultee |  |
| National Organisation |  |
| Regional Organisation |  |
| Parish Council and other Community Group |  |
| Councillor |  |
| Landowner or Developer |  |
| Members of the public |  |

| **Response Id** | **Name** | **Organisation** | **Comment** | **Council Response** |
| --- | --- | --- | --- | --- |
| **Duty to Cooperate Body / Statutory Consultee** | | | | |
| 1248292 | Amber Valley Borough Council | Amber Valley Borough Council | Thank you for formally consulting Amber Valley Borough Council on the Regulation 18 version of your Local Plan Part 1 Review. Through our joint work, utilising the Derby Housing Market Area (HMA) Joint Advisory Board and officer groups, you have kept us informed and sought our views to help develop the draft plan, principally but not limited to, how the unmet housing needs across the Derby HMA should be addressed. This longstanding cooperation has led to positive planning outcomes in that the submitted Amber Valley Local Plan and your Reg 18 Local Plan Part 1 Review have, when taking account of the minimum number of homes that the City estimates it can achieve, are allocating sufficient homes to meet the HMA needs for the period 2022-2039.  We support and welcome the proposed allocations in your draft plan that help to meet the HMA housing needs. If the Governments draft approach to revising how local housing need is calculated, then it is likely that the requirements across the HMA will increase, with Amber Valley facing a significant increase in its annual LHN. This will have implications for all three plans but we believe the current strategy across the HMA for future growth is correct. It may mean that plans may have to consider increasing allocations in line with that strategy.  To that end we would request that the Regulation 19 version of your plan refers to HMA unmet need, rather than being specific to Derby City. We would also request that to align with the submitted Amber Valley Local Plan, a review policy is included in the plan with appropriate triggers, including addressing unmet HMA housing needs, and detailing the process for a review.  We look forward to continuing to work positively with you and colleagues as your plan progresses |  |
| 1242629 | Derby City Council | Derby City Council | We would like to understand more clearly how the wider strategy for housing growth in South Derbyshire, including the edge of the city, has been evidenced in terms of both the quantum and location of growth, and how the strategy has been developed to meet both South Derbyshire and Derby City housing needs. It is difficult to understand this process, partly due to the fact that the Plan carries forward some existing strategic housing allocations, some of which are partially or significantly built out.  While supporting the general principle of further urban extensions to the city, there is currently not enough understanding of the rationale for identifying the proposed new strategic allocations and how the related infrastructure requirements and implications for the city have been considered. We welcome opportunities to work with you to achieve a full understanding of these matters as the preparation of your plan progresses.  We note that Paragraph 22 of the NPPF requires that “Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery”. Within this context the growth planned on the edge of the city, which includes several urban extensions, should perhaps be set within a longer-term vision, and importantly include and comprehensively provide for the SDITL route (see later) .  The Council feels that it is critical that development sites on the edge of the city are carefully planned between the two authorities, with input from relevant stakeholders and the County Council, from an early stage, to ensure the right development occurs in the right place at the right time. This includes, in particular, that the necessary local and strategic infrastructure is provided in a timely manner and sustainable transport and travel connections are provided. We need to be creating communities not just functioning to meet a number of homes. It is currently unclear how some of the required infrastructure has been evidenced and considered for the proposed new strategic housing allocations, especially in terms of local and strategic highway implications. Again we welcome opportunities to work with you on these matters.  Of particular interest is a need to consider how development is connected to the existing Derby urban area. This is to ensure that any car-borne trips can make optimal route choices that do not impact on exiting congested residential areas, and more importantly, that access can be provided for public transport services and non-motorised users. It is an issue that needs to be generally considered beyond the local plan period to ensure that development does not prejudice any long-term future connections. Again see later reference and support for SDITL.  There are also concerns around how green infrastructure and particularly how the Green Wedges in Derby will be impacted by the new growth areas. Green infrastructure including biodiversity net gain needs strengthening where enhanced ‘green’ provision can demark communities providing recreation and cooling. One of the main purposes of the City’s Green Wedges is to allow the open countryside outside the city to penetrate into the heart of the city, and it is unclear how this can be continued with the current information. Detailed master planning is therefore essential in this community creation with connections across the open areas to other facilities.  These infrastructure issues were envisaged to be dealt with through a Derby HMA Strategy, which would consider a multitude of cross boundary matters, not least the dwelling splits to meet Derby’s housing needs, and to set in place agreed policies to deal with the issues. In the absence of such a strategy, we expect that a series of Statements of Common ground will be required, but in order to set these out it’s again crucial that the authorities have dialogue about the complex cross boundary issues and involvement in master planning of the specific sites.   Potential Changes to National Policy and the Standard Method On the general matter of strategic housing growth, we note that the Government recently consulted on proposed planning reforms including changes to the National Planning Policy Framework and to the Standard Method for calculating housing needs. While we understand that South Derbyshire District Council was keen to publish the draft plan in order to keep to plan making timetables, it appears inevitable that both Derby City and South Derbyshire will not be subject to the proposed transitional arrangements and will therefore need to consider the changes when the reforms are published.  If the Standard Method dwelling requirements change as suggested in the recent consultation, it would mean that Derby City’s housing need reduces and South Derbyshire’s need increases. In this case it may be necessary to revisit/reconsider the strategy and evidence for locating growth. | Noted.  Since these representations were made the Council has entered into a Statement of Common Ground (SoCG) with Derby City and Amber Valley Borough Councils which substantially address issues raised.  The Council has also been involved in the site specific Design Reviews to ensure that key concerns regarding the design and delivery of the site are addressed in a collaborative and effective way.  The Council agrees that further Statement of Common Ground will be required.  The Council will continue to engage with the other HMA Councils to ensure that the need across the HMA is met. |
| 1243661 | Derbyshire County Council Adult Health and Social Care | Derbyshire County Council Adult Health and Social Care | There is some outdated language throughout the document that you may consider updating, for example…   * Page 145 (J) the language used is healthy lifestyles – should it be healthy lives/ living (Healthy lifestyles is out of date terminology as it implies it is a lifestyle choice. More often it is influenced by wider social economic factors). Consider changing this terminology throughout the draft plan. * Likewise use Physical activity rather than sport (throughout the document) * Page 146 (9.10) Connecting them together replace with creating opportunities for social connection/ interaction. * Page 163 (10.7) instead of ‘public health and wellbeing benefits’ it could say support people’s mental and physical health * Also add encourage active travel * Page 181 (10.42) Change sport to physical activity * Page 187 (10.63) healthy lifestyles –healthy lives/ living * Exercise – physical activity | Noted.  The Council will amend the document to ensure that the terminology is appropriate and up-to-date.  Please note that Sport England has suggested an alternative suggestion retaining the word ‘sport’ rather than replacing it. |
| 1242371 | East Staffordshire Borough Council | East Staffordshire Borough Council | As a neighbouring authority and duty to cooperate partner we support the overall strategy and the associated infrastructure enhancements. | Noted. |
| 1242867 | Natural England | Natural England | Natural England has no specific comments on the Development Strategy itself but offers the following general advice:  In accordance with paragraph 181 of NPPF, the local plans should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the Sustainability Appraisal and Habitat Regulations Assessment, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile (BMV) agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes. | Noted. |
| 1243643 | Sport England | Sport England | Sport England strongly recommend that ‘sport and physical recreational facilities’ are included within criterion (iii). As explained previously, the occupiers of new residential development would generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. In this regard, new development should contribute towards meeting the demand that it generates through the provision of on-site facilities and/or providing additional capacity off-site. Sport England can assist in providing data on the existing facilities in the area.  The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facilities Strategy, Playing Pitch Strategy (PPS) or other relevant needs assessment. Section 8 of the NPPF also advises that any new sports facility needs arising as a result of new development should be met. As stated previously, an up to date evidence is required in South Derbyshire to identify shortfalls in existing sports provision and to identify how an increase in the demand in an area would generate additional/new demand for sports provision. | Agree.  The Council will include reference to ‘sports and physical recreational facilities’ in the spatial strategy.  The Council will ensure that development will contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision will be informed by a robust evidence base such as an up to date Sports/Built Facilities Strategy, Playing Pitch Strategy (PPS) or other relevant needs assessment. |
| **National Organisation** | | | | |
| 1243542 | Home Builders Federation (HBF) | Home Builders Federation (HBF) | HBF notes that the strategy sets out that “Over the plan period (2022 – 2039) at least 14483 dwellings will be built within South Derbyshire. This comprises 8874 homes to meet South Derbyshire’s own needs and 5609 to help meet Derby City’s unmet need. The housing sites required will be met on a mixture of brownfield and greenfield sites with encouragement given to the re-use of previously developed land.”  We welcome the recognition that greenfield sites will be needed to meet the housing needs of South Derbyshire and contribute to meeting the needs of Derby. HBF would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. Therefore, HBF welcome the focus of the review on allocating new strategic housing and employment sites on the Derby urban fringe to meet needs which cannot be met within Derby City’s boundaries due to capacity constraints. This is a very important focus, and one HBF supports. However, in the midst of a housing crisis HBF would also support a higher housing requirement, and the allocations of other housing sites  HBF does not comment on individual sites, other than to say the Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full. The soundness of strategic and non-strategic site allocations, whether brownfield or greenfield, will be tested in due course at the Local Plan Examination.  As mentioned elsewhere in response, HBF also question if the Plan Period should be extended This would have a consequential effect on the total housing requirement.  HBF also note that “Draft Plan does not incorporate the changes currently being consulted on by government on the 2024 National Planning Policy Framework as these are still under discussion nationally. Once these changes are finalised, after the consultation, the plan will be amended in line with the updated Framework.”  HBF would welcomes the opportunity to work with the Council on responding to the implications of the revised NPPF including providing comments on any proposed revision to this Plan. | Noted.  The Council considers that the settlement hierarchy set out in the plan is logical and does address the needs of all of the areas within the District.  The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in it’s Draft Local Plan, published October, 2024. This is to reflect current uncertainty regarding the extent to which the emerging Amber Valley Local Plan can assist in meeting Derby’s needs; to recognise and reflect the high level of housing delivery recorded for the District over the past several years and to provide a buffer for flexibility.  The Council will consider the implications of new NPPF however it is envisaged that this plan will fall within the transitional period for production under the 2023 NPPF. |
| **Parish Council and other Community Group** | | | | |
| 1243158 | Melbourne Civic Society | Melbourne Civic Society | Yes but the strategy should not just be about housing and employment . With regard to contributing to the economy contribution to GDP is more important that the old fashioned emphasis on employment. The District’s agriculture and its precious concentration of Grade 2 agricultural land is a huge contribution to the food industry – the agri-food chain contributed £148billion in 2022 about the same as the Tech/digital sector not have such an important | Noted.  The Council can only support employment growth through land use policies. The plan does include policies that protect the best and most versatile land where possible and supports agricultural diversification to support the agricultural economy. |
| 1240947 | Barrow Upon Trent Parish Council | Barrow upon Trent Parish Council | As an area of sustained growth, right in the heart of the UK, we have to address the needs of the future. | Noted. |
| 1242585 | Egginton Parish Council | Egginton Parish Council | The PC cannot agree the Strategic Site 2 on the edge of Mickleover. It is a ‘kitchen sink’ site. SDDC is proposing to push everything into this, including massive housing unmet needs of Derby City, employment, gypsy and traveller sites, accommodation for the elderly. These elements do not fit comfortably together. There is no mention of blue infrastructure, the area sits adjacent to flood zones an there are massive associated traffic issues. No additional secondary school is included in Strategic Site 2. At para 4.27 there is a recommendation to consider the identification of a new strategic scale site a Egginton Common (the Freeport site). The PC contests the suitability of this site due to commercial viability (the site is heavily contaminated), it is adjacent to flood zone 3, it is environmentally transformational to a rural area and cannot easily be assimilated into the landscape and character of this part of the District. | Noted.  Site specific comments relating to the strategic allocations have been considered further under questions 5b & 7. |
| 1244412 | Etwall Parish Council | Etwall Parish Council | We support the Strategy, but with reservations as noted in our response to following questions. | Noted. |
| 1238750 | Hilton Parish Council | Hilton Parish Council | Large development in key service villages requires disproportionate provision of local facilities and in some cases they need to 'catch-up' first.  It also means large amounts of commuting mainly by car, adding to traffic issues and pollution. | Noted.  The plan does not allocate new development  in the key service villages. |
| 1236404 | Repton Parish Council | Repton Parish Council | Repton Parish Council response to SDDC Local Plan Consultation November 2024 The Repton Parish Council (RPC) wishes to support the new SDDC Local Plan and makes the following points to ensure that the revised Local Plan meets the requirements of the Parish. 1. The first comment is that the new SDDC Local Plan Part 1, out for consultation, does not contain any reference to the Neighbourhood Development Plans (NDP) that are currently in place and being undertaken in the District and their involvement in the Planning process. This is particularly important since the policies in an NDP take precedence over existing non-strategic policies in a local plan covering the neighbourhood area where they are in conflict. 2. The second concern is in section 6.8 explanation to the Local Plan Policy H1. This section states the settlement boundaries will be refreshed in the next phase of the plan making. This process is undefined in the context of any timescales or scale. The Parish Council would like to see the approach and methodology to be used in this process. It should be noted that the Repton and Milton NDP is quite explicit on the need for the two settlements to be separate from each other to retain their own different characters and forms a guiding principle in the NDP. 3. The Policy H1, Section 5, Rural Areas does not contain all the requirements of the existing Local Plan Part 2 Policy BNE5, nor contains a reference to Policy BNE5. It should be noted that the Repton and Milton NDP Policy H1 has a specific reference to Policy BNE5. 4. The RPC would propose that INF3 (Freeport) should include a criteria that states that transport developments in the area should take note of the impact of the Freeport to minimise workers traffic on nearby rural settlements, not just HGVs. 5. INF3 should also include the potential cycle link between Repton and Willington, as part of the Freeport infrastructure requirements (Repton and Milton NDP Policy T2) and in support of the Local Plan Policy BNE1 (Active Travel). 6. INF4 (Transport) should acknowledge the impact of the development of the Freeport (INF3) and under section C include the need to minimise the effect of workers journeys and traffic on nearby rural settlements on any major development. 7. The Swarkstone Bridge Bypass mentioned in INF4 would have a major effect on the level of traffic through the parish. We propose that this should be included as part of the Freeport infrastructure requirements due to the Freeport’s effect on the area’s transport, both HGV and employees. 8. It is noted that the map for INF3 Freeport Interchange has managed to convert the current railway track to the A5132. It is assumed that this is a mistake rather than a major policy change. The above comments relate to the Local Plan Part 1 out for consultation. A major concern is the potential impact of the NPPF that is currently being updated and how the SDDC Local Plan process could be impacted by this on timescales and more importantly on the consultation process. The Repton and Milton Parish Council also requests that a meeting of the relevant people in the RPC and SDDC is set up to understand the potential implications of the NPPF that is currently being updated, to discuss its link to the Repton and Milton Neighbourhood Development Plan (NDP), to ensure the NDP remains relevant. | Noted.  1. It is accepted that, by way of context, a reference to neighbourhood plans would be appropriate as part of the Introduction to the document.  2. The methodology to be used in reviewing the settlement boundaries will be determined as part of the review of the Part 2 Local Plan policies and will be published.  3. Policy BNE5, contained within the adopted Part 2 Local Plan, will be addressed as part of the review of that document. In the meantime the existing policy will continued to be applied.  4. It is agreed that a reference to highway impacts should be included in Policy INF3.  5. A cycle path connection between Willington and Repton is included in the Councils Cycle Network Supplementary Planning Document, adopted in 2024, as part of the proposed Local Cycle Network.  6. Developer funding of new off-site transport infrastructure to be provided to support a strategic rail freight interchange at this location will be considered as part of the Development Consent Order process. The relevant parties are aware of the cycle network proposals for the District, although contributions toward particular elements of this will need to be justified using clear evidence of their potential to mitigate transport impacts.  7. As referred to in response to point 6, developer funding of new off-site transport infrastructure needed to support a strategic rail freight interchange at this location will be considered as part of the Development Consent Order process. Any new highway infrastructure to be provided in this way will need to be justified using clear evidence of its potential to mitigate transport impacts.  8. This observation is correct and INF3 plan can be amended to address this error.  Para 234 of the new National Planning Policy Framework (NPPF), published in December 2024, states that the policies in that version of the NPPF will not apply where emerging Local Plans are published for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 on or before 12 March, 2025 and its draft housing requirement meets at least 80% of local need. The District Council intends that these criteria should be met.  The request for a meeting concerning the new NPPF is noted and will be addressed as a separate matter to the production of the emerging Local Plan. |
| 1243603 | SAVE (Save Aston & Weston Village Environment) | SAVE Aston and Weston Residents Group | Derby City should be looking at ways of increasing housing density, the use of brown field sites and the use of underused commercial sites in the city centre. As stated above, sites to the east and west should be considered as well as the north and south areas covered by the HMA | Noted.  The Council agrees that the capacity in Derby should be maximised and the Council will continue to work in partnership with the other HMA Councils to ensure that the needs of the HMA are met in the most sustainable locations. |
| 1242402 | Weston-on-Trent Parish Council | Weston-on-Trent Parish Council |
| **Landowner or Developer** | | | | |
| 1241834 | Rula Developments Limited | Rula Developments Limited | The Local Plan Part 1 looks only at the delivery of large-scale strategic sites. The Local Plan Part 1 should be looking to meet the full employment land need across a wide range of different sizes of employment sites, rather than leaving sites below the strategic scale threshold to the Part 2 plan. | Noted.  Collectively the adopted Local Plan Part 1 employment allocations being carried forward and the proposed strategic sites cover a wide geographical area and offer a range of site sizes.  The Local Plan Part 1 review is concerned with new strategic scale housing, employment and mixed use needs. Any need for new smaller scale employment sites will be considered as part of a Local Plan Part 2/Full Local Plan review. |
| 1243628 | Define Planning on behalf of Bloor Homes Ltd | Define Planning on behalf of Bloor Homes Ltd | The programme set out in the consultation document states that the Plan will be submitted for examination in Spring 2025, with a final approved Plan anticipated in Winter 2025. Submission for examination can only take place once a further consultation (Regulation 19) on the proposed submission plan has been undertaken. The timetable sets this for early 2025.  As such, the programme is incredibly ambitious in terms of the time required for consultation, as well as to review comments and make amends to the document. The programme is likely to be impacted by delays due to the time each stage can take, including appropriate consideration of representations received to this consultation, and the collection of robust supporting evidence.  The potential publication of the revised NPPF before the end of the year is also likely to impact timescales. The Government has made it clear that Local Plans should not be rushed to examination to pre-empt changes to national policy or legislation; and the submission of plans that require time consuming ‘fixing’ during examination is not supported.  Therefore, whilst BHL encourages the proactive approach the Council is taking to contribute to meeting the Derby City unmet need, the timetable is overly ambitious and should be revised to ensure a sound and robust Plan is submitted for examination.  The document does acknowledge that a full review of the Plan will be required to begin once this Review has been adopted, and proposes a policy to reflect this. However, this does not justify the submission of an unsound plan that has not appropriately and fully considered the alternative opportunities for delivering homes. In fact, in stating the need to immediately review the Plan the Council are acknowledging that the Review currently being prepared will be immediately out-of-date.  Sites such as ‘Land west of Castle Gresley’ would align with the Council’s strategy to avoid sites in the Green Belt. It would provide an option to deliver much needed homes, earlier in the plan period, without an overreliance on the delivery of a small number of significant sites. It would also direct further investment into Swadlincote where there is an objective to “enhance and develop Swadlincote town centre and its wider urban area as a focus for living, working, shopping and leisure”. | Noted.  A revised LDS will be published with the Regulation 19 consultation.  The Council does not consider the approach to producing a plan to be out-of-date or unsound and reference to a future review is within the context of the need to continually review the Local Plan and the emerging requirement to undertake a single Local Plan which comes into effect in 2026.  Omission sites will be considered in question 13. |
| 1242643 | Andrew Large Surveyors Ltd & The Staunton Harold Estate | Andrew Large Surveyors Ltd & The Staunton Harold Estate | The draft local plan solely proposes 3 additional large scale allocation sites. Paragraph 60 of the NPPF states that it is important a variety of land is brought forward by LPA’s. Concentration of the additional allocation solely to 3 sites could create deliverability issues within the plan period if unexpected delays are found at one or more of the sites. The SHELAA methodology states it assumes 30 dwellings per annum per developer. It is assumed the larger sites by matter of their scale will have multiple developers however their build out rate will still be limited by the provision of access and also market competition. As is evidenced by slow development of Drakelow Power Station, redevelopment of the site initially being granted consent in 2009 and with this being far from completion, now the remaining site is proposed to be allocated and is expected to deliver 68Ha of employment use prior to 2039.The SDDC SHELAA Methodology states:  *“Assessing the suitability, availability and achievability of a site will provide the information necessary to determine whether a site can be considered deliverable within the first 5 years of the plan period (or developable at a particular point in time)”*  Paragraph 70 of the NPPF states that sites of a variety of sizes should be considered in plan making as smaller sites be built out quicker, and that they make an important contribution to housing requirements for areas and that LPA’s should seek out a mix of sites on this basis. It is therefore considered the plan is unsound and additional sites need to be considered to mitigate the risks.  It is therefore considered that the plan is unsound, on the basis it is not fully justified as reasonable alternatives have not been taken into consideration and that it is not consistent within national policy in the NPPF. The plan is also likely not to be effective in its housing targets being deliverable during the plan period to 2039. Additional sites of varying scales and locations need to be considered | Noted.  A number of housing allocations identified in the adopted Local Plan Part 1, including sites in Hatton, Hilton, Drakelow and the Swadlincote Urban Area, have been rolled forward as part of the Local Plan Part 1 review and continue to deliver significant numbers of homes away from the Derby urban area. It should also be noted that housing sites identified in the adopted Local Plan Part 2 continue to deliver new homes and a review of that document will provide the opportunity to address any need for additional non-strategic scale housing allocations. |
| 1242137 | Bellway Homes | Bellway Homes Ltd | Policy S1 (Sustainable Growth Strategy) promotes sustainable growth to meet its objectively assessed housing and commercial needs in the plan period 2022-2039. For the reasons set out elsewhere in our submission, we object to the plan period end date of 2039. The end date should be 2041 at the earliest, based on a likely adoption during 2026 or 2027.  Policy S1 proposes a new housing requirement of 14,483 (851 dpa) over the plan period (2022-2039). This includes 5,609 dwellings (or 329 dpa) towards Derby’s unmet housing need, and a local need for South Derbyshire of 8,874 dwellings (or 522 dpa), based on the current standard method.  Affordable housing need The Council is not proposing any further uplift to the minimum local housing need figure under this policy. However, planning practice guidance highlights that an increase in the total housing figures in the plan may need to be considered where it could help deliver the required number of affordable homes.  Affordable housing delivery has fallen significantly short of projected needs in South Derbyshire since 2011. The adopted LPP1 review refers to analysis in the Derby SHMA published in July 2013, which sets out that across the Derby HMA there was a net need for 7,611 affordable homes up to 2017; of this, the need within South Derbyshire was 1,723 affordable dwellings between 2012-2017, or 347 dpa. During this period, the Council delivered 445 affordable homes (at an average of 89 affordable homes per annum) according to the Council’s own monitoring data.  A more recent update to the assessment of affordable housing in South Derbyshire was published to support the Issues and Options consultation in 2022, presented in the South Derbyshire SHMA (2020) which covered the period 2019 to 2028. Whilst slightly lower than adopted LPP1 figure, the net need for affordable housing was assessed at 325 dpa; still a significant level of need. Between 2019 and 2023, the Council has delivered 753 affordable homes over the four-year period ; an average of 188 affordable homes per annum. The latest measure of affordable need in the District is set out in the Derby and South Derbyshire Local housing Need Assessment, dated December 2023; this indicates a need for 214 affordable homes per annum over the new plan period to 2039.  Furthermore, since 2011 a total of 283 affordable homes have been sold or demolished in South Derbyshire , reducing the available stock of affordable homes for prospective households and putting an ever increasing pressure on the ability of the existing affordable stock to meet those needs in the District.  The analysis above clearly shows that the delivery of affordable housing has fallen significantly short of meeting the scale of need in South Derbyshire over a sustained period stretching back more than ten years. Whilst affordable need is not required to be met in full, at no point since 2011 has the need actually been met. This is clear evidence that the Council is not doing enough to address the scale of need in the District. On this basis, the LPP1 review fails to address the chronic issue of affordable housing delivery. We recommend urge the Council to include that an additional uplift is incorporated into the overall housing figure to help tackle the chronic under-delivery of affordable homes in South Derbyshire, as shown in its own evidence and other data. Such an uplift should be considered in the context of the increase in overall housing need which is very likely going to impact on the next stage of the LPP1 review process.  Changes to the standard method need in South Derbyshire Nonetheless, the Council does accept that the draft LPP1 review has not accounted for the forthcoming reforms to the NPPF, which are likely to confirm a different housing figure for South Derbyshire based on a new methodology for calculating local housing need. If confirmed, the housing need specific to South Derbyshire will increase from 522 to 606 dpa, or a minimum additional 1,428 dwellings over the 17-year plan period. The proposed housing requirement of 14,483 dwellings will not be sufficient to meet both local and wider HMA housing needs. The Council will need to identify additional land to meet the increased level of homes needed in the District.  The Land at Sandcliffe Road, Swadlincote is clearly an ideal candidate to contribute. This can go some way towards increasing the delivery of affordable housing, in line with planning guidance. As the largest settlement in South Derbyshire, Swadlincote (together with Woodville) is identified in Policy H1 (Settlement Hierarchy) as an Urban Area, and is the main settlement and one of the most sustainable locations for growth. Under the LPP1 review, Swadlincote will continue to perform this vital role and function in the district. The Land at Sandcliffe Road is considered to be a suitable and deliverable site to accommodate the increased need for housing in district. Whilst under current policy the Site lies outside of the settlement boundary, it is nonetheless contiguous with the edge of the largest town in the district and is accessible to local services and facilities. The Site is in single ownership and controlled by a willing national developer with a record of delivery in the area. It is also a viable development prospect, capable of delivering homes in the early years of the plan period. Further details regarding the suitability and deliverability of the Site is set out in Appendix 1 of this submission.  For the reasons set out above, we object to the proposed housing requirement set out in draft Policy S1 and consider the Council should be taking a far more positive approach to the plan making process in line with the Government’s ambition to increase housing delivery and the direction of travel in the proposed changes to the NPPF. | Noted/ Agree in part.  The Council will amend the plan period to 2041.  It should be noted that the new standard method formula was published in December 2024 and differs markedly from the version proposed in draft earlier in 2024, to which this representation refers.  The new Standard Method changes the minimum needs of the three HMA authorities significantly, substantially increasing Amber Valley Boroughs annual figure, substantially reducing Derby’s and increasing South Derbyshire’s, albeit to a much lesser degree.  The District Council’s current position is that whilst recognising these changes, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024. This is to reflect current uncertainty regarding the extent to which the emerging Amber Valley Local Plan can assist in meeting Derby’s needs; to recognise and reflect the high level of housing delivery recorded for the District over the past several years and to provide a supply buffer for flexibility.  It is not considered that the outputs of the new standard method justify an increase in South Derbyshire’s overall requirement.  The Part 1 Local Plan review is concerned with strategic scale housing, employment and mixed use development. The subsequent review of Part 2 policies will provide an opportunity to address any need for smaller scale development allocations, including to help meet any affordable housing needs.  The Derby and South Derbyshire Housing Needs Assessment considers whether there is a case for raising overall housing provision in order to deliver additional affordable housing, but does not make any recommendation to do so.  Omission sites will be considered in question 13. |
| 1242615 | Carney Sweeney on behalf of Peveril Homes Ltd and Kingsmere Holdings Ltd | Carney Sweeney on behalf of Peveril Homes Ltd and Kingsmere Holdings Ltd | Paragraphs 1.6 - 1.8 of the draft Local Plan are clear in setting out that this document comprises a partial review of the adopted Local Plan Part 1, with the Part 2 Local Plan (adopted 2017) being saved in its entirety. It is further noted that the draft Local Plan refers to the next stage of the plan making process comprising a full review of the Local Plan, with Paragraph 1.9 outlining that the existing Local Plan Part 2 will remain in place until the Local Plan is reviewed as a whole.  In the context of the above, Appendix 2 and Appendix 3 of the draft Local Plan are noted to seek to identify which policies are ‘superseded’ and ‘saved’, respectively. It would be helpful if Appendix 3 makes it explicitly clear which policies will remain ‘saved’ by listing all the relevant policies, similar to how Appendix 2 explicitly lists all the policies being superseded.  Overall, the draft Local Plan’s strategy to undertake a partial review of the adopted Local Plan Part 1 is considered to be appropriate to deal with the strategic matter of accommodating unmet housing need to ensure growth in South Derbyshire is co-ordinated both within and outside the Derby HMA as per Strategic Objective 13. The capacity constraints of Derby City are a significant factor and undertaking a partial review of the Local Plan Part 1 will allow for strategic policies and proposed allocations to be examined to address the unmet housing need as a matter of priority.  It is noted that this plan making process is at the earlier stages of preparation and may be subject to change following any subsequent publication of the draft NPPF subject of consultation in 2024, and so the draft Local Plan’s strategy could be subject to review again. | Noted.  The Local Plan Part 1 Review is a full review of the adopted Local Plan Part 1 not a partial review. Every policy has been reviewed, and changes have been made to policies where deemed necessary. The Council will ensure that the Pre-Submission Local Plan Part 1 clarifies this.    The Council is permitted to undertake a part 2 plan process until the new Bill comes into force December 2026. The Council will progress with either a Part 2 Local Plan or Full Plan Review very quickly after adoption. |
| 1243227 | Carter Jonas on behalf of Miller Homes Ltd | Carter Jonas on behalf of Miller Homes Ltd | 3.52 For the reasons detailed above, in order for the Plan to meet the legal requirements of the Duty to Cooperate set out in the Localism Act (2011) and meet the test of soundness detailed in the NPPF (2023), SDDC are required to allocate additional land to meet local housing needs.  3.53 Whilst the strategic site’s locations on the edge of Derby are acknowledged and understood. In order to ensure the sustainable growth of the District as a whole, it is recommend that further sites are dispersed across the district utilising the settlement hierarchy which is a well-established planning tool for guiding development towards the most sustainable locations. To ensure development is sustainable, we recommend that the additional allocations are proposed in urban areas and key service villages. | Noted.  A number of housing allocations identified in the adopted Local Plan Part 1, including sites in Hatton, Hilton, Drakelow and the Swadlincote Urban Area, have been rolled forward as part of the Local Plan Part 1 review and continue to deliver significant numbers of homes away from the Derby urban area. It should also be noted that housing sites identified in the adopted Local Plan Part 2 continue to deliver new homes and a review of that document will provide the opportunity to address any need for additional non-strategic scale housing allocations. |
| 1243582 | CBRE Ltd on behalf of Land Project UK (LPUK) | CBRE Ltd | No, as currently drafted, we consider the plans Strategy for Employment needs to be insufficient and unsound. It is paramount that the emerging Local Plan provides a range of unit sizes and ensures a mixed and balanced set of warehouse products for future occupiers.  As outlined above, and having reviewed the Employment Land Review and subsequent emerging Local Plan allocations (discussed below), we consider there is a demonstrable lack of space across South Derbyshire in the sub 100,000 sq ft market of Garde A quality and it is evident that a greater number of sites to meet this requirement (circa. 15-20 acres) are required.  In addition, we do not consider the Council’s approach to bringing forward allocations from the 2016 Local Plan Part 1 to be sound and have concerns these will not be delivered over the plan period. There is also a question around validity of this approach and how the allocations are ‘strategic’ allocations. For example, half of the eight sites are under 5ha, with three of the sites being 0.71 ha, 2 ha and 2.5 ha respectively. The Plan then has a significant jump to new allocations which are 68ha and 70ha. It is therefore clear that a gap exists in size of site and type of product that can be delivered through the emerging Plan as currently drafted.  We are happy to provide the Council and/or Inspector with further evidence around Industrial Demand within South Derbyshire if this would be helpful. | Noted.  It is proposed to identify an employment land requirement for the District based upon that identified in the Derby and South Derbyshire Employment Land Review. The Employment Land Study indicates that the quantitative employment land need for the District for the plan period 2022-41 is 39.12ha. Whilst this is met by sites rolled forward from the adopted Local Plan Part 1 (40.53ha), all but one of which have been granted planning permission, further allocations have been made in order to support sustainable growth as part of mixed use strategic development on the southern edge of Derby comprising Infinity Garden Village (STRA1, 70ha) and land to the south of Mickleover (STRA2 5-10ha). In addition to balancing proposed large cale housing development STRA1 is ideally placed to take advantage of investor interest from across the sub region as it is to offer convenient highway access via a new A50 junction.  A further site at Drakelow (STRA3-68ha), is already identified for employment and energy development in the adopted Local Plan Part 2 (Policy BNE 12). The formal allocation of this largely redundant brownfield site as part of the current review allows for clarification concerning the scale of the employment development to be provided for and the matters that will need to be addressed as part of any development proposal.  In total the sites rolled forward from the adopted Local Plan Part 1 sites and STRA1, STRA2 and STRA3 comprise land measuring 178-183ha, representing South Derbyshire’s employment land provision.  In addition, the East Midlands Freeport Site (173ha), is to be allocated to assist in meeting national, regional and sub regional needs business accommodation needs. |
| 1244437 | CBRE on behalf of Labcorp | CBRE on behalf of Labcorp | The Regulation 18 Consultation Document (Policy S1, page 34) identifies there is still a need to deliver strategic growth in order to not only meet South Derbyshire's own needs but also to help meet the unmet requirements of the City of Derby which is understood to be the main driver behind the Local Plan Review. Consequently, it is understood that South Derbyshire District Council are proposing an additional 5,609no. dwelling contribution towards the unmet needs of the City of Derby.  Whilst it is recognised that there is a substantial amount of housing land being considered to be provided to meet the City of Derby's unmet need, we do question if a review of strategic allocations is an appropriate approach, particularly given a review of the whole plan is to take place after this emerging plan adoption. As such, a review of the Local Plan Part 2 as smaller on-strategic site allocations would be better placed to deliver dwellings within the plan period, given development of this scale often takes less mobilisation time.  As outlined within the consultation document, Local Planning Authorities have a legal duty to cooperate with neighbouring authorities and it is evident that the unmet housing requirements of the City of Derby is a key cross boundary issue that will need to be addressed with South Derbyshire through this Plan preparation process. Greater consideration should be given throughout the Local Plan in relation to smaller sites which are well connected to Derby, either within or outside of the Derby urban area in order to demonstrate and maintain the 5 year-housing land supply (which for South Derbyshire is 5.76 years from the January 2024 Housing Trajectory Paper).  Furthermore, the South Derby LHNA identifies low household growth in the City of Derby due to affordability challenges for younger age groups. Increased development through spatial planning growth strategies promotes the opportunity to increase the affordability of dwellings throughout South Derbyshire and Derby by delivering smaller, well-connected sites; such as the site identified in this response letter. | Noted.  A number of housing allocations identified in the adopted Local Plan Part 1, including sites in Hatton, Hilton, Drakelow and the Swadlincote Urban Area, have been rolled forward as part of the Local Plan Part 1 review and continue to deliver significant numbers of homes away from the Derby urban area. It should also be noted that housing sites identified in the adopted Local Plan Part 2 continue to deliver new homes and a review of that document will provide the opportunity to address any need for additional non-strategic scale housing allocations. |
| 1243619 | Chave Planning on behalf of Mr R Beeston | Chave Planning on behalf of Mr R Beeston | Policy S4: Housing Strategy The Local Plan sets out a housing requirement of 14,483 dwellings to meet the needs of the district and the unmet needs of Derby. This housing provision to meet this requirement includes 4,500 dwellings on two new strategic sites, 8,847 dwellings on sites carried forward from Local Plan Part 1, 285 dwellings carried forward from Local Plan Part 2 and 851 dwellings coming forward as windfall. There is no buffer in the housing provision as a safeguard against failing to meet the housing requirement. This is a risky strategy as the Local Plan is reliant on two strategic sites with major infrastructure requirements to bring forward a large component of the housing supply. There is no delivery trajectory for these sites within the consultation documents, so it cannot be understood how they are expected to come forward within the plan period.  Furthermore, it should be critically evaluated why sites allocated in the adopted Local Plan have not yet brought forward housing as anticipated when the sites were allocated in 2016 and 2017. The plan period for the adopted Local Plan Part 1 ends in 2028 and yet there is still 8,847 of the 10,790 dwellings allocated in that plan that have not yet come forward. Carrying forward sites that are experiencing delays in delivery adds to the riskiness of the strategy in relying almost entirely on 2 strategic sites and carried forward sites. It would be prudent to allow a buffer to the overall housing supply, at least 10% above the housing requirement, to insulate against slippage in delivery of strategic and carried forward sites. This additional supply should include further small sites, which are generally quicker in delivering housing than strategic allocations and would form a valuable component of the supply in maintaining delivery against the housing requirement throughout the plan period.  The National Planning Policy Framework (NPPF) paragraph 70 says that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. It says that, to promote the development of a good mix of sites, local planning authorities should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. This guidance has been carried forward in the consultation version of the revised NPPF.  For South Derbyshire, this would mean 1,448 dwellings in the housing supply coming forward on sites below one hectare. The Draft Local Plan proposes only 3 sites of this scale, for a total of 28 dwellings. This falls substantially short of following guidance in the NPPF and fails to make an important contribution to meeting the housing requirement on sites which will be built out relatively quickly. The Local Plan should therefore incorporate an additional housing supply of small and medium scale sites. These sites could be brought forward in a Part 2 Local Plan, which could focus on reviewing settlement boundaries to enable proportionate growth to sustainable settlements. Such an approach would support the vitality and viability of villages and rural areas and would provide a robust housing supply.  In view of the above representations, it is submitted that the Local Plan housing supply should be increased from 14,483 to 15,931 in order to provide a 10% buffer over the housing requirement and insulate against slippage in the delivery of strategic allocations and carried forward sites. Of that supply, 10% (1,593 dwellings) should be allocated on small to medium sites, in order to provide an important component of sites that will be built out relatively quickly.  Without the 10% buffer and the inclusion of housing allocations on small to medium sites in the housing supply, the Local Plan is not positively prepared, effective or consistent with national policy. | Noted.  A housing trajectory will be prepared taking account of any significant constraints that will need to be addressed.  In regard to the NPPF requirement to identify in the Local Plan a proportion of sites of less than 1ha, the Local Part Part 1 review is concerned with new strategic scale housing, employment and mixed use development. Any need for additional non-strategic allocations will be taken into account as part of a subsequent review of policies contained in the Part 2 Local Plan.  There is no NPPF requirement to include a buffer in the housing supply. Notwithstanding this although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in it’s Draft Local Plan, published October, 2024.  This is to reflect current uncertainty regarding the extent to which the emerging Amber Valley Local Plan can assist in meeting Derby’s needs; to recognise and reflect the high level of housing delivery recorded for the District over the past several years and to provide a buffer for flexibility. |
| 1243190 | David Lock Associates on behalf of Hallam Land | David Lock Associates | The overall strategy is unchanged and remains broadly supported, subject to amending the plan period and housing target.  Please note these representations are specific to Hallam Land’s land interests at Infinity Garden Village. | Noted/Agree in part.  The Council will amend the plan period to 2041. |
| 1242592 | Dean Lewis Estates | Dean Lewis Estates | .4 Plan’s Strategy Q3: Do you agree with the Plan’s Strategy?  2.4.1 The Sustainability Appraisal indicates that meeting the unmet housing and employment needs of Derby city closest to the city boundaries is sustainable.  2.4.2 The other options are not dismissed as unsustainable, but less sustainable. The option to disperse some growth to sustainable locations such as Hatton, where rail connectivity is available to Derby City should not be dismissed.  2.4.3 The Strategy is Not supported for the following reasons.  2.4.4 It is evident that the housing requirements requires 5609 dwellings to be delivered with South Derbyshire District to meet the newly arising unmet needs of Derby City. The Strategic Allocations only deliver 4,500 dwellings within the Plan period (up to 2039).  2.4.5 The ambit of the Partial Review should deal discreetly with matter only.  2.4.6 Polices that are discreet to STRA1, STRA2 and STRA3 are supported.  2.4.7 However, the element of the Partial Review which seeks to roll forward housing allocations to 2039 is Not supported.  Policy S4: Housing Strategy flows from the Plan’s Strategy and Policy S1:Sustainable Growth Strategy.  2.4.9 The policy states: “Provision will be made in the Local Plan Part 1 for at least 13,347 additional dwellings on allocated sites over the plan period, comprising dwellings to be provided as part of two new housing –led strategic sites (as set out in Policies STRA1 and STRA2) plus those remaining to be completed on allocations included in the adopted 2016 Local Plan Part 1, which have been carried forward In addition, 285 dwellings will be provided in the form of dwellings remaining to be completed on saved allocated sites in the adopted 2017 Local Plan Part 2. The balance of provision needed to meet the overall requirement of 14,483 homes, as identified under Policy S1, will be provided through windfall development comprising a minimum of 851 dwellings”  The Plan’s Strategy relies on 8,847 dwellings identified within Part 1 of the 2011 – 2028 Local Plan together with 285 dwellings from Part 2 allocations, and a ‘Windfall’ allowance of 851 dwellings.  2.4.11 The standard method currently gives an annual requirement of 522 dwellings, as opposed the Local Plan based annual target of 742 dwellings. The Local Plan target includes part of the need generated within Derby City whilst the standard method does not. It has, therefore, been determined that the South Derbyshire five-year housing land supply should be calculated using both the Local Plan target and the housing need figure derived using the standard method pending consideration of the appropriate distribution of housing provision among the three HMA local authorities in the context of their respective Local Plan reviews. The net number of completed dwellings from the start of the plan period in 2011 total of 9336 dwellings have been built over the ten-year period to 31 March 2023, which is an average of approximately 778.  2.4.12 What is evident is that the original Plan Strategy within the 2011 – 2028 has performed poorly in terms of delivery on allocated housing sites. Against a plan requirement of 12,618 dwellings only 3,486 dwellings have come forward to date on allocated sites as of 2022.  2.4.13 Simply rolling forward the allocations in this Partial Review does not address the underlying reasons why the allocations have either failed or been so slow to deliver.  2.4.14 This also means that a significant of amount of unplanned growth has been relied upon to meet housing need within the district.  2.4.15 An unintended consequence also being that affordable housing delivery has been woefully inadequate within the district. Only 1,653 affordable dwelling have been delivered since 2011 against a plan target of 3,785 affordable homes. With only three/four years left until the end plan period, the under provision of affordable homes within South Derbyshire is acute.  2.4.16 The Plan Strategy in the 2011 -2028 was designed to deliver housing, employment and essential infrastructure together with commensurate levels of community facilities within this period. The significant under performance on the around 70% of the allocation sites is a fundamental issue that must thoroughly assessed through a comprehensive plan review.  2.4.17 To role forward the 2011 -2028 allocations until 2039 is Unsound.  2.4.18 The Partial Plan Review and related Plan Strategy should deal specifically with the unmet needs of Derby City Growth and STRA3 at Drakelow. | Noted.  Noted.  A number of housing allocations identified in the adopted Local Plan Part 1, including sites in Hatton, Hilton, Drakelow and the Swadlincote Urban Area, have been rolled forward as part of the Local Plan Part 1 review and continue to deliver significant numbers of homes away from the Derby urban area. It should also be noted that housing sites identified in the adopted Local Plan Part 2 continue to deliver new homes and a review of that document will provide the opportunity to address any need for additional non-strategic scale housing allocations.  As set out in the Housing Position Paper and the housing trajectory the Council considers that that the allocations rolled forwards from the previous iteration of the plan are deliverable, well-served by infrastructure and attractive for development.  The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three authorities significantly, substantially reducing Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  The Derby and South Derbyshire Housing Needs Assessment considers whether there is a case for raising overall housing provision in order to deliver additional affordable housing, but does not make any recommendation to do so. |
| 1243664 | Deloitte LLP on behalf of Church Commissioners for England | Deloitte LLP on behalf of Church Commissioners for England | 4.1.1. The Commissioners support the Local Plan Part 1 strategy insofar as it aligns with paragraph 35a of the NPPF which states that Local Plans should be positively prepared and provides a strategy that “as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development”.  4.1.2. The Commissioners understand the need to update the Local Plan with specific consideration for the need to deliver at least 5609 additional dwellings beyond that which is required for South Derbyshire, in order to assist Derby City in meeting their unmet need. However, to ensure that the Local Plan is justified in line with NPPF paragraph 35b and takes “into account the reasonable alternatives, and based on proportionate evidence”, the Comissioners consider that SDDC should focus delivering this unmet need across the district’s diverse and established settlements rather than only allocating large-scale new strategic housing and employment sites on the Derby urban fringe. Paragraph 70 of the NPPF considers that “small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly”. Generally, large-scale strategic housing sites, often have longer delivery timescales. This is due to several factors, including the increased complexity of planning, which often requires more intricate masterplans, extensive infrastructure assessments, and lengthy stakeholder consultations. Additionally, the provision of essential infrastructure, such as utilities, schools, healthcare facilities, and transport links, can significantly impact timelines. Securing funding for such large-scale projects is another challenge, often involving multiple stakeholders and complex agreements. In contrast, smaller housing sites tend to have shorter delivery timescales. Therefore, focusing on smaller sites can potentially address unmet housing needs faster than relying solely on large-scale strategic sites. In order to provide the significant quantum of additional unmet need, the Commissioners consider that a range of sites should be allocated to ensure delivery is spread across the plan period.  4.1.3. The Commissioners consider available sites that are in existing settlements in close proximity to the Derby urban fringe, such as the Commissioners landholdings at Land south of Milton Road, Repton (SHELAA ref 040), Land east of Main Street, Milton (SHELAA ref 222), and Land at Ex Common Farm, Milton (SHELAA ref 223) provide a strong opportunity for some of the unmet need to be delivered efficiently and sustainably early on in the plan period.  4.1.4. Further to the above, the Commissiners are concerned regarding the structure of the update to the Local Plan, reiterating their response to the SDDC Issues and Options Regulation 18 consultation (2022), the Commissioners note that the Local Plan should not be updated in two parts, as this risks disconnection between the strategic and non-strategic elements of the Local Plan.  4.1.5. The Commissioners wish to reiterate these comments in light of additional housing need being addressed across South Derbyshire, particularly the consideration that all policies within the Local Plan should be interlinked and form a coherent narrative in order to successfully achieve all aspirations set out within the overarching Vision and Objectives. As one document, the Local Plan would be able to provide all relevant information needed in order for housing and employment allocations to be developed in a timely manner, enabling consistent growth within the district. Providing, or in this case updating, the Local Plan in two parts will inevitably form a disconnect in the narrative of the plan, emphasised through the later adoption of Part 2. Therefore, the Commissioners consider that the emerging Local Plan be drafted and submitted as one document in order for all policies to be considered concurrently, avoiding any possible barriers to development and growth that may come with updating the Local Plan Part 1 in isolation, and subseqeutly directing all unmet need to be addressed through urban extension policies STRA 1 – Infinity Garden Village and and STRA 2 – Land South of Mickleover. Furthermore, it is the Commissioners position that reliance on allocations from the 2016 Local Plan Part 1 and 2017 Local Plan Part 2 is not the most appropriate method to address current housing need. If allocations have not been delivered after 8 or 9 years, it is doubful that these sites can be relied upon to deliver housing in the short term | Noted.  A number of housing allocations identified in the adopted Local Plan Part 1, including sites in Hatton, Hilton, Drakelow and the Swadlincote Urban Area, have been rolled forward as part of the Local Plan Part 1 review and continue to deliver significant numbers of homes away from the Derby urban area. It should also be noted that housing sites identified in the adopted Local Plan Part 2 continue to deliver new homes and a review of that document will provide the opportunity to address any need for additional non-strategic scale housing allocations.  Omission sites will be considered in question 13.  The Council is permitted to undertake a part 2 plan process until the new Bill comes into force December 2026. The Council will progress with either a Part 2 Local Plan or Full Plan Review very quickly after adoption. |
| 1242621 | Fisher German on behalf of David Wilson Homes East Midlands | Fisher German | The Plan proposes a 17-year Plan period between 2022-2039. The NPPF provides guidance as to the expectations of strategic policies in respect of the proposed Plan period. The wording adopted by the NPPF is clear and unequivocal, that the 15-year period is expressed specifically as a minimum (Paragraph 22), which indicates it should be exceeded only, and is not measured from the base date of the Plan, but adoption – “Strategic policies should look ahead over a minimum 15 year period from adoption”. The NPPF could have adopted more flexible language in this regard, but this requirement, which has been present in all iterations of the Framework since 2018, is clear this is a minimum threshold to deliver a sound plan period, and to be sufficiently consistent with National Policy (Paragraph 35d).  2.2 As recently confirmed by the Inspector in the Erewash Local Plan Examination, there is a clear expectation that Plans will deliver a period of 15 years or more post adoption, in accordance with the NPPF. The Erewash Inspector has in post hearing session correspondence (Post Hearings Letter, 4 September 2024) instructed Erewash to make provision for an extended Plan period to deliver 15-years, with corresponding increases in supply.  2.3 Accordingly, there is a clear expectation that Plans will deliver a 15-year time period from adoption. Turning back to South Derbyshire, the Council’s proposal is a Plan period to 2039. To achieve the requisite 15-year plan period the Plan would need to be adopted this year (2024), which was initially anticipated by the Council’s Local Development Scheme (LDS) but will clearly be missed by some margin. The adopted LDS anticipated this consultation to commence in June 2023 (17 months ago), submission to the Secretary of State and commencement and hearing session earlier this year, with adoption anticipated next month. The Council anticipated an 18-monthperiod between this consultation and adoption. Given the need to consider these responses, Reg 19, submission, examination hearings, main mods, etc, we consider this timeline as optimistic.  Assuming an 18-month period however, that would see adoption of this Plan in May 2026. Having regard for the above it is considered that this could easily slip to 2027, having regard for experiences elsewhere. This means at a minimum the Plan period should extend to 2041, and for robustness ideally beyond 2042 to allow for further slippage in development of the Plan, particularly if the Plan needs to respond to the requirements of the new NPPF. What is evident however is even assuming an optimistic approach in respect to the remaining process of Plan making, the Plan period will need to be extended, with corresponding increase in supply.  2.4 With regards to the proposed Plan requirement, the Council identifies a housing requirement of 14,483 dwellings, comprising of 8,874 (522 dwellings per annum) dwellings to meet the needs of South Derbyshire and a contribution of 5,609 dwellings to meet the needs of Derby City. This is of course predicated on the proposed 17 year Plan period, and thus regardless of any further consideration of need, would need to be increased to cover a robustly established Plan period post adoption, at least two additional years with corresponding increase in housing land supply.  2.5 Turning to need, this is split into two separate considerations, South Derbyshire’s need and the appropriate contribution to unmet need emanating from the HMA (Derby City). In respect of South Derbyshire’s need, the Plan advocates delivering Base Local Housing Need (BLHN) only, disregarding any uplifts to deliver additional affordable housing for example. The NPPF confirms that Local Housing Need should in essence form the minimum starting point when establishing a housing requirement (NPPF Paragraph 61). The PPG affirms when it may be appropriate to uplift the housing requirement (Paragraph: 010 Reference ID: 2a-010-20201216), which include but are not limited to:   * growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals); * strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or * an authority agreeing to take on unmet need from neighbouring authorities.   2.6 Crucially, the exploration as to whether an increase in housing requirement from base local housing need is justified must be “assessed prior to, and separate from” the consideration as to whether or not the level of housing need can be accommodated. This means that the Council must in the first instance explore whether there is any justification to increase the housing requirement. Only once a robust housing requirement has been established should an assessment be undertaken as to whether or not the authority can meet such needs, establishing if in meeting such needs would result in an unacceptable pattern of development and if such fully established needs cannot be met, where any shortfalls can be delivered.  2.7 It is noted that the Local Housing Needs Assessment (December 2023) sets out an affordable need of 214 dwellings per annum, which paragraph 6.55 of the Draft Local Plan affirms is 40% of the South Derbyshire’s BLHN. However, having regard for the composition of the Council’s supply, much of which is expected to be delivered on small windfalls and other sites which may deliver lower levels of affordable housing, or no affordable housing at all. Even if viability testing demonstrate that 40% affordable provision is deliverable and viable, Council will most likely not meet its affordable housing needs. As such the Council should give due consideration to whether this amounts to sufficient justification to increasing the housing requirement to ensure affordable needs are met in full.  2.8 Turning to South Derbyshire’s approach to Derby City’s unmet need, it is saliant to note that Derby City set out in a letter to HMA partners that the City anticipates a housing need of 21,522 dwellings with a capacity of only 12,500 homes, covering the period 2022-2039, resulting in an unmet need of 9,022 dwellings (this figure is still part of ongoing discussions and is predicated on Derby City’s supply being accurate, thus will likely only be finalised on adoption of Derby City’s emerging plan).  Amber Valley, who are far more advanced in the Plan making process at Examination have proposed a 1,320 dwelling contribution to Derby City’s unmet needs through a single strategic allocation at Brun Lane, Mackworth. We have raised serious concerns to the Amber Valley Examination in relation to the approach adopted by Amber Valley in identifying its contribution to Amber Valley’s contribution to unmet need, which is based solely on the capacity of the Brun Lane site. This is in conflict with the PPG (Paragraph 2a-010-20201216) which affirms assessment of how much housing need should be delivered should be wholly separate from any consideration of supply in the first instance.  2.9 Notwithstanding this, it is further pertinent to note that the Brun Lane site has been withdrawn from consideration by the landowners and thus may not even be deliverable. A smaller area of land has been put forward instead, but it is not clear whether this will be viewed as acceptable or not, but even if so, will reduce significantly the quantum of unmet need to be delivered in Amber Valley. Even if the whole site was seen as deliverable, there is no work being undertaken towards a planning application and thus the Council’s anticipated trajectory for the site seems wholly optimistic with high delivery on the site assumed to commence in 2029, thus logically the deliveryof unmet needs would again be lower.  2.10 Regardless of these matters, even if it is assumed that delivery of the full 1,320 dwelling contribution to Derby City can be guaranteed, this leaves remaining unmet need of 7,702 dwellings, and with South Derbyshire’s proposed contribution of 5,609 dwellings, this still leaves unmet needs of 2,093 dwellings. This is need that must be positively delivered within the HMA, and whilst it would not be unreasonable for South Derbyshire to argue at least part of this should be delivered in Amber Valley, outstanding unmet need should be positively met within South Derbyshire also. Given this Plan is proposing only 2 new allocations, it would not seem unreasonable for the Council to either identify further sites through this Plan to meet this need in full or commit to meeting this need under a review of the Part 2 Plan. Our client’s land interests are both spatially and geographically well connected to Derby City and thus could easily be selected to positively meet this need.  2.11 Earlier this year the new Labour Government consulted on proposed changes to the NPPF and PPG insofar as it relates to the methodology of calculating Local Housing Need. Our understanding is that the new NPPF will be published this calendar year, but we do not know what will be in the final version. Clearly the Plan will need to respond appropriately to this and the new NPPF, and there will be opportunities in future consultations to comment, but for the purpose of this response we will utilise the draft NPPF and PPG. The updated Local Housing Need will increase to 606 dwellings per annum (Outcome of the Proposed Standard Methodology 20241). Due to the removal of the 35% urban uplift, Derby City sees its housing requirement reduce from 1.244 dwellings to 1,062 dwellings per annum, a reduction of circa 180 dwellings per annum. Therefore, it may be assumed that the increase to South Derbyshire’s need will be removed by the reduction in Derby City’s Local Housing Need. It is however not that simple, as Amber Valley’s needs have increased even further to 682 dwellings per annum (from a current BLHN of only 351 dwellings pr annum).  2.12 Derby City’s Local Housing Need would reduce from 21,148 dwellings to 18,054 dwellings. Assuming the supply position in the City remains at 12,500 dwellings without Green Belt release(which is the currently adopted HMA strategy), unmet need would drop from 8,648 dwellings2 to 5,554 dwellings. Given the increase to Amber Valley’s needs, it is possible that they will not be able to meet any of Derby City’s needs or declare unmet needs themselves. This means South Derbyshire may need to meet its higher BLHN figure, and a similar or potentially even greater figure in respect of unmet needs. Again, there are suitable sites which could be identified to meet this need, including the two sites put forward by our client.  2.13 We provide further comments in relation to the approach to unmet need in Question 4 below. 1 https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and?other-changes-to-the-planning-system 2 This number deviates from the number provided at 2.8 as is based on the Governments calculation within consultation document Outcome of the Proposed Standard Methodology 2024 not that which informed the Derby HMA evidence  2.14 The Council has not provided a detailed trajectory or updated 5-year housing land supply assessment as part of this consultation. Therefore, it is very difficult to critically assess the Council’s assumed supply position. Full trajectories and anticipated supply on adoption should be provided at Regulation 19 stage so these can inform responses and aid the Inspector in setting their MIQs. At this stage however we would make the following comments in relation to existing commitments or rolled over allocations. In particular, we would point out that the Local Plan Part 1 was adopted over 8 years ago, and the Local Plan Part 2 adopted over 7 years ago. The Planning Practice Guidance (PPG) (Paragraph: 065 Reference ID: 61-065-20190723) confirms that when updating Plans consideration can be given to “whether issues have arisen that may impact on the deliverability of key site allocations”. The Council should apply a highly critical view as to whether sites which have not advanced or have stalled are realistically going to be deliverable. Our comments are based on the Council’s South Derbyshire Authority Monitoring Report Appendix 2: Housing Position Paper (January 2024).  2.15 We set out concerns below in relation to the Wragley Way (Phase 2) (H15) in respect of it not currently having an outline permission but also in how it will likely compete and thus potentially slow delivery on the additional Infinity Garden Village allocation proposed in this Plan or vice versa, particularly given the two sites forming essentially part of the same SUE are together anticipated to deliver 3,850 dwellings up to 2039.  2.16 Policy H23M: Montracon, Swadlincote is acknowledged by the Council to likely be deliverable for employment uses (South Derbyshire Authority Monitoring Report Appendix 2: Housing Position Paper (January 2024)) and thus should be removed. There are further sites which appear to have stalled or remain without a permission despite being allocated for a significant period of time. The aforementioned South Derbyshire Authority Monitoring Report Appendix 2: Housing Position Paper should be updated, or similar evidence, with a full trajectory of sites inclusive of planning status and a trajectory clearly showing assumed start dates and annual yields thereafter of all commitments and proposed allocations (it is noted there is a trajectory in the Appendix 2 document but this is out of date and does not show projections for the new allocations).  2.17 The Appendix 2 document provides a 5-year land supply calculation of 5.76 year based on the Part 1 Local Plan requirement, and 8.18 years based solely on BLHN (exclusive of contribution to Derby City unmet need), but again updated figures and full supporting evidence should be provided at Regulation 19 for comment, to ensure the Plan is capable of meeting a 5-year housing land supply and supply over the Plan period (inclusive of appropriate buffers and contributions to unmet need). If the proposed requirement of the emerging Plan is used, 852 dwellings per annum (522 BLHN and 329 dwelling per annum contribution to Derby City’s unmet needs (5,609 divided by the 17-year Plan period)), then utilising the Council’s assumptions on supply within the Appendix 2 document, the supply would be 5.0 years. This is before any critical evaluation of the Council’s proposed supply. Given the Plan is not proposing any new allocations, this position is likely to brought to under 5-years on adoption, thus could find itself either unsound or immediately out of date (Particularly if the new NPPF is applicable wherein a buffer would need to be provided). We will provide detail comments at Regulation 19 when the Council provide updated figures. If the new Standard Method (606) was to be utilised, and 5% buffer, supply would drop to 6.7 years, but as discussed within these representations despite Derby City’s need decreasing, it would still have unmet needs. Moreover, Amber Valley may not be able to meet any needs given the significant increase to their requirement. As such, we do not believe it inconceivable that a similar quantum of unmet need would need to be met in South Derbyshire, if this occurred and 329 dwellings per annum of contribution to unmet need was established, supply would drop to 4.4 years. Again, this assumes that the supply is wholly robust, which is not agreed.  2.18 Policy S4: Housing Strategy outlines that assuming the delivery of all expected sites and contributions of unmet need by HMA partners, this will leave a shortfall of 851 dwellings which the Council proposes to provide through windfall delivery. Paragraph 23 of the NPPF is clear that “Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area”. It is necessary that Plans provide sufficient allocations to cover the housing requirement, not insufficient to be later bolstered through anticipated windfall delivery. Moreover, there is no provision of supply to provide a buffer against non-delivery of site’s thus the Plan has very little flexibility.  2.19 Your attention is again drawn to the conclusions of the Inspector of the Bedford Local Plan 2040 which is currently undergoing examination, who at Paragraph 56 of the post hearing note states “by the Council’s own acceptance, the Plan has very little flexibility built in that may assist with managing either of these issues”, concluding that “from the evidence presented, I am not satisfied that housing needs after 2030 would be addressed as anticipated, leaving an overall gap in provision against assessed needs within the Borough across the entire plan period (including affordable housing)”.  2.20 At the ongoing Erewash Core Strategy Review examination, the Inspector is requiring sufficient housing sites to be identified to meet the housing requirement. Should this Plan leave any shortfalls in housing land supply, it should be explicit that these will need to be met through the subsequent Part 2 Local Plan Review, not simply met through windfall. The Erewash Inspector in their post hearing note (Paragraph 4.6) stated “Given the marginal supply in relation to requirements it would be sensible to identify sufficient capacity to provide a reasonable amount of flexibility in addition to this” [our emphasis]. I.E. in terms of supply there should not only be sufficient to cover the housing requirement, but reasonably a buffer to protect against non-delivery, particularly given the Plan’s reliance on just two new strategic allocations | Agree in part / Noted.  The Council will amend the plan period sto 2041.  The new Standard Method changes the minimum needs of the three HMA authorities significantly, substantially increasing Amber Valley Boroughs annual figure, substantially reducing Derby’s and increasing South Derbyshire’s, albeit to a much lesser degree.  The District Council’s current position is that whilst recognising these changes, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024. This is to reflect current uncertainty regarding the extent to which the emerging Amber Valley Local Plan can assist in meeting Derby’s needs; to recognise and reflect the high level of housing delivery recorded for the District over the past several years and to provide a supply buffer for flexibility.  It is not considered that the outputs of the new standard method justify an increase in South Derbyshire’s overall requirement.  The Part 1 Local Plan review is concerned with strategic scale housing, employment and mixed use development. The subsequent review of Part 2 policies will provide an opportunity to address any need for smaller scale development allocations, including to help meet any affordable housing needs.  The Derby and South Derbyshire Housing Needs Assessment considers whether there is a case for raising overall housing provision in order to deliver additional affordable housing, but does not make any recommendation to do so.  A housing trajectory will be prepared taking account of any significant constraints that will need to be addressed. |
| 1243572 | Fisher German on behalf of Mrs E Goodson | Fisher German |
| 1243598 | Fisher German on behalf of Mr Grantham Newton Solney | Fisher German |
| 1243178 | Freeths on behalf of Commercial Development Projects Ltd | Freeths LLP | No. The approach is too focussed on strategic sites.  Whilst the allocation of large strategic sites close to the Derby urban area is a reasonable strategy in addressing, at least in part, Derby City Council’s (“DCC”) unmet housing needs, as explained in response to questions 4 and 9, the overall housing numbers that the Plan should cater for is likely to increase.  If the draft NPPF’s consultation proposal to change the standard methodology was not adopted, and the existing methodology maintained, SDDC should be exploring how they could accommodate a greater percentage of unmet DCC housing need. The much likelier scenario is that the new NPPF will be shortly published and coupled with guidance in the National Planning Practice Guidance will revise the standard methodology for calculating Local Housing Need. Based on the figures that accompanied the consultation this will increase SDDC’s annual requirement by 16% from that proposed in the draft Local Plan (522 to 606). There will also still be a requirement for accommodating a significant amount of DCC’s unmet need.  Under either of the above scenarios, the emerging Local Plan should provide greater flexibility to the proposed locations and scale for new allocations. There are a number of reasons justifying this;   * The new allocations are limited to two Sustainable Urban Extensions (2,000 and 2,500 dwellings) respectively. As has been experienced with SDDC’s existing SUEs, these take significant time to deliver and in the short term will put significant pressure on SDDC’s ability to demonstrate a five-year housing supply in the early period of the Local Plan. Further, given that the plan period is only until 2039, it is almost inevitable that the two SUEs will not deliver in full during the plan period. * SDDC has a significant number of Key Service Villages which are highly sustainable and could provide development proportionate to these settlements, at a scale that could deliver in the first five years of the adoption of the Plan. * Distribution of some development to Key Service Villages would provide a better balance to the spatial strategy, which effectively concentrates all new development on the Derby Urban fringe.   These points are explained in further detail in response to individual policies under Question 9. | Noted.  The new Standard Method changes the minimum needs of the three HMA authorities significantly, substantially increasing Amber Valley Boroughs annual figure, substantially reducing Derby’s and increasing South Derbyshire’s, albeit to a much lesser degree.  A number of housing allocations identified in the adopted Local Plan Part 1, including sites in Hatton, Hilton, Drakelow and the Swadlincote Urban Area, have been rolled forward as part of the Local Plan Part 1 review and continue to deliver significant numbers of homes away from the Derby urban area. It should also be noted that housing sites identified in the adopted Local Plan Part 2 continue to deliver new homes and a review of that document will provide the opportunity to address any need for additional non-strategic scale housing allocations. |
| 1242071 | Green 4 Development | Green 4 Development | A full review of housing and employment need would have been preferable rather than only carrying forward existing allocations and only considering two new strategic housing allocations both of which are to meet Derby housing need rather than the opportunities within South Derbyshire. | Noted.  A number of housing allocations identified in the adopted Local Plan Part 1, including sites in Hatton, Hilton, Drakelow and the Swadlincote Urban Area, have been rolled forward as part of the Local Plan Part 1 review and continue to deliver significant numbers of homes away from the Derby urban area. It should also be noted that housing sites identified in the adopted Local Plan Part 2 continue to deliver new homes and a review of that document will provide the opportunity to address any need for additional non-strategic scale housing allocations. |
| 1243182 | Hawksmoor on behalf of I Foster | Hawksmoor | We would respectfully suggest the Plan process should be a full review not a first stage partial review, thereby making the process more futureproof, reliable and ultimately capable of being found sound to deliver all housing requirements. | Noted.  The Council is permitted to undertake a part 2 plan process until the new Bill comes into force December 2026. The Council will progress with either a Part 2 Local Plan or Full Plan Review very quickly after adoption. |
| 1242038 | Calum Reford | Inspire Design & Development | How does the LPA plan on proividng the calculated 20% uplift in annual housing requirements proposed by the incoming NPPF revised standard method? | Noted.  The new Standard Method changes the minimum needs of the three HMA authorities significantly, substantially increasing Amber Valley Boroughs annual figure, substantially reducing Derby’s and increasing South Derbyshire’s, albeit to a much lesser degree |
| 1236582 | JMI Planning | JMI Planning | The non-strategic allocations rolled forward should also be reviewed. Site H23L is capable of expansion to deliver a further 10 to 12 units. Representations to include the site within the SHELAA were submitted in August 2024. In summary:-  The site is located on the edge of a rural settlement. It is adjoined on three of its four sides by existing and forthcoming built form. The development of the site for residential purposes would not therefore introduce a non-conforming use into the area and would not involve isolated intrusion into open countryside.  The site has an area of approximately 0.62ha. Based upon the surrounding built form, it could deliver around 10 to 12 dwellings. This would represent a modest and sustainable increase in the number of houses in Scropton and would not overwhelm the existing settlement.  The new houses would help to maintain the ongoing viability of existing services in the area. New family homes in the village would increase the customer base for services and facilities in nearby Hatton, helping to secure their long term retention.  The site is accessed via the neighbouring residential development site, which is within the same ownership. The residential development site is accessed off Scropton Road. The access has been designed to accommodate residential development and visibility is good in both directions.  There are no public rights of way crossing the site.  The Grade II listed Old Hall on the Scropton Road frontage is viewed in the context of more recent residential properties and as such the sensitive residential development of the site would not introduce an alien feature into its setting which would fundamentally affect its character.  The site is not designated as a Site of Special Scientific Interest (SSSI) or a Special Area of Conservation (SAC). Any impact upon protected species and their habitat can be further assessed and mitigated through the planning application process. There is adequate space on the site to provide suitable mitigation and biodiversity enhancement as required.  The site lies within Flood Zone 3, but there has been significant recent works to defences along this section of the River Dove. Flood risk was not an insurmountable constraint to developing the site immediately to the east, which sits at a broadly similar level.  The site is not affected by underground coal workings.  The parcel is relatively small in agricultural terms and does not constitute Best and Most Versatile Agricultural Land. Development of the site would not prejudice food production.  There are services and utilities running along Scropton Road. The development would therefore be sustainably located relative to services and utilities with minimal disruption involved.  The parcel is in single ownership and the owner is committed to bringing it forward for development  The site owner is prepared to release the site for self-build plots if required to help the Council meet its targets.  There are therefore no legal or technical constraints preventing development from being brought forward. | Noted.  Omission sites will be considered in question 13. |
| 1242408 | Lichfields (on behalf of St Philips Land Ltd) | Lichfields | The Plan Period 2.5 Draft Policy S1 (Sustainable Growth Strategy) sets out that the Council will “will promote sustainable growth to meet its objectively assessed housing and commercial needs in the plan period 2022-2039.” In this regard, St Philips wishes to highlight to the Council that the NPPF (2023) is clear that: “Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.” (Para 22) (Emphasis added)  2.6 The NPPF is explicit that strategic policies should look ahead over a 15-year period and, importantly, this should be from adoption. In this regard, the Council is seeking to submit the DLP to the Secretary of State for examination in public [EiP] in 2025 and St Philips considers that it is unlikely that the DLP will be adopted before 2026. Assuming these timescales are correct and the plan is adopted quickly in 2026, this would result in only a 13-year plan period from adoption. The proposed plan period is therefore not in accordance with paragraph 22 of the NPPF.  2.7 St Philips would therefore urge the Council to consider amending the plan period to cover the period up until 2042. This would ensure that the plan covers a 15-year period from adoption, even in the event that the EIP programme were to slip. It is important to note that by extending the plan period, the Council would need to identify land for an additional 1,818 dwellings (equating to an additional three years of housing need). St Philips considers that this is a reasonable approach and is required to ensure compliance with paragraph 22 of the NPPF.  Housing Requirement The Councils Approach  2.8 Draft Policy S1 outlines the proposed housing requirement for South Derbyshire over the period 2022 to 2039. It sets out that “at least 14,483 dwellings will be built within South Derbyshire”, which “comprises 8,874 homes to meet South Derbyshire’s own needs and 5609 to help meet Derby City’s unmet need.”  2.9 Supporting text to the policy states that the ‘Derby and South Derby Local Housing Needs Assessment (December 2023)’ [LHNA] underpins the housing needs set out within the DLP. The LHNA utilizes the Standard Method [SM] to calculate local housing need [LHN]; it finds that South Derbyshire has a housing need of 522 dwellings per annum [dpa] and that there are no ‘exceptional circumstances’ which would justify departing from the use of the SM. Additionally, the Council has relied upon the ‘Growth Options Study 2021’ [GOS] and ‘Derby HMA Sustainability Appraisal of Housing Options (2024)’ (“DHMA SA”) to conclude that South Derbyshire can accommodate approximately 5,600 dwellings of the unmet needs which arise from Derby as a part of the Derby Housing Market Area (“DHMA”).  2.10 St Philips broadly supports the Councils approach to assessing its’ housing needs. In accordance with the Planning Practice Guidance [PPG], the Council appear to have correctly utilized the 2014-based household projections and 2023 median work-place-based affordability ratios in order to generate the LHN figure. Notwithstanding this, St Philips wishes to highlight to the Council that the PPG is clear that this figure should be kept under review and revisions should be made where appropriate (e.g. in order to reflect the latest median affordability ratios). St Philips is also supportive of the Council helping Derby to address its unmet housing needs and considers that providing for these strategic and cross boundary needs is in accordance with paragraph 11b and 35c of the NPPF.  The Emerging NPPF 2.11 Notwithstanding the above, the newly elected Labour Government have recently undertaken a consultation on proposed changes to the NPPF and the new SM. The use of the new SM to calculate housing needs would see South Derbyshire’s LHN figure increase from 507 dpa to 606 dpa. This would generate a total housing need of 10,302 dwellings over the proposed DLP plan period (an additional 1,428 dwellings).  2.12 Whilst the proposed changes to the SM have yet to be adopted (and currently carry limited weight), St Philips notes that Angela Rayner (the Deputy Prime Minister, and Secretary of State for the Ministry of Housing, Communities & Local Government) has outlined the Governments position within a Written Ministerial Statement [WMS] (dated 30th July 2024). The WMS is clear that “local authorities will be expected to make every effort to allocate land in line with their housing need as per the standard method”.  2.13 When considered alongside the transitional arrangements proposed at paragraph 226-229 of the emerging NPPF [NPPF 24], and the Councils suggested timeframes for the New Local Plan, it is evident that South Derbyshire will soon need to plan for the new SM figures. If the DLP were to be adopted in 2o25/6, South Derbyshire would need to address the increased SM figures through the next stage of plan-making. In this context, St Philips has reservations regarding the Council only making allocations on the edge of Derby and considers that this risks overconcentrating growth in this location. St Philips considers that the Council should explore allocating further sites within the district in order to meet its own needs.  Housing Land Supply Trajectory  2.14 St Philips has been unable to identify a housing trajectory for the plan period; it appears that the Council has not yet identified the expected rate of development for the extant and strategic allocations. Equally, no assumptions have been made in respect of timescales for when development is likely to commence at these sites. St Philips therefore considers that, at present, the DLP does not accord with paragraph 75 of the NPPF as it does not provide adequate detail to evidence the assumed delivery rates of strategic allocations. It is therefore unclear whether the strategic allocations are deliverable and if a sufficient housing land supply will be maintained over the plan period.  Housing Land Supply Buffer 2.15 Over the proposed plan period (2022-2039), South Derbyshire’s proposed housing requirement is stated to be 14,483 dwellings. This total includes a 5,604 dwelling contribution towards the unmet needs of Derby, as well as 8,874 dwellings of South Derbyshire’s own need. Draft Policy S4 (Housing Strategy) states that the DLP will make provision for 13,632 dwellings over the plan period, which will include:   1. Existing/Remaining Local Plan Part 1 allocations. 2. Existing/Remaining Local Plan Part 2 allocations. 3. New strategic allocations (STRA1 and STRA2). 4. An additional 851 dwellings through windfall development.   2.16 St Philips notes that South Derbyshire are only making adequate provision to meet their housing needs, and no buffer has been applied; there is consequently no ‘headroom’ within the Councils proposed supply. St Philips is concerned that the supply is therefore vulnerable to delays in delivery or sites failing to come forward.  2.17 St Philips acknowledges that the DLP’s housing requirement exceeds the LHN figure by providing a contribution towards meeting the unmet needs of Derby. However, this contribution should not be used to act as a buffer. This approach would result in Derby’s needs not being met if components of the supply failed to come forward or were delayed. Consequently, St Philips considers that this would not be an approach that allowed for flexibility and adaptability as required by NPPF paragraph 86.  2.18 St Philips would suggest that the Council considers incorporating a buffer and should look to identify additional sites for housing. This would introduce flexibility into the Councils land supply, allowing for a response where sites fail to come forward or do not deliver at expected rates. St Philips wishes to highlight the following cases where an Inspector has found the inclusion of a buffer to be sound at examination:   1. Guildford: 36% buffer 2. South Kesteven: 18% buffer 3. Chelmsford: 18% buffer 4. Harrogate: 25% buffer 5. South Oxfordshire: 27% buffer 6. Chesterfield: 59% buffer 7. Mansfield: 34% buffer   2.19 In the context of the above, St Philips considers that the Council should incorporate a buffer, applying it to South Derbyshire’s own housing needs and the unmet needs of Derby. This approach would introduce flexibility and ensure that the Council could still meet its own and Derby’s needs, if some supply components were to fall away. It is St Philips position that this buffer should incorporate approximately 20% headroom into the DLP supply. This would require the Council to identify further suitable sites for housing. In this regard, St Philips would urge the Council to consider allocating the land at Main Street, Etwall (discussed in further detail below) in order to ensure the plan is suitably flexible and able to adapt to changing circumstances.  Land at Main Street, Etwall  2.20 St Philips is promoting the land at Main Street, Etwall for allocation within the DLP. The site is located on the north-eastern boundary of Etwall, which is identified within the DLP as a ‘Key Service Village’ and ranked second in the settlement hierarchy. The site comprises agricultural land which is bound by residential development to the south, Main Street to the north, and agricultural land to the east. With the exception of the eastern boundary, the site is enclosed on all sides by built development and is bound by mature trees and hedgerows.A Vision Document has been included within Appendix 1 of these representations to aid the Councils consideration of the site.  2.21 A range of facilities such as a primary school, a secondary school (John Port Spencer Academy), convenience store, post office and a pharmacy, are within a twenty-minute walk of the site. Multiple indoor and out-door sports facilities (including football pitches, a cricket field, a bowls club and Etwall Leisure Centre) are accessible within Etwall, and allotments are also located to the south of the settlement. 2.22 The site is sustainably located, with the nearest bus stop (Sutton Lane) situated within a five-minute walking distance. Bus service ‘V1-the villager’ provides frequent services between Burton upon Trent and Derby and the site is therefore strategically and sustainably positioned for residential development.  2.23 The site itself is not subject to any environmental constraints and is located within Flood Zone 1. It does not accommodate any listed structures, however it is located adjacent to Etwall Conservation Area.  2.24 St Philips is proposing to deliver a high-quality residential development of 55 dwellings alongside open space and children’s play facilities. The development would deliver a landscape led scheme which frames a network of ecological spaces and ensures the delivery of biodiversity net gain. Safe access to the site would be achieved via Main Street and new foot routes would be delivered to encourage recreation and physical activity. The proposed development will seek to enhance the sense of place of Etwall as well as incorporate distinctive existing features from the local built environment.  2.25 In this context, St Philips would encourage the Council to consider allocating the land at Main Street as a strategic site allocation within the DLP. | Agree in part / Noted.  The Council will amend the plan period sto 2041.  The new Standard Method changes the minimum needs of the three HMA authorities significantly, substantially increasing Amber Valley Boroughs annual figure, substantially reducing Derby’s and increasing South Derbyshire’s, albeit to a much lesser degree. The Standard Method calculation will be kept under review.  A housing trajectory will be prepared taking account of any significant constraints that will need to be addressed.  There is no NPPF requirement to include a buffer in the housing supply. Notwithstanding this although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in it’s Draft Local Plan, published October, 2024.  This is to reflect current uncertainty regarding the extent to which the emerging Amber Valley Local Plan can assist in meeting Derby’s needs; to recognise and reflect the high level of housing delivery recorded for the District over the past several years and to provide a buffer for flexibility.  Omission sites will be considered in question 13. |
| 1243594 | Marrons on behalf of 2012 Partnership Homes Ltd | Marrons on behalf of 2012 Partnership Homes Ltd | 2. SCOPE, VISION AND OBJECTIVES 2.1 PLAN PERIOD 2.1.1 The Draft Plan sets out a growth strategy for South Derbyshire between 2022 and 2039. The National Planning Policy Framework (NPPF) (December 2023) requires strategic policies to look a minimum of 15 years beyond adoption (paragraph 22). Paragraph 1.38 of the Draft Plan anticipates adoption by the end of 2025. As the end date of the Plan should be calculated from the first full monitoring year following adoption, the Council’s timeline indicates that the Draft Plan should extend to March 31, 2041 as a minimum based on the current anticipated timescales.  2.1.2 Given that the Draft Plan is only at Regulation 18 stage and the likely need to update its content given the impending changes to the NPPF, it is highly unlikely that adoption will occur by the end of 2025. A more realistic estimate would be end of 2026 and this would, following the advice of the NPPF, require the plan period to extend to March 31, 2042.  2.1.3 The Plan period underpinning the Draft Plan, which runs only to 2039, is not compliant with paragraph 22 of the NPPF.  2.2 SCOPE OF THE PLAN 2.2.1 Paragraph 1.6 of the Draft Plan states that this review is a partial update of the Part 1 Local Plan, intended specifically to address unmet housing needs from Derby. Paragraph 1.12 clarifies that a comprehensive plan and full review will follow after adoption of the Part 1 Partial Review. Further, paragraph 1.13 highlights that the primary focus of the emerging Plan will be two key allocations on Derby’s urban fringe: Infinity Garden Village and the Land to the South of Mickleover.  2.2.2 Section 15 of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to prepare and maintain a Local Development Scheme (LDS). The LDS must, amongst other things, specify the subject matter and geographical area to which each development plan document relates.  2.2.3 The most recent LDS available for South Derbyshire covers the period 2022 to 2025. Inter alia, the LDS sets out that the Joint Advisory Board for the Derby Housing Market Area (HMA) agreed a minimum Plan period of 15 years and that most of the policies of the Local Plan Part 2 for South Derbyshire will be reviewed alongside the Part 1 Local Plan Review, and subsumed into a new Local Plan. In addition, it is stated the new Part 1 Plan will provide a long-term vision for the spatial development of South Derbyshire and provide allocations for housing and employment sites “across the District.”  2.2.4 As set out above, the form of the Plan currently consulted on clashes with the most recently adopted LDS. It does not provide for the minimum Plan period of 15 years nor does it review the adopted Part 2 Local Plan, which is carried forward in its entirety. Most importantly, the Plan now published for consultation fails to provide a long-term vision for the spatial development of the District as a whole. In short, what has been published in the form of the emerging Plan as a partial review to address unmet needs from Derby only and on the edge of Derby only, is not in compliance with the most recent LDS.  2.2.5 The purpose of the LDS is to create some degree of certainty for the public, stakeholders and the development industry over the timescales and scope of plan preparation. Here the LDS has not been followed nor has it been updated and published as it should have been to reflect a drastically altered scope from the publication of the most recent LDS.  2.2.6 Paragraph 1.13 of the Draft Plan which states that its focus will be upon two specific strategic allocations at Derby Urban Fringe illustrates that the substantive content of the Plan has been pre-judged. A robust process to formulate the most appropriate strategy when considered against the reasonable alternatives has not been followed. Rather, the Draft Plan appears to have started at what ought to have been its destination through the allocation of specific sites in a certain location, rather than by following an objective process informed by a robust evidence base to identify the best performing strategy and sites which meet objectively assessed needs for development.  2.2.7 The Plan should address housing needs of South Derbyshire as a whole in addition to those unmet needs emanating from Derby and across the HMA over an appropriate plan period. The Draft Plan’s accompanying Interim Sustainability Appraisal acknowledges that as a result of forthcoming national policy changes, the number of homes required for South Derbyshire are likely to increase as a result of changes to the Standard Method for calculating local housing need and that the Plan will need to take account of these changes.  2.2.8 The restricted scope of the Plan as a partial review only to deal with Derby’s unmet housing need is not justified and is inappropriately driving choices regarding the amount and location of housing and economic development.  4.5.1 The Plan allocates two large-scale strategic urban extensions net of existing commitments to address housing needs to 2039, including part of the unmet need arising from Derby within the same period. For the reasons explained above, the SA has closed its mind to reasonable alternatives that do not involve strategic expansions to the edge of Derby and this has informed an approach that is not robustly evidenced or justified.  4.5.2 The Plan has failed to consider locally-specific settlement-based needs. Paragraph 67 of the NPPF (December 2023 version) states that strategic policies should set out a housing requirement for designated neighbourhood areas. The Plan fails to do this thereby falling into conflict with national policy. The Plan has also failed to consider making provision for a stock of small and medium sized sites over the plan period, as required by paragraph 70 of the NPPF, thus falling into conflict with this aspect of national policy as well.  4.5.3 The Draft Plan does not outline how housing needs have been assessed at a more detailed, parish level across the District. This is despite clear evidence in Section A of the December 2023 LHNA, which indicates that areas of South Derbyshire beyond the Derby fringe have distinct affordable housing needs. It also appears that the Plan has not considered other housing needs necessary to sustain local settlements. In contrast, Amber Valley District Council’s local plan’s evidence base included a “Small Area Analysis” to estimate the housing needed to maintain a stable working-age population and adequate numbers of children to support local schools. In SDDC’s case, there is no indication of whether the distribution of housing over the plan period will address the social sustainability of settlements outside of Derby and, critically, whether the amount of housing already planned for in these areas will support local service provision. In this respect, we draw attention to paragraph 83 of the NPPF (December 2023) which states to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies, it states, should identify opportunities to grow and thrive, particularly where this will support local services. On the basis that the Plan has taken the decision to concentrate all net growth on the edge of Derby, it clearly has not had appropriate regard to paragraph 83.  4.5.4 The top-heavy nature of the spatial strategy becomes even more apparent considering the apportionment of housing across the District under the Plan which would see almost 70% of growth over the plan period directed to Derby. Whilst as the largest and most sustainable settlement in the HMA it is inevitable to some extent that Derby will play a significant role in meeting growth needs, the quantity of provision brought forward on the edge of the urban boundary when compared to elsewhere in the District will not lead to a balanced pattern of growth that spreads the benefits of development. It may also create infrastructure delivery and capacity challenges and under-delivery in the early parts of the plan period. The strategy should be reviewed to provide a balanced portfolio of sites in a variety of areas which are capable of coming forward to address parish-based and localised needs to underpin the viability and vitality of settlements. | Agree in part / Noted.  The Council will amend the plan period sto 2041.  The Local Plan Part 1 Review is a full review of the adopted Local Plan Part 1 not a partial review. Every policy has been reviewed, and changes have been made to policies where deemed necessary. The Council will ensure that the Pre-Submission Local Plan Part 1 clarifies this.  A revised LDS will be published with the Regulation 19 consultation.  A number of housing allocations identified in the adopted Local Plan Part 1, including sites in Hatton, Hilton, Drakelow and the Swadlincote Urban Area, have been rolled forward as part of the Local Plan Part 1 review and continue to deliver significant numbers of homes away from the Derby urban area. It should also be noted that housing sites identified in the adopted Local Plan Part 2 continue to deliver new homes and a review of that document will provide the opportunity to address any need for additional non-strategic scale housing allocations.  The new Standard Method changes the minimum needs of the three HMA authorities significantly, substantially increasing Amber Valley Boroughs annual figure, substantially reducing Derby’s and increasing South Derbyshire’s, albeit to a much lesser degree.  Comments relating to the SA have been considered under question 12.  The Council has produced a Settlement Growth Study which considers the level of growth required across the District within each of the settlements. The outcome of the study is that growth in settlements (other than the Derby Fringe) is not strategic in scale and can be addressed through the Part 2 Local Plan / Full Plan Review or via Neighbourhood Plans.  In regard to the NPPF requirement to identify in the Local Plan a proportion of sites of less than 1ha, the Local Part Part 1 review is concerned with new strategic scale housing, employment and mixed use development. Any need for additional non-strategic allocations will be taken into account as part of a subsequent review of policies contained in the Part 2 Local Plan. |
| 1243636 | Marrons on behalf of Ainscough Strategic Land | Marrons on behalf of Ainscough Strategic Land | 3. THE HOUSING REQUIREMENT – POLICY S1 3.1 INTRODUCTION 3.1.1 Policy S1 sets out the “Sustainable Growth Strategy,” which is to secure sustainable growth to meet objectively assessed housing and commercial needs in the Plan period 2022 to 2039. Over the Plan period, at least 14,483 dwellings will be built in South Derbyshire comprising 8,874 homes to meet South Derbyshire’s own needs and 5,609 to help meet Derby City’s unmet needs. Below we comment further upon the soundness and legal compliance of the Draft Plan’s housing requirement drawing on key elements of the evidence base as relevant.  4. POLICY S4: HOUSING STRATEGY 4.1 INTRODUCTION 4.1.1 Draft Policy S4 states that the Local Plan Part 1 will allocate at least 13,347 dwellings, including existing commitments and two proposed strategic housing sites on the outskirts of Derby. The remainder of the overall housing requirement is expected to be met through windfall developments, estimated at 851 dwellings in total.  6.1 THE HOUSING REQUIREMENT 6.1.1 The Draft Plan's proposed housing requirement is unsound, as it lacks adequate justification from the evidence base and fails to fully address Derby’s unmet housing needs. Additionally, the plan has been set over an unreasonably short timeframe. Derby’s urban housing capacity has been significantly overestimated, with no rigorous audit of the sites expected to deliver housing within the city. Nevertheless, SDDC and AVBC have based their emerging Plans on this incomplete and flawed data, which, as of this writing, remains to be published fully. This approach risks an HMA-wide housing shortfall, undermining both the soundness of the Draft Plan and the Duty to Cooperate. Moreover, the housing requirement has not been developed with proper regard to the guidelines in the PPG.  6.2 SPATIAL STRATEGY 6.2.1 The Draft Plan’s scope has driven the site selection process. The sites taken forward for allocation on the edge of Derby have not been chosen following a robust, transparent and objective process through the Sustainability Appraisal. The Growth Options Study 2021 and the associated HMA-wide SA have considerable methodological flaws and the ISA’s assessment of strategic options is not robust. The result is the Draft Plan and it evidence base fails to justify its overall spatial strategy or the quantity of growth it plans for. | Noted.  It should be noted that the new standard method formula was published in December 2024 and differs markedly from the version proposed in draft earlier in 2024, to which this representation refers.  The new Standard Method changes the minimum needs of the three HMA authorities significantly, substantially increasing Amber Valley Boroughs annual figure, substantially reducing Derby’s and increasing South Derbyshire’s, albeit to a much lesser degree.  The District Council’s current position is that whilst recognising these changes, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024. This is to reflect current uncertainty regarding the extent to which the emerging Amber Valley Local Plan can assist in meeting Derby’s needs; to recognise and reflect the high level of housing delivery recorded for the District over the past several years and to provide a supply buffer for flexibility.  It is not considered that the outputs of the new standard method justify an increase in South Derbyshire’s overall requirement.  Comments relating to the SA have been considered under question 12.  The Council disagrees that the sites chosen have not been as a result of a robust and transparent process.  The Derby Capacity Study identifies an unmet need of 9022 dwellings. The Local Plan Part 1 Review looks to update strategic policies and help address Derby City’s unmet need.  The Derby HMA Growth Options Study identifies potential locations for future growth in the HMA and considers at a strategic level, their pros and cons.  The study defines strategic growth locations of accommodating a minimum of approximately 1000 homes). The study identified ‘Unsuitable Areas of Strategic Growth’ ‘Potential Areas for Strategic Growth’ and ‘Suitable Areas for Strategic Growth’. Within South Derbyshire four broad areas were identified as being Suitable for Strategic Growth, Land to the west of Derby urban area, Hilton northern expansion, Derby A50 Corridor South Expansion, North-East of Swadlincote.  The HMA wide Sustainability Appraisal looked at the distribution of Derby’s unmet need, including between sites adjoining Derby (the Derby Urban Area), Towns and Key Villages). The conclusion of the SA is that meeting the unmet need arising from Derby as close as possible to the City amounts to Sustainable Development.  South Derbyshire’s Sustainability Apprisal Report looked at four strategic site options for distributing housing need for the Derby HMA.  Development at Thulston Fiels was not progressed at there was not exceptional circumstances to develop Green Belt land and Land south of Littleover was not progressed as it was decided that the housing need could be met in more sustainable locations when taking the consideration of the SA assessment as well as the outcome of the AECOM Study.  The two remaining options (Infinity Garden Village and Land south of Mickleover) are proposed for allocation. |
| 1243202 | Marrons Planning on behalf of William Davis Homes | Marrons Planning | 2.2 SCOPE OF THE PLAN  Paragraph 1.6 of the Draft Plan states that this review is a partial update of the Part 1 Local Plan, intended specifically to address unmet housing needs from Derby. Paragraph 1.12 clarifies that a comprehensive plan and full review will follow after adoption of the Part 1 Partial Review. Further, paragraph 1.13 highlights that the primary focus of the emerging Plan will be two key allocations on Derby’s urban fringe: Infinity Garden Village and the Land to the South of Mickleover.  Section 15 of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to prepare and maintain a Local Development Scheme (LDS). The LDS must, amongst other things, specify the subject matter and geographical area to which each development plan document relates.  The most recent LDS available for South Derbyshire covers the period 2022 to 2025. Inter alia, the LDS sets out that the Joint Advisory Board for the Derby Housing Market Area (HMA) agreed a minimum Plan period of 15 years and that most of the policies of the Local Plan Part 2 for South Derbyshire will be reviewed alongside the Part 2 Local Plan and subsumed into a new Local Plan. In addition, it is stated the new Part 1 Plan will provide a long-term vision for the spatial development of South Derbyshire and provide allocations for housing and employment sites “across the District.”  As set out above, the form of the Plan currently consulted on clashes with the most recently adopted LDS. It does not provide for the minimum Plan period of 15 years nor does it review the adopted Part 2 Local Plan, which is carried forward in its entirety. Most importantly, the Plan now published for consultation fails to provide a long-term vision for the spatial development of the District as a whole. In short, what has been published in the form of the emerging Plan as a partial review to address unmet needs from Derby only and on the edge of Derby only, is not in compliance with the most recent with the LDS.  The purpose of the LDS is to create some degree of certainty for the public, stakeholders and the development industry over the timescales and scope of plan preparation. Here the LDS has not been followed nor has it been updated and published as it should have been to reflect a drastically altered scope from the publication of the most recent LDS.  Paragraph 1.13 of the Draft Plan which states that its focus will be upon two specific strategic allocations at Derby Urban Fringe illustrates that the substantive content of the Plan has been pre-judged. A robust process to formulate the most appropriate strategy when considered against the reasonable alternatives has not been followed. Rather, the Draft Plan appears to have started at what ought to have been its destination through the allocation of specific sites in a certain location, rather than by following an objective process informed by a robust evidence base to identify the best performing strategy and sites which meet objectively assessed needs for development.  The Plan should address housing needs of South Derbyshire as a whole in addition to those unmet needs emanating from Derby and across the HMA over an appropriate plan period. The Draft Plan’s accompanying Interim Sustainability Appraisal acknowledges that as a result of forthcoming national policy changes, the number of homes required for South Derbyshire are likely to increase as a result of changes to the Standard Method for calculating local housing need and that the Plan will need to take account of these changes.  The restricted scope of the Plan as a partial review only to deal with Derby’s unmet housing need is not justified and is inappropriately driving choices regarding the amount and location of housing and economic development.   HOUSING STRATEGY Draft Policy S4 states that the Local Plan Part 1 will allocate at least 13,347 dwellings, including existing commitments and two proposed strategic housing sites on the outskirts of Derby. The remainder of the overall housing requirement is expected to be met through windfall developments, estimated at 851 dwellings in total.  INTERIM SUSTAINABILITY APPRAISAL The Plan should be based on an appropriate strategy and informed by a full understanding of the reasonable alternatives. The most recent iteration of the Sustainability Appraisal (SA) is the South Derbyshire Local Plan Sustainability Appraisal Regulation 18 Interim Sustainability Appraisal Report (“ISA”) by SLR.  4.2.2 The ISA is clear upon the reasonable alternatives it has identified, which comprise four strategic sites on the edge of Derby – Infinity Garden Village (Site 1), Thulston Fields, (Site 2) Land South of Mickleover (Site 3) and South of Littleover (Site 4). Sites 1 and 3 have been selected for allocation and identified in Policies STRA1 and STRA3, respectively. It is plain, therefore, that early on in the SA process the Council has closed its mind to reasonable alternatives which do not involve these four specific strategic site options on the edge of Derby.  Outside of these four strategic site options, there is virtually no discussion of other reasonable alternatives for the scale or distribution of growth within South Derbyshire. Whilst reference is made to the Growth Options Study 2021 by AECOM and the separate Sustainability Appraisal associated with it, the ISA does not advance this work at all in exploring and testing reasonable alternatives for how growth needs could be met within the District.  THE GROWTH OPTIONS STUDY (2021) Following the commentary in the ISA, the Derby Housing Market Area Growth Options Study (“GOS”) by AECOM has been instrumental in framing the spatial strategy for the Plan and, alongside the accompanying Sustainability Appraisal, has been relied upon to discount virtually every other location in South Derbyshire other than the four sites discussed within the ISA.  The GOS undertakes the following: • Breaks down the HMA into six assessment areas;  • Analyses the six assessment areas to identify 16 broad areas of search for detailed consideration in Stage 2 of the study; • Analyses the 16 assessment areas; and  • Forms concludes as to whether they are unsuitable, potentially suitable or suitable  At the outset, it is appropriate to note the GOS’ limitations which are set out: • The broad locations have only been identified where they have the capacity to accommodate a minimum of 1,000 homes. • It does not identify specific sites nor quantify the level of growth that could be accommodated. • It has not been undertaken with reference to housing need within the HMA or individual local authorities.  The substantive analysis of the GOS commences with a consideration of the key constraints within the very high level HMA assessment areas, of which there are six. The scale of these units of assessment is significant and the conclusions drawn about the key constraint and opportunities can only be very high level and not applicable at the scale of individual sites and settlements. Following this very broad thematic review, data in respect of constraints and proximity to services is combined in a land suitability and proximity map which uses various shades of purple to provide a land suitability score. The information is presented at such a high level it is practically impossible to infer the relative performance of individual sites or broad directions of growth around settlements. Following this very high level work, the GOS moves on to discussing the sixteen broad areas of search but there is limited explanation as to how they’ve been selected or how the previous stages of analysis informed these choices. The GOS therefore moves from a very high level review of the HMA to selecting individual broad areas with little in the way of context or explanation.  Given the leap in reasoning it makes, we consider that the GOS has very limited utility in the way of understanding or testing reasonable alternatives. To illustrate this point, at least one of the options considered in the ISA by AECOM (South of Littleover) is not reviewed in the GOS. If this reasonable alternative to the selected growth strategy has been overlooked, then it begs the question what other potential sites have.  DERBY HMA SUSTAINABILITY APPRAISAL OF HOUSING OPTIONS The Derby HMA Sustainability Appraisal of Housing Options by AECOM considers the approach to meeting housing needs within the Derby HMA specifically for housing and specifically in relation to Derby’s unmet needs for housing.  The HMA SA tests three scale scenarios and 4 distribution scenarios. In relation to the scale of housing, the three options comprise the Standard Method (of which the 35% uplift is part) (Scale 1) and Scales 2 and 3 which do not include the 35% uplift despite it forming part of the Standard Method.  Four distribution options are tested which fundamentally are either meet growth on the edge or and/or within Derby (options 1, 2, and 4) or disperse growth across the HMA. Within the options, different apportionments are considered between Amber Valley and South Derbyshire as administrative areas.  We have the following comments upon the HMA SA: • The plan period is misunderstood. It refers to a 17 year plan period, but states this is 2023 – 2039, which is 16 years. The base date of the Plan is also 2022 and not 2023; • Derby’s shortfall of 9,022 appears to be fixed rather than treated as a variable despite the tentative and imprecise understanding of the city’s urban capacity discussed above In relation to the reasonable alternatives for scale, no genuine alternative has been explored to the Standard Method. The 35% urban uplift applicable to Derby is an intrinsic part of the Standard Method, so scenarios without the urban uplift are not reasonable alternatives as they would be tantamount to not meeting the minimum amount of housing required; • Higher alternatives than the Standard Method have not been tested, despite the recognition that the Standard Method is only a starting point for calculating the housing requirement and substantive explanation is given; • Distribution Option D1 (Urban Concentration) is not a reasonable alternative. If all of Derby’s unmet need could be feasibly met within Derby’s administrative area, then Derby would not have unmet needs for housing; • Distribution Option D3 (Dispersed) continues to include land Derby’s urban fringe and no scenario is considered that does not include Derby. Other than the administrative split between AVBC and SDDC, there is no explanation as to how growth is apportioned across Amber Valley and South Derbyshire’s settlements; • The four broad areas identified within the GOS as areas “suitable for strategic growth” have been taken forward within the HMA SA despite the clear limitations of the GOS and its arbitrary identification of these areas; • It is not clear how the broad areas of search identified within the GOS have informed the testing of the various spatial options, if at all. But given the high level and very selective nature of the GOS, it is not an appropriate tool to inform SA testing; • Page 16 claims that the options testing has considered individual sites submitted through the Strategic Housing and Economic Land Availability Assessment (SHELAA) in the testing of spatial options, but it states that sites have not been considered where they fall outside of the broad areas of search within the GOS set out in Table 3-1. Two of the four broad areas identified are on the edge of Derby, with the other identified areas being located north of Hilton in South Derbyshire or North East of Swadlincote. As such, it appears that strategic growth on the edge of Derby has only been compared to two other locations across the HMA; • The document discusses the suitable areas for strategic growth in the GOS, but ignores those that were identified as potentially suitable; • Section 3.2 in relation to Assessment Assumptions and Limitations heavily implies that the SA process has not considered options which can provide dwellings of less than 1,000 units, which is the threshold set within the GOS. Clearly, this does not provide a reasonable picture of the relative performance of different sites and growth options and skews the results of the SA; and • Despite assessing options against SO8 (Sustainable Travel) amongst other factors, page 25 of the HMA SA states “It has not been possible to obtain detailed information about the frequency of public transport services within the Derby HMA.”  For the reasons set out above, we do not consider that the HMA SA provides a suitably robust discussion or analysis of the preferred option or the reasonable alternatives. Given this, its conclusions that the preferred options on the edge of Derby perform better against the SA objectives than the other options considered cannot be relied upon. The Plan and its spatial strategy are therefore unjustified.  OTHER COMMENTS ON THE SPATIAL STRATEGY The Plan allocates two large-scale strategic urban extensions net of existing commitments to address housing needs to 2039, including part of the unmet need arising from Derby within the same period. For the reasons explained above, the SA has closed its mind to reasonable alternatives that do not involve strategic expansions to the edge of Derby and this has informed an approach that is not robustly evidenced or justified.  The Plan has failed to consider locally-specific settlement-based needs. Paragraph 67 of the NPPF (December 2023 version) states that strategic policies should set out a housing requirement for designated neighbourhood areas. The Plan fails to do this thereby falling into conflict with national policy. The Plan has also failed to consider making provision for a stock of small and medium sized sites over the plan period, as required by paragraph 70 of the NPPF, thus falling into conflict with this aspect of national policy as well.  The Draft Plan does not outline how housing needs have been assessed at a more detailed, parish level across the District. This is despite clear evidence in Section A of the December 2023 LHNA, which indicates that areas of South Derbyshire beyond the Derby fringe have distinct affordable housing needs. It also appears that the Plan has not considered other housing needs necessary to sustain local settlements. In contrast, Amber Valley District Council’s local plan’s evidence base included a “Small Area Analysis” to estimate the housing needed to maintain a stable working-age population and adequate numbers of children to support local schools. In SDDC’s case, there is no indication of whether the distribution of housing over the plan period will address the social sustainability of settlements outside of Derby and, critically, whether the amount of housing already planned for in these areas will support local service provision. In this respect, we draw attention to paragraph 83 of the NPPF (December 2023) which states to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies, it states, should identify opportunities to grow and thrive, particularly where this will support local services. On the basis that the Plan has taken the decision to concentrate all net growth on the edge of Derby, it clearly has not had appropriate regard to paragraph 83.  The top-heavy nature of the spatial strategy becomes even more apparent considering the apportionment of housing across the District under the Plan which would see almost 70% of growth over the plan period directed to Derby. Whilst as the largest and most sustainable settlement in the HMA it is inevitable to some extent that Derby will play a significant role in meeting growth needs, the quantity of provision brought forward on the edge of the urban boundary when compared to elsewhere in the District will not lead to a balanced pattern of growth that spreads the benefits of development. It may also create infrastructure delivery and capacity challenges and under-delivery in the early parts of the plan period. The strategy should be reviewed to provide a balanced portfolio of sites in a variety of areas which are capable of coming forward to address parish-based and localised needs to underpin the viability and vitality of settlements.  6.2 SPATIAL STRATEGY The Draft Plan’s scope has driven the site selection process. The sites taken forward for allocation on the edge of Derby have not been chosen following a robust, transparent and objective process through the Sustainability Appraisal. The Growth Options Study 2021 and the associated HMA-wide SA have considerable methodological flaws and the ISA has relied upon these to consider only a very limited pool of sites. The result is the Draft Plan fails to justify its overall spatial strategy or the quantity of growth it plans for.  The spatial strategy also fails to consider smaller sites and localised needs resulting in several significant breaches of national planning policy, which can only be rectified through a fundamental re-consideration of the Draft Plan’s strategy.  Land north of Milton Road has been promoted for development. | Noted.  The Local Plan Part 1 Review is a full review of the adopted Local Plan Part 1 not a partial review. Every policy has been reviewed, and changes have been made to policies where deemed necessary. The Council will ensure that the Pre-Submission Local Plan Part 1 clarifies this.  A revised LDS will be published with the Regulation 19 consultation.  It should be noted that the new standard method formula was published in December 2024 and differs markedly from the version proposed in draft earlier in 2024, to which this representation refers.  The new Standard Method changes the minimum needs of the three HMA authorities significantly, substantially increasing Amber Valley Boroughs annual figure, substantially reducing Derby’s and increasing South Derbyshire’s, albeit to a much lesser degree.  The District Council’s current position is that whilst recognising these changes, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024. This is to reflect current uncertainty regarding the extent to which the emerging Amber Valley Local Plan can assist in meeting Derby’s needs; to recognise and reflect the high level of housing delivery recorded for the District over the past several years and to provide a supply buffer for flexibility.  It is not considered that the outputs of the new standard method justify an increase in South Derbyshire’s overall requirement.  Comments relating to the SA have been considered under question 12.  The Council notes the objection to the Growth Options Study. Notwithstanding this Council considers that a logical and appropriate methodology has been followed to identify the most suitable sites for development.  The Derby Capacity Study identifies an unmet need of 9022 dwellings. The Local Plan Part 1 Review looks to update strategic policies and help address Derby City’s unmet need.  The Derby HMA Growth Options Study identifies potential locations for future growth in the HMA and considers at a strategic level, their pros and cons.  The study defines strategic growth locations of accommodating a minimum of approximately 1000 homes). The study identified ‘Unsuitable Areas of Strategic Growth’ ‘Potential Areas for Strategic Growth’ and ‘Suitable Areas for Strategic Growth’. Within South Derbyshire four broad areas were identified as being Suitable for Strategic Growth, Land to the west of Derby urban area, Hilton northern expansion, Derby A50 Corridor South Expansion, North-East of Swadlincote.  The HMA wide Sustainability Appraisal looked at the distribution of Derby’s unmet need, including between sites adjoining Derby (the Derby Urban Area), Towns and Key Villages). The conclusion of the SA is that meeting the unmet need arising from Derby as close as possible to the City amounts to Sustainable Development.  South Derbyshire’s Sustainability Apprisal Report looked at four strategic site options for distributing housing need for the Derby HMA.  Development at Thulston Fiels was not progressed at there was not exceptional circumstances to develop Green Belt land and Land south of Littleover was not progressed as it was decided that the housing need could be met in more sustainable locations when taking the consideration of the SA assessment as well as the outcome of the AECOM Study.  The two remaining options (Infinity Garden Village and Land south of Mickleover) are proposed for allocation.  The Council has produced a Settlement Growth Study which considers the level of growth required across the District within each of the settlements. The outcome of the study is that growth in settlements (other than the Derby Fringe) is not strategic in scale and can be addressed through the Part 2 Local Plan / Full Plan Review or via Neighbourhood Plans.  In regard to the NPPF requirement to identify in the Local Plan a proportion of sites of less than 1ha, the Local Part Part 1 review is concerned with new strategic scale housing, employment and mixed use development. Any need for additional non-strategic allocations will be taken into account as part of a subsequent review of policies contained in the Part 2 Local Plan.  A number of housing allocations identified in the adopted Local Plan Part 1, including sites in Hatton, Hilton, Drakelow and the Swadlincote Urban Area, have been rolled forward as part of the Local Plan Part 1 review and continue to deliver significant numbers of homes away from the Derby urban area. It should also be noted that housing sites identified in the adopted Local Plan Part 2 continue to deliver new homes and a review of that document will provide the opportunity to address any need for additional non-strategic scale housing allocations.  As set out in the Housing Position Paper and the housing trajectory the Council considers that that the strategic allocations and those rolled forwards are deliverable, well-served by infrastructure and attractive for development as demonstrated by the recent high level of delivery on other sites within the Derby fringe.  Omission sites will be considered in question 13. |
| 1243616 | Marrons Planning on behalf of Miller Homes | Marrons Planning | As above with the following omission site…  Land at Rosliston Road, Walton on Trent promoted. |
| 1243209 | Marrons Planning on behalf of Wain Estates | Marrons Planning | As above with the following omission site…  Promotion of land north of Burton Road, Swadlincote |
| 1243213 | Marrons Planning on behalf of Northern Trust | Marrons Planning | As above with the following omission site…  Promotion of land at Winchester Drive, Linton |
| 1242103 | Marrons on behalf of Rainier Developments | Rainier Developments | Policy REV1: Review of the Local Development Plan  Policy REV1 states that the comprehensive or full review will commence after the adoption of this Part 1 Review, and be submitted for Examination within five years of adoption. Paragraph 33 of the Framework makes clear that relevant strategic policies are likely to require earlier review (i.e. less than 5 years) if local housing need is expected to change significantly in the near future. The wording of this policy will need to be reviewed to ensure consistency with the latest version of the Framework prior to the Regulation 19 stage. |
| 1243226 | Marrons Planning on behalf of Redrow Homes | Marrons Planning | SCOPE OF THE PLAN Paragraph 1.6 of the Draft Plan states that this review is a partial update of the Part 1 Local Plan, intended specifically to address unmet housing needs from Derby. Paragraph 1.12 clarifies that a comprehensive plan and full review will follow after adoption of the Part 1 Partial Review. Further, paragraph 1.13 highlights that the primary focus of the emerging Plan will be two key allocations on Derby’s urban fringe: Infinity Garden Village and the Land to the South of Mickleover.  Section 15 of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to prepare and maintain a Local Development Scheme (LDS). The LDS must, amongst other things, specify the subject matter and geographical area to which each development plan document relates.  The most recent LDS available for South Derbyshire covers the period 2022 to 2025. Inter alia, the LDS sets out that the Joint Advisory Board for the Derby Housing Market Area (HMA) agreed a minimum Plan period of 15 years and that most of the policies of the Local Plan Part 2 for South Derbyshire will be reviewed alongside the Part 2 Local Plan and subsumed into a new Local Plan. In addition, it is stated the new Part 1 Plan will provide a long-term vision for the spatial development of South Derbyshire and provide allocations for housing and employment sites “across the District.”  As set out above, the form of the Plan currently consulted on clashes with the most recently adopted LDS. It does not provide for the minimum Plan period of 15 years nor does it review the adopted Part 2 Local Plan, which is carried forward in its entirety. Most importantly, the Plan now published for consultation fails to provide a long-term vision for the spatial development of the District as a whole. In short, what has been published in the form of the emerging Plan as a partial review to address unmet needs from Derby only and on the edge of Derby only, is not in compliance with the most recent with the LDS.  The purpose of the LDS is to create some degree of certainty for the public, stakeholders and the development industry over the timescales and scope of plan preparation. Here the LDS has not been followed nor has it been updated and published as it should have been to reflect a drastically altered scope from the publication of the most recent LDS.  Paragraph 1.13 of the Draft Plan which states that its focus will be upon two specific strategic allocations at Derby Urban Fringe illustrates that the substantive content of the Plan has been pre-judged. A robust process to formulate the most appropriate strategy when considered against the reasonable alternatives has not been followed. Rather, the Draft Plan appears to have started at what ought to have been its destination through the allocation of specific sites in a certain location, rather than by following an objective process informed by a robust evidence base to identify the best performing strategy and sites which meet objectively assessed needs for development.  The Plan should address housing needs of South Derbyshire as a whole in addition to those unmet needs emanating from Derby and across the HMA over an appropriate plan period. The Draft Plan’s accompanying Interim Sustainability Appraisal acknowledges that as a result of forthcoming national policy changes, the number of homes required for South Derbyshire are likely to increase as a result of changes to the Standard Method for calculating local housing need and that the Plan will need to take account of these changes.  The restricted scope of the Plan as a partial review only to deal with Derby’s unmet housing need is not justified and is inappropriately driving choices regarding the amount and location of housing and economic development.  In respect of the substantive point about the fragmentation of landownership, the area is under promotion by a combination of Redrow Homes, Ainscough Strategic Land and Richborough Estates, all of which have agreements with their respective landowners to promote the site for development, as clearly evidenced by the SHELAA. It is therefore not clear on what basis AECOM believe the site is not viable as it is all available for development. Once again, this vague and generalised statement is indicative of a lack of robustness and objectivity in the assessment.  THE GROWTH OPTIONS STUDY (2021) Following the commentary in the ISA, the Derby Housing Market Area Growth Options Study (“GOS”) by AECOM has been instrumental in framing the spatial strategy for the Plan.  The GOS undertakes the following: • Breaks down the HMA into six assessment areas; • Analyses the six assessment areas to identify 16 broad areas of search for detailed consideration in Stage 2 of the study; • Analyses the 16 assessment areas; and • Forms concludes as to whether they are unsuitable, potentially suitable or suitable 4.3.3 At the outset, it is appropriate to note the GOS’ limitations which are set out: • The broad locations have only been identified where they have the capacity to accommodate a minimum of 1,000 homes. • It does not identify specific sites nor quantify the level of growth that could be accommodated. • It has not been undertaken with reference to housing need within the HMA or individual local authorities.  The substantive analysis of the GOS commences with a consideration of the key constraints within the very high level HMA assessment areas, of which there are six. The scale of these units of assessment is vast and the conclusions drawn about the key constraint and opportunities can only be very high level and not applicable at the scale of individual sites and settlements. Following this very broad thematic review, data in respect of constraints and proximity to services is combined in a land suitability and proximity map which uses various shades of purple to provide a land suitability score. The information is presented at such a high level it is practically impossible to infer the relative performance of individual sites or broad directions of growth around settlements. Following this very high level work, the GOS moves on to discussing the sixteen broad areas of search but there is limited explanation as to how they’ve been selected or how the previous stages of analysis informed these choices. The GOS therefore moves from a very high level review of the HMA to selecting individual broad areas with little in the way of context or explanation.  Given the leap in reasoning it makes, we consider that the GOS has very limited utility in the way of understanding or testing reasonable alternatives. To illustrate this point, at least one of the options considered in the ISA by AECOM (South of Littleover) is not reviewed in the GOS.  DERBY HMA SUSTAINABILITY APPRAISAL OF HOUSING OPTIONS The Derby HMA Sustainability Appraisal of Housing Options by AECOM considers the approach to meeting housing needs within the Derby HMA.  The HMA SA tests three scale scenarios and 4 distribution scenarios. In relation to the scale of housing, the three options comprise the Standard Method (of which the 35% uplift is part) (Scale 1) and Scales 2 and 3 which do not include the 35% uplift despite it forming part of the Standard Method.  Four distribution options are tested which fundamentally are either meet growth on the edge or and/or within Derby (options 1, 2, and 4) or disperse growth across the HMA. Within the options, different apportionments are considered between Amber Valley and South Derbyshire as administrative areas.  We have the following comments upon the HMA SA: • The plan period is misunderstood. It refers to a 17 year plan period, but states this is 2023 – 2039, which is 16 years. The base date of the Plan is also 2022 and not 2023; • Derby’s shortfall of 9,022 appears to be fixed rather than treated as a variable despite the tentative and imprecise understanding of the city’s urban capacity discussed above; • In relation to the reasonable alternatives for scale, no genuine alternative has been explored to the Standard Method. The 35% urban uplift applicable to Derby is an intrinsic part of the Standard Method, so scenarios without the urban uplift are not reasonable alternatives as they would be tantamount to not meeting the minimum amount of housing required; Higher alternatives than the Standard Method have not been tested, despite the recognition that the Standard Method is only a starting point for calculating the housing requirement and substantive explanation is given; • Distribution Option D1 (Urban Concentration) is not a reasonable alternative. If all of Derby’s unmet need could be feasibly met within Derby’s administrative area, then Derby would not have unmet needs for housing; • The four broad areas identified within the GOS as areas “suitable for strategic growth” have been taken forward within the HMA SA despite the clear limitations of the GOS and its arbitrary identification of these areas; • It is not clear how the broad areas of search identified within the GOS have informed the testing of the various spatial options, if at all. But given the high level and very selective nature of the GOS, it is not an appropriate tool to inform SA testing; • The document discusses the suitable areas for strategic growth in the GOS, but ignores those that were identified as potentially suitable; and • Despite assessing options against SO8 (Sustainable Travel) amongst other factors, page 25 of the HMA SA states “It has not been possible to obtain detailed information about the frequency of public transport services within the Derby HMA.”  For the reasons set out above, we do not consider that the HMA SA provides a suitably robust discussion or analysis of the preferred option or the reasonable alternatives.   6.2 SPATIAL STRATEGY 6.2.1 The Draft Plan’s scope has driven the site selection process. The sites taken forward for allocation on the edge of Derby have not been chosen following a robust, transparent and objective process through the Sustainability Appraisal. The Growth Options Study 2021 and the associated HMA-wide SA have considerable methodological flaws and the ISA’s assessment of strategic options is not robust. The result is the Draft Plan and it evidence base fails to justify its overall spatial strategy or the quantity of growth it plans for. |
| 1242570 | Nineteen47 on behalf of Hallam Land (land at Blackwell Lane) | Nineteen47 on behalf of Hallam Land (land at Blackwell Lane) | Question 3: Do you agree with the Plan’s Strategy? 3.11 We welcome the recognition that greenfield sites will be needed to meet the housing needs of South Derbyshire and contribute to meeting the needs of Derby. However within this context, we object to the limited update approach subsequently proposed, particularly given the delay in progressing the 5 year review following initial consultation in 2022.  3.12 For the reasons set out in this response, we recommend that the housing requirement is reviewed in full and that a comprehensive review of the Local Plan is progressed. This is in order to review the spatial strategy as a whole and ensure that the plan can addressed the housing needs within the District, and potentially those of neighbouring authorities, over the appropriate plan period.  3.13 It is not considered to be either necessary or efficient for the emerging Local Plan to be split into two parts. The Levelling Up and Regeneration Act seeks to speed up the plan-making process, which will be further delayed by continued pursuance of the two part approach. The production of a single Local Plan is the simplest and most transparent option to provide certainty and demonstrate deliverable allocation and land supply requirements.  3.14 The summary leaflet accompanying the consultation document, indicates that the indicative timescale for adoption of the updated Part 1 plan is Winter 2025. This is based on submission of the emerging draft version in June 2025 and examination taking place in summer 2025. We consider that the Council’s timetable is extremely ambitious.  3.15 Our research (based on the Planning Inspectorate’s Procedure Guide for Local Plan Examinations) indicates that once the emerging Local Plan has been submitted, that it will take a minimum of 3 – 5 weeks to appoint a Planning Inspector (provided that adequate notice of submission has been given and a Programme Officer is in place). Furthermore, 6 weeks’ notice must be given prior to the Hearing Sessions commencing. Therefore, a minimum of 9 weeks will pass on these two matters alone without consideration to matters such as the Inspector’s Initial Assessment of Plan, any questions or queries from the Inspector that may need clarification upon before progressing to the Hearing Sessions, the Hearing Sessions themselves and then allowing the Inspector sufficient time to prepare and complete their report.  3.16 For comparison purposes, it is worth noting the progression of the East Riding of Yorkshire Council – Local Plan Update, which was submitted for examination on 31st March 2023. Following appointment of the Planning Inspector, the first Hearing Session was not held until 31st October 2023, 6 months after submission, with the most recent Hearing Session concluding on 16th July 2024 , circa 15 months after submission. As it currently stands, circa 18 months after submission, the Planning Inspectors report remains outstanding.  3.17 Realistically, we believe that the examination process will take in the region of 24 months. We therefore have serious concerns about the Plan period and whether the Plan is deliverable in the timescales set out in the Consultation Document.  3.18 Our recommendation is that the Local Plan timetable is reviewed and the implications for progressing under the transitional arrangements are reconsidered. | Noted/Agree in part.  The Local Plan Part 1 Review is a full review of the adopted Local Plan Part 1 not a partial review. Every policy has been reviewed, and changes have been made to policies where deemed necessary. The Council will ensure that the Pre-Submission Local Plan Part 1 clarifies this.  The Council is permitted to undertake a part 2 plan process until the new Bill comes into force December 2026. The Council will progress with either a Part 2 Local Plan or Full Plan Review very quickly after adoption.  The Council will amend the plan period to 2041. |
| 1243538 | Pegasus Group On behalf of L&Q Estates in relation to Land at Staker Lane, Mickl | Pegasus Group | 2.1. Our response is set out using the headings used in the Draft Plan. Chapter 1. Introduction Policy REV1: Review of the Local Development Plan  2.2. Policy REV1 states that Plan making for a comprehensive South Derbyshire District Local Plan will commence immediately upon adoption of the Part 1 Review Plan. Paragraphs 1.43 -1.51 provide the explanation for the Policy: “*Part 1 review will assist with meeting Derby’s unmet housing need” and “the adoption of the Part 1 review will allow the strategic allocations (STRA1, STRA2, STRA3) to attract investment, carefully ensure appropriate infrastructure is delivered on site, expedite the development of relevant planning applications and ensure these locations grow as sustainable communities as soon as possible*”.  2.3. Stating that the Local Plan will be reviewed immediately in effect admits that the Local Plan Part 1 that is being prepared will be out-of-date following its adoption which is clearly unsatisfactory. This is of concern to our clients given the Site’s allocated status at Policy STRA2: Land South of Mickleover, as discussed in detail below.  2.4. A positive approach to plan making is required from the outset as required by the NPPF, as Regulation 18 is an early part of the Local Plan process the Council has the opportunity before Regulation 19 consultation to include a sufficient amount and range of specific deliverable and developable sites to meet the needs of the district, instead of choosing to immediately review the Local Plan Part 1 following adoption. | Noted.  A number of housing allocations identified in the adopted Local Plan Part 1, including sites in Hatton, Hilton, Drakelow and the Swadlincote Urban Area, have been rolled forward as part of the Local Plan Part 1 review and continue to deliver significant numbers of homes away from the Derby urban area. It should also be noted that housing sites identified in the adopted Local Plan Part 2 continue to deliver new homes and a review of that document will provide the opportunity to address any need for additional non-strategic scale housing allocations.  The immediate reviews relates to the Part 2 of the Local Plan which is required to be reviewed.  The Council is permitted to undertake a part 2 plan process until the new Bill comes into force December 2026. The Council will progress with either a Part 2 Local Plan or Full Plan Review very quickly after adoption. |
| 1243534 | Pegasus Group on behalf of Cameron Homes Limited-Land s of Cauldwell Road Linton | Pegasus Group | Chapter 4. Spatial Strategy a Plan for Growth  Plan Period 2.12. Paragraph 22 of the National Planning Policy Framework states that Strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities.  2.13. The South Derbyshire Draft Plan sets out a Plan period to 2039. The report to the South Derbyshire Environmental & Development Services Committee anticipates Regulation 19 consultation taking place in early 2025 and submission to the Secretary of State by 30 June 2025. This is not a realistic timetable. This consultation ends in December and the Council need to review the consultation responses, consider the next steps, finalise the evidence, prepare the Regulation 19 Pre-Submission Local Plan and seek approval for it. It is unlikely the Council can do all this and be out for consultation in early 2025.  2.14. It is noted that the most recent Local Development Scheme is out of date and the Council does not have a published projected adoption date for the Local Plan. Experience from other recent local examinations suggests that the examination and adoption process is very likely to take more than a year. It is therefore unlikely the plan will be adopted before the end of 2026. This would be short of the 15 year time horizon by almost three years.  2.15. A new Local Development Scheme needs to prepared and published and this should take account of the recent experience elsewhere in the East Midlands and the influx of Local Plans reaching examination under the transitional arrangements for the NPPF changes and ahead of the deadline for submitting under the current system. This will ensure the proposed time table is realistic.  2.16. The Government has confirmed that the deadline for submission of Local Plans will be extended to December 2026. This provides South Derbyshire District Council with an 18- month opportunity to prepare their plan under the current national regime of plan making. In order to deliver a long-term planning framework, and to align with South Derbyshire stated Local Plan Vision, the plan period should be extended to ensure that it provides a 15-year time horizon from adoption, and includes sufficient allocations to ensure that housing needs over the plan period are met in full.  Chapter 4. Spatial Strategy a Plan for Growth Plan Period Local Plan Vision, the plan period should be extended to ensure that it provides a 15-year time horizon from adoption, and includes sufficient allocations to ensure that housing needs over the plan period are met in full.  Spatial Strategy 2.33. The Council’s states that it can currently demonstrate a 5-year land supply. However the Council’s housing need is due to increase, and it would appear that the supply of smaller, more readily deliverable sites will drop off with no other planned growth to replace this supply.  2.34. The Council has not provided housing trajectories for the strategic sites, however these sites are unlikely to deliver in the short term, and this will mean that the Council may not be able to demonstrate a 5-year supply of land, on the adoption of the plan. This would be unsound as it would not comply with the NPPF paragraph 69. | Noted / Agree in part.  The Council will amend the plan period to 2041.  A revised LDS will be published with the Regulation 19 consultation.  The new Standard Method changes the minimum needs of the three HMA authorities significantly, substantially increasing Amber Valley Boroughs annual figure, substantially reducing Derby’s and increasing South Derbyshire’s, albeit to a much lesser degree.  A housing trajectory will be prepared taking account of any significant constraints that will need to be addressed. |
| 1243546 | Pegasus on behalf of Cameron Homes Land at Moor Ln Aston on Trent | Pegasus on behalf of Cameron Homes Land at Moor Ln Aston on Trent | As above with the following additional text…  2.35. Cameron Homes are a small housebuilder, and as such, are a key part of delivering the Government’s overall aim of building 1.5 million new homes between 2025 and 2030. Attached at Appendix C is research paper Land Matters Report (June 2024) commissioned by Land, Planning and Development Federation and Richborough Estates which shows that: “*delivering 1.5 million homes over the next five years is only achievable through a focus on bringing forward additional sites for up to 250 homes. Sites of this size are less complex, likely involving only one landowner, and require less supporting infrastructure. They therefore start to deliver new homes sooner*”.  2.36. Also attached at Appendix C is a report by Savills “Where do we need more small and medium-sized sites?”. Figure 2 shows the position of authorities in regard to meeting newly proposed definition of need. It can be seen that south Derbyshire is one of the authorities that have fewer homes consented than is necessary to meet the new level of need.  2.37. The target of 1.5 million homes set by government is very challenging and can only be achieved by each Council taking the opportunity to respond to identified need in the most positive, expeditious and pragmatic way. The approach of South Derbyshire District Council does not do this.  2.38. The approach to preparing a Part 1 Local Plan to only plan for strategic scale sites is fundamentally flawed. The council should instead prepare a Local Plan with a mixed portfolio of new housing allocations, of a variety of sizes, in a variety of locations, to provide a rolling 5-year supply of housing from the point the Local Plan is adopted.  Land east of Moor Lane, Aston on Trent | Noted.  As above.  The Local Part Part 1 review is concerned with new strategic scale housing, employment and mixed use development. Any need for additional non-strategic allocations will be taken into account as part of a subsequent review of policies contained in the Part 2 Local Plan.  Omission sites will be considered in question 13. |
| 1244535 | Pegasus on behalf of Harworth Group Cadley Lane | Pegasus on behalf of Harworth Group | 4. Spatial Strategy a Plan for Growth Local Plan Period 2.12. Paragraph 22 of the National Planning Policy Framework states that Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities.  2.13. The South Derbyshire Draft Plan sets out a Plan period to 2039. The report to the South Derbyshire Environmental & Development Services Committee anticipates Regulation 19 consultation taking early 2025 and submission to the Secretary of State by 30 June 2025. It is noted that the most recent Local Development Scheme is out of date and the Council does not have a published projected adoption date for the Local Plan Experience from other recent local examinations suggests that the examination and adoption process is very likely to take more than a year.  2.14. For example, Leicester City Council submitted their Local Plan for examination 26th September 2023 and their first hearing session took place in October 2024. Charnwood Borough Council submitted their Local Plan for examination in December 2021 and are unlikely to adopt until 2025 at the earliest. For south Derbyshire, the proposed Local Plan period of 2039 will likely result in a plan period of 12 years, even at positive timescales for plan preparation and examination.  2.15. It is likely that the Government will confirm that the deadline for submission of Local Plans under the transitional arrangements set out in the NPPF will be extended to December 2026, this provides an 18 month opportunity for councils to prepare their plan under the current national regime of plan making. In the interests of proper plan making, and to align with South Derbyshire stated Local Plan Vision, the plan period should be extended to ensure that it provides a 15 year time horizon from adoption (likely 2029), and includes sufficient allocations to ensure that housing needs over the plan period are met in full. The plan would need to provide for an extra 3,025 homes to extend the plan period to 15 years at the point of adoption.  Planning for Changing National Planning Context 2.16. It is accepted that Government changes to standard method are likely to have implications over the plan period, including for planning across the Derby Housing Market Area. Against this backdrop the Council needs to take a pragmatic approach to a likely dynamic planning context.  2.17. The current Plan includes provision for provision for 14,483 homes which comprises 8,874 to meet south Derbyshire need and 5,609 to help meet part of the unmet need of Derby City. The Briefing note to the South Derbyshire Local Plan Working Group set out the position with partners across the Housing Market Area covering the period 2022-2039 as follows: \*Please see full representations available on the Councils website\*  2.18. The results of the Government’s proposed changes to the standard method on each of the Derby HMA authorities is set out below: \*Please see full representations available on the Councils website\*  2.19. The implications of the Government’s proposed changes are that there is likely to be an increased housing need across the Derby HMA, with an overall under provision of 3,349 homes up to 2039. With Derby City’s constrained capacity and with Amber Valley currently in examination, if South Derbyshire fails to respond to the changes to standard method, then addressing the housing needs of HMA will be delayed for many years. It is therefore important that South Derbyshire takes pragmatic steps to address housing for the HMA need whilst it has the opportunity to do so in the preparation of its Pre-Submission Draft Plan.  2.20. These pragmatic steps are to use existing evidence to identify a pattern of development that meets likely unmet need sustainably. The Derby HMA Sustainability Appraisal of Housing Options August 2024 Derby HMA Sustainability Appraisal of Housing Options (HMA SA) provides a basis from which South Derbyshire District Council can prepare an appropriate strategy to accommodate unmet need within the HMA. The HMA SA tested a variety of options with splits between South Derbyshire and Amber Valley, with further permutations including different proportions within urban areas and towns and key villages Table (2-2).  The assessment findings of the SA 4.2 show that: \*Please see full representations available on the Councils website\*  2.21. The HMA SA demonstrates that there is not an obviously worse or obviously better district in which to accommodate unmet housing from Derby City. The SA however does not consider Green Belt, and in this case South Derbyshire is significantly less constrained than Amber Valley.  2.22. A pragmatic response to the evidence to respond to the emerging standard method figures and to deliver on the Council’s Vision would be for South Derbyshire to accommodate the majority of the likely shortfall in housing provision to 2039. Given this shortfall is likely to amount to 3349 homes, it would be prudent, reasonable and responsible for South Derbyshire to make provision for a further 2000 homes to address unmet need in the HMA. This will ensure that unmet need is being addressed and not deferred. It should also be noted that South Derbyshire’s housing need increases from 522 to 605 dwellings per year, and so this additional need should be met across the whole of the district and not simply adjoining the urban area of Derby.  Spatial Strategy 2.29. The Council’s current position is that it can demonstrate a 5-year land supply. However the Council’s housing need is due to increase, and it would appear that the supply of smaller, more readily deliverable sites will drop off with no other planned growth to replace this supply. The Council has not provided housing trajectories for the strategic sites at Infinity Garden and Land south of Mickleover, however these sites are unlikely to deliver in the short to medium term, and this will mean that the Council will not be able to demonstrate a 5 year supply of land, on the adoption of the plan. This would be clearly unsound as it would not comply with the NPPF paragraph 69.  2.30. The approach to preparing a Part 1 Local Plan to only plan for strategic scale sites is fundamentally flawed. The council should instead prepare a Local Plan with a mixed portfolio of new housing allocations, of a variety of sizes, in a variety of locations, to provide a rolling 5-year supply of housing from the point the Local Plan is adopted. | Noted / Agree in part.  The Council will consider whether the plan period should be amended.  A revised LDS will be published with the Regulation 19 consultation.  The new Standard Method changes the minimum needs of the three HMA authorities significantly, substantially increasing Amber Valley Boroughs annual figure, substantially reducing Derby’s and increasing South Derbyshire’s, albeit to a much lesser degree.  A housing trajectory will be prepared taking account of any significant constraints that will need to be addressed.    The Council will continue to work with it’s HMA colleagues to ensure that the HMA need is met.  A number of housing allocations identified in the adopted Local Plan Part 1, including sites in Hatton, Hilton, Drakelow and the Swadlincote Urban Area, have been rolled forward as part of the Local Plan Part 1 review and continue to deliver significant numbers of homes away from the Derby urban area. It should also be noted that housing sites identified in the adopted Local Plan Part 2 continue to deliver new homes and a review of that document will provide the opportunity to address any need for additional non-strategic scale housing allocations.  The Council will ensure that it maintains a five year land supply throughout the plan period. |
| 1243233 | Pegasus on behalf of Harworth Group Land at Site D Cadley Park | Pegasus on behalf of Harworth Group Land at Site D Cadley Park | As above including the following text…  1.29. These pragmatic steps are to use existing evidence to identify a pattern of development that meets likely unmet need sustainably. The Derby HMA Sustainability Appraisal of Housing Options August 2024 Derby HMA Sustainability Appraisal of Housing Options (HMA SA) provides a basis from which South Derbyshire District Council can prepare an appropriate strategy to accommodate unmet need within the HMA. The HMA SA tested a variety of options with splits between South Derbyshire and Amber Valley, with further permutations including different proportions within urban areas and towns and key villages Table (2-2). The assessment findings of the SA 4.2 show that: \*Please see full representations available on the Councils website\*  1.30. The HMA SA demonstrates that there is not an obviously worse or obviously better district in which to accommodate unmet housing from Derby City. The SA however does not consider Green Belt, and in this case South Derbyshire is significantly less constrained than Amber Valley.  1.31. A pragmatic response to the evidence to respond to the emerging standard method figures and to deliver on the Council’s Vision would be for South Derbyshire to accommodate the majority of the likely shortfall in housing provision to 2039. Given this shortfall is likely to amount to 3349 homes, it would be prudent, reasonable and responsible for South Derbyshire to make provision for a further 2000 homes to address unmet need in the HMA. This will ensure that unmet need is being addressed and not deferred. It should also be noted that South Derbyshire’s housing need increases from 522 to 605 dwellings per year, and so this additional need should be met across the whole of the district and not simply adjoining the urban area of Derby.  Spatial Strategy 1.38. The Council’s current position is that it can demonstrate a 5-year land supply. However the Council’s housing need is due to increase, and it would appear that the supply of smaller, more readily deliverable sites will drop off with no other planned growth to replace this supply. The Council has not provided housing trajectories for the strategic sites at Infinity Garden and Land south of Mickleover, however these sites are unlikely to deliver in the short to medium term, and this will mean that the Council will not be able to demonstrate a 5 year supply of land, on the adoption of the plan. This would be clearly unsound as it would not comply with the NPPF paragraph 69.  1.39. The approach to preparing a Part 1 Local Plan to only plan for strategic scale sites is fundamentally flawed. The council should instead prepare a Local Plan with a mixed portfolio of new housing allocations, of a variety of sizes, in a variety of locations, to provide a rolling 5-year supply of housing from the point the Local Plan is adopted. |
| 1243222 | Pegasus on behalf of Harworth Group Land at Site E Cadley Park | Pegasus on behalf of Harworth Group Land at Site E Cadley Park | 1.36. The Council’s current position is that it can demonstrate a 5-year land supply. However the Council’s housing need is due to increase, and it would appear that the supply of smaller, more readily deliverable sites will drop off with no other planned growth to replace this supply.  The Council has not provided housing trajectories for the strategic sites at Infinity Garden and Land south of Mickleover, however these sites are unlikely to deliver in the short to medium term, and this will mean that the Council will not be able to demonstrate a 5 year supply of land, on the adoption of the plan. This would be clearly unsound as it would not comply with the NPPF paragraph 69.  1.37. The approach to preparing a Part 1 Local Plan to only plan for strategic scale sites is fundamentally flawed. The Council should instead prepare a Local Plan with a mixed portfolio of new housing allocations, of a variety of sizes, in a variety of locations, to provide a rolling 5-year supply of housing from the point the Local Plan is adopted. |
| 1242100 | RPS on helaf of Bellway and Clowes (Thulston Fields) | RPS on helaf of Bellway and Clowes (Thulston Fields) | 4.1 Policy S1 (Sustainable Growth Strategy) promotes sustainable growth to meet its objectively assessed housing and commercial needs in the plan period 2022-2039. For the reasons set out elsewhere in our submission, we object to the plan period end date of 2039. The end date should be 2041 at the earliest, based on a likely adoption during 2026 or 2027.  4.2 Policy S1 proposes a new housing requirement of 14,483 (851 dpa) over the plan period (2022-2039). This includes 5,609 dwellings (or 329 dpa) towards Derby’s unmet housing need, and a local need for South Derbyshire of 8,874 dwellings (or 522 dpa), based on the current standard method.  4.3 RPS understands that the LPP1 is designed to update the current Part 1 of the South Derbyshire Local Plan to deal with the critical issue of meeting unmet housing need arising from the Derby City.  4.4 The LPP1 also increases what developers need to provide in terms of green space and biodiversity net gain.  4.5 The LPP1 further updates the existing Part 1 to ensure that it is consistent with the latest national government planning policy from 2023, which is set out in the National Planning Policy Framework.  4.6 The LPP1 adds two new strategic sites on the Derby urban fringe, both wholly within South Derbyshire district.  4.7 As this is a partial review, the Part 2 South Derbyshire Local Plan adopted in 2017 will be saved in its entirety. This means the Part 2 Plan will stay in use until the Local Plan is reviewed as a whole.  4.8 Given the LPP1 review is being progressed under the current local plan system, there is nothing necessarily wrong with taking this course of action, which we consider is at odds with the broad direction of travel in the Levelling Up and Regeneration Act 2023 in particular the statutory requirement for single local plans. However, following a two-stage review process appears to be driven solely by a desire to address the unmet need emanating from Derby City (which we agree with in principle) but ignores key fundamental issues that should be tackled now, rather than through a future comprehensive review.  4.9 These issues include addressing the increasing level of housing need in South Derbyshire that is likely to come into effect very soon after the LPP1 consultation has finished (which is expected to increase from 522 to 606 dpa, or over 1,400 dwellings across the plan period) and the pressing need for affordable housing in the District which has persistently not being met since 2011 (according to annual monitoring figures 1,627 affordable homes were delivered in South Derbyshire between 2011-2023, an average of 135 units per year or 17% of overall completions, against a policy requirement of 30% affordable). These are matters that should not be left to a later review, but should be addressed now to align with the Government’s commitment to increase housing delivery across the Country and promote economic growth.  Paragraph 11b of the NPPF which advises that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. Policy S1 (Sustainable Growth Strategy) promotes sustainable growth to meet its objectively assessed housing and commercial needs in the plan period 2022-2039. For the reasons set out elsewhere in our submission, we object to the plan period end date of 2039. The end date should be 2041 at the earliest, based on a likely adoption during 2026. Policy S1 proposes a new housing requirement of 14,483 (851 dpa) over the plan period (2022-2039). This includes 5,609 dwellings (or 329 dpa) towards Derby’s unmet housing need, and a local need for South Derbyshire of 8,874 dwellings (or 522 dpa), based on the standard method.  Affordable housing need The Council is not proposing any further uplift to the minimum local housing need figure under this policy. However, planning practice guidance highlights that an increase in the total housing figures in the plan may need to be considered where it could help deliver the required number of affordable homes. Affordable housing delivery has fallen significantly short of projected needs in South Derbyshire since 2011. The adopted Local Plan (LPP1) refers to analysis in the Derby SHMA published in July 2013, which sets out that across the Derby HMA there was a net need for 7,611 affordable homes up to 2017; of this, the need within South Derbyshire was 1,723 affordable dwellings between 2012-2017, or 347 dpa. During this period, the Council delivered 445 affordable homes (at an average of 89 affordable homes per annum) according to the Council’s own monitoring data.  A more recent update to the assessment of affordable housing in South Derbyshire was published to support the Issues and Options consultation in 2022, presented in the South Derbyshire SHMA (2020) which covered the period 2019 to 2028. Whilst slightly lower than adopted LPP1 figure, the net need for affordable housing was assessed at 325 dpa; still a significant level of need. Between 2019 and 2023, the Council has delivered 753 affordable homes over the four-year period ; an average of 188 affordable homes per annum. The latest measure of affordable need in the district is set out in the Derby and South Derbyshire Local housing Need Assessment, dated December 2023; this indicates a need for 214 affordable homes per annum over the new plan period to 2039. Furthermore, since 2011 a total of 283 affordable homes have been sold or demolished in South Derbyshire , reducing the available stock of affordable homes for prospective households and putting an ever increasing pressure on the ability of the existing affordable stock to meet those needs in the district.  The analysis above clearly shows that the delivery of affordable housing has fallen significantly short of meeting the scale of need in South Derbyshire over a sustained period stretching back more than ten years. Whilst affordable need is not required to be met in full, at no point since 2011 has the need actually been met. This is clear evidence that the Council is not doing enough to address the scale of need in the District. On this basis, we recommend that an additional uplift is incorporated into the overall housing figure to help tackle the chronic under-delivery of affordable homes in South Derbyshire, as shown in its own evidence and other data. Such an uplift should be considered in the context of the increase in overall housing need which is very likely going to impact on the next stage of the LPP1 review process.  Housing Strategy and Distribution As set out in our previous representations to the issues and options consultation Plan, RPS favoured Option 1 (i.e. growth on the edge of Derby City) in the first instance. Locating the unmet need in relatively close proximity to where the need arises is an appropriate strategy that can also allow those moving to South Derbyshire to access or retain jobs provided in the City and maintain family and social networks. Therefore, it is welcomed that the distribution of new development should follow the Settlement Hierarchy starting with the Urban Areas.  An appropriate option that exists on the edge of Derby in a sustainable and accessible location is Thulston Fields which would serve as a natural extension to the existing sustainable urban extension (SUE) at Boulton Moor. This is supported by information and analysis set out in the accompanying Vision Document at Appendix 1 of this submission. This shows that the only major constraint on development for housing on the site is the existing Green Belt designation.  A number of factors point in favour of the Thulston Fields site as a reasonable alternative for assisting in addressing the housing needs of the HMA. Firstly, the site is well located strategically in relation to the existing direction of growth to the immediate south of Derby City. Development at Thulston Fields would therefore represent a logical extension to Derby along the southern axis. This offers the added benefit of accommodating development inside the route of the A6/A50 southern link, which allows for the creation of a logical defensible boundary which would not undermine the wider purposes of the Green Belt further to the south. Additionally, in the context of the proposed changes to the NPPF and the potential for ‘Grey Belt’ to form a new typology of Green Belt land it is important. As set out within the accompanying Vision Document, RPS contend that Thulston Fields can fulfil the ‘Grey Belt’ criteria following the steps of the flow chart considerations. In this context, the draft NPPF (para 144) sets out that “where it is necessary to release Green Belt land for development, plans should give first consideration to previously-developed land in sustainable locations, then consider grey belt land in sustainable locations which is not already previously-developed (added emphasis) and only then consider other sustainable Green Belt locations”. Therefore, it is clear that Thulston Fields should be a site considered first in the process of site assessment selection.  Secondly, Thulston Fields is situated with good access to major infrastructure, including the new Secondary School allocation on land within the IGV development site, whilst also being capable of providing new infrastructure in the form of new primary education / employment, retail, transport related development in the form of a dedicated Park and Ride facility and accessible open space / play facilities within its own boundaries. The site also has excellent access to services and connectivity with the existing transport network in the area, by virtue of its proximity to the Bouton Moor SUE. It is expected, for example, that the committed bus service can be extended to service Thulston Fields, increasing the long-term viability and frequency of the service. All of these taken together allow for compensatory improvements, thereby complying with para 147 of the current operational NPPF which states that sites removed from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. Thirdly, the location of the Thulston Fields site is broadly consistent with emerging evidence on strategic growth directions for the HMA as a whole, notably the Derby HMA Growth Options Study (GOS). In 2020, the Derby HMA authorities (which includes South Derbyshire District Council) jointly commissioned planning consultants AECOM to prepare an independent study to appraise opportunities for new strategic sustainable growth outside Derby City up to 2050. The GOS was completed in 2021 and has now been formally endorsed by the Derby HMA Joint Advisory Board, and identifies potential areas for urban and village expansion, co-dependent settlements and new settlements.  The GOS identifies six assessment areas to provide ‘broad units for initial spatial analysis and reporting’. From this, the GOS then identified 16 ‘broad areas of search’ for more detailed consideration. Page 8 of the GOS makes clear that “these locations are generally the most suitable (based on known constraints and designations) and seek to optimise locations that score strongly in the existing proximity analysis (to services and the transport networks).”  This indicates to us that sites located within these broad areas of search are likely to form the ‘starting point’ for any potential development opportunities to meet future growth requirements where that growth cannot be accommodated within existing urban areas, as part of the respective local plan reviews that include these broad areas.  The Thulston Fields site is located in broad area D3 (Trent Valley - Derby A50 Corridor South Extension). The map extract below illustrates the extent of each assessment area across the HMA. Area D3 is shown on the map.   Of the 16 broad areas, the GOS only identifies four of these as a ‘Suitable Area for Strategic Growth’. They were also deemed suitable locations for strategic growth because they were deemed capable of supporting the smallest typology (i.e. an urban extension/village expansion or new garden village) with the requisite social, green and physical infrastructure. One of these 4 suitable areas is D3.  D3: Derby A50 Corridor South Extension (Urban Extension(s)) As we have highlighted previously, the Thulston Fields site has been included in broad area of search ‘D3’. D3 is also one of only four ‘Suitable Areas for Strategic Growth’. D3 lies adjacent to Derby City urban area. Therefore, development opportunities taken forward in this area of search would be addressing the needs of Derby City. The extract above illustrates the extent of D3. As can be deduced from the extract, the Thulston Fields site covers a large extent of the eastern portion of D3. Summary of findings for area D3 In terms of overall findings, the GOS states that: • There is sufficient land to provide further sustainable urban extensions in this area of search. • Development south of the A50 Derby bypass is adjudged to be unsuitable due to the risk of increasing perceived sprawl of the city of Derby. • Possibility of coalescence between settlements south of the A50, such as Stenson, Swarkestone, Aston-on-Trent, Barrow-on-Trent and Weston-on-Trent. • Public transport connections would be critical to the success of these locations in order to provide sustainable modes of transport into Derby. • Growth at Lowes Farm and Thulston Fields could not come forward without new A50 junctions/access points. • Less opportunities for growth in these areas as many of the remaining areas are extant allocations or under construction, aside from areas in the vicinity of Highfields Farm, Thulston Fields and Lowes Farm. • Any further growth in this location would need to be coordinated with the planning and delivery of additional infrastructure necessary to achieve sustainable development.  Based on the findings of the GOS, there is clearly support ‘in principle’ for growth in this area to address the potential overspill housing from Derby City. This makes the Thulston Fields site an obvious candidate as a strategic location for growth within this broad location.  Employment Land Strategy and Distribution In terms of employment land as part of the overall Plan strategy, it follows our earlier comments to the Vision and Objectives where we consider employment should be supported in the LPP1. In addition to existing employment locations the opportunity should be taken to create new employment destinations in suitable locations, in order to respond specifically to key emerging sectors that will complement existing employment supply, and to meet demands which cannot be met from existing employment locations.  Key sectors that would benefit from this approach, and which would also contribute to the stated climate change and net zero aims of South Derbyshire, include green innovation, future energy and future transport. The Local Plan should therefore support opportunities to create a significant new employment destination geared towards these sectors.  Furthermore, the LPP1 should help to address, especially in relation to the emerging green innovation and future energy sectors, include the following: • location and transport connectivity – a location that suits unconstrained growth, without conflicting neighbouring uses and a location easily accessible by A roads. • links to higher education and research – destinations that have a partnership with a university • Scale of opportunity - including purpose-built and flexible accommodation, co-location and opportunities for collaboration and networking • Commitment to sustainability – throughout the design and operations of the employment destination, supporting sustainable choices by operators • Proximity to a skilled workforce • Flexibility in design and delivery  The LPA should support proposed allocations that demonstrate commitment to overcoming these challenges, in order to promote economic growth of key sectors. Whilst para 4.25 of the LPP1 concludes that South Derbyshire had sufficient quantity of land to meet its own needs, it follows that when contributing to Derby’s unmet need within South Derbyshire a mix of housing and employment growth is needed together to drive sustainable development.  RPS strongly believe the emerging proposals at Thulston Fields includes a significant proportion of land for employment to support local jobs alongside the provision of homes, community facilities and other infrastructure. This accords with national policy for the supply of large number of homes delivered through new settlements, which supports new settlements that are of a size that can support a sustainable community with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment ). Accordingly, RPS encourage the Council to look at appropriate locations for accommodating a proportion of the future employment needs of the District that should be taken forward. | Noted/Agree in part.  The Council will consider whether the plan period should be amended.  The new Standard Method changes the minimum needs of the three HMA authorities significantly, substantially increasing Amber Valley Boroughs annual figure, substantially reducing Derby’s and increasing South Derbyshire’s, albeit to a much lesser degree.  It is not considered that the outputs of the new standard method justify an increase in South Derbyshire’s overall requirement.  The Part 1 Local Plan review is concerned with strategic scale housing, employment and mixed use development. The subsequent review of Part 2 policies will provide an opportunity to address any need for smaller scale development allocations, including to help meet any affordable housing needs.  The Derby and South Derbyshire Housing Needs Assessment considers whether there is a case for raising overall housing provision in order to deliver additional affordable housing, but does not make any recommendation to do so.  Omission sites will be considered in question 13.  It is proposed to identify an employment land requirement for the District based upon that identified in the Derby and South Derbyshire Employment Land Review. The Employment Land Study indicates that the quantitative employment land need for the District for the plan period 2022-41 is 39.12ha. Whilst this is met by sites rolled forward from the adopted Local Plan Part 1 (40.53ha), all but one of which have been granted planning permission, further allocations have been made in order to support sustainable growth as part of mixed use strategic development on the southern edge of Derby comprising Infinity Garden Village (STRA1, 70ha) and land to the south of Mickleover (STRA2 5-10ha). In addition to balancing proposed large cale housing development STRA1 is ideally placed to take advantage of investor interest from across the sub region as it is to offer convenient highway access via a new A50 junction.  A further site at Drakelow (STRA3-68ha), is already identified for employment and energy development in the adopted Local Plan Part 2 (Policy BNE 12). The formal allocation of this largely redundant brownfield site as part of the current review allows for clarification concerning the scale of the employment development to be provided for and the matters that will need to be addressed as part of any development proposal.  In total the sites rolled forward from the adopted Local Plan Part 1 sites and STRA1, STRA2 and STRA3 comprise land measuring 178-183ha, representing South Derbyshire’s employment land provision.  In addition, the East Midlands Freeport Site (173ha), is to be allocated to assist in meeting national, regional and sub regional needs business accommodation needs. |
| 1243197 | Savills on behalf of Diocese of Derby | Savills | SDDC has a significant housing need to meet for the next Plan period and also has an agreement to assist with meeting the shortfall from the adjacent Derby City administrative area. There is however a need for SDDC to plan to meet the changes arising through the new NPPF, which is expected to include an increased housing need for SDDC to accommodate within sustainable settlement locations which deliver a dispersal of the benefits arising from new development across the communities of South Derbyshire, along with ensuring there is a sufficient and flexible supply of housing land, in a robustly evidenced and viable way.  Such an approach should therefore maximise the opportunities for housing development to be located at the sustainable Key Service Villages. The Key Service Villages already benefit from a range of existing community and social infrastructure which can serve, be sustained by, and where necessary be improved by, new housing development. Our client is promoting land adjacent to the Hatton Key Service Village which is deemed to be: sustainably located; available and suitable for housing development to meet the needs of the new Plan period; and would form a natural and logical extension to the built form of this settlement.  The land owned by our client (Title DY400956), shown shaded in blue on the plan included below at Figure 1, is immediately to the east of allocation H11. This site has already been assessed as being suitable, available and achievable for residential development through the SHELAA process (ref. 110) and our client contends that this remains the case. The site is currently comprised of a field in agricultural use bordered by Derby Road to the north, new residential development to the west / south and agricultural land (which is being promoted by another landowner) to the east. This site could still be developed in isolation or in tandem with the land being promoted to the east (ref. 235). The necessary land control and cooperation between the landowners is in place in this location to achieve such a development proposal.  New residential development proposals on this site should be seen in the context of the residential development being brought forward on the adjacent land to the west, which already creates significant urbanising features in the landscape. It should also be noted that the Lower Dove Flood Management Scheme has been installed, which reduces the flood risk for the promoted site from the River Dove. A scheme can be put in place which manages the surface water on the site as part of the green infrastructure strategy, alongside the delivery of new public open spaces and play areas. In addition there is an opportunity for development proposals to contribute towards local social and transport infrastructure, as necessary.  The site is in the countryside, but is not in the Green Belt and is not considered to contain physical attributes that would preclude development from taking place. Existing trees and hedgerows either on, or on the edge of, the site will be incorporated into a development proposal where possible and will be supplemented with additional planting as part of the proposals. There is not considered to be an adverse impact on any designated heritage assets, or their setting, as a result of development taking place on the site.  The site is adjacent to the built development boundary for the Key Service Village of Hatton in a location which has already been deemed to be sustainable and suitable for development through the existing Local Plan residential allocation (Ref: H11) and subsequent planning permission for 385 dwellings (Ref: 9/2015/1108) on the land immediately to the west. The delivery of residential development on the site is considered to represent a relatively modest and logical further expansion to Hatton in a suitable and sustainable location.  The site is largely well contained by existing landscape features and built development and there are opportunities to provide additional / enhanced landscape features along the site boundary as part of the development proposals for the site. The site benefits from an existing access via a field gate from Derby Road. The site: does not contain any, and is not within the setting of any, Listed Buildings; is not within or affecting the setting of a Conservation Area; and is not designated as Local Green Space. The site is available and suitable for release to comprise a stand-alone allocation or as the first phase of a wider allocation should SDDC seek to allocate a larger strategic development area in this location. | Noted.  The new Standard Method changes the minimum needs of the three HMA authorities significantly, substantially increasing Amber Valley Boroughs annual figure, substantially reducing Derby’s and increasing South Derbyshire’s, albeit to a much lesser degree.  A number of housing allocations identified in the adopted Local Plan Part 1, including sites in Hatton, Hilton, Drakelow and the Swadlincote Urban Area, have been rolled forward as part of the Local Plan Part 1 review and continue to deliver significant numbers of homes away from the Derby urban area. It should also be noted that housing sites identified in the adopted Local Plan Part 2 continue to deliver new homes and a review of that document will provide the opportunity to address any need for additional non-strategic scale housing allocations.  Omission sites will be considered in question 13. |
| 1243648 | Tensi Properties Ltd | Tensi Properties Ltd | 3.1. Tesni has concerns around the focus and over-reliance on large allocation such as Infinity Garden Village (STRAT1) and Land South of Mickleover (STRA2), which could create an over-concentration of development located to the north of the borough and directly adjacent to the city of Derby.  3.2. This approach neglects smaller settlements and more rural parts of the district, which could benefit from proportionate growth to support local economies, services and infrastructure. As alluded to previously, over-reliance on large sites such as these could lead to delays in housing delivery due to their complexity. Therefore, a diversity in the proposed strategy around allocations is likely to be more sustainable for the wider area.  3.3. Even though it is acknowledged that the borough and the local housing market has a strong relationship with this conurbation. The strategy of focusing development towards Derby risks exacerbating disparities within wider South Derbyshire, leaving smaller communities without adequate investment or development in order to sustain their viability.  3.4. In order to support and sustain the existing services, such as the schools, shops and public houses in the long term. It is felt that this proposed strategy is not in accordance with Paragraph 83 of the NPPF, which requires the local authority to identify opportunities for villages to grow and thrive, especially where this will support local services.  3.5. Smaller allocations in rural settlements, such as Rosliston, could address local housing needs more appropriately and include provision for affordable housing. This omission is likely to hinder balanced growth and support the sustainability of rural communities.  3.6. Smaller sites can often be delivered quicker than larger strategic allocations. As highlighted in Lichfields report ‘Start to Finish’, smaller housing sites begin delivering homes earlier, often within three years of outline planning approval. In comparison, larger sites, with over 2,000 homes, can take an average of eight years to deliver their first unit, due to complexities around infrastructure and planning delays.  3.7. Tesni also senses that the absence of smaller sites might compromise the council’s ability to meet short to medium term housing needs. Including a broader range of smaller sites would enable more diverse housing development, potentially offering a wider mix of housing types and tenure to meet varying community needs.  3.8.Concentrating growth in a few large areas could strain local infrastructure particularly transport networks. Allocation should consider the capacity of existing systems and distribute growth to areas where infrastructure improvements may be less challenging.  Tesni feels that Land at Burton Road, Rosliston should be reconsidered for allocation | Noted.  A number of housing allocations identified in the adopted Local Plan Part 1, including sites in Hatton, Hilton, Drakelow and the Swadlincote Urban Area, have been rolled forward as part of the Local Plan Part 1 review and continue to deliver significant numbers of homes away from the Derby urban area. It should also be noted that housing sites identified in the adopted Local Plan Part 2 continue to deliver new homes and a review of that document will provide the opportunity to address any need for additional non-strategic scale housing allocations.  Omission sites will be considered in question 13. |
| 1243215 | Trent and Dove Housing Association | Trent and Dove | The Plan’s Strategy has identified the needs of the District whilst addressing the unmet housing need from Derby City. | Noted. |
| 1242865 | Turley on behalf of Hallam Land | Turley on behalf of Hallam Land | The review of the Local Plan is supported in principle, as set out in our representations to the Issues and Options consultation in 2022. However, the partial review of the Local Plan, comprising the Part 1 Local Plan only, is not supported. We consider that the Review of the Local Plan should be undertaken as a comprehensive, full review. This is on the basis that a full plan review will allow a more comprehensive approach to strategic issues such as addressing the unmet needs of the Derby housing market area (HMA).  Furthermore, the Part 2 Local Plan was adopted in 2017, paragraph 33 of the NPPF (2023) outlines a requirement for Local Plans to be reviewed “at least” once every five years. Given the Part 2 Local Plan is some 7 years old, the plan is dated and in urgent need of review. This is an opportunity to undertake a full plan review ensuring that all policies contained would age at the same pace, avoiding a potential policy vacuum where policies in part of the plan become out of date more quickly than others. Paragraph 1.9 of the emerging Local Plan Review states that “the Part 2 South Derbyshire Local Plan adopted in 2017 will be saved in entirety. This means the part 2 Plan will stay in use until the Plan is reviewed as a whole”. Given the dated nature of the Part 2 Plan, and that there will otherwise be no substantive review of whether policies are fit for purpose before they are “saved”, this approach is considered to be entirely inappropriate and unsound. As a minimum, the Council should undertake a review of the Part 2 policies as part of the Sustainability Appraisal to help to consider whether the policies are still sound and meet the tests of soundness set out by paragraph 35 of the NPPF, including whether they are consistent with national policy. Having regard to the policies contained within the Local Plan Part 2, non-strategic housing allocations included in the plan have largely been developed, with just 285 homes outstanding for delivery on these sites (as set out at Paragraph 4.73), applying a blanket approach to saving all policies in this plan is not therefore a sound approach since it would not meet objectively assessed needs. A comprehensive review of the Local Plan is considered to be the most efficient and effective means of ensuring the plan is sound.  In addition, the combined comprehensive review alongside the Local Plan Part 2 would allow the Council to allocate additional non-strategic housing allocations, in combination with large scale Sustainable Urban Extensions (SUE’s). This would avoid there being an overreliance on strategic sites, which typically require extensive infrastructure and complex and convoluted detailed planning permissions prior to new homes being built. Sites like those identified in Repton and Overseal, require much less infrastructure and are typically less constrained, meaning they can come forward quickly and early in the plan period, representing a more sustainable approach to growth and addressing housing needs.  Further detail is provided in our submitted representations (December 2024). | Noted.  The Council is permitted to undertake a part 2 plan process until the new Bill comes into force December 2026. The Council will progress with either a Part 2 Local Plan or Full Plan Review very quickly after adoption.  A number of housing allocations identified in the adopted Local Plan Part 1, including sites in Hatton, Hilton, Drakelow and the Swadlincote Urban Area, have been rolled forward as part of the Local Plan Part 1 review and continue to deliver significant numbers of homes away from the Derby urban area. It should also be noted that housing sites identified in the adopted Local Plan Part 2 continue to deliver new homes and a review of that document will provide the opportunity to address any need for additional non-strategic scale housing allocations. |
| 1243606 | TWB Town Planning Consultants Ltd on behalf of Mr. G. Roe & Mr. J Warren | TWB Town Planning Consultants Ltd | No. we object to the Plan Strategy as there is an overreliance on previously allocated sites together with the two proposed large strategic sites on the edge of Derby. This results in a significant risk that the plan will fail to deliver. If the previously allocated sites have yet to come forward having already been allocated since 2016, this suggests some have serious delivery issues. Strategic sites also take a long period to deliver due to infrastructure requirements and therefore the plan is unlikely to be able to maintain the supply of dwellings required to meet the identified need. | Noted.  As set out in the Housing Position Paper and the housing trajectory the Council considers that that the strategic allocations and those rolled forwards are deliverable, well-served by infrastructure and attractive for development as demonstrated by the recent high level of delivery on other sites within the Derby fringe. |
| 1244443 | Walsingham Planning on behalf of Metacre Ltd | Walsingham Planning | Scope and Justification for a Partial Review  Paragraph 1.6 of the consultation document notes that: ‘This review updates Part 1 of the South Derbyshire Local Plan to deal with the critical issue of meeting unmet housing need arising from the Derby Urban Area. This issue has become a pressing requirement since the adoption of the Part 1 strategic plan in 2016’.  The adopted Local Plan for South Derbyshire has been prepared in two parts. Part 1 was adopted by Full Council on June 13, 2016. The Local Plan Part 2 was adopted by Full Council on November 2, 2017. Therefore, the Part 1 Local Plan was adopted over 8 years ago, with the intention of providing the area’s strategic planning policies up to 2028, a date which is approaching at relative speed.  Paragraph 33 of the National Planning Policy Framework (NPPF) notes that ‘Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary’. These timescales are also clearly referenced within the Plan Making section of the National Planning Practice Guidance (NPPG).  In this regard, with the Part 1 Plan now over 8 years old and with approaching 3 years to run in its intended coverage period, it is fundamentally questioned how a partial review is being taken forward at this stage, particularly when it is clearly acknowledged that a significantly broader range of strategic matters will also require review and accepting that no regard has been made within the proposed review to the new Government’s intention to adopt an updated NPPF in the current months? It is the view of ourselves and our client that the Council should cease this proposed partial review process and instead progress with a comprehensive review of the Plan as a whole (Parts 1 and 2), noting that the matters covered within an all-encompassing review are directly interrelated and that such a review must also be undertaken in accordance with the contents of the updated NPPF.  Whilst it is the view of ourselves and our client that progressing a partial review of the Local Plan is an inappropriate and insufficient step at this present time, we comment further on additional matters of relevance in our representations below.  Spatial Strategy As we have noted above, we consider it wholly inappropriate and a poor use of time and resources, for all parties, for the Council to progress a partial review of the Part 1 Local Plan at this stage.  Rather than focussing the Review and consultation on a small range of matters, notably how South Derbyshire Council will accommodate part of Derby City Council’s housing need, a comprehensive and all-encompassing review of the whole South Derbyshire Local Plan should be progressing at this stage.  The issues that feed into the preparation and composition of a Local Plan are deeply interconnected. As such, to progress a partial review, focussing on a small range of issues is not appropriate, particularly when the scope and recommendations of the new NPPF have been wholly ignored.  Meeting an element of an adjoining Council’s housing need is just one component of the plan-making process, and to be able to appropriately meet this requirement – once appropriately established – there will be various other matters that need to be factored into this consideration, not least outlining what South Derbyshire’s appropriate housing need is and the quality and availability of sites to meet this. Progressing a partial review of the nature proposed is not an appropriate plan-making step and a more comprehensive all-encompassing review of the Plan (Part 1 and 2) is the most appropriate step the Council should be taking at this stage of the adopted Local Plan’s lifecycle.  Paragraph 33 of the current NPPF notes, inter alia; i.‘Policies in local plans and spatial documents should be reviewed to assess whether they need updating at least once every five years’ – the Council’s current review is sporadic and has a very narrow focus, something the NPPF does not endorse or encourage; and  ii.‘Reviews should be completed no later than five years from the adoption of the plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy’ – this partial review is taking place over eight years since the adoption of the Part 1 Plan and is partial in nature. The review also wholly ignores the implications of a key emerging change in national policy, the new NPPF, which will shortly be adopted.  The Council’s proposed approach to meeting part of Derby City’s housing need is to propose the allocation of two very large strategic site allocations of 2,000 and 2,500 dwellings.  In itself, such an approach carries significant risk, given the issues that can be associated with bringing forward and delivering such large and strategic sites. To ensure the new Local Plan appropriately meets Derby City’s housing needs, as well as that for South Derbyshire – once appropriately established inclusive of the recommendations of the new NPPF – it is integral that the mix of sites proposed for allocation and delivery are varied in size and location, across the local plan area.  Paragraph 70 of the NPPF is clear in noting that ‘Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly’. The Council’s approach to meeting Derby City’s housing need wholly ignores this requirement.  An all-encompassing review of the Local Plan, as is required at this stage, should include a wide variety of housing allocation site sizes and locations to ensure that the prospects for subsequent housing delivery are maximised.  Land West of Longlands Road, Midway In taking forward a comprehensive review of the Part 1 and II Local Plan Documents, as the appropriate course of action, as opposed to the current proposed partial Part I review, the Council should consider a wide range of options for meeting its housing needs, inclusive of those it will accommodate from Derby City. The housing needs figure should be established in accordance with recommendations from the new NPPF. In considering appropriate housing locations to meet part of the established housing needs figure, we again request that Land West of Longlands Road, Midway is considered as an appropriate, available and deliverable location to meet part of Swadlincote’s significant future housing needs.  We thank the Council for the opportunity to comment on the proposed partial review of the Part 1 Local Plan.  In our comments we have been clear in noting our view that the proposed approach of a partial review, focussing only exclusively on matters related to meeting part of Deby City’s housing need is an inappropriately narrow step in taking forward a new Local Plan; one which is not endorsed or encouraged by the NPPF – adopted or emerging.  Further, wholly ignoring the recommendations and implications of the new NPPF, which should shortly be adopted, is also wholly inappropriate and renders the current consultation exercise largely irrelevant.  The proposed partial review is very limited in its recognition that substantial new housing development is required to meet the future needs of South Derbyshire. The plan review proposes just two new very large sites to meet Derby’s housing need; the new Local Plan should consider a vast range of options for meeting South Derbyshire’s housing needs – and part of Derby’s – something the current review wholly ignores.  This is an inappropriate approach that only serves the purpose of wasting valuable time and resources that could be better utilised, by all parties, in bringing forward a new all-encompassing Local Plan for South Derbyshire, which should include the addition of small sites such as the Land west of Longlands Road.  We look forward to playing a part in shaping the new Local Plan and again propose Land West of Longlands Road, Midway as a site for inclusion within the new plan as an appropriate and beneficial location, which has been viewed positively in the most recent SHELAA, to accommodate a part of the area’s future housing needs. | Noted.  The Local Plan Part 1 Review is a full review of the adopted Local Plan Part 1 not a partial review. Every policy has been reviewed, and changes have been made to policies where deemed necessary. The Council will ensure that the Pre-Submission Local Plan Part 1 clarifies this.  The Council is permitted to undertake a part 2 plan process until the new Bill comes into force December 2026. The Council will progress with either a Part 2 Local Plan or Full Plan Review very quickly after adoption.  It should be noted that housing sites identified in the adopted Local Plan Part 2 continue to deliver new homes and a review of that document will provide the opportunity to address any need for additional non-strategic scale housing allocations.  Omission sites will be considered in question 13.  The new Standard Method changes the minimum needs of the three HMA authorities significantly, substantially increasing Amber Valley Boroughs annual figure, substantially reducing Derby’s and increasing South Derbyshire’s, albeit to a much lesser degree.  It is not considered that the outputs of the new standard method justify an increase in South Derbyshire’s overall requirement. |
| **Members of the public** | | | | |
| 1235572 | Lisa Marie Roberts |  | No  Sustainability Assessment for housing and the traveller community wasn't published until after the consultation.  Mickleover has already taken more than its fair share of housing growth near the ward/city boundary. The proposed development south of Mickleover will impact on the current infrastructure which is already strained with increase traffic and facilities.  Up to 40% of the housing will be social, yet SDDC civic offices are 12 miles away in Swadlincote. This again will impact on travel arrangements.  Green space is already limited due to the housing development in the area. | Noted.  Site specific comments relating to the principle of development of the strategic sites or the infrastructure requirements for the strategic allocations have been considered under the respective questions (i.e. 5a, 5b, 5c, 6, 7 & 8).  With regards to Derby’s unmet need and the Duty to Cooperate please see the response to question 4.  The strategy has been informed by the HMA wide Sustainability Appraisal and the Growth Options Study both of which consider the most sustainable way to address the housing need across the HMA area.  The Council is permitted to undertake a part 2 plan process until the new Bill comes into force December 2026. The Council will progress with either a Part 2 Local Plan or Full Plan Review very quickly after adoption. |
| 1239208 | Clive Schreiber |  | 1. South Derbyshire is taking an unfair burden of Derby’s housing provision and has consistently done so. Between 2011 – 2021, South Derbyshire ranked fourth of all Districts in the East Midlands in terms of the percentage increase in housing provision and this is a continuing trend. The current proposals will increase that building rate much to the very serious detriment of existing communities by way of increased traffic congestion, delays and associated traffic dangers 2. The analysis of housing need is seriously flawed, based as it is on an artificially constructed geographical area, a working tool that does not truly reflect the true housing area. The public has never been consulted or provided with an opportunity to comment on the area chosen. Neither has it ever been asked to comment on strategic plans leading to the dispersal and spread of proposed new housing in a strategic sense. The only opportunity to comment has been on small, fragmented elements of the housing allocation district by district such that undertaken by South Derbyshire District Council. 3. In addition to South Derbyshire and Amber Valley, the overall housing need should be partially met by Erewash and parts of Staffordshire and at least considered in the assessment area. Erewash for example, contributes to the city’s workforce at virtually the same levels of daily commuting as seen from Amber Valley and South Derbyshire Districts yet takes none of the growth. Indeed, some 6000+ people from Erewash and a further 3000+ travelling in reverse to the Borough daily for employment alone. Moreover, Amber Valley has historically taken significantly less housing, and will again continuing that trend. I believe Amber Valley should take a greater proportion. This would relieve pressures on communities in and around South Derbyshire and the southern fringes of Derby. |
| 1241682 | Sue Glover |  | As above  Question 1 response: I feel that Mickleover has had more than it's fair share of development over the last few years. The infrastructure can not cope with any extra pressure/burdens ie Doctors surgeries, schools, roads, shops, local parking etc. The local roads are a lot busier than they used to be.  Question 2 response: 2,500 dwellings is a hell of a lot to stick on the edge of Mickleover an already burgeoning suburb of Derby. Locally we have had enough. |
| 1239219 | Anne Heathcote |  | As an area of sustained growth, we have to address the needs of the future. |
| 1236474 | Alan Dixon |  | As answer 1   Question 1: Do not agree with the proposal for housing south of Mickleover Already enough new housing near Mickleover Ward/City boundary. There is plenty of land available elsewhere in South Derbyshire, and should be nearer Swadlincote because of the 40 percent of social housing |
| 1235279 | Gerald Arthur Bowker |  | As stated in my answer to question 2. SDDC should wait for clarity from the national government on the National planning policy and A38 upgrade before pushing through any further development proposals. So I cannot agree to an unknown final proposal, in principal or otherwise when the actual national framework has not been decided. I certainly do not agree with it as it stands prior to that possible further alteration/amendment. |
| 1232988 | Leigh Fearon |  | Blaming Derby City is an excuse, nothing more, if Mickleover was closer to SDDC offices the situation would be very different. |
| 1234080 | Nick Pope |  | Derby city cannot complete its obligations, as rightly said, it is full! You are not adding to infrastructure. You are only sucking what is left out of the existing and spreading it even more thinly than it is, which is completely unsustainable. |
| 1238115 | Fiona Bevington |  | Derby City could use sites within the city boundary - there are multiple sites that could be regenerated. It’s just lazy to consistently pick green field sites. |
| 1234342 | Julia Bather |  | Derby city is now building flats and apartments to satidfy its requirements. No more building on Green field land is needed |
| 1242052 | Susan Marshall |  | Derby City should be looking at ways of increasing housing density, the use of brown field sites and the use of underused commercial sites in the city centre. As stated above, sites to the east and west should be considered as well as the north and south areas covered by the HMA. |
| 1233743 | Matt Hunt |  | Derby needs housing but the issue is transportation, facilites (doctors/dentists/shops etc) are not matched to the level of people living in these communities. |
| 1238942 | Mr Brian J Harrison |  | Derby's housing issues sit squarely with Derby, not South Derbyshire. I chose to live in the area to avoid the urban sprawl of Derby. |
| 1243600 | Geoffrey Tubey |  | Development should be prioritised on Brownfield sites not agricultural land or other open spaces. Never get promised vital infrastructure - major example - still waiting for Walton Crossing. |
| 1242574 | Christian Murray-Leslie |  | Doesn't address Climate Emergency requirements. Please see general comments. |
| 1243552 | Jim Froggatt |  | Due to difficulties which have arisen with existing sites on and across the Derby city border, I do not believe that the strategy should include major new developments where suggested. No comments on other parts of the strategy. |
| 1233824 | AYeomans |  | Firstly, Mickleover has already taken its fair share of housing developments close to the city/ward boundary.  Secondly, the proposed plans are not a sustainable development. Mickleover is bursting at the seams: doctors surgeries are at breaking point and residents are unable to get an appointment, ultimately putting the health of residents in extreme danger. There is no plan to build a school on the development and local schools are already struggling to meet the demands of the numbers of the community. The road and infrastructure around Mickleover is at capacity and building a further development will only add to the unsustainable traffic issues in the local area.  It is outrageous that you are proposing that 40% of the dwellings are social housing, yet the local council offices and support required by future residents is 12 miles away in Swadlincote. If there is a requirement for such significant numbers of social housing, these should be built much closer to the offices and the support services. Perhaps South Derbyshire Council could better invest the funding into supporting the existing pupils (particularly SEND pupils) in Mickleover Primaries and secondaries instead of bringing more challenges by enrolling more children.  Additionally, proposing 2500 houses is not a sustainable nor appropriate development in an area already overrun with new build developments and lack of green space. There are other, more suitable areas in South Derbyshire.  Furthermore, SDCC are rushing their plan to local plan process. The Government are currently reviewing national policy and the future of the A38 junction scheme: SDCC should have waited for clarity on both of these. |
| 1241860 | Innes Mary |  | For the reasons given previously. |
| 1241773 | Joanna Ayres |  | Has the use of brownfield sites in South Derbyshire been properly considered? |
| 1234532 | Michelle Garnham |  | I agree with the green space and the vision of resources to be implemented but only if the schools and GP practice was brought forward so the infrastructure is there earlier. |
| 1241728 | Julie Craig |  | I believe that South Derbyshire has taken more than its share of Derby City overflow. There are other adjoining councils that should be able to take their fair share. This will also allow for levelling up between poorer and richer areas of the county instead of adding houses which will attract higher prices due to being in a desirable location which will not help those that are on lower incomes and trapped in a rental cycle |
| 1233335 | Ian Molyneux |  | I believe there is a significant number of 'brown' sites which could be re-developed to meet most/all of these needs and there are other areas around Derby (eg Spondon/Borrowash/Belper) that have not been developed as significantly as Mickleover |
| 1242360 | Christina |  | I believe we are swallowing up too much land to build larger homes in low density estates. More affordable housing needed for young people, terrace type 2 storey 2 to 3 bedroom rather than 4 or 5 bedroom. |
| 1233131 | Mariah Senaa |  | I do not agree with the Plan’s Strategy. While it aims to meet housing and employment needs on the Derby urban fringe, the approach overlooks the significant negative impacts on local communities, such as those in areas like The Hollow. The strategy of focusing development on the fringe risks overdevelopment, increased traffic congestion, and strain on local infrastructure, which have not been adequately addressed. The sustainability appraisal may suggest this approach is sustainable, but in reality, it compromises the quality of life for residents in these areas and threatens to harm the natural environment. Moreover, the strategy fails to consider alternative solutions that could distribute housing needs more evenly across the region without concentrating development in sensitive areas. Therefore, I cannot support this strategy in its current form. |
| 1242063 | Laura Massey-Pugh |  | I do not feel it is sustainable and I do not feel enough time has been taken and worm done to establish if it is. The lived experience of residents should be taken into account as the pressures of the expanse of housing are already keenly felt and even if "capacity constraints " mean the city is unable to house more, Mickleover is not the answer. |
| 1234363 | Julie Eason |  | I find it hard to believe that Derby are being told to build more houses in the city if the city is already built to the boundaries and asked to go into another district. |
| 1238657 | Clare Wood |  | If Derby City Council cannot meet its housing targets in its own boundaries, then they should not be met by other Councils on Derby City's urban fringe. Mickleover, for example, is already at full capacity, and it is unfair to impose even more developments around the area as they will impact on the quality of life of residents as a result of the increased traffic, noise and pollution, the increased demand for GP appointments and school places and the increased demand on local shops. |
| 1241985 | Shirley Jackson |  | I'll thought out with current local resources |
| 1241973 | Graham Keith Sanders |  | Infrastructure (Doctors,Shops,Schools,Roads,Utilities) will not cope ! Councils inability to fulfill obligations (Refuse,Drains,Paths,Roads,Trees,Grass cutting) |
| 1232922 | Maureen Shenton |  | It is not south Derbyshires job to provide housing for Derby City Council. There are large industries with the SDDC area that cannot attract staff due to little local housing. Areas closer to these industries should be developed |
| 1240880 | Rebecca Buckley |  | It's all about money and not about people |
| 1241240 | Jonathan Watson |  | Mickleover has already taken more than its fair share of housing growth near the Ward/City boundary. The proposed development south of Mickleover lacks ‘breathing space’ / green space buffer for established Derby City communities.  Proposing 2,500 more homes as an urban extension to Mickleover is neither sustainable nor appropriate development, especially with ample land available elsewhere in South Derbyshire.  Up to 40% of the housing will be social, yet SDDC offices are 12 miles away in Swadlincote. This housing should be closer to SDDC services. There's also no reason to place SDDC Gypsy & Traveller pitches near Derby when suitable land exists in South Derbyshire.  SDDC is rushing the local plan process. The government is reviewing national planning policy and the future of the A38 Derby junction upgrade. SDDC should have waited for clarity on both.  The Sustainability Assessment Report, critical for validating housing and traveller site choices, wasn't published until after the consultation began, which undermines the process.  The new plans don't include any form of sustainable transport, e.g. for cycling. Staker lane is already dangerous, any new development must make cycling these areas easier, the best solution being, suitable off-road cycle paths to encourage this sustainable travel.  There is not enough thought given to the needs of a new community, Doctors, shops, schools, dentists etc. They will just become a burden on already stretched services. The track record is not good, lots of things were planned for the Cotchett village site, but none have happened. |
| 1233334 | Harvey Heldreich |  | Mickleover has had its fill of development and has more than been levelled up, and the area in question doesn't need regeneration, this is prime farmland which has already been stripped away in other areas of the town. |
| 1232852 | Angus Chan |  | No plan should be published until National Framework is available. |
| 1233241 | Russell Licence |  | No this is building houses in and around the city where the same challenges exist as per the arguments of the city to build within the city boundary.  The areas proposed are already over populated where infrastructure cannot manage demand.  There are not enough school places, there are not enough doctors, there is simply not enough space |
| 1239872 | Daniel Robertson |  | No, the proposed developments near Derby and particularly near Mickleover are examples of the worst kind of unimaginative generic development of low density suburbia.  Mickleover has already had several thousand houses added both in Derby and Derbyshire. The local roads are already congested and it is unlikely that they can be upgraded. Local services are already inadequate, particularly GP services.  Despite claims that this development would be a "garden city" evidence of previous developments at Langley Country Park and Hackwood Farm show that this is unlikely to be the case.  Proposed Doctors and shops for these estates never ended up being constructed leaving several thousand residents dependant entirely on services elsewhere in Derby and being entirely dependent on cars for access to jobs, services and recreation.  These estates were ugly generic new builds that created no sense of place and could have been built anywhere. Given that any new developments would be constructed by the same national housebuilders with the same incentives and (lack of) skills it is reasonable to expect the same outcomes again.  Additional houses with Derby and South Derbyshire could be provided by means of densification of existing areas as settlements in both areas. There are many examples of post war housing estates which are filled with low quality houses with poor insulation and limited visual merit.  These areas have relatively low population density due to widely spaced small houses. These areas could be densified by means of allowing higher density housing such as town houses or mansions blocks. Property managed the uplift in value would benefit local property owners and residents could be offered a larger floor area modern house in the same location.  This type of development has been used with some success in London Boroughs. |
| 1235357 | Lorna Hodgetts |  | Oversubscribed area, resources in existence are already full to capacity. |
| 1242325 | Tracy and Gordon Harrison |  | Page 34 point 1 states - “The housing sites required will be met on a mixture of brownfield and greenfield sites with encouragement given to the re-use of previously developed land.”  In my view there are at least two glaring examples of a failure to develop brownfield sites as per your own objectives and strategy.  One is the old Willington Power station site (around 1,000 homes proposed) that hasn’t been in use since 1999. At the local meeting to discuss the plan I was told that there is an issue with the landowner? Why after probably 5 years before its closure and 25 years after there is no plan and issues with the landowner?  The second is the Great Northern Railway Bonded Goods Warehouse which has been derelict since 1967. I’ve lived in Derby all my life and this has been crying out for development. There have been lots of talk on this over the years and very little action. It now stands as a shell of a listed building. I’ve found a developer online, Glancy Nicholls Architects that have a plan to build at least 276 new homes, along with a health and fitness space, outdoor play areas and “pocket parks” There seems to be plans (not listed) by Wavensmere Homes which is developing the site alongside Pegasus Group and landowner Clowes Developments. Why isn’t this plan being enacted? Let’s say it delivers 500 new homes. These 2 sites can yield 1500 new homes, and that’s just two examples.  I also disagree with not including accommodation for students (as an example, are there others?) in the formula for housing needs.  What about empty homes? According to DCC Strategic Housing Empty Homes Strategy 2021 – 2026 there are;  “In Derby, there are currently around 2,300 registered empty homes, of which 1,100 have been empty for six months or more…”  Does the requirement for new houses take into the 2,300 empty homes and the plan to bring into use?  So, 1500 + 2,300 = 3,700 homes in 3 examples. I do realise context is everything but it’s quite frustrating to see very, very obvious wasteland (brownfield) and empty properties both retail and homes that can be used rather than just keep building on land that could be rewilded. You’ve “declared an Ecological Emergency and a Climate Emergency”, let’s leave existing green belt alone, plant more trees etc (not just next to roads and retail parks) and let nature do its thing. |
| 1242135 | Matt Coxon |  | Poor infrastructure, local travel links, doctors and roads should be addressed before considering adding more housing to the area.  All proposed SDC dwellings should be close enough to SDC faciities that this is the most practical use instead of leaning on all neighboring areas facilities. The dwelling boardering Mickleover is a prime example of a poor decision. |
| 1235132 | Frazer Murphy |  | See above  (Response to question 1: Mickleover has received so much development in recent years. As an owner of a terrace house with no drive, the increase in population in the area has had a massively negative impact on my ability to park near my own house, on top of this the traffic coming to and from Mickleover is already bad along with the constant road works, without potentially another few thousand cars on the road. it’s not just a just a green space and congestion issue, air quality is a massive concern. On top of this the police rarely patrol around Mickleover as there currently isn’t as much of a need too and also being at one of the furthest points in derby from a station - building an extra 2500 homes on the border, 1000 of which will be social housing will inevitably cause an increase in crime in the area, long story short, local infrastructure cannot handle 2500 homes being built in this proposed area.) |
| 1241058 | Stephen Alcock |  | See comments in question 5.  (Question 5 response: Dear sir, I have been a resident of Howden Close Mickleover for over 25 years. We chose the close for its wonderful views over open countryside, and benefited from regular sightings and visits of many species of animals and birds, including foxes hares, owls, birds of prey, and pheasants. I also chose the area due to the infrastructure i.e. good roads that were not generally congested, great access to Derby city centre, great schools, doctors, dentists and adequate shopping facilities. In recent years we have seen a whole string of housing developments placed around the south /west side of Derby City boundary, which has eroded many of the benefits listed above, and has decimated the local wildlife. Traffic jams at peak times have become a regular event, especially on the A38/A516 major roads, plus the radial roads into the city centre, especially Uttoxeter Road, Burton Road and Ashbourne Road. Virtually every day I witness emergency services vehicles struggling to get through the traffic at peak times, especially around the Royal Derby Hospital, which creates potentially life-threatening delays to ill patients. Noting that many housing developments in the area are not yet completed, there is clearly going to be a lot more traffic that will result once all the current approved plans are delivered. I can only guess that traffic flow predictions are somehow made to assess the combined impact, but for sure things are only going to get worse. The situation is further compromised by the lack of previously planned major road improvements going ahead, plus if/when they do, the resultant construction work will cause mayhem to traffic flow for many months/years to come. Also, although you may plan for high quality pedestrian and cycle routes within the development, the existing roads are not suitable for pedestrians or cyclists to use, and would need major improvement to accommodate such plans. I Noting all the above comments, I also list some specific objections on the following grounds: 1. Impact on Local Infrastructure Mickleover schools, doctors, and dentists are all full. The demand on places is continually growing as a result of the new housing developments in the area, most of which at best, have deferred plans for limited facilities, so very reliant on Derby City facilities. Local shopping is also very difficult, with the only large supermarket (Tesco), often being extremely busy at peak times, creating parking problems, and causing general frustration. Similarly, the adjacent Parade of small shops has very limited parking, which again causes much frustration for local residents trying to pop to the post office, Birds etc. I am fortunate that I live close enough to walk, but there are a lot of elderly residents that that rely on taking their car or get a lift from family members. The surrounding streets are progressively becoming extended parking areas, which again causes frustration to some residents, plus adding to traffic flow issues. How does your assessments of these plans take account of such impacts? Specifically for your development, you need to understand just how much traffic flows from Mickleover down Staker Lane, since this is the obvious route for anybody heading south on A38. Staker Lane is a narrow country road, which is unlit, has several 90-degree bends, and has no footpath. It is also very narrow, and is quite dangerous for cyclists who also use it. It would therefore need widening to take account of increased traffic, plus adding at least a pavement on one side of the road. Furthermore, although the primary access is being proposed off the Finden island, the smaller access off Staker Lane could be very dangerous, especially if placed on the bend near the current Watergo Farm entrance.   2. Environmental Concerns  The proposed development will result in the destruction of greenfield land, which serves as a vital habitat for local wildlife and a natural buffer against pollution. Developing this area will irreparably harm biodiversity and contribute to further urban sprawl. With increasing awareness of the need to preserve green spaces, it is imperative to explore alternatives on brownfield sites before considering such damaging developments. If such land cannot be found, then it should be placed in an area where the impact on the existing infrastructure will be far less, or new adequate infrastructure is built as part of the development.  3. Village Character and Community Impact  The scale of the proposed development, including a traveller site, risks overwhelming the existing local community. While diversity and inclusion are important, there is a need for proper consultation and provision to ensure any development integrates effectively and does not create division or strain on local resources. The rural character of Mickleover, which has previously drawn people to live here, will be irreversibly altered by overdevelopment.  4. Lack of Justification  The National Planning Policy Framework emphasizes the need to prioritize brownfield developments over greenfield. There is insufficient evidence to suggest that this particular site is the only viable option. Given the ongoing housing developments in the area, it is unclear why additional pressure needs to be placed on this location, especially when other, more suitable sites could be considered. In particular, this area would not be suitable for a retirement village for the reasons stated above, and equally not suitable for a traveller site, so close to residential properties.  I would also like to draw your attention to the New House farm development. Firstly, the new island caused many accidents initially due to inadequate lighting and road signs. It also has an unnecessary impact on traffic flow due to east bound traffic heading to Mickleover, being directed to turn right at the island, affecting traffic flow going west. This completely ignores the fact that there is a perfectly acceptable slip road another 400 m down the A516, leading up into Mickleover. Also, x years on, the promised pedestrian crossing at the top of Ladybank Road has never materialised, nor has the walk way lights or a proper pavement down the official pedestrian route into the development off Ladybank Road been added. The apparent and promised steps to try and limit vehicle use into Mickleover has only received token improvements, and I for one, would be very reluctant to walk down there in the dark! It would be worth doing a survey of its use, especially for children going to schools in the area. Noting the almost constant traffic flow down Ladybank Road at peak times, plus increased parking and exclusion zones near schools in the area, it is clear that the majority of children off the development are transported to school in cars, with the resultant increase in traffic flow we had predicted. I hope such lessons have been learned for future developments, and developers are held more accountable for delivering their previous commitments/obligations.  In conclusion, I believe Mickleover has had far more than its fare share of new housing developments placed on its doorsteps, which has eroded the previous benefits of the area, and urge the planning authority to reject this draft proposal due to the negative impact on infrastructure, road safety, the environment, and the character of the local area. Sustainable development requires careful consideration, and this project fails to address the needs and concerns of the existing community.  Thank you for considering my objections.  Yours sincerely, Mr Stephen Alcock) |
| 1242138 | Tiran Sahota |  | The areas proposed for development already have had a significant number of new homes built in recent years. The proposals in the plan's strategy would completely overwhelm these areas resulting in a diminished quality of life for residents living in these areas. |
| 1241910 | Nigel Bentley |  | The draft plan makes entirely clear that no consultation has been entered into with Derby City Council on the suitability of these proposals. In particular, with reference to Mickleover, as proposal to add 2500 homes is totally unrealistic and not sustainable given the previous extent of development that has taken place in recent years both around and within the suburb. |
| 1233332 | Ameila Hunt |  | The mickleover/littleover boundary has been substantially over built on, and so planning more in that area is unsustainable. the land identified also floods significantly and by building there blends areas together |
| 1240252 | Ian McHugh |  | The strategy is based on unpublished "need" from Derby City Council - Derby City are not due to adopt their Plan until May 2026 at the earliest. The subtext in the question above, that the plan will be amended in line with future changes to the 2024 NPPF, brings into question what the "strategy" is. |
| 1232937 | Margery Morgan |  | The strategy will change areas like Mickleover and Littleover from desirable outer city suburbs to effectively inner city areas by pushing green areas further and further away while at the same time allowing residents of South Derbyshire to take advantage of facilities and infrastructure paid for by residents of Derby city. |
| 1234311 | Ian Fox |  | The target area is full and the services can not support the current population. |
| 1235411 | Andrew Norman |  | There are already good transport connections from other areas of South Derbyshire to the employment sites in Derby and thus no requirement to build so close to the existing urban area. |
| 1232857 | Teri Licence |  | There are ample brownfield sites within the city boundary that should be considered prior to look at the fringe. Mickleover in particular cannot cope with any further housing. Look at the mess that has been made in Chellaston as an example. |
| 1232938 | Martin Turner |  | There is clearly not enough land within Derby to meet future requirements. It is now time to expand the city boundary so that all requirements can be met. This would allow all services to be adequately planned & included in future plans. I believe that the boundary has not been expanded since the 1960s |
| 1235713 | Rob M |  | There is never enough consideration given to the adverse effects on people already living in adjoining areas, and genuine environmental concerns are not addressed. It is also highly concerning that food security will also be affected when arable and agricultural land is built on. |
| 1232909 | Stuart Orr |  | Too many houses are planned adjacent to derby city boarder. Boundary should be extended for the city so the impact and any taxes etc can be accounted for by the city. |
| 1232876 | Claire Woodward |  | Up to 40% of the dwellings are to be social housing, yet SDDC offices are 12 miles away in Swadlincote. This housing should be closer to SDDC services. There is no justification for placing SDDC Gypsy & Traveller pitches on the Derby City boundary. Suitable land is available in South Derbyshire. |
| 1241873 | Hilary Lomas |  | Use existing brown field sites and empty buildings to redevelop to fulfill housing needs rather than green belt which will be lost forever |
| 1242108 | Chris Wilson |  | Utter nonsense! Why should South Derbyshire be responsible and suffer the consequences of Derby City’s failures. Stand up to them and look after your own communities. |
| 1241995 | Donna Shacklock |  | Utter rubbish.. your proposals are purely financially driven away from sddc areas and impacting on DCC residents and infrastructure, no thought of already struggling schools, doctors, traffic congestion, and local residents well being. |
| 1241473 | Amy Simes |  | We support STRA 2: Draft Land South of Mickleover Mixed Use Allocation. This site sits next to SHELAA site 159 New Range Farm, Burnaston which would be suitable to come forwards as part of this allocation and future expansion to Mickleover. |
| 1232940 | Jon Arnott |  | Where is the evidence that Derby city council can’t meet its requirement within its boundaries?  If so - there must be different site options which would be more ‘sustainable’ and have less negative impact on the local community than mickleover |
| 1233359 | Sukhdev Bangar |  | Yes, however question the selection criteria. Greater emphasis needs to be placed on minimizing impact on existing residents |
| 1240863 | Amardeep Bhopal |  | You've already shown disregard for the process by not providing the consultation before moving this to plan review. |
| 1242119 | George Selby |  | Zero confidence this can be delivered sustainably.  Roads, doctors, local facilities are completely overwhelmed.  A38 improvements paused, doctors surgery site not enacted as recent examples. These should be a priority and come first. |
| 1232906 | Steve Wilson |  | You should concentrate on building home where your people want them, Ashby,Swadlincote & Burton. |
| 1241896 | Margaret Holmes |  | Again, on the whole. Housing must be of prime importance as long as all of the details surrounding development are dealt with sympathetically and the end product is of a high standard. |
| 1241993 | Alan Mercer Jones |  | Derby City's housing needs should be met in close proximity to the City boundary in order to minimise transport needs and to make it possible to integrate new housing estates into the City's bus network. Given the limited transport links across the River Trent none of this need should be met to the south of the river. |
| 1241686 | John Moore |  | Constant development on the "Urban Fringe" , as STRA 2 is, merely increases the size of, and the demands on the adjacent City infrastructure. Derby City is clearly "overstretched" already otherwise it would not have an "unmet" requirement for it's own housing development. |
| 1241986 | Andrea Thompson |  | I di not agree with anymore houses being constructed in Mickleover |
| 1241987 | Patrick Munro |  | I disagree because these developments on the fringes do not have sufficient facilities built with them. How many house have been built around Mickleover? Not a single dentist or doctor surgery has been built. No football fields for kids. The playgrounds that have been built are poor. One convenience store has been built. It's all really poorly considered. |
| 1242116 | Jonathan Nutman |  | Impossible to view these in isolation from all the other proposals being discussed elsewhere e.g. the upgraded power line set to come through the area, and the changes to the road system that have been proposed |
| 1241749 | Mark Hoptroff |  | It is simply too many houses for an area that has already been overloaded with new houses over the past 10 years, Mickleover simply cant cope with anymore. |
| 1241975 | Paul Hopkin |  | This is a smokescreen. Your evidence to support the contention that Derby City Council has capacity constraints is poorly judged. This 'evidence' requires more careful consideration and impact comparison against alternative sites within SDDC. At the moment its smacks of just having been thrown in to support the outcome you seek. |
| 1242055 | Mr Eddie Pickering |  | a full review would have been more appropriate to address the housing needs in full |
| 1241890 | Edward Stupple |  | Sites nearer to the centre of Swadlincote should be considered. Public transport between Mickleover and the SDDC offices in Swadlincote is very difficult for the people located in the 2,500 housing. It is 12 miles away. |
| 1236005 | Richard Larder |  | The proposed developments should take place elsewhere in South Derbyshire as Mickleover is now overcrowded and the existing residents will suffer from the demands being placed on the local infrastructure. |

# Qu. 4: Do you agree that the Draft local Plan Part 1 Review is providing the correct quantum of housing towards Derby City unmet need?

|  |  |
| --- | --- |
| Duty to Cooperate Body / Statutory Consultee | 4 |
| National Organisation | 3 |
| Regional Organisation | 1 |
| Parish Council and other Community Group | 9 |
| Councillor | 1 |
| Landowner or Developer | 34 |
| Members of the public | 86 |

| **Response Id** | **Name** | **Organisation** | **Do you agree that the Draft Local Plan Part 1 Review is providing the correct quantum of housing towards Derby City unmet need?** | **Comment** | **Council Response** |
| --- | --- | --- | --- | --- | --- |
| **Duty to Cooperate Body / Statutory Consultee** | | | | | |
| 1243643 | Sport England |  |  | At the time of writing Sport England understand that South Derbyshire Council have appointed consultants to write a Built Facilities Strategy and a Playing Pitch Strategy. Sport England would expect these strategies to take into consideration any existing and future cross boundary issues, particularly those associated with Derby’s unmet need. The results and recommendations of these strategies should inform the emerging policies of the Local Plan | Noted. |
| 1248292 | Amber Valley Borough Council | Amber Valley Borough Council |  | Thank you for formally consulting Amber Valley Borough Council on the Regulation 18 version of your Local Plan Part 1 Review. Through our joint work, utilising the Derby Housing Market Area (HMA) Joint Advisory Board and officer groups, you have kept us informed and sought our views to help develop the draft plan, principally but not limited to, how the unmet housing needs across the Derby HMA should be addressed. This longstanding cooperation has led to positive planning outcomes in that the submitted Amber Valley Local Plan and your Reg 18 Local Plan Part 1 Review have, when taking account of the minimum number of homes that the City estimates it can achieve, are allocating sufficient homes to meet the HMA needs for the period 2022-2039.  We support and welcome the proposed allocations in your draft plan that help to meet the HMA housing needs. If the Governments draft approach to revising how local housing need is calculated, then it is likely that the requirements across the HMA will increase, with Amber Valley facing a significant increase in its annual LHN. This will have implications for all three plans but we believe the current strategy across the HMA for future growth is correct. It may mean that plans may have to consider increasing allocations in line with that strategy.  To that end we would request that the Regulation 19 version of your plan refers to HMA unmet need, rather than being specific to Derby City. We would also request that to align with the submitted Amber Valley Local Plan, a review policy is included in the plan with appropriate triggers, including addressing unmet HMA housing needs, and detailing the process for a review.  We look forward to continuing to work positively with you and colleagues as your plan progresses. |  |
| 1242629 | Derby City Council |  |  | Derby City Council welcomes and supports the principle of South Derbyshire District Council making provision to meet some of Derby City’s unmet housing need in its local plan. The Council also supports the fact that the best place to meet Derby’s unmet housing need is within the Derby Housing Market Area (HMA) around the edge of the city, as evidenced through the recent Derby HMA Sustainability Appraisal work.  As a general point we remain concerned, however, that despite discussions over recent months, the whole of Derby’s unmet housing need is not accounted for across the three Derby HMA emerging local plans. This includes Derby’s 12,500 capacity limit, which has been evidenced and agreed by the three HMA authorities, Amber Valley’s submitted local plan which refers to meeting 1,320 of Derby’s need at the proposed Brun Lane allocation, and the 5,609 dwellings proposed in the Draft South Derbyshire Local Plan Review. Currently, it would appear that as the emerging local plans are set out there is circa 1,700 dwelling deficit in meeting Derby’s housing need.  We believe that it is crucial that the three Derby HMA authorities must work to agree how both the overall HMA housing needs, and those of Derby City, are to be met in a coordinated and agreed manner, as soon as possible. The JAB can ratify this position. This is particularly important given that the Amber Valley Local Plan is currently at Examination with imminent Hearings. It would appear to us that presently, both Amber Valley and South Derbyshire are using old (2023) Standard Method Housing Need figures and these should be updated, as well as the supply positions, to form an agreement as soon as possible.  No doubt a HMA growth table will emanate from the Amber Valley examination that cements this overarching position.  Potential Changes to National Policy and the Standard Method On the general matter of strategic housing growth, we note that the Government recently consulted on proposed planning reforms including changes to the National Planning Policy Framework and to the Standard Method for calculating housing needs. While we understand that South Derbyshire District Council was keen to publish the draft plan in order to keep to plan making timetables, it appears inevitable that both Derby City and South Derbyshire will not be subject to the proposed transitional arrangements and will therefore need to consider the changes when the reforms are published.  If the Standard Method dwelling requirements change as suggested in the recent consultation, it would mean that Derby City’s housing need reduces and South Derbyshire’s need increases. In this case it may be necessary to revisit/reconsider the strategy and evidence for locating growth. | It is agreed that the Derby HMA authorities must work together to agree how the HMA and Derby’s needs should be met. The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three authorities individually, substantially reducing Derby’s overall minimum need, whilst substantially increasing Amber Valley’s and also increasing South Derbyshire’s, albeit to a much lesser degree. The housing need over the HMA is very similar in relation to the 2023 and 2024 versions of the NPPF.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated the previous method was 507 dwellings per annum.  The outcome of the Amber Valley Local Plan Examination, in terms of any contribution toward Derby’s unmet housing need, is awaited.  The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  The wording of Policy S1 be changed. |
| 1248292 | Amber Valley Borough Council | Amber Valley Borough Council | Q4 | Thank you for formally consulting Amber Valley Borough Council on the Regulation 18 version of your Local Plan Part 1 Review. Through our joint work, utilising the Derby Housing Market Area (HMA) Joint Advisory Board and officer groups, you have kept us informed and sought our views to help develop the draft plan, principally but not limited to, how the unmet housing needs across the Derby HMA should be addressed. This longstanding cooperation has led to positive planning outcomes in that the submitted Amber Valley Local Plan and your Reg 18 Local Plan Part 1 Review have, when taking account of the minimum number of homes that the City estimates it can achieve, are allocating sufficient homes to meet the HMA needs for the period 2022-2039.  We support and welcome the proposed allocations in your draft plan that help to meet the HMA housing needs. If the Governments draft approach to revising how local housing need is calculated, then it is likely that the requirements across the HMA will increase, with Amber Valley facing a significant increase in its annual LHN. This will have implications for all three plans but we believe the current strategy across the HMA for future growth is correct. It may mean that plans may have to consider increasing allocations in line with that strategy.  To that end we would request that the Regulation 19 version of your plan refers to HMA unmet need, rather than being specific to Derby City. We would also request that to align with the submitted Amber Valley Local Plan, a review policy is included in the plan with appropriate triggers, including addressing unmet HMA housing needs, and detailing the process for a review.  We look forward to continuing to work positively with you and colleagues as your plan progresses. | Noted.  The new Standard Method for calculating housing need, which came into being in December, 2024, changes the needs of the three authorities individually, substantially reducing Derby’s overall minimum need, whilst substantially increasing Amber Valley’s and also increasing South Derbyshire’s, albeit to a much lesser degree. The housing need over the HMA is very similar in relation to the 2023 and 2024 versions of the NPPF.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated using this method was 507 dwellings per annum.  The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed to change the wording of Policy S1 to reflect this.  The policy REV1 is sufficent to address any issues surround Derby or the wider HMA housing need and will require a review sooner than that proposed. |
| 1243623 | Derbyshire County Council |  |  | Derby City Unmet Need  General Comments on HMA Joint Working  Derbyshire County Council has been working jointly with Amber Valley Borough Council, Derby City Council and South Derbyshire District Council for a number of years now as the three local planning authorities have been reviewing their respective Local Plans. This joint working has been facilitated through a number of Member and Officer Working Groups, to consider the future housing requirements of the whole of the Derby Housing Market Area (HMA) and for the individual local authority areas which includes the Derby HMA Joint Advisory Board, Derby HMA Officer Coordination Group and Derby HMA Growth Strategy Officer Working Group.  These Member and Officer Groups are also considering the likely potential strategic infrastructure requirements that are likely to be required to support housing and employment growth across the HMA and the need for the commissioning of joint evidence. A Derby HMA Transport Strategy Group has also recently been established to consider the highways and transport implications of planned growth across the HMA.  Under the requirements of the Duty to Cooperate, the four HMA authorities have also engaged with Erewash Borough Council on a regular basis over the last three years through these Member and Officer Groups to consider cross boundary strategic housing matters and future housing needs arising in Erewash Borough and the Derby HMA.  The joint working arrangements within the Derby HMA have underpinned the preparation of separate but aligned local plans for each local authority areas, over a common timeframe as far as possible. This joint working has included: • sharing of officer expertise • joint commissioning of technical studies and other work to develop a comprehensive, shared evidence base; • ensuring that planning policies for each authority area complement one another, to enable the long-term provision of housing and economic growth over the plan period and for future development to be supported by appropriate services and infrastructure.  On the basis of the above, it is welcomed and supported that the South Derbyshire Draft Local Plan has been prepared and drafted to reflect the considerable and extensive joint working that has taken place between the four HMA authorities and the key strategic issues that have been identified and join approaches that have been agreed on key strategic cross boundary planning matters. This joint working is fully reflected in Chapter 4: Spatial Strategy of the Plan.  Housing Provision and Meeting Derby City’s Unmet Need Derbyshire County Council considers that the District Council’s approach to assessing the District’s future housing needs and its proposed approach in the Plan that makes provision for a minimum of 14483 dwellings over the plan period (2022 – 2039), is robust and well justified and is supported by a range of up-to-date evidence.  It is noted in Policy S1 that this total housing requirement of 14,483 comprises 8874 homes to meet South Derbyshire’s own needs and 5609 to help meet Derby City’s unmet need (see further comments below); and that the housing sites required will be met on a mixture of brownfield and greenfield sites with encouragement given to the re-use of previously developed land.  It is considered that the Draft Local Plan appropriately sets out the national planning policy basis for establishing the overall housing requirement for the District, particularly the need for using the Government’s Standard Methodology for assessing housing need, that also takes into account potential housing needs arising in adjoining areas, as particularly set out in paragraphs 61 and 66 of the NPPF.  Meeting HMA Housing needs and Derby City’s Unmet Need Paragraph 66 of the NPPF states that strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.  In this context, as noted above, Derbyshire County Council has been working jointly and collaboratively for some time with Amber Valley Borough Council, Derby City Council and South Derbyshire District Council that comprise the Derby HMA, to consider cross boundary housing matters and particularly the future housing requirements of both the Derby HMA as a whole, and the individual local authority areas that will be set out in the three councils’ local plan reviews. This collaborative working has been carried out in the context that each of the three authorities are preparing their Local Plan Reviews to aligned timescales, with the Amber Valley Local Plan being the most advanced of the three plans, which is currently in the examination stage. The implications of this are considered further below.  This collaborate working has established that within the Derby HMA the overall housing requirement using the standard methodology and 35% uplift for Derby City over the period 2020 – 2039 is around 36,500.  Derby City Council has recently carried out extensive work to assess the City’s capacity for accommodating future housing needs, which has been assisted by the other HMA authorities including the County Council. The combination of a tightly drawn local authority boundary around the existing built-up area of Derby, together with the application of a 35% uplift to local housing need by the Government (on the basis of Derby being one of the top 20 cities and urban areas nationally by population), has significant implications for how the City’s housing need can be met. The City Council’s capacity work has recently been concluded and peer reviewed for robustness by consultants AECOM. This capacity work has concluded that the City can only accommodate around 12,500 new homes over the City Council’s Local Plan Review period against a standard methodology housing need and 35% uplift of 21,500 new homes, thus leaving a shortfall of around 9,000 homes that cannot be met within the City.  To address this issue, the three HMA authorities, supported by the County Council, have recently commissioned consultants (Clearlead) to undertake a Sustainability Appraisal (SA) of a range of options of how Derby City’s unmet need could be accommodated within Amber Valley Borough and South Derbyshire District in the most sustainable way. The HMA authorities identified three alternative scale options to be tested through the SA which included: • Scale 1: Standard method in full (including 35%); 36,584 dwellings; • Scale 2: Standard method (no 35% uplift); 31,008 dwellings; and • Scale 3: Standard method (no 35% uplift) + 10%; 34,109 dwellings.  Within each of these scale options the SA considers different apportionment options between the three local authority areas, including distribution between sites adjoining Derby (the Derby Urban Area, or ‘DUA’), towns and key villages. The assessment was informed by the HMA Growth Options Study. Within the SA, the Broad Areas of Search identified in the GOS have been compared to the sites submitted to the Strategic Housing and Economic Land Availability Assessment (SHELAA) for Amber Valley and South Derbyshire in order to provide an indication of site capacity for residential development.  The over conclusion of the SA is that meeting the unmet need arising from Derby as close as possible to the City amounts to the most sustainable development option.  On the basis of the above, Derbyshire County Council fully supports and commends the District Council’s approach in Policy S1: Sustainable Growth Strategy, which identifies an overall housing provision requirement for District of 14,483 dwellings over the Plan period, which comprises 8,874 dwellings to meet the District’s own needs and importantly provides 5,609 dwellings to help meet Derby City’s unmet need.  It is noted that the Draft Local Plan, in seeking to help meet part of Derby City’s unmet need, proposes to allocate two large strategic sites that form sustainable urban extensions to the City on land at Infinity Garden Village for 2000 homes and on land south of Mickleover for 2,500 dwellings. Further comments are provided below on the site specific merits of these allocations. However, the location of the sites fully reflects the conclusion of the SA work above, which indicated that that the most sustainable location to meet Derby’s unmet need was for sites located as close to the City boundary as possible. In principle, therefore, the allocation of these two strategic sites is supported.  In terms of how the remainder of Derby City’s unmet need will be met, the Amber Valley Pre-Submission Local Plan, which is currently at examination, makes provision for a minimum of 9,036 additional homes in sustainable locations between 2022 and 2040. This meets a housing requirement for the Borough of 6,564 homes and provides 2,000 homes (1,320 homes in the Plan period) to meet the needs of Derby City located as an urban extension at Brun Lane, Mackworth. Statement of Common Ground  A Statement of Common Ground is currently being drafted by the three HMA local planning authorities, to which Derbyshire County Council will also be signatory as strategic infrastructure provider, that sets out an agreed approach of how the authorities will work together to seek to ensure that the unmet needs of Derby City are met in full through the Local Plans of Amber Valley Borough Council and South Derbyshire District Council. | Noted.  The new Standard Method for calculating housing need, which came into being in December, 2024, changes the needs of the three authorities individually, substantially reducing Derby’s overall minimum need, whilst substantially increasing Amber Valley’s and also increasing South Derbyshire’s, albeit to a much lesser degree. The housing need over the HMA is very similar in relation to the 2023 and 2024 versions of the NPPF.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated using this method was 507 dwellings per annum.  The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed to change the wording of Policy S1 to reflect this. |
| **National Organisation** | | | | | |
| 1243542 | Home Builders Federation (HBF) |  |  | HBF strongly supports the focus of this Local Plan review on allocating new strategic housing and employment sites on the Derby urban fringe to meet needs which cannot be met within Derby City’s boundaries due to capacity constraints. This is a very important focus, and one HBF supports. However, in the midst of a housing crisis HBF would also support a higher housing requirement, and the allocations of other housing sites. HBF support the proposed contribution of 5609 additional dwellings towards Derby’s unmet needs. Indeed, HBF would encourage the Council to do as much as it can to help meet the unmet needs of Derby.  HBF agree that it is very important for South Derbyshire to play its role in the joint-working on meeting the housing needs of the Derby HMA. It will be essential for South Derbyshire to make its contribution to meeting this need.  HBF would suggest that the delivery of housing to meet the unmet needs of Derby within South Derbyshire could usefully be set out and monitored separately, so monitoring can ensure both that South Derbyshire is meeting its own needs and making a contribution to Leicester’s unmet need. Different interventions may be needed if monitoring shows under-delivery of housing. | Noted.  The new Standard Method for calculating minimum need has been formulated taking account of the need to address the national housing crisis, so it is not considered that additional provision could be justified on this basis. The new standard method substantially reduces Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated using this method was 507 dwellings per annum.    The new Standard Method for calculating housing need, which came into being in December, 2024, changes the needs of the three authorities individually, substantially reducing Derby’s overall minimum need, whilst substantially increasing Amber Valley’s and also increasing South Derbyshire’s, albeit to a much lesser degree. The housing need over the HMA is very similar in relation to the 2023 and 2024 versions of the NPPF.  The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It nis proposed that the woding of Policy S1 be changed to reflect this.  It is not proposed that individual sites should be identified to meet Derby’s unmet housing needs, but rather that the overall provision should be such as to be capable of accommodating and delivering to meet those needs. In this context discrete monitoring of provision to accommodate unmet needs from Derby will not be possible. |
| 1240828 | Open Spaces Society |  | Yes |  | Noted |
| 1235628 | British Horse Society |  | Yes |  | Noted |
| **Regional Organisation** | | | | | |
| 1242640 | Derbyshire Association of Local Councils |  | Yes | We acknowledge that Derby City are not in a position to build their quota of housing but other areas e.g., South Derbyshire are | Noted. |
| **Parish Council and other Community Group** | | | | | |
| 1236404 | Repton Parish Council |  |  | Repton Parish Council response to SDDC Local Plan Consultation November 2024 The Repton Parish Council (RPC) wishes to support the new SDDC Local Plan and makes the following points to ensure that the revised Local Plan meets the requirements of the Parish.  1. The first comment is that the new SDDC Local Plan Part 1, out for consultation, does not contain any reference to the Neighbourhood Development Plans (NDP) that are currently in place and being undertaken in the District and their involvement in the Planning process. This is particularly important since the policies in an NDP take precedence over existing non-strategic policies in a local plan covering the neighbourhood area where they are in conflict.  2. The second concern is in section 6.8 explanation to the Local Plan Policy H1. This section states the settlement boundaries will be refreshed in the next phase of the plan making. This process is undefined in the context of any timescales or scale. The Parish Council would like to see the approach and methodology to be used in this process. It should be noted that the Repton and Milton NDP is quite explicit on the need for the two settlements to be separate from each other to retain their own different characters and forms a guiding principle in the NDP.  3. The Policy H1, Section 5, Rural Areas does not contain all the requirements of the existing Local Plan Part 2 Policy BNE5, nor contains a reference to Policy BNE5. It should be noted that the Repton and Milton NDP Policy H1 has a specific reference to Policy BNE5.  4. The RPC would propose that INF3 (Freeport) should include a criteria that states that transport developments in the area should take note of the impact of the Freeport to minimise workers traffic on nearby rural settlements, not just HGVs.  5. INF3 should also include the potential cycle link between Repton and Willington, as part of the Freeport infrastructure requirements (Repton and Milton NDP Policy T2) and in support of the Local Plan Policy BNE1 (Active Travel).  6. INF4 (Transport) should acknowledge the impact of the development of the Freeport (INF3) and under section C include the need to minimise the effect of workers journeys and traffic on nearby rural settlements on any major development.  7. The Swarkstone Bridge Bypass mentioned in INF4 would have a major effect on the level of traffic through the parish. We propose that this should be included as part of the Freeport infrastructure requirements due to the Freeport’s effect on the area’s transport, both HGV and employees.  8. It is noted that the map for INF3 Freeport Interchange has managed to convert the current railway track to the A5132. It is assumed that this is a mistake rather than a major policy change. The above comments relate to the Local Plan Part 1 out for consultation. A major concern is the potential impact of the NPPF that is currently being updated and how the SDDC Local Plan process could be impacted by this on timescales and more importantly on the consultation process. The Repton and Milton Parish Council also requests that a meeting of the relevant people in the RPC and SDDC is set up to understand the potential implications of the NPPF that is currently being updated, to discuss its link to the Repton and Milton Neighbourhood Development Plan (NDP), to ensure the NDP remains relevant. | Noted.  1. It is accepted that, by way of context, a reference to neighbourhood plans would be appropriate as part of the Introduction to the document.  2. The methodology to be used in reviewing the settlement boundaries will be determined as part of the review of the Part 2 Local Plan policies and will be published.  3. Policy BNE5, contained within the adopted Part 2 Local Plan, will be addressed as part of the review of that document. In the meantime the existing policy will continued to be applied.  4. It is agreed that a reference to highway impacts should be included in Policy INF3 as follows:  “C ii) there shall be no undue amenity **~~or~~**~~,~~ safety ***or highway*** impacts including noise, vibration, odours, light pollution and traffic generation; and  5. A cycle path connection between Willington and Repton is included in the Councils Cycle Network Supplementary Planning Document, adopted in 2024, as part of the proposed Local Cycle Network.  6. Developer funding of new off-site transport infrastructure to be provided to support a strategic rail freight interchange at this location will be considered as part of the Development Consent Order process. The relevant parties are aware of the cycle network proposals for the District, although contributions toward particular elements of this will need to be justified using clear evidence of their potential to mitigate transport impacts.  7. As referred to in response to point 6, developer funding of new off-site transport infrastructure needed to support a strategic rail freight interchange at this location will be considered as part of the Development Consent Order process. Any new highway infrastructure to be provided in this way will need to be justified using clear evidence of its potential to mitigate transport impacts.  8. This observation is correct and INF3 plan can be amended to address this error.  Para 234 of the new National Planning Policy Framework (NPPF), published in December 2024, states that the policies in that version of the NPPF will not apply where emerging Local Plans are published for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 on or before 12 March, 2025 and its draft housing requirement meets at least 80% of local need. The District Council intends that these criteria should be met.  The request for a meeting concerning the new NPPF is noted and will be addressed as a separate matter to the production of the emerging Local Plan. |
|  | SAVE (Save Aston & Weston Village Environment) |  | No | Derby City should look again at how it meets it’s housing needs to encourage more people to live in the city centre. Any sprawl at the fringes should be more evenly distributed around the city. | The City Council’s capacity work has been peer reviewed for robustness by consultant AECOM.  To identify the most suitable locations for growth within Amber Valley Borough, Derby City and South Derbyshire District, the three authorities jointly commissioned consultants to prepare a Growth Options Study, which looked at opportunities and constraints affecting all potential development locations. This concluded that in relation to the Derby fringe, the locations within which the identified strategic sites, STRA1 and STRA2 are situated represented the most sustainable options for further growth. The subsequent Derby Housing Market Area Sustainability Appraisal confirmed that the Derby fringe was the best location for new development intended to serve Derby’s unmet needs.  In addition to the new strategic sites, housing sites on the Derby fringe which have not yet been built out are being rolled forwards in the new Local Plan. These comprise land at Boulton Moor, Elvaston; Wragley Way and Primula Way, Stenson and land to the West of Mickleover. This means that housing development will take place at a number of locations distributed around the Derby fringe.  Therefore no change is proposed in regard to the above. |
| 1242402 | Weston-on-Trent Parish Council |  | No | Derby City should look again at how it meets it’s housing needs to encourage more people to live in the city centre. Any sprawl at the fringes should be more evenly distributed around the city | The City Council’s capacity work has been peer reviewed for robustness by consultant AECOM.  To identify the most suitable locations for growth within Amber Valley Borough, Derby City and South Derbyshire District, the three authorities jointly commissioned consultant AECOM to prepare a Growth Options Study, which looked at opportunities and constraints affecting all potential development locations. This concluded that in relation to the Derby fringe, the locations within which the identified strategic sites, STRA1 and STRA2 are situated represented the most sustainable options for further growth. The subsequent Derby Housing Market Area Sustainability Appraisal confirmed that the Derby fringe was the best location for new development intended to serve Derby’s unmet needs.  In addition to the new strategic sites, housing sites on the Derby fringe which have not yet been built out are being rolled forwards in the new Local Plan. These comprise land at Boulton Moor, Elvaston; Wragley Way and Primula Way, Stenson and land to the West of Mickleover. This means that housing development will take place at a number of locations distributed around the Derby fringe.  Therefore no change is proposed in regard to the above. |
| 1239943 | Castle Gresley Parish Council |  | No | SDDC currently has approximately 5597 houses being built in the area. The current infrastructure in the locality of these developments has not been improved to accommodate them or previous developments and this is already having a massive impact on the local communities.  It is unclear where any additional infrastructure and amenities will be introduced within the local plan for the current developments let alone any future builds. There is no detail regarding extra services such as Doctors, Dentists and school places. Educational mainstream places are already at full capacity. A particular concern is that at the Drakelow Development there is a lack of secondary placement support – It appears that only primary education is being incorporated. There is the additional issue of the lack of a new bridge to enable the additional traffic to commute to Burton, the A38 and other arterial roads. Most of which will be diverted through Catton and Walton and Trent. This will not only include domestic vehicles but commercial vehicles as well as the proposes bus service that would be needed for such a large development. | Details of the infrastructure requirements for each of the new strategic policies are included in the respective polices contained within the draft Local Plan document. These will be detailed further in the Infrastructure Delivery Plan.  Specific comments relating to the Former Drakelow Power Station will be considered under Question 5c and/or 8 |
| 1242585 | Egginton Parish Council |  | No | The PC does not agree. The quantum of housing for our District is too great. It requires reappraisal and a return to the HMA negotiating table. Specifically, building out a bolt-on massive development on Grade 3 high quality agricultural land to the west of Mickleover is unsustainable. Development should be on brownfield sites and high rise should be prioritised in Derby City who should be incentivised to seek their own sites and numbers | The City Council’s housing capacity work has been peer reviewed for robustness by consultant AECOM.  To identify the most suitable locations for growth within Amber Valley Borough, Derby City and South Derbyshire District, the three authorities jointly commissioned consultants AECOM to prepare a Growth Options Study, which looked at opportunities and constraints affecting all potential development locations. This concluded that in relation to the Derby fringe, the locations within which the identified strategic sites, STRA1 and STRA2 are situated represented the most sustainable options for further growth. The subsequent Derby Housing Market Area Sustainability Appraisal confirmed that the Derby fringe was the best location for new development intended to serve Derby’s unmet needs. |
| 1244412 | Etwall Parish Council |  | No | We believe that the HMA agreement with Derby should be reviewed. SDDC appear to be meeting their agreement, but not other areas. In our opinion Derby has significant brownfield land with planning permission that is not being developed to meet their need. SDDC have allocated agricultural land on the boundary which contradicts other policies. We are concerned that Derby has no incentive to meet its needs within their boundary. | The City Council’s housing capacity work has been peer reviewed for robustness by consultant AECOM.  To identify the most suitable locations for growth within Amber Valley Borough, Derby City and South Derbyshire District, the three authorities jointly commissioned consultants AECOM to prepare a Growth Options Study, which looked at opportunities and constraints affecting all potential development locations. This concluded that in relation to the Derby fringe, the locations within which the identified strategic sites, STRA1 and STRA2 are situated represented the most sustainable options for further growth. The subsequent Derby Housing Market Area Sustainability Appraisal confirmed that the Derby fringe was the best location for new development intended to serve Derby’s unmet needs. |
| 1238750 | Hilton Parish Council |  | No | The forecasting process is not that good and all the housing numbers could be disputed as to what the actual housing needs are for the three areas in the HMA.  As a proportion, it feels like South Derbyshire is taking more than its fair share as it did in the existing Local Plan. However, provided the large developments are all adjoin to the Derby fringes, this will provide the flexibility to provide whatever is the real need for Derby turns out to be. | Noted. |
| 1241376 | Rosliston Parish Council |  | Yes | We note the placement of 2 strategic sites of 4500 houses on the edge of Derby, to build and support Derby Cities unmet need, building logically where there is an infrastructure to support this development. It is also noted that many of the existing sites will already accommodate much of the housing numbers for Derby City. This therefore reinforces and demonstrates the numbers being passed to SDDC should not be further increased. | Noted. |
| 1243158 | Melbourne Civic Society |  | Yes |  | Noted. |
| **Councillor** | | | | | |
| 1242293 | Lucy Care | Derby City Council Councillor | Yes | Or even more, to help ensure low carbon sustainable communities are built not contributing unduly to climate change during construction (concrete + steel in high rise) or in use |  |
| **Landowner or Developer** | | | | | |
| 1243594 | Marrons on behalf of 2012 Partnership Homes Ltd |  |  | 3.2 DERBY’S UNMET NEEDS  Derby’s Urban Capacity  3.2.1 Paragraph 4.41 of the Draft Plan states that ongoing work within the Housing Market Area (HMA) has concluded that the City of Derby is only able to provide 12,500 dwellings over the Plan period. To date, despite generalised references to HMA-wide work, the Derby Capacity Study has yet to be published. It has not been published to support SDDC’s current Regulation 18 Consultation, nor does it support Amber Valley Borough Council’s (AVDC) submission plan, which is currently at examination. Those commenting on the Plan have therefore been deprived of an opportunity at this stage to comment on a key part of the evidence base which has informed the housing requirement and without sight of this underlying work, it is impossible to conclude that the housing requirement is justified.  3.2.2 We nonetheless note the content of the Derby Housing Land Capacity: Position Paper dated October 2024 published by Derby City Council (DCC). This does not form part of the Plan’s evidence base, but summarises the discussions to date. Importantly, the Position Paper itself states: “The position paper identifies the steps that have been taken to assess and independently review Derby’s housing land capacity. However, it does not provide a detailed assessment of the specific sites and locations that have been considered through the capacity work as further assessment is required to fully assess the merits of locations, including through Sustainability Appraisal (SA).” [Emphasis Added]  3.2.3 This statement confirms that as at a month before the time of writing, detailed site assessments had not been carried out of the sites which are relied upon as composing the city’s urban capacity. We therefore do not see how the assumed contribution from Derby (12,500 dwellings over the plan period) is robustly based in evidence.  3.2.4 In respect of Derby’s urban capacity, the Position Paper explains that even the lower end of the range identified (11,900 dwellings) was “ambitious” and associated with significant uncertainty. In addition, the Position Paper clarifies that it used a “no stone left unturned” approach, which went beyond sites actively promoted for development. That must necessarily add further uncertainty to the deliverability of the claimed capacity over the plan period given that a significant proportion of it may be unavailable for development. The scale of the ambition if the assumed capacity is also illustrated by the fact that, according to the Position Paper, it is predicated on an average completion rate of 700 to 800 dwellings per annum, versus an average rate of completions of 549 dwellings per annum from 2011 to 2021.  3.2.5 Following the above work, the Position Paper states that AECOM was appointed to review the results of the earlier officer-led work in August, which concluded that it was “essentially robust” in terms of its estimate of capacity, but that AECOM felt that a “more realistic” figure was 10,400 dwellings. Despite the Position Paper concluding this work was completed in January 2023, almost two years ago at the time of writing, it was not published and it is unclear from the Position Paper alone which site typologies are relied upon to demonstrate this alleged capacity, whether they are available for development, or if they are suitable or technically deliverable.  3.2.6 Following the completion of the initial study, it was updated in March 2023 to include an inappropriately short plan period (17 years from 2022 i.e. 2039) and to include a “highly ambitious” figure from City Centre sites. That approach resulted in an assumed capacity figure of 12,041 dwellings. There appears to be no firm justification for increasing the figure so significantly beyond what AECOM had assessed to be reasonable as summarised above. There is also nothing within the Position Paper to suggest this decision had been peer reviewed by AECOM or another in contrast to the approach taken before that point.  3.2.7 Subsequently, the capacity position was updated again to 12,361 dwellings as a result of increasing the windfall allowance from 100 dpa to 120 dpa (“dwellings per annum”) because of the possible availability of as yet unidentified “surplus” employment land and a further 200 dwellings on top of the already ambitious and unrealistic figure deriving from city centre land availability. It was then “rounded up” to 12,500 without any reference to further sources of supply.  3.2.8 The Position Paper concludes with the following statement: “It is acknowledged that work on DCC’s new Local Plan is behind that of HMA partners. This has resulted in a position where DCC has been required to provide an indication of urban capacity to help inform the development of adjacent plans, without having undertaken the full, detailed assessment of sites that would normally be required to justify a housing requirement figure.” [Emphasis Added]  3.2.9 In summary, the Position Paper states that work undertaken to understand Derby’s capacity which was then peer reviewed by AECOM concluded a realistic capacity of 10,400. That figure has been increased by 2,100 dwellings since January 2023 for reasons that have not been substantiated.  3.2.10 For the reasons set out above, the housing requirement for South Derbyshire has not been underpinned by a full and robust assessment of Derby’s urban capacity, a fact that is accepted by Derby City Council in its October 2024 Position Paper.  3.2.11 For comparison, the Housing Trajectory in the Derby City Council Local Plan Part Core Strategy (2017) projected that, by the 2022/2023 monitoring year, a total of 9,459 dwellings would be delivered from the plan’s base year (2011/2012). However, the Government’s live tables on housing delivery show a cumulative total of 6,747 dwellings, resulting in a shortfall of approximately 2,712 units compared to the targets set in the adopted Core Strategy for the same period. The actual delivery rate equates to an annual average of 613 dwellings, significantly lower than the 800 dwellings per annum anticipated in the urban capacity study. This suggests that Derby City Council has recently and substantially overestimated housing completions, and there is little reason to believe that such a substantial increase in delivery is feasible within the context of a constrained urban authority.  3.2.12 For the above reasons, we consider that the urban capacity attributed to Derby is entirely unrealistic and not robustly evidenced. Therefore, the unmet need figure is likely to be much higher than 9,000 dwellings and plan-making within the HMA has not proceeded on the basis of a full, robust and realistic understanding of Derby’s capacity.  Accommodating Derby’s Unmet Needs  3.2.13 Notwithstanding that the work undertaken to date to establish Derby’s capacity for growth lacks robustness, even the estimated level of shortfall based on this incomplete work will not be met by the Plan nor other plans being progressed within the HMA. The level of unmet need estimated from Derby is “likely to be around 9,000 homes” (paragraph 4.43). It is not clear from the Draft Plan or its evidence base over what period this 9,000 home shortfall arises. Having regard to the Derby City Council’s Position Paper, the base date of this estimate is April 2024 and over 17 years, equating to an end date of 2041. Therefore, the decision for the Draft Plan to only run until 2039 which, as discussed above, does not comply with the NPPF, means that it will not align with the timescales over which Derby’s shortfall has been estimated.  3.2.14 Amber Valley Borough Council’s emerging local plan (currently at examination) makes provision for 2,000 homes at Brun Lane, Mackworth, but only 1,320 will be delivered within the plan period to 2040. However, through the examination of the Amber Valley Local Plan, it has become apparent that the landowners for the Land at Brun Lane, Mackworth (the sole site brought forward to address Derby’s unmet needs) within Amber Valley do not wish to develop the site and wish to continue farming as much of it as possible. According to evidence submitted to the Amber Valley Local Plan Examination (Appendix 1), the most the landowners would wish to see is a scheme of between 300 and 600 dwellings. In reality, given the level of mitigation that would be required to render the Land at Brun Lane sustainable in terms of accessibility, it is unlikely that a development at that quantum would deliver the necessary package of sustainable transport and infrastructure measures. As such, the most likely scenario is that the Land at Brun Lane, Mackworth will not come forward for development at all meaning the only provision made to address Derby’s unmet housing will be 5,609 in South Derbyshire alone, leaving the city with unmet housing need of about 3,400 dwellings to 2041 based upon the urban capacity work. Progressing the Plan on the basis of a significant HMA shortfall and deferring the matter to an early review, means that it is not positively prepared and therefore unsound.  3.2.15 The Draft Plan does not provide substantive evidence of how it has met the Duty to Cooperate (DtC) regarding Derby’s unmet housing need. However, according to Amber Valley Borough Council’s Duty to Cooperate Statement, submitted for the current examination of the Amber Valley Local Plan, no discussions or decisions were made on how to apportion Derby’s unmet housing need after it became clear in early to mid-2023. It appears that Amber Valley Borough Council made the decision to allocate land at Burn Lane, Mackworth unilaterally, based on the assumption that the Borough would need to accommodate some growth from Derby, although the scale and location of that need had not been discussed. Based on the limited information provided by South Derbyshire District Council (SDDC) in the current consultation on cross-boundary housing matters, we can only speculate that a similar approach has been taken in South Derbyshire. The lack of proactive and ongoing discussions across the Housing Market Area (HMA) is evident in the misalignment between Derby’s unmet housing needs, the periods over which those needs occur, and the differing planning periods of Amber Valley and South Derbyshire. Additionally, the scale of growth being planned for in each emerging local plan is clearly insufficient to address Derby’s needs, even based on what Derby City Council has recognized as an overly optimistic housing capacity assessment. As such, we cannot see how the Draft Plan meets the requirement for active and ongoing engagement with partners, and therefore, it fails to comply with the Duty to Cooperate.  The Housing Requirement  3.2.16 As the Council is aware, the District’s Local Housing Need (LHN) figure, calculated using the Standard Method, serves as a minimum starting point and does not represent the final housing requirement. This is clearly outlined in the Planning Practice Guidance (PPG). The PPG also specifies that exceptional circumstances are required if planning for fewer homes than the Standard Method indicates. Therefore, the LHN should be viewed as a floor, not a ceiling. The PPG also sets out a number of circumstances and factors where it might be appropriate to plan for a higher housing requirement than the LHN. These are summarised below: The Standard Method does not attempt to predict the impact of changing economic circumstances or the impact other factors might have on demographic behaviour. Circumstances where it may be appropriate to plan for a greater level of housing growth than the LHN includes, but is not limited to: · Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth · Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or · An authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground. · There may also be situations where previous levels of housing delivery in an area, or previous assessments of need, are significantly greater than the outcome of the Standard Method. Total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes. [Emphasis Added]  3.2.17 The Draft Plan, in paragraph 4.35, states that the Local Housing Needs Assessment (LHNA) dated December 2023 confirms there are no exceptional circumstances justifying a departure from the Standard Method in calculating housing needs. However, the question of whether there are exceptional circumstances to depart from the Standard Method is distinct from whether the housing requirement should be increased beyond the Standard Method to account for the factors mentioned in the Planning Practice Guidance (PPG). The PPG makes it clear that the Standard Method does not determine a final housing requirement, but only serves as a minimum starting point. Therefore, we would expect the Plan and its evidence base to comprehensively address the factors outlined in the PPG.  3.2.18 The Government’s live tables on net additional housing supply indicate that over the last five years South Derbyshire has seen an annual average of 1,107 competitions per annum. This suggests that the Council is able to establish and sustain a rate of housing delivery well in excess of the LHN (which for South Derbyshire is 522 dwellings per annum and an annualised housing requirement (with Derby’s unmet needs incorporated) of 851 dpa. Planning for significantly less growth than what has been recently achieved is clearly not consistent with the NPPF’s objectives of significantly boosting the supply of housing.  3.2.19 According to government data, South Derbyshire has averaged 167 affordable housing completions per year. However, the Local Housing Needs Assessment (LHNA) identifies a need for 410 affordable dwellings per year, highlighting a significant shortfall. Similarly, Derby City Council has delivered an annual average of 169 affordable units over the past decade, while the LHNA estimates its annual need at 1,076 homes. In South Derbyshire, the annual affordable housing need constitutes 78% of the total Local Housing Need (LHN) figure, far surpassing the average rate of delivery over the last ten years.  3.2.20 The LHNA states at paragraph 6.53 that the notional percentage of affordable housing in South Derbyshire is 41% of the LHN. However, this does not appear to capture the calculated need for affordable home ownership and intermediate affordable tenures. The true ratio is therefore much higher and closer to 80%, when compared to an affordable housing policy requirement of 30% within the District. Even expressed as a percentage of the overall annualised housing requirement including Derby’s needs, annual affordable housing need in South Derbyshire represents 48% of the LHN, but that figure should be seen in the context of Derby’s own limited ability to meet its own significant needs for affordable housing. As such, the Draft Plan should clearly consider an increase in the overall housing requirement to meet affordable housing needs.  3.2.21 In spite of the above, the LHNA concludes that the housing requirement should not include an uplift to address affordable housing needs. The rationale for this is explained at paragraph 6.69 and amounts to the claim that it is too difficult to link affordable housing to the overall housing requirement and that there is no justification for making the link. That proposition is supported by reference to guidance issued by the Planning Advisory Service (PAS) in 2015. Despite seemingly being aware of the clear direction in the PPG to consider an increase in total housing figures to help deliver the required number of affordable homes, the LHNA appears to disagree with the PPG’s clear advice and has proceeded not to apply it, concluding that no uplift should be made to deliver affordable housing figures. That approach is inconsistent with national policy and has resulted in an unsound housing requirement which has clearly not been informed by the significant level of affordable housing need within Derby and South Derbyshire identified within the evidence base. | It is agreed by the HMA authorities that Derby City is constrained, with Derby City Council having undertaken work that estimates that their housing capacity supply over the period 2022-2039 is 12,500. Derby City Council commit to delivering a minimum of 12,500 homes over the period 2022-2039.  Circumstances where it might be appropriate to plan for a higher level of housing provision than the minimum identified through the Standard Method are considered as part of the Derby and South Derbyshire Local Housing Needs Assessment (2023). The assessment does not recommend raising provision above the level identified through the Standard Method.  The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three authorities significantly, substantially reducing Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated the previous method was 507 dwellings per annum.  The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed that the wording of Policy S1 be changed to reflect the above. |
| 1248307 | Copesticks on behalf of Alexander Bruce Estates Ltd. | Copesticks on behalf of Alexander Bruce Estates Ltd. | Q4 | NPPF Changes – Revised Methodology 1.4 The consultation notification material acknowledges that the government is consulting on changes to the NPPF and implies that there will not be any consultation on any resultant changes, specifically, but that the plan will be amended to accord with the updated NPPF. Whilst there ought to be a further round of consultation before the Examination, there is a particular aspect of the NPPF consultation that will need very careful consideration and that is the revised methodology for determining housing requirements, as it could result in the need for further strategic allocations in the Part 1 Review (which ought to be the subject of consultation, now) otherwise it will result in more significant reliance on non-strategic allocations in the Part 2 Review and inevitably controversial windfall sites in future years.  1.5 Noting the duty to cooperate and the existing capacity issues within the Derby City Council area, it is likely to remain necessary for South Derbyshire to contribute to the Derby City housing delivery.  1.6 The NPPF draft revised methodology indicates that the City of Derby’s housing requirement may shrink by around 15%. That will not resolve the City’s capacity issue, but merely apply less pressure on SDDC and Amber Valley in the short term, but there will inevitably be a continued need to cooperate and deliver a proportion of the homes needed to meet Derby’s target. Indeed policy S1 indicates that 5609 homes will need to be delivered in the District, to help Derby achieve the City’s unmet need.  1.7 The 2016 Plan identified the need to deliver 12,618 homes over the plan period (2011-2028). The Draft Revised Local Plan identifies the need to deliver 20,092 new homes, including a share of Derby’s need.  1.8 The revised methodology in the draft NPPF indicates that Derby City’s Housing requirement may reduce by 15%, if that translates to a 15% reduction in the assistance needed under the duty to cooperate, SDDC will need to allocate 4.767 plots, to help Derby meet it’s unmet need. A reduction of 842.  1.9 However, the revised methodology seeks to add around 20% to SDDC housing requirements, taking the overall total from 8,874 to around 10,650. An increase of 1776  1.10 The consequence of the revised methodology in the emerging NPPF may result in the need for SDDC to find allocations for a further 934 homes over the plan period.  1.11 If the NPPF is published without changes to the revised methodology, the housing requirement for SDDC, over the plan period may increase to approximately 21,000, being 1,235 per annum.  1.12 Our concern is that not enough is being done at Part 1 stage to allocate land, or direct development, strategically, to the right places. This is a simpler process where Local Plans are prepared, or updated in a single stage, but in this case, it is suggested that additional certainty is delivered at Part 1 stage, either through additional allocations, or through apportioning growth to the higher tier settlements, based on their sustainability. The latter option, “directions for growth” is a common approach and establishes targets for the District and Parish Councils and for developers and landowners. | Noted.  The new Standard Method for calculating housing need, which came into being in December, 2024, changes the needs of the three authorities individually, substantially reducing Derby’s overall minimum need, whilst substantially increasing Amber Valley’s and also increasing South Derbyshire’s, albeit to a much lesser degree. The housing need over the HMA is very similar in relation to the 2023 and 2024 versions of the NPPF.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated using this method was 507 dwellings per annum.  The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed to change the wording of Policy S1 to reflect this.  The Local Plan Part 1 review is focussed upon strategic scale housing, employment and mixed use development. Proposals for any non-strategic scale development can be considered as part of the review of policies contained in the Part 2 Local Plan. |
| 1243636  1243650  1243658 | Marrons on behalf of Ainscough Strategic Land; Davidsons regarding their Melbourne Site; Davidsons regarding their Newton Solney Site |  |  | 3.2 DERBY’S UNMET NEEDS  Derby’s Urban Capacity  3.2.1 Paragraph 4.41 of the Draft Plan states that ongoing work within the Housing Market Area (HMA) has concluded that the City of Derby is only able to provide 12,500 dwellings over the Plan period. To date, despite generalised references to HMA-wide work, the Derby Capacity Study has yet to be published. It has not been published to support SDDC’s current Regulation 18 Consultation, nor does it support Amber Valley Borough Council’s (AVDC) submission plan, which is currently at examination. Those commenting on the Plan have therefore been deprived of an opportunity at this stage to comment on a key part of the evidence base which has informed the housing requirement and without sight of this underlying work, it is impossible to conclude that the housing requirement is justified.  3.2.2 We nonetheless note the content of the Derby Housing Land Capacity: Position Paper dated October 2024 published by Derby City Council (DCC). This does not form part of the Plan’s evidence base, but summarises the discussions to date. Importantly, the Position Paper itself states: “The position paper identifies the steps that have been taken to assess and independently review Derby’s housing land capacity. However, it does not provide a detailed assessment of the specific sites and locations that have been considered through the capacity work as further assessment is required to fully assess the merits of locations, including through Sustainability Appraisal (SA).” [Emphasis Added] 3.2.3 This statement confirms that as at a month before the time of writing, detailed site assessments had not been carried out of the sites which are relied upon as composing the city’s urban capacity. We therefore do not see how the assumed contribution from Derby (12,500 over the plan period) is robustly based in evidence.  3.2.4 In respect of Derby’s urban capacity, Position Paper explains that even the lower end of the range identified (11,900) was “ambitious” and associated with significant uncertainty. In addition, the Position Paper clarifies that it used a “no stone left unturned” approach, which went beyond sites actively promoted for development. That must necessarily add further uncertainty to the deliverability of the claimed capacity over the plan period given that a significant proportion of it may be unavailable for development. The scale of the ambition if the assumed capacity is also illustrated by the fact that, according to the Position Paper, it is predicated on an average completion rate of 700 to 800 dwellings per annum, versus an average rate of completions of 549 dwellings per annum from 2011 to 2021.  3.2.5 Following the above work, the Position Paper states that AECOM was appointed to review the results of the earlier officer-led work in August, which concluded that it was “essentially robust” in terms of its estimate of capacity, but that AECOM considered that a “more realistic” figure was 10,400. Despite the Position Paper concluding this work was completed in January 2023, almost two years ago at the time of writing, it was not published and it is unclear from the Position Paper alone which site typologies are relied upon to demonstrate this alleged capacity, whether they are available for development or if they are suitable or technically deliverable.  3.2.6 Following the completion of the initial study, it was updated in March 2023 to include an inappropriately short plan period (17 years from 2022 i.e. 2039) and to include a “highly ambitious” figure from City Centre sites. That approach resulted an assumed capacity figure of 12,041. There appears to be no firm justification for increasing the figure so significantly beyond what AECOM had assessed to be reasonable as summarised above. There is also nothing within the Position Paper to suggest this decision had been peer reviewed by AECOM or another in contrast to the approach taken prior.  3.2.7 Subsequently, the capacity position was updated again to 12,361 as a result of increasing the windfall allowance from 100 dpa to 120 dpa because of the possible availability of as yet unidentified “surplus” employment land and a further 200 dwellings on top of the already ambitious and unrealistic figure deriving from city centre land availability. This figure was then “rounded up” to 12,500 without any reference to further sources of supply.  3.2.8 The Position Paper concludes with the following statement: “It is acknowledged that work on DCC’s new Local Plan is behind that of HMA partners. This has resulted in a position where DCC has been required to provide an indication of urban capacity to help inform the development of adjacent plans, without having undertaken the full, detailed assessment of sites that would normally be required to justify a housing requirement figure.” [Emphasis Added]  3.2.9 In summary, the Position Paper states that work undertaken to understand Derby’s capacity which was then peer reviewed by AECOM concluded a realistic capacity of 10,400. For reasons that have not been properly substantiated, that figure has been increased by 2,100 dwellings since January 2023.  3.2.10 For the reasons set out above, the housing requirement for South Derbyshire has not been underpinned by a full and robust assessment of Derby’s urban capacity, a fact that is accepted by Derby City Council in its October 2024 Position Paper.  3.2.11 For comparison, the Housing Trajectory in the Derby City Council’s adopted Local Plan Part Core Strategy (2017) projected that, by the 2022/2023 monitoring year, a total of 9,459 dwellings would be delivered from the plan’s base year (2011/2012). However, the Government’s live tables on housing delivery show a cumulative total of 6,747 dwellings, resulting in a shortfall of approximately 2,712 units compared to the targets set in the adopted Core Strategy for the same period. The actual delivery rate equates to an annual average of 613 dwellings, significantly lower than the 800 dwellings per annum (dpa) anticipated in the urban capacity commentary. This suggests that Derby City Council has recently and substantially overestimated housing completions within its administrative area, and there is little reason to believe that a substantial increase in delivery is feasible within the context of a highly constrained urban authority.  3.2.12 For the above reasons, we consider that the urban capacity attributed to Derby is entirely unrealistic and not robustly evidenced. Therefore, the unmet need figure is likely to be much higher than 9,000 dwellings and plan-making within the HMA has not proceeded on the basis of a full, robust and realistic understanding of Derby’s capacity.  Accommodating Derby’s Unmet Needs  3.2.13 Notwithstanding that the work undertaken to date to establish Derby’s capacity for growth lacks robustness, even the estimated level of shortfall based on this incomplete work will not be met by the Plan nor other plans being progressed within the HMA. The level of unmet need estimated from Derby is “likely to be around 9,000 homes.” (paragraph 4.43) It is not clear from the Draft Plan or its evidence base over what period this 9,000 home shortfall arises. Having regard to Derby City Council’s Position Paper, the base date of this estimate is April 2024 and over 17 years, equating to an end date of 2041. Therefore, the decision for the Draft Plan to only run until 2039 which, as discussed above, does not comply with the NPPF, means that it will not align with the timescales over which Derby’s shortfall has been estimated.  3.2.14 Amber Valley Borough Council’s emerging local plan (currently at examination) makes provision for 2,000 homes at Brun Lane, Mackworth, but only 1,320 will be delivered within the plan period to 2040. However, through the examination of the Amber Valley Local Plan, it has become apparent that the landowners for the Land at Brun Lane, Mackworth (the sole site brought forward to address Derby’s unmet needs) within Amber Valley do not wish to develop the site and wish to continue farming as much of it as possible. According to evidence submitted to the Amber Valley Local Plan Examination (Appendix 1), the most the landowners would wish to see is a scheme of between 300 and 600 dwellings. In reality, given the level of mitigation that would be required to render the Land at Brun Lane sustainable in terms of accessibility, it is unlikely that a development at that quantum would deliver the necessary package of sustainable transport and infrastructure measures. As such, the most likely scenario is that the Land at Brun Lane, Mackworth will not come forward for development at all meaning the only provision made to address Derby’s unmet housing will be 5,609 in South Derbyshire alone, leaving the city with unmet housing need of about 3,400. Progressing the Plan on the basis of a significant HMA shortfall and deferring the matter to an early review, means that it is not positively prepared and therefore unsound.  3.2.15 The Draft Plan does not provide substantive evidence of how it has met the Duty to Cooperate (DtC) regarding Derby’s unmet housing need. However, according to Amber Valley Borough Council’s Duty to Cooperate Statement, submitted for the current examination of the Amber Valley Local Plan, no discussions or decisions were made on how to apportion Derby’s unmet housing need after it became clear in early to mid-2023 that the city would be unable to meet its own needs. It appears that Amber Valley Borough Council made the decision to allocate land at Brun Lane, Mackworth unilaterally, based on the assumption that the Borough would need to accommodate some growth from Derby, although the scale and location of meeting that need had not been discussed with HMA partners. Based on the limited information provided by SDDC in the current consultation on cross-boundary housing matters, we can only speculate that a similar approach has been taken in South Derbyshire. The lack of proactive and ongoing discussions across the HMA is evident in the misalignment between Derby’s unmet housing needs, the periods over which those needs occur, and the differing planning periods of Amber Valley and South Derbyshire. Additionally, the scale of growth being planned for in each emerging local plan is clearly insufficient to address Derby’s needs, even based on what Derby City Council has recolonised as an overly optimistic housing capacity assessment. As such, we cannot see how the Draft Plan meets the requirement for active and ongoing engagement with partners, and therefore, it fails to comply with the Duty to Cooperate | The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three authorities significantly, substantially reducing Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated the previous method was 507 dwellings per annum.  The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed that the wording of Policy S1 be changed to reflect the above. |
| 1243616  1243226  1243202  1243209  1243213 | Marrons Planning on behalf of Miller Homes; Redrow Homes: William Davis Homes; Wain Estates; Northern Trust |  |  | 3.1 INTRODUCTION  3.1.1 Policy S1 sets out the “Sustainable Growth Strategy,” which is to secure sustainable growth to meet objectively assessed housing and commercial needs in the Plan period 2022 to 2039. Over the Plan period, at least 14,483 dwellings will be built in South Derbyshire comprising 8,874 homes to meet South Derbyshire’s own needs and 5,609 to help meet Derby City’s unmet need. Below we comment further upon the soundness and legal compliance of the Draft Plan’s housing requirement drawing on key elements of the evidence base as relevant.  3.2 DERBY’S UNMET NEEDS  Derby’s Urban Capacity 3.2.1 Paragraph 4.41 of the Draft Plan states that ongoing work within the Housing Market Area (HMA) has concluded that the City of Derby is only able to provide 12,500 dwellings over the Plan period. To date, despite generalised references to HMA-wide work, the Derby Capacity Study has yet to be published. It has not been published to support SDDC’s current Regulation 18 Consultation, nor does it support Amber Valley Borough Council’s (AVDC) submission plan, which is currently at examination. Those commenting on the Plan have therefore been deprived of an opportunity at this stage to comment on a key part of the evidence base which has informed the housing requirement and without sight of this underlying work, it is impossible to conclude that the housing requirement is justified.  3.2.2 We nonetheless note the content of the Derby Housing Land Capacity: Position Paper dated October 2024 published by Derby City Council (DCC). This does not form part of the Plan’s evidence base, but summarises the discussions to date. Importantly, the Position Paper itself states:  “The position paper identifies the steps that have been taken to assess and independently review Derby’s housing land capacity. However, it does not provide a detailed assessment of the specific sites and locations that have been considered through the capacity work as further assessment is required to fully assess the merits of locations, including through Sustainability Appraisal (SA).”  3.2.3 This statement confirms that as at a month before the time of writing, detailed site assessments had not been carried out of the sites which are relied upon as composing the city’s urban capacity. We therefore do not see how the assumed contribution from Derby (12,500 over the plan period) is robustly based in evidence.  3.2.4 In respect of Derby’s urban capacity, Position Paper explains that even the lower end of the range identified (11,900) was “ambitious” and associated with significant uncertainty. In addition, the Position Paper clarifies that it used a “no stone left unturned” approach, which went beyond sites actively promoted for development. That must necessarily add further uncertainty to the deliverability of the claimed capacity over the plan period given that a significant proportion of it may unavailable for development. The scale of the ambition if the assumed capacity is also illustrated by the fact that, according to the Position Paper, it is predicated on an average completion rate of 700 to 800 dwellings per annum, versus an average rate of completions of 549 dwellings per annum from 2011 to 2021.  3.2.5 Following the above work, the Position Paper states that AECOM was appointed to review the results of the earlier officer-led work in August, which concluded that it was “essentially robust” in terms of its estimate of capacity, but that AECOM felt that a “more realistic” figure was 10,400. Despite the Position Paper concluding this work was completed in January 2023, almost two years ago at the time of writing, it was not published and it is unclear from the Position Paper alone which site typologies are relied upon to demonstrate this alleged capacity, whether they are available for development or if they are suitable or technically deliverable.  3.2.6 Following the completion of the initial study, it was updated in March 2023 to include an inappropriately short plan period (17 years from 2022 i.e. 2039) and to include a “highly ambitious” figure from City Centre sites. That approach resulted an assumed capacity figure of 12,041. There appears to be no firm justification for increasing the figure so significantly beyond what AECOM had assessed to be reasonable as summarised above. There is also nothing within the Position Paper to suggest this decision had been peer reviewed by AECOM or another in contrast to the approach taken before that point.  3.2.7 Subsequently, the capacity position was updated again to 12,361 as a result of increasing the windfall allowance from 100 dpa to 120 dpa because of the possible availability of as yet unidentified “surplus” employment land and a further 200 dwellings on top of the already ambitious and unrealistic figure deriving from city centre land availability. It was then “rounded up” to 12,500 without any reference to further sources of supply.  3.2.8 The Position Paper concludes with the following statement: “It is acknowledged that work on DCC’s new Local Plan is behind that of HMA partners. This has resulted in a position where DCC has been required to provide an indication of urban capacity to help inform the development of adjacent plans, without having undertaken the full, detailed assessment of sites that would normally be required to justify a housing requirement figure.”  3.2.9 In summary, the Position Paper states that work undertaken to understand Derby’s capacity which was then peer reviewed by AECOM concluded a realistic capacity of 10,400. That figure has been increased by 2,100 dwellings since January 2023 for reasons that have not been substantiated.  3.2.10 For the reasons set out above, the housing requirement for South Derbyshire has not been underpinned by a full and robust assessment of Derby’s urban capacity, a fact that is accepted by Derby City Council in its October 2024 Position Paper.  3.2.11 For comparison, the Housing Trajectory in the Derby City Council Local Plan Part Core Strategy (2017) projected that, by the 2022/2023 monitoring year, a total of 9,459 dwellings would be delivered from the plan’s base year (2011/2012). However, the Government’s live tables on housing delivery show a cumulative total of 6,747 dwellings, resulting in a shortfall of approximately 2,712 units compared to the targets set in the adopted Core Strategy for the same period. The actual delivery rate equates to an annual average of 613 dwellings, significantly lower than the 800 dwellings per annum (dpa) anticipated in the urban capacity study. This suggests that Derby City Council has recently and substantially overestimated housing completions, and there is little reason to believe that such a substantial increase in delivery is feasible within the context of a constrained urban authority.  3.2.12 For the above reasons, we consider that the urban capacity attributed to Derby is entirely unrealistic and not robustly evidenced. Therefore, the unmet need figure is likely to be much higher than 9,000 dwellings and plan-making within the HMA has not proceeded on the basis of a full, robust and realistic understanding of Derby’s capacity.  Accommodating Derby’s Unmet Needs 3.2.13 Notwithstanding that the work undertaken to date to establish Derby’s capacity for growth lacks robustness, even the estimated level of shortfall based on this incomplete work will not be met by the Plan nor other plans being progressed within the HMA. The level of unmet need estimated from Derby is “likely to be around 9,000 homes.” (paragraph 4.43) It is not clear from the Draft Plan or its evidence base over what period this 9,000 home shortfall arises. Having regard the Derby City Council’s Position Paper, the base date of this estimate is April 2024 and over 17 years, equating to an end date of 2041. Therefore, the decision for the Draft Plan to only run until 2039 which, as discussed above, does not comply with the NPPF, means that it will not align with the timescales over which Derby’s shortfall has been estimated.  3.2.14 Amber Valley Borough Council’s emerging local plan (currently at examination) makes provision for 2,000 homes at Brun Lane, Mackworth, but only 1,320 will be delivered within the plan period to 2040. However, through the examination of the Amber Valley Local Plan, it has become apparent that the landowners for the Land at Brun Lane, Mackworth (the sole site brought forward to address Derby’s unmet needs) within Amber Valley do not wish to develop the site and wish to continue farming as much of it as possible. According to evidence submitted to the Amber Valley Local Plan Examination (Appendix 1), the most the landowners would wish to see is a scheme of between 300 and 600 dwellings. In reality, given the level of mitigation that would be required to render the Land at Brun Lane sustainable in terms of accessibility, it is unlikely that a development at that quantum would deliver the necessary package of sustainable transport and infrastructure measures. As such, the most likely scenario is that the Land at Brun Lane, Mackworth will not come forward for development at all meaning the only provision made to address Derby’s unmet housing will be 5,609 in South Derbyshire alone, leaving the city with unmet housing need of about 3,400 dwellings to 2041 based upon the urban capacity work. Progressing the Plan on the basis of a significant HMA shortfall and deferring the matter to an early review, means that it is not positively prepared and therefore unsound.  3.2.15 The Draft Plan does not provide substantive evidence of how it has met the Duty to Cooperate (DtC) regarding Derby’s unmet housing need. However, according to Amber Valley Borough Council’s Duty to Cooperate Statement, submitted for the current examination of the Amber Valley Local Plan, no discussions or decisions were made on how to apportion Derby’s unmet housing need after it became clear in early to mid-2023. It appears that Amber Valley Borough Council made the decision to allocate land at Burn Lane, Mackworth unilaterally, based on the assumption that the Borough would need to accommodate some growth from Derby, although the scale and location of that need had not been discussed. Based on the limited information provided by South Derbyshire District Council (SDDC) in the current consultation on cross-boundary housing matters, we can only speculate that a similar approach has been taken in South Derbyshire. The lack of proactive and ongoing discussions across the Housing Market Area (HMA) is evident in the misalignment between Derby’s unmet housing needs, the periods over which those needs occur, and the differing planning periods of Amber Valley and South Derbyshire. Additionally, the scale of growth being planned for in each emerging local plan is clearly insufficient to address Derby’s needs, even based on what Derby City Council has recognized as an overly optimistic housing capacity assessment. As such, we cannot see how the Draft Plan meets the requirement for active and ongoing engagement with partners, and therefore, it fails to comply with the Duty to Cooperate  6.1 THE HOUSING REQUIREMENT 6.1.1 The Draft Plan's proposed housing requirement is unsound, as it lacks adequate justification from the evidence base and fails to fully address Derby’s unmet housing needs. Additionally, the plan has been set over an unreasonably short timeframe. Derby’s urban housing capacity has been significantly overestimated, with no rigorous audit of the sites expected to deliver housing within the city. Nevertheless, SDDC and AVBC have based their emerging Plans on this incomplete and flawed data, which, as of this writing, remains to be published fully. This approach risks an HMA-wide housing shortfall, undermining both the soundness of the Draft Plan and the Duty to Cooperate. Moreover, the housing requirement has not been developed with proper regard to the guidelines in the PPG. | The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three authorities significantly, substantially reducing Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated the previous method was 507 dwellings per annum.  The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed that the wording of Policy S1 be changed to reflect the above. |
| 1242615 | Carney Sweeney on behalf of Peveril Homes Ltd and Kingsmere Holdings Ltd |  |  | In part yes, on the basis South Derbyshire are looking to accommodate circa 60% of Derby City’s unmet need but we note that publication of the Derby City Capacity Study is still awaited, which may require a further review of housing provision to address unmet need.  In January 2024, Derby City Council circulated a Newsletter setting out the issues and challenges to be addressed through their Local Plan. This Newsletter, a copy of which is included at Appendix A of this completed Questionnaire, identified that Derby City Council’s housing requirement for a period of 2022-2039 equates to 21,522 dwellings, with the authority having a housing land capacity of 12,500, resulting in a difference of -9,022.  Question 10 of this Questionnaire refers to the Derby HMA Sustainability Appraisal of Housing Options (2024) (referred to as the ‘HMA SA’ hereafter) as forming part of the evidence base supporting this draft Local Plan consultation. From a review of the HMA SA, which is commented on further at Question 11 below, it is noted that it states as follows:  “… Options which direct more of the Derby unmet need to the SDDC Urban Fringe would benefit from good potential for accessibility to services and facilities through achieving a degree of self-sufficiency within large urban extensions and through accessibility into Derby by sustainable transport.” [Source: Chapter 4, Derby HMA Sustainability Appraisal, dated September 2024. Section 4.3.3 (page 38)]  With South Derbyshire forming part of the Derby HMA, alongside Amber Valley Borough Council, it is encouraging to see that South Derbyshire have committed to make provision for 5,609 dwellings to address unmet need arising from Derby City. This commitment also aligns with the above statement in the HMA SA of directing more of Derby City’s unmet need to the South Derbyshire Urban Fringe.  Amber Valley Borough Council are noted to be at an advanced stage of their emerging plan making process, with Examination Hearing sessions due to commence in December 2024. However, Amber Valley are noted to have only made provision to accommodate 2,000 homes towards meeting Derby City’s unmet need within their Submission plan document (Amber Valley Examination Document Reference: CD01).  Whilst the soundness of Amber Valley’s Submission plan is due to be the subject of Examination shortly, taking the proposed figures across South Derbyshire and Amber Valley at face value at this present time, there would be a shortfall of circa -1,413 dwellings to address the unmet need of -9,022 dwellings arising from Derby City across the Derby HMA area. As such, this may require a further review to be undertaken as part of the emerging plans within the Derby HMA area to address any shortfall of unmet need, and also, to address any subsequent increase in housing requirement across the Derby HMA as a result of the proposed changes to the Standard Method approach forming part of the draft NPPF in consulted upon in 2024. | Noted.  The outcome of the Amber Valley Local Plan Examination, in terms of any contribution toward Derby City’s unmet need, is awaited.  The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three authorities significantly, substantially reducing Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated the previous method was 507 dwellings per annum.  The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed that the wording of Policy S1 be changed to reflect the above. |
| 1243582 | CBRE Ltd on behalf of Land Project UK (LPUK) |  |  | We welcome the Council’s aspiration for growth and desire to accommodate some of the unmet housing need from nearby Boroughs. LPUK advise that the additional employment needs of such growth should also be planned for as the two are intrinsically linked. This ensures the long term growth of South Derbyshire. | Noted. |
| 1244437 | CBRE on behalf of Labcorp |  |  | As we highlighted earlier in this response, the revised Standard method housing calculation expected to come forward in the revised 2024/25 NPPF will affect the objectively assessed needs of housing targets for both South Derbyshire and the City of Derby. The potential changes to the objectively assessed housing needs are detailed in Table 1 of the representation  . Given that the Local Plan Review is currently at Regulation 18 stage it will likely be necessary to reconsult at this stage with an overall change as the objectively assessed housing need will likely be more than 200 dwellings for both its own need and the City of Derby. It is therefore likely that SDDC will need to provide more land for housing to meet its own need in addition to the City of Derby's (even though that is likely to reduce overall).  It is important to provide a range of site sized that are brought forward for housing allocations in order to provide housing towards the City of Derby's unmet need,. However, as Part 2 id the Local Plan is nor being reviewed for smaller non strategic allocations, this consultation does not consider the importance of smaller sites and their ability in bringing forward development in shorter timescales than their larger counterparts, thus significantly boosting the supply of homes in accordance with paragraph 60 of the National Planning Policy Framework.  Therefore we generally disagree with the quantum of housing towards city of derby's unmet need, based on the additional housing requirements (an additional 99 no dwellings per annum for SDDC) under the new SM and how this will affect the objectively assessed housing need for South Derbyshire.  Furthermore we generally disagree with the premise of the Local Plan Part 2 Review not taking place alongside this review as smaller non strategic allocations cannot be identified, where there is genuine opportunity for smaller sites to bring forward development to contribute towards City of Derbv;s unmet housing need within significantly shorter timescales.  Table 1- current and proposed SM Annual Housing Delivery Calculations for South Derbyshire and the City of Derby. | The new standard method formula was published in December 2024 and differs markedly from the version proposed in draft earlier in 2024, to which this representation refers.  A number of housing allocations identified in the adopted Local Plan Part 1, including sites in Hatton, Hilton, Drakelow and the Swadlincote Urban Area, have been rolled forward as part of the Local Plan Part 1 review and continue to deliver significant numbers of homes away from the Derby urban area. It should also be noted that housing sites identified in the adopted Local Plan Part 2 continue to deliver new homes and a review of that document will provide the opportunity to address any need for additional non-strategic scale housing allocations.  The decision to review the Local Plan Part 1 ahead of the Local Plan Part 2 was taken in recognition of the need to address the substantial quantum of housing need in as short a time as possible.  To have done this in tandem with a review of the Local Plan Part 2 would have slowed down the process considerably.  The District Council in consultation with its HMA partners has chosen to allocate two new strategic scale development sites, rather than smaller scale sites, on the edge of Derby as these will provide the critical mass of development needed to deliver essential infrastructure, such as primary and secondary schools and new local centres. They are in locations identified in the HMA Growth Options Study as presenting the most sustainable opportunities for new housing development on the edge of Derby within South Derbyshire. The subsequent Derby Housing Market Area Sustainability Appraisal confirmed that the Derby fringe was the best location for new development intended to serve Derby’s unmet needs.  The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three authorities significantly, substantially reducing Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated the previous method was 507 dwellings per annum.  The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed that the wording of Policy S1 be changed to reflect the above. |
| 1243664 | Deloitte LLP on behalf of Church Commissioners for England |  |  | 5.1.1. As considered previously in this representation, the Local Plan Part 1 notes the increase from 12,618 between 2011-2028 to at least 14,483 between 2022-2039, an increase from 742 dwellings per annum to at least 851 dwellings per annum. The Commissioners support the increase in housing delivery in general, insofar as it not only aligns with NPPF paragraph 26 which states that “joint working should help to determine … whether development needs that cannot be met wholly within a particular plan area could be met elsewhere” but will also assist in bolstering growth across the South Derbyshire district as a whole.  5.1.2. The Commissioners note the importance of ensuring that the revised housing figure is delivered within the plan period, to assist in meeting Derby City’s unmet need, however, consider that at present there is an over reliance on large-scale allocations within the Local Plan Part 1. Instead, the Commissioners consider that a balanced approach to development should be utilised to meet Derby City’s unmet need, which includes “sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability” in line with paragraph 69 of the NPPF, and considers differing market areas and supports the long term sustainability of the districts existing settlements. Furthermore, the Commissioners note that SDDC intend to rely on incomplete allocations from the 2016 and 2017 Local Plan. The Commissioners wish to reiterate that relying on allocations, that have not been built out some 8 to 9 years later, brings into question their ability to contribute to meeting short term housing needs.  5.1.3. If the Local Plan is to be updated to assist in providing additional dwellings to account for unmet need in Derby City, the Commissioners consider that a range of new sites should be allocated and considered for development rather than the two new large-scale urban extension allocations currently proposed. Without a range of sites, the Commissioners consider that this additional unmet need would struggle to be met in line with paragraph 69 of the NPPF which notes that strategic policy-making authorities should consider deliverable sites for 5 years, 6-10 years and 11-15 years of the plan period. Furthermore, paragraph 70 of the NPPF considers that “small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built?out relatively quickly”. In order to provide the significant quantum of additional unmet need, the Commissioners consider that a range of sites should be allocated to ensure delivery is spread across the plan period. With smaller sites, such as the Commissioners landholdings at Land south of Milton Road, Repton (SHELAA ref 040), Land east of Main Street, Milton (SHELAA ref 222), and Land at Ex Common Farm, Milton (SHELAA ref 223) providing some of this need early on in the plan period, where large-scale allocations would not.  5.1.4. In addition, the Commissioners stress the importance of delivery options to be underpinned by robust evidence to ensure the successful deliverability of the unmet need, specifically with regards to STRA 1 – Infinity Garden Village and STRA 2 – Land South of Mickleover, which are to provide 2000 and 2500 houses over the plan period respectively. The Commissioners are supportive with the amount of Derby City’s unmet need to be provided within South Derbyshire, however, reiterate the need to justify the way in which the Local Plan will successfully deliver this additional need in the most sustainable way.  5.2. National Planning Policy Framework Reforms 5.2.1. In addition, despite SDDC noting that it has agreed to publish this plan for consultation, with the expectation that it is likely to need to be amended in some respects by the new Framework and NDMPs following the 2024 consultation on NPPF reforms, the Commissioners do stress the importance of ensuring that the Local Plan Part 1 does at some point consider the potential 20% uplift in the proposed Standard Method for South Derbyshire. The Local Plan should be prepared positively, in line with NPPF paragraph 16b, which the Commissioners understand as including consideration for assisting Derby City in meeting their unmet need, but also ensuring that growth can be bolstered in South Derbyshire in its own right.  5.2.2. Further iterations of the Local Plan Part 1 Review should consider the impacts of the potential NPPF Reforms to ensure that the needs of residents of South Derbyshire are met alongside the additional dwellings to cover the unmet need in Derby City. | Noted.  The District Council in consultation with its HMA partners has chosen to allocate two new strategic scale development sites, rather than smaller scale sites, on the edge of Derby as these will provide the critical mass of development needed to deliver essential infrastructure, such as primary and secondary schools and new local centres. They are in locations identified in the HMA Growth Options Study as presenting the most sustainable opportunities for new housing development on the edge of Derby within South Derbyshire. The subsequent Derby Housing Market Area Sustainability Appraisal confirmed that the Derby fringe was the best location for new development intended to serve Derby’s unmet needs.  The viability of the sites will be a key consideration and will be fully evidenced.  The Council is currently able to demonstrate a five year housing land supply, showing that short term delivery needs can be met. The Council has an excellent record of annual delivery as evidenced by successive Housing Delivery Test results.  Most of the housing allocations identified in the adopted Local Plan Part 1 rolled forward as part of the current review have planning permission and continue to deliver new homes.  In addition housing allocations in the Part 2 Local Plan continue to deliver and a future review of that document will provide an opportunity to consider any need for additional non-strategic scale housing allocations.  The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three authorities significantly, substantially reducing Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated the previous method was 507 dwellings per annum.  The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed that the wording of Policy S1 be changed to reflect the above. |
| 1242621  1243572  1243598 | Fisher German on behalf of David Wilson Homes East Midlands; Mrs E Goodson; Mr Grantham, Newton Solney |  |  | Whilst the reasoning that Derby City related growth should be located where it is geographically or spatially well connected to Derby Cit, is understood and agreed, however the rationale to the approach to unmet need and the quantum proposed to be met in South Derbyshire is not agreed.  2.22 The rationale for the proposed provision of 5,609 dwellings is not provided within the Plan, nor does it appear in any of the published evidence documents, including the SA. It however seemingly derives from a “Briefing Note to the Local Plan Working Group (no date provided but published as Appendix 3 to the 19 September 2024 Environmental and Development Services Committee). Whilst not explicit within the text, it appears that the approach taken was to take the undersupply of Derby City (9,022 dwellings), offset by oversupply made in Amber Valley’s Local Plan above BLHN (3,413), with South Derbyshire to meet the residual amount (5,609).  2.23 The fundamental issue is this approach grossly overestimates Amber Valley’s proposed contribution to unmet need, and conflates additional supply provided in that Plan as a contribution to unmet need. Amber Valley’s commitment to Derby City’s unmet need is 1,320 dwellings, not the 3,413 dwellings assumed in Table 1 of the briefing note. Housing requirement and supply should not be confused, and as we have set out in representations to Amber Valley, the NPPF and PPG are quite clear in the approach that should be adopted.  2.24 The additional supply provided in the submitted Amber Valley Local Plan has been provided to safeguard delivery of Amber Valley’s housing requirement, in the knowledge that it is highly unlikely that the Plan will meet its requirements unless additional supply is provided above the requirement. This provides both choice and competition in the market, but also provides contingency if sites should fail to deliver or deliver as anticipated. As set out in relation to Question 3, the contribution to Derby City should be read as 1,320 dwellings. As we have set out to the Amber Valley Local Plan examination, contribution to unmet needs will form part of the Plan’s housing requirement, thus what the authority will be tested against when demonstrating housing land supply, for example. The additional housing which makes up the supply is supply only, it does not form part of the requirement thus it is not tested through 5-year housing land supply for example. There is therefore no impact if this is not delivered, there would be no penalty to Amber Valley through the application of Paragraph 11 for example. That supply will likely not be delivered in full, thus it cannot be read as a contribution to Derby City’s unmet needs.  2.25 Notwithstanding our significant concerns in relation to Amber Valley’s plan in respect of process of identifying its contribution to Derby City’s unmet need, which in conflict with the PPG is based solely on consideration of supply, we have significant concerns in relation to their supply in generality, but that will be fully explored through that Examination process. Insofar as it relates to South Derbyshire at this stage however, at best Amber Valley’s contribution can be assumed to be 1,320 dwellings, thus to meet HMA needs in full will require a high contribution from South Derbyshire. The approach proposed is not justified, nor effective, thus would not be sound. It is however acknowledged that that changes to the NPPF and PPG as discussed above will be highly material here, and thus will require proper consideration once published. | The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three HMA authorities significantly, substantially reducing Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated using this method was 507 dwellings per annum.  The outcome of the Amber Valley Local Plan Examination, in terms of the extent of any contribution toward derby’s unmet housing need, is awaited.  The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed that the wording of Policy S1 be changed to reflect the above. |
| 1248322 | Oxalis Planning on behalf of Chesshire Partnership | Oxalis Planning on behalf of Chesshire Partnership | Q4 | We agree that the Draft Local Plan should include allocations and policies to deliver dwellings to meet Derby City’s unmet need beyond South Derbyshire’s needs alone. However, we do not agree with the standard method used, which was based on the 2023 NPPF version as opposed to the emerging revision.  The emerging NPPF revision (as proposed) would increase South Derbyshire’s annual housing delivery requirement from 507 dwellings per annum, to 606dpa. Furthermore, Derby City’s annual housing delivery requirement reduces from 1,244dpa to 1,062dpa, which is mostly as a result of the removal of the 35% uplift.  Based on the current stage of the Local Plan review, we consider it unlikely that the plan will have reached the regulation 19 publication stage 1 month after the revised framework is published, which is anticipated by the end of December 2024. Therefore, housing requirements will need to be in accordance with the emerging NPPF’s housing requirement methodology.  As a result, although housing delivery requirements across the two authorities combined results in minimal change, it should be noted that South Derbyshire’s delivery would meet more of their own need, and less of Derby City’s. | The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three HMA authorities significantly, substantially reducing Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated using this method was 507 dwellings per annum.    The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed that the wording of Policy S1 be changed to reflect the above. |
| 1243628 | Define Planning on behalf of Bloor Homes Ltd |  | No | The Derby City unmet need is well evidenced. The Derby and South Derbyshire Local Housing Needs Assessment (December 2023) sets out that the current standard method generates a minimum local housing need of 1,266 dpa for Derby and 522 dpa for South Derbyshire. This includes a 35% urban area uplift in Derby. The Assessment goes on to analyse whether an uplift above the standard method would be appropriate and concludes there are no exceptional circumstances to justify a deviation from the standard method. An interim Sustainability Appraisal (SA) for the Derby HMA analyses three growth and four distribution options. On balance, the options on housing requirement are sufficiently distinct to enable an appropriate assessment and comparison, in accordance with PPG. However, the SA should test further reasonable alternatives in relation to a longer plan period, higher housing requirements and different scales of development. All areas raised in these representations as requiring further consideration in the plan preparation. On the housing requirement, the SA discusses applying a buffer and notes a buffer “often ranges between 5-20% of the total figure, with arguments for a greater buffer tending to be stronger where there is a bigger reliance on larger, strategic sites”. The SA notes a buffer has not been included at this stage. In the context of the scale of developments (2,000 and 2,500 new homes) proposed to be allocated, it would be appropriate to apply a buffer of 20% to the housing requirement to protect against under delivery or delays associated with the complexities of developing such large scale sites. In doing so, the Council should then allocate further sites that could be delivered to meet the unmet needs. These sites should be located outside the fringes of Derby City given the constraints and impact the two sustainable urban extensions would have on the area, and could slow further development if allocated here. The Council should undertake further consideration of the options for growth. This should include options for development at the existing urban areas including Swadlincote, which sit at the top of the settlement hierarchy and are sustainable and appropriate locations for growth. Sites in these locations such as BHL’s site ‘Land west of Castle Gresley’ should be considered for allocation. The current strategy over relies on strategic urban extensions on the fringe of Derby City, which will be complex to deliver. Therefore, it is strongly recommended that a suitable buffer is applied to the housing requirement and a wider mix of sites not only in scale but location, are allocated to ensure much needed homes are delivered | The Local Plan Part 1 review is concerned with strategic scale housing, employment and mixed use land allocations and is being pursued ahead of the review of the policies in the Local Plan Part 2 to address the substantial quantum of housing need in as short a time as possble. The subsequent review of Local Plan Part 2 policies will provide an opportunity to address any non-strategic development needs within the District.  In the short term, planning permission is in place for a considerable number of new homes in the Swadlincote urban area , mainly on site allocated in the adopted Local Plan Part 1 which are being rolled forward as part of the current review.  The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three HMA authorities significantly, substantially reducing Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated using this method was 507 dwellings per annum.    The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed that the wording of Policy S1 be changed to reflect the above. |
| 1242038 | Inspire Design & Development |  | No | How has the Council considered the revised need from Derby City following adoption of the revised standard method? | The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three HMA authorities significantly, substantially reducing Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated using this method was 507 dwellings per annum.    The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed that the wording of Policy S1 be changed to reflect the above. |
| 1242408 | Lichfields (on behalf of St Philips Land Ltd) |  | No | St Philips welcomes that the Council is seeking to help address the unmet housing needs of the DHMA. Notwithstanding this, St Philips wishes to highlight that the proposed new SM will have wider implications for the DHMA, as well as South Derbyshire. Table 2.1 sets out a comparison of the current LHN and proposed LHN figures for the DHMA: Table 2.1 Current x Proposed LHN Figures Amber Valley Derby South Derbyshire Current LHN 351 1,244 507 Proposed LHN 682 1,062 606 Difference 331 -182 99 Source: Lichfield Analysis 2.27 On the 25th of September, Derby City Council declared that “it has not been possible to consult on a draft version of our Local Plan in line with our published timetable” and that: “In addition to this, the new Government is consulting on changes to the National Planning Policy Framework (NPPF), this includes changes to the way we are required to calculate the number of houses our Local Plan needs to find and how we protect our Green Belt. The Government has indicated that these changes could come in as soon as the end of 2024. We are therefore going to take a bit of time to review these implications before formally revising our local Plan preparation timetable.” 2.28 St Philips acknowledges that the Council has stated “the Draft Plan does not incorporate the changes currently being consulted on by government on the 2024 National Planning Policy Framework as these are still under discussion nationally. Once these changes are finalised, after the consultation, the plan will be amended in line with the updated Framework.” Notwithstanding this, it is unclear why the Council is advancing plan-making in order to address the unmet needs of Derby (as well as their own needs) when these needs are likely to change shortly. When the proposed LHN figure for South Derbyshire is considered, the Councils contribution towards the unmet needs of Derby falls from c.5,600 dwellings to c. 4,200. 2.29 St Philips notes that the ‘Amber Valley Borough Local Plan 2022-2040’ was submitted to the Secretary of State in July 2024 for independent examination in public. The plan makes a contribution of c. 3,413 dwellings towards helping to address Derby’s unmet needs (as generated by the current standard method). Upon adoption of the new standard method (as proposed within the NPPF 24), Amber Valleys housing needs would rise from 351 dpa to 682 dpa, a 331 dpa increase. In accordance with the transitional arrangements set out within the NPPF 24, this would need to be addressed at the earliest opportunity through a review of the Local Plan under the ‘New Style Local Plan’ system. Consequently, Amber Valley’s contribution towards the unmet needs of Derby is likely to disappear, with the borough needing to ‘bank’ the supply in order to meet their own needs through a subsequent Local Plan Review. Table 2.2 Unmet Housing Need under the proposed SM Proposed Standard Method Housing Req. 2022-2039 Housing Land Supply Surplus/ Shortfall Derby City 1,062 18,054 12,500 -5,554 South Derbyshire 606 10,302 14,483 4,181 Amber Valley 682 11,594 9,601 -1,993 Total 2,350 39,950 36,584 -3,366 Source: Lichfields Analysis 2.30 It is recognized that under the new SM (which proposes the removal of the 35% urban centers uplift from the SM calculation), the LHN figure for Derby would reduce. Notwithstanding this, a shortfall of c. 5,500 dwellings will still exist (Table 2.2), and this will need to be met within the DHMA. In this regard, St Philips notes that the DHMA SA suggests that it may not be sustainable to pursue further growth within Amber Valley: “Similarly, SHELAA sites within the AVBC Urban Fringe area demonstrate there is capacity for approximately 3,000 new homes albeit not all of these homes will be delivered by 2040; some of these homes are already consented and being constructed. Where an option directs housing into the Amber Valley Urban Fringe above the identified 3,000 new homes capacity, housing delivery performs less positively for the same reason” (Pg.38, DHMA SA) 2.31 St Philips notes that options which direct over the proposed 3,500 dwellings contribution towards Derby’s unmet needs (e.g. options S1\_D4A-S1\_D4C) towards Amber Valley are scored particularly negatively against numerous SA Objectives (Table 4.-1 of the DHMA SA).2 On the other hand, concentrating more growth at South Derbyshire (e.g. DHMA SA Options S1\_D4D-S1\_D4E) is found to be more sustainable in SA terms (albeit it is acknowledged that some ‘Significant Negative Effects’ still occur). 2.32 Furthermore, whilst Option D3 (Dispersed) was considered less sustainable in SA terms than Option D4 (Urban Fringe Focus), the new SM would result in the scale of the unmet.... 2 Including Air, Climate Change Mitigation, Landscape, Soils and Water and Light and Noise Pollution.  ...needs reducing significantly from the 9,000 dwellings previously tested. It is therefore likely that Options S1\_D3D and S1\_D3E would perform much better given the reduction in unmet needs. 2.33 St Philips notes that paragraph 27 of the emerging NPPF 24 states that plans should ensure that “unmet development needs from neighbouring areas are accommodated in accordance with paragraph 11b”. Paragraph 28 goes on to set out that this should be informed by information available at the time. Consequently, St Philips considers that South Derbyshire may need to make a higher contribution towards helping Derby to meet its unmet housing needs (i.e. more than the agreed 62% split). 2.34 It is probable that Amber Valley will be able to address any unmet needs which arise from an increase to its own LHN figure through a future local plan review. However, it is unlikely that the Borough will be able to make contributions towards the unmet needs of Derby due to the DHMA SA scoring and other constraints. This would require South Derbyshire to identify an additional 1,373 dwellings throughout the district in order to address Derby’s unmet needs (c.5,554 dwellings). Table 2.3 Unmet Housing Need under the proposed standard method Derby’s Unmet Need South Derbyshire’s Housing Req. 2022-2039 (Proposed SM) South Derbyshire’s Housing Land Supply Need to be Planned for in South Derbyshire Additional shortfall to be addressed through sites across South Derbyshire  2.35 In the context of the above, it is apparent that the DLP may need to address a higher housing requirement than that which is currently proposed. In order to address these increased needs, the Council will need to allocate further sites in order to help address South Derbyshire’s increased housing needs and the unmet needs arising from the DHMA. St Philips considers that the Council should focus this growth at sustainable locations throughout the district, such as Tier 1 and Tier 2 settlements (e.g. Etwall). This would ensure the Council is not overly reliant on allocations at the edge of Derby which do not sustainably address South Derbyshire’s own Indigenous housing needs. 2.36 St Philips wishes to highlight that the Council is proposing to safeguard land at Eggington Common for a Strategic Rail Freight Interchange/ Freeport (draft Policy INF3). Etwall’s location means that it will have convenient and sustainable access to both the Strategic Rail Freight Interchange/ Freeport and Toyota Plant. Without further growth at this settlement, pressure will be placed on the existing housing stock as workers seek housing nearby to their place of work. Without sufficient growth to facilitate this, new workers could be forced to move further afield, reducing the labour supply in the local area and increasing unsustainable commuting patterns. In this regard, allocating Land at Main Street, would help ensure the Council is sustainably addressing its own indigenous housing needs. | It should be noted that the new standard method formula was published in December 2024 and differs markedly from the version proposed in draft earlier in 2024, to which this representation refers.  The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three HMA authorities significantly, substantially reducing Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated using this method was 507 dwellings per annum.    The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed that the wording of Policy S1 be changed to reflect the above.  It is not considered that the outputs of the new standard method justify an increase in South Derbyshire’s overall requirement.  The potential for any impact on housing need arising from the East Midlands Freeport strategic rail freight interchange proposal at Egginton Common was considered as part of the Derby and Derbyshire Local Housing Needs assessment, which concluded that this did not provide justification for additional housing provision above that identified through the Standard Method. |
| 1243634 | Lichfields on behalf of St Modwen - Land south of Station St Castle Gresley |  | No | 3. A Greater Role in addressing the unmet needs of the Derby HMA 3.13 Whilst St Modwen welcomes that the Council is looking to play its role in addressing the unmet housing needs of the DHMA, in addition to the implications of the proposed new SM on South Derbyshire, it would also have wider implications for the DHMA. For example, a comparison of the current LHN and proposed LHN figures for the DHMA is set out below: Table 3.1 Current x Proposed SM LHN Figures Amber Valley Derby South Derbyshire Current LHN 351 1244 507 Proposed LHN 682 1062 606 Difference 331 -182 99 Overall Difference +248 Source: Lichfields Analysis 3.14 It is notable that Derby Council recently announced on the 25th of September that “it has not been possible to consult on a draft version of our Local Plan in line with our published timetable” and that: “In addition to this, the new Government is consulting on changes to the National Planning Policy Framework (NPPF), this includes changes to the way we are required to calculate the number of houses our Local Plan needs to find and how we protect our Green Belt. The Government has indicated that these changes could come in as soon as the end of 2024. We are therefore going to take a bit of time to review these implications before formally revising our local Plan preparation timetable.” 3.15 St Modwen is therefore unclear why the Council is looking to expedite plan-making to meet a level of unmet need from Derby – and the Council’s own housing needs – that are likely to change shortly– and which the Council will need to have regard to (i.e. the proposed transitional arrangements set out in paragraphs 226-229 of the consultation document). When the proposed LHN figure for the Council is considered, the Council’s contribution towards Derby’s unmet needs would fall from c.5,600 to c.4,200. 3.16 St Modwen notes that Amber Valley has submitted their ‘Amber Valley Borough Local Plan 2022-2040’ to the Secretary of State on 29 July 2024 for EiP. The submitted plan proposes a 3,413-dwelling contribution towards Derby’s unmet housing needs (as calculated under the current SM). Notably, under the proposed SM, Amber Valley's needs would increase by 331 dpa. Additionally, per the transitional arrangements proposed, Amber Valley’s increased need would need to be addressed through a review of the Local Plan under the ‘New Style Local Plan’ system at the earliest opportunity. In this context, Amber Valley is unlikely to be contributing towards the unmet needs of Derby, as they will in all likelihood need to ‘bank’ this supply to ensure they can meet their own increased needs through the next Local Plan. South Derbyshire's Draft Local Plan Part 1 Review : Representations on behalf of St Modwen Homes Ltd Pg 7 Table 3.2 Unmet Housing Need under the proposed SM Proposed Standard Method Housing Req. 2022-2039 Housing Land Supply Surplus/ Shortfall Amber Valley 682 11,594 9,601 -1,993 Derby City 1,062 18,054 12,500 -5,554 South Derbyshire 606 10,302 14,483 4,181 Total 2,350 39,950 36,584 -3,366 Source: Lichfields Analysis 3.17 In this regard, whilst the proposed new SM would result in the LHN figure for Derby reducing (due to the proposed removal of the 35% urban centres uplift from the SM calculation), it is likely that a shortfall arising from Derby will still exist. Indeed, there may still be an unmet need of c.5,500 dwellings which would need to be met throughout the DHMA. As set out in the DHMA SA, further growth in Amber Valley may not be sustainable: “Similarly, SHELAA sites within the AVBC Urban Fringe area demonstrate there is capacity for approximately 3,000 new homes albeit not all of these homes will be delivered by 2040; some of these homes are already consented and being constructed. Where an option directs housing into the Amber Valley Urban Fringe above the identified 3,000 new homes capacity, housing delivery performs less positively for the same reason” (Pg.38, DHMA SA) 3.18 Moreover, any option which concentrated more than the proposed c.3,500 dwellings contribution towards Derby’s unmet needs in Amber Valley (i.e. DHMA SA Options S1\_D4A-S1\_D4C) scored particularly negative in SA terms against several SA Objectives2 - Table 4.-1 of the DHMA SA. Conversely, whilst some ‘Significant Negative Effects’ still occurred under directing more growth to South Derbyshire Valley (i.e. DHMA SA Options S1\_D4D-S1\_D4E), the impacts are more sustainable in SA terms. 3.19 It should be noted that the draft NPPF has strengthened the case for the need to meet unmet housing needs through the DtC (Para 27), on the basis of the information available at the time (Para 28). St Modwen therefore considers that the Council may have a greater role to play in addressing any unmet housing needs for Derby in due course (i.e. more than the 62% split already agreed). 3.20 South Derbyshire may need to address c. 5,554 dwellings of Derby’s unmet needs, assuming that Amber Valley will address any unmet need arising from its own LHN figure increasing but would not be able to contribute to any unmet need in Derby through a future ‘New Style Local Plan’ due to established constraints and negative DHMA SA consequences. This would require the Council to find an additional 1,373 dwellings throughout South Derbyshire to address Derby’s needs in full. 2 SA Objectives including, Air, Light and Noise Pollution; Climate Change Mitigation; Landscape; and Soils and Water South Derbyshire's Draft Local Plan Part 1 Review : Representations on behalf of St Modwen Homes Ltd Pg 8 Table 1 Unmet Housing Need under the proposed SM Derby’s Unmet Needs South Derbyshire’s Housing Req. 2022-2039 (Proposed SM) South Derbyshire’s Housing Land Supply Need to be Planned for South Derbyshire Additional shortfall to be addressed through sites across South Derbyshire South Derbyshire 5,554 10,302 14,483 15,856 1,373 Source: Lichfields Analysis 3.21 In this context, it is clear that the Council may need to address a higher housing requirement through the DLPP1R than currently proposed. This would mean that the Council will need to identify further housing land to address these increased needs. In this regard, St Modwen is concerned that the Council’s spatial strategy is currently reliant upon two Strategic Urban Extensions on the edge of Derby to deliver growth, as opposed to distributing delivery across South Derbyshire as a whole. St Modwen considers that the proposed changes to the NPPF and SM reinforce St Modwen’s view that there is a cogent need to allocate further housing land to seek to meet the increased housing needs of the District and potentially any unmet needs from the DHMA. Summary 3.22 The draft NPPF and revised SM are likely to be adopted in early 2025 and, considering the proposed transitional arrangements and the Council’s working timetable for the DLPP1R, it is clear that the Council will likely need to plan for the new SM figures in due course. 3.23 The plan period, as currently proposed, is not sufficient and should be extended by an additional three years of housing need to ensure a 15-year plan period, requiring the provision of an additional c.1,800 dwellings (Para 22, NPPF). Additionally, it is unlikely that Amber Valley will be able to assist in meeting Derby’s reduced unmet housing needs, and the Council may therefore need to make a further provision for c.1,300 dwellings (draft paragraphs 27-28, proposed NPPF). Overall, it is clear that the Council will need to consider making provision for a greater housing requirement through the DLPP1R in due course, than currently proposed | The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three HMA authorities significantly, substantially reducing Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated using this method was 507 dwellings per annum.    The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed that the wording of Policy S1 be changed to reflect the above.  It is not considered that the outputs of the new standard method justify an increase in South Derbyshire’s overall requirement. |
| 1242632 | Lichfields on behalf of St Modwen (Egginton Rd Hilton) |  | No |  | Noted. |
| 1242570 | Nineteen47 on behalf of Hallam Land (land at Blackwell Lane) |  | No | Question 4: Do you agree that the Draft Local Plan Part 1 Review is providing the correct quantum of housing towards Derby City unmet need? 3.19 No. In determining the housing requirement for the District, South Derbyshire's housing requirement over the plan period is stated as 8,874 dwellings (522 per annum) plus a share of the Derby Housing Market Area, also comprising Derby City and Amber Valley. Derby City’s capacity is constrained to 12,500 dwellings leaving an unmet need. South Derbyshire proposes to accommodate 5,609 dwellings towards Derby City’s unmet need, bringing the total for the District to 14,483. These figures should be viewed as a minimum starting point for the targeted delivery of housing and not a ceiling beyond which housing should be resisted. 3.20 The Local Plan Part 1 Review only makes provision for 13,347 additional dwellings, including two new housing led strategic sites (4,500 dwellings), allocations within the adopted 2016 Local Plan Part 1 which have remaining completions (8,752 dwellings) and 95 dwellings from Adopted 2016 Local Plan Part 1 housing allocations, on sites which have completed development since the start date of the Local Plan Part 1 Review (April 2022). The remaining homes to meet the 14,483 housing requirement are stated to be provided by 285 dwellings from the adopted 2017 Local Plan Part 2 allocations, which have remaining completions; and ‘Windfalls’\* on unallocated sites (851 dwellings). 3.21 The proposed approach raises a number of concerns, first with regard to the proposed proportion of Derby’s unmet need to be accommodated. It is understood that a least one of the strategic sites relied upon to contribute to the housing supply within the Derby City boundary has now been withdrawn (Mackworth strategic site). This could have significant implications for the additional unmet need to be accommodated by neighbouring authorities. Additionally, whilst South Derbyshire has planned positively for the additional need from Derby City, Amber Valley’s replacement Local Plan has already been subject to significant delay and must potentially now address the anticipated uplift in the LHN figure (from 351 dwellings per annum to 682) as a result of the NPPF update and the revised Standard Method for calculating housing need, which could result in further pressure on South Derbyshire. 3.22 The update LHN figure and the recent withdrawal of a major strategic housing site at Mackworth undermines the soundness of the joint approach to meeting both South Derbyshire’s own need and a proportion of Derby City’s need. The Council has insufficient evidence as a result of this to support the position within the consultation update, and therefore needs to go further in terms of the policy review than is currently proposed. 3.23 There is the potential for a range of sites in other settlements to contribute to the need within the HMA as a whole. The additional benefit of considering such sites at this stage is to protect and enhance the future vitality of these settlements. This approach will also avoid a result under or over reliance on smaller sites as part of a subsequent Part 2 or full plan review, whereby the expectation of delivery on the two identified strategic sites will have already been set. 3.24 Additionally, the plan must consider and respond to the overall distribution of need, including affordable housing need based on the findings of an up to date Housing Market Assessment, Blackwell Lane, Melbourne Regulation 18 Consultation Representation 11 in order to ensure it is robust and therefore sound. The SHELAA indicates that a range of sites in sustainable Key Service Villages are available for consideration and in sustainable locations close to employment opportunities. These sites should be considered to inform the preparation of a positively prepared plan. 3.25 Based on the above, we object to the current approach of the Council to only seeking partial update of the Local Plan. 3.26 We recommend that a single Local Plan, going back to first principles to assess the needs of the District as a whole. This approach will also provide the opportunity to ensure that the appropriate proportion of Derby’s housing requirement is incorporated within the housing figure, reflective of a deliverable supply and range of housing land, in accordance with the NPPF paragraph 69-70. This will ensure that the plan is justified and positively prepared. | The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three HMA authorities significantly, substantially reducing Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated using this method was 507 dwellings per annum.    The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed that the wording of Policy S1 be changed to reflect the above.  It is not considered that the outputs of the new standard method justify an increase in South Derbyshire’s overall requirement.  The Part 1 Local Plan review is concerned with strategic scale housing, employment and mixed use development. The subsequent review of Part 2 policies will provide an opportunity to address any need for smaller scale development allocations, including to help meet any affordable housing needs. |
| 1242103 | Marrons on behalf of Rainier Developments |  | No | Policy S1: Sustainable Growth Strategy  The housing requirement within Policy S1 is not sound as it is not positively prepared, justified, effective or consistent with national policy for the following reasons. The minimum Local Housing Need (LHN) has been calculated using the standard method. However, the Council will be mindful of proposed changes arising from the Government’s stated intention to change the method for calculating LHN to align it with their aspirations for the housing market. The LHN using the previous standard method (507) is anticipated to change to the proposed standard method figure (606), which is a notable difference. The Council should therefore review this figure after the publication of the Framework, and prepare and submit a Plan on the basis of at least the LHN reflecting the new standard method that aligns with the Government’s aspirations for the housing market. The Local Plan proposes a Plan period of 2022 to 2039. The Framework requires Strategic Polices to look ahead over a minimum 15-year period from adoption. The Local Plan will not be adopted in 2024. On the basis that it is already December 2024 and the Plan has not reached Regulation 19 stage, allowing time for further consultation, review, submission and examination it is more likely that the Plan would be adopted in 2027, and therefore the housing requirement and the plan period should be extended to at least 2042. The Council must assess whether the Plan should contain a housing requirement higher than the minimum local housing need in accordance with Paragraph: 010 Reference ID: 2a-010-20201216 of the NPPG. In particular, the housing requirement should be increased where necessary to take account of affordability within the District, consistent with Paragraph 2a-024-20190220 of the NPPG. The Derby and South Derbyshire Local Housing Need Assessment identifies a need for 214 affordable homes per annum. Although the Assessment suggests this is not a reason to increase the housing requirement, the need as identified represents over 40% of the total requirement per annum. Given the Council only seek to secure 40% of new housing as affordable on sites of over 10 dwellings, and that the 40% figure is a target that still needs to be tested as to its effects on viability, the housing requirement should be increased to take account of the need for affordable housing. Rates of past delivery have averaged over 1,000 dwellings per annum, notably higher than the proposed housing requirement figure of 850 dwellings per annum. This is evidence of market demand and further reason for a higher housing requirement than LHN. The Council’s evidence on all of the other factors to be taken into account when establishing its housing requirement will need to be reviewed and updated prior to the Regulation 19 stage. The Draft Plan proposes a contribution of 5,609 homes to meet unmet needs from Derby. Paragraph 27 of the Framework requires strategic plan-making authorities to prepare and maintain one or more statements of common ground, documenting the cross boundary matters being addressed. These should be made available throughout the plan-making process to provide transparency. No statements of common ground are available, and therefore it is not possible to comment on whether this figure is sound and whether the Council can demonstrate effective joint-working on this issue. 1The failure to address this matter will need to be resolved prior to submission of the Plan for examination, a legal requirement under Section 33A of the 2004 Act, Framework 11(b) and 24-27. The failure to do so will not maximise the effectiveness of the preparation of the Local Plan, and render the Plan not sound. As it stands, the Draft Plan is proposing a housing requirement that fails to meet the bare minimum it must provide. It will need to be updated to reflect the proposed standard method and the Government’s aspirations, it will need to propose a plan period that is at least the minimum of 15 years, it will need to consider the implications for labour supply and affordable housing need, it will need to demonstrate it is meeting the evidenced unmet needs coming from Derby, and it will need to reflect market demand. Further, the Sustainability Appraisal of the Plan does not provide any evidence as to why the required higher levels of housing growth could not be accommodated without causing significant adverse effects. | The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three HMA authorities significantly, substantially reducing Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated using this method was 507 dwellings per annum.    The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed that the wording of Policy S1 be changed to reflect the above.  It is not considered that the outputs of the new standard method justify an increase in South Derbyshire’s overall requirement.  Circumstances where it might be appropriate to plan for a higher level of housing provision than the minimum identified through the Standard Method, including in relation to the provision of affordable housing and any additional demand that might arise from the East Midlands Freeport strategic rail freight interchange proposal, are considered as part of the Derby and South Derbyshire Local Housing Needs Assessment (2023). The assessment does not recommend raising provision above the level identified through the Standard Method.  As the introduction of the new Standard method will not lead to a change in overall housing provision within the Local Plan Part 1 it is not considered that a change to the end date of the Local Plan period will be necessary. |
| 1242100 | RPS on behalf of Bellway and Clowes (Thulston Fields) |  | No | Derby City’s Unmet Need and the HMA No. South Derbyshire, Amber Valley and Derby City share a Housing Market Area. In accordance with the Localism Act the Councils have been considering how to meet housing needs which cannot be accommodated within Derby City’s Boundaries. Derby City has concluded that their capacity is constrained to 12,500 dwellings. Taking this capacity into account, the Local Plan Review process includes allocations and polices to deliver 5,609 additional dwellings, beyond that which is needed for South Derbyshire’s needs alone. RPS accepts the Derby HMA as a geographic basis for distributing any unmet housing need from one area to another. Pages 24 and 25 of the LPP1 confirm that ongoing cooperation between the authorities is taking place and this will need to continue in order to address the development needs of the HMA through the Duty to Cooperate and Statements of Common Ground. In terms of the proportion of Derby’s unmet need that South Derbyshire should accommodate, the redistribution of unmet need has been informed by the Local Housing Needs Assessment (Dec 2023) and sets out a methodology for doing this. We note the reference to the Derby City Capacity Study which has been undertaken and concluded that Derby has a capacity of around 12,500 homes. On 27 July 2023, Derby wrote to the other two Councils setting out its final position on its available capacity. Given the standard method requirement of 21,522, this would result in an unmet need of 9,022 dwellings. However, the Derby Capacity Study has not been issued by the Council as part of the evidence base to support the LPP1. It is therefore not possible to test whether the capacity of available land in Derby is either suitable or deliverable. Similarly, what we do know is that the capacity work carried out in Derby was based on a 2022 starting date . This means that two years worth of housing delivery will have occurred in Derby (202/23 and 2023/24) since that date. This is likely to lead a reduction in the available capacity within the City on which Derby City Council will have included in their capacity work. Furthermore, it is notable that only 649 net new dwellings were built in Derby during 2022/23 , against a housing need of 1,266 dpa using the current standard method, this represents an additional under-delivery of housing (617 dwellings) that should be taken into account in assessing the scale of need to be met outside the city. Given the primary focus of the LPP1 is to address the ongoing housing shortfall emanating from Derby it is not possible to agree or disagree regarding what should be the appropriate contribution in South Derbyshire without the ability to scrutinise the evidence on capacity prepared by Derby City Council. Taken together, we cannot agree that the correct unmet need from Derby has been identified until the full evidence base has been made available for public scrutiny. It is also important to note that Amber Valley has proposed a 2,000 dwelling contribution towards Derby’s unmet need in its emerging local plan . It is notable however, that Amber Valley have never provided the circa 2,388 homes towards the current Derby City Plan’s unmet need up to 2028 that they had previously offered to provide through the Duty to Cooperate prior to the withdrawal of their Submission Local Plan in May 2019. As such it can be argued that this need has not been met. The potential under-delivery of housing in the context of a contribution to wider HMA needs was an issue that has contributed to the withdrawal of the Solihull Local Plan earlier this year . The Amber Valley Local Plan has now reached the examination stage, having been submitted in July 2024. Amber Valley Council has allocated a site of 2,000 homes at Mackworth, close to the urban area of Derby to help meet their unmet needs. However, of this, only 1,320 dwellings are expected to be delivered by 2040 (the end of the plan period) . In addition, the Mackworth site is not expected to delivery any homes until 2028/29 at the earliest . This leaves a residual shortfall of 680 dwellings that would be delivered beyond 2039 (the plan period for the new Derby Local Plan) and could lead to a significant shortfall in housing delivery across the HMA. It also means that the existing shortfall from the current Derby City Plan is not proposed to be provided in the time frame that it is needed. This is also significant given the impending change to the quantum of homes needed across the wider HMA. Whilst the need in Derby is likely to fall, the need across the wider Derby HMA is like to increase. We suggest this could be as much as 250 dwellings each year. The summary table below illustrates the changes, based on the Government’s consultation. Figure 4–1 Derby HMA – housing need based on the proposed standard method Dpa Current Method Proposed Method Change Derby City 1,244 1,062 -182 South Derbyshire 507 606 +99 Amber Valley 351 682 +331 HMA 2,101 2,351 +250 The increase in need across the HMA will need to be accounted for in the emerging plans coming forward in South Derbyshire and Amber Valley. Over a 17-year plan period, the proposed changes results in an additional 4,250 dwellings to be planned for across the HMA as a whole. Action should be taken now to ensure that a scenario as has happened in Solihull/Birmingham does not occur in the Derby HMA. Accordingly, the existing need of 2,338 homes and the residual need of 680 dwellings should be met within the emerging timeframe of this round of plan-making. This is further justification for additional land that needs to be identified in South Derbyshire through the LPP1 review. | The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three HMA authorities significantly, substantially reducing Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated using this method was 507 dwellings per annum.    The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed that the wording of Policy S1 be changed to reflect the above. |
| 1242865 | Turley on behalf of Hallam Land |  | No | The Draft Plan for South Derbyshire proposes to contribute 330 dwellings per annum towards the unmet needs of Derby. While this may appear to fully meet them in light of the new approach, such an interpretation would fail to recognise that the district’s own needs are higher, meaning that scale of any surplus would shrink by roughly one quarter to only 246 dwellings per annum. This alone would meet only three quarters of Derby’s unmet needs. Amber Valley is making its own contribution of 73 dwellings per annum towards the unmet needs of Derby. This would almost entirely close the gap in theory, but should arguably not be relied upon where it will have been proposed in the context of an entirely different policy context when the borough’s own needs were some 47% lower than they could be now. It is unclear whether this contribution would endure if the Local Plan is not found sound, and AVBC starts again in the context of a far greater need of its own. It equally may not survive any review that would have to be undertaken ‘as soon as possible’ after this Local Plan is adopted, due to the extent of the increase in housing need. As it progresses the new Local Plan for South Derbyshire, SDDC could help this situation by slightly increasing the scale of its own contribution towards Derby’s unmet needs. It could feasibly accommodate them in full with a requirement for 933 dwellings per annum, since this would only slightly elevate the requirement proposed in the Draft Plan – by circa 10% – and would in no way require an unprecedented level of housing provision in the district. Such a requirement would remain circa 11% below the rate of delivery seen since the current Local Plan was adopted in 2016. SDDC is encouraged to reflect on this option as it adapts the Draft Plan to reflect changes in national policy, as it has explicitly committed to doing . Such an approach would provide far greater certainty that Derby’s needs are being met in full, without requiring an unreasonable contribution from South Derbyshire. Further detail is provided in our submitted representations (December 2024), including the review of Housing Need in South Derbyshire (Appendix 3 of our representation).  Appendix 3: Derby Unmet Needs 3.15 Paragraph 24 of the NPPF states that: “Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.” 3.16 It is noted that the Statement of Common Ground (SoCG) prepared by the Derby HMA and Derbyshire County Council in March 2020 will be updated as the Plan Review progresses, with the view to setting out the approach to the Derby unmet need and distribution across the HMA. 3.17 The total unmet need was calculated by the July 2023 Derby Capacity Study as 9,022 dwellings. The Amber Valley Borough Local Plan 2022-2040 was submitted to the Secretary of State on 29 July 2024. At the time of preparing the Local Plan, no agreement had been reached on the proportion of need Amber Valley should provide, as such, the Council included a 2,000 homes allocation at Mackworth to contribute to the needs of Derby (1,320 to be delivered in the plan period). A hearing statement submitted by South Derbyshire specifies that that full amount (2,000) should be provided within the plan period. 3.18 By contrast, South Derbyshire propose at Policy S1 “Sustainable Growth Strategy” to provide for 5,609 dwellings to contribute to the unmet needs of Derby. Combined, Amber Valley and South Derbyshire will provide for 7,609 dwellings towards the unmet needs of Derby. As it currently stands, this would leave a remaining unmet need of 1,413 homes against the figure established by the 2023 Derby Capacity Study, and although this situation would evolve with the introduction of a new standard method there is very likely to remain an unmet need, as discussed in the previous section and at Appendix 3. 3.19 It is noted that the Inspector examining the Amber Valley Local Plan has tabled questions for the upcoming hearing sessions on the evidence underpinning the contributions proposed in their plan. However, as the South Derbyshire Local Plan Review progresses, we would anticipate there being further discussion and agreement with the HMA to update the SoCG. Given there is still a shortfall, this should be 7 directed towards the areas with strong functional links to Derby City. On this basis, South Derbyshire is considered to be well placed to contribute a greater proportion of the Derby unmet needs, as it has done historically, given its geographical proximity, excellent transport connections and functional connections to Derby City. 3.20 To accord with the requirements of the NPPF, the Derby HMA SoCG must be updated prior to the South Derbyshire Local Plan being progressed any further than Regulation 18. Further consultation on the plan must be informed by an agreed position in respect of the unmet needs of Derby City to ensure that needs can be appropriately planned for. | The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three HMA authorities significantly, substantially reducing Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated using this method was 507 dwellings per annum.    The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed that the wording of Policy S1 be changed to reflect the above. |
| 1242137 | Bellway Homes Ltd |  | No | To meet the proposed 14,483 dwelling target, provision is made under Policy S4 as follows: • Strategic Site Allocations: 4,500 (2,000 at Infinity Garden Village (STRA1), and 2,000 at Land South of Mickleover (STRA2)) • 2016 Local Plan Part 1 allocations (remaining): 8,847 • 2017 Local Plan Part 2 allocations (remaining): 285 • Windfall allowance: 851 The Council propose two new strategic sites on the edge of Derby urban area, but are located within South Derbyshire (STRA1 and STRA2). These two strategic sites have been identified to assist in meeting Derby’s unmet housing need. Notably, there are no new site allocations proposed to meet the needs of South Derbyshire; instead the Council intends to simply roll forward the existing allocations that haven’t yet secured planning consent from the current LPP1 and LPP2 alongside other existing housing commitments (sites with PP). Consequently, no additional allocations are proposed at Swadlincote beyond those existing allocations rolled forward from the adopted Part 1 and 2 Plans.. We have reviewed the draft policy and wish to register our very strong concerns. We set out our objections to the approach taken below. Firstly, the draft policy highlights that 13,347 dwellings are expected to come forward on allocated sites comprising the two strategic sites and the remainder of the existing site allocations rolled forward from the adopted LPP1, and the intention to roll forward a further 285 dwellings remaining on LPP2 non-strategic allocations that also haven’t come forward yet. The total number of dwellings to be delivered on sites rolled forward from adopted plans is 9,132 This equates to 63% (nearly two-thirds) of the sites identified in the updated strategy in Policy S4. It cannot be We do not believe it is correct to simply roll forward this scale of development from an existing plan without first considering other potential sites for allocation or whether these historic allocations are even capable of being delivered. If these sites were available now and deliverable they would undoubtedly have come forward for development by now given their status as fully fledged allocations. This is relevant given the current adopted LPP1 and the adopted development strategy under Policies S1 and S4 are out of date (it has been reviewed and found to require updating through the LPP1 review process). We strongly believe that alternative site options, including the Land at Sandcliffe Road, Swadlincote (ref. 045), should be appraised and assessed alongside the adopted site allocations. This will ensure a fair, transparent and consistent approach is taken in the site assessment and selection process for the LPP1 review. Secondly, the housing provision under Policy S4 represents the minimum amount of growth necessary to meet the current standard method figure for South Derbyshire and the unmet need element from Derby City. The Council has not incorporated any uplift to the housing provided for in terms of land allocations in order to build in a suitable measure of flexibility into the overall amount of housing to be planned for in the future as required by the NPPF. We believe tThis is a reasonable necessary adjustment the Council will have to make, particularly in the context of supporting the delivery of affordable housing in the district. Thirdly, whilst recognising the number of new homes required in South Derbyshire is likely to increase following publication of the revisions to the NPPF, the Council intend to merely update their evidence base as required prior to submission of the LPP1 Review for examination. We do not agree with this approach. As explained in our response to Policy S1, the current provision of housing land will not be sufficient to meet the increased housing needs in the District. At least an additional 1,400 dwellings will need to be planned for, which represents a considerable increase over the current need identified in Policy S1 (8,874 dwellings) and will inevitably increase the amount of land that needs to be allocated under Policy S4. This will need to be underpinned by additional technical work and further SA/SEA in order to assess reasonable site alternatives required to accommodate the increased need. The additional assessment work is also necessary because the evidence base issued in support of the draft LPP1 review only includes appraisal of those sites that the Council deem appropriate in the context of meeting Derby’s unmet housing need. This has resulted in a current focus on a small number of large sites focused on addressing Derby’s unmet housing need. This is particularly evident in the interim SA, which has only appraised four site options, all of which are located on the edge of Derby administrative boundary. Consequently, there is clear gaping hole in the site assessment and selection evidence base and lack of focus on the reasonable site options needed to meet the housing needs of South Derbyshire. Furthermore, the additional work and the inevitable changes that will need to be made in the next iteration of the LPP1 will also need to be issued for consultation (given the scale of changes that are likely) to ensure all relevant parties are given a fair opportunity to raise their concerns, in accordance with the appropriate legal regulations on public engagement processes. As it stands, the current draft version of the Plan is not ready to proceed to the pre-submission (Regulation 19) stage. To ensure this happens correctly, the additional work and subsequent consultation exercise should be carried out prior to issuing the pre-submission (Regulation 19) version of the LPP1 (in effect, a second stage Regulation 18 consultation) to ensure adequate engagement with local communities and stakeholders is undertaken, and not prior to submission of the final LPP1 as currently suggested by the Council . In order to address the increase in local need, the Council should first look to appropriate site options at Swadlincote, given this is the principal settlement in the current settlement hierarchy, and which the Council says is still up to date. For the reasons set out above, we object to draft Policy S4 in the LPP1 review. | The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three HMA authorities significantly, substantially reducing Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated using this method was 507 dwellings per annum.    The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed that the wording of Policy S1 be changed to reflect the above.  Planning permission is in place for a considerable number of new homes in the Swadlincote urban area, mainly on site allocated in the adopted Local Plan Part 1 which are being rolled forward as part of the current review. These include land at William Nadin Way; Church Street, Church Gresley; Broomy Farm, Midway and the Woodville Regeneration Area.  The review of the Local Plan Part 1 is concerned with new strategic scale housing, employment and mixed use development. The adopted Local Plan Part 2 will provide the opportunity to address any need for additional non-strategic scale housing allocations.  Circumstances where it might be appropriate to plan for a higher level of housing provision than the minimum identified through the Standard Method, including the need to deliver affordable housing, are considered as part of the Derby and South Derbyshire Local Housing Needs Assessment (2023). The assessment does not recommend raising provision above the level identified through the Standard Method. |
| 1243190 | David Lock Associates on behalf of Hallam Land |  | No | Following the new standard method indicates that South Derbyshire should plan for at least 933 dwellings per annum to meet its own needs in full as well as the unmet needs of Derby City.  Infinity Garden Village is clearly best positioned to take on the unmet need of Derby City, and Hallam Land are the Applicants for the live outline planning application on the Wragley Way allocation | Noted. |
| 1242645 | Emery Planning on behalf of Strategic Land Group Ltd |  | No | 4.21 An unmet need of approximately 9,000 dwellings has been identified in relation to Derby. South Derbyshire Council has been working with Derby and Amber Valley, and a report entitled “Derby HMA Sustainability Appraisal of Housing Options” dated 2 August 2024 has been produced. The draft South Derbyshire Local Plan Part 1 proposes a contribution of 5,609 dwellings to meet Derby’s unmet needs. Assuming an unmet need in Derby of 9,000 dwellings, this leaves a residual requirement of approximately 3,400 dwellings to be met in Amber Valley. However, Amber Valley has now submitted its Local Plan for examination and proposes just 1,320 dwellings to meet the needs of Derby City. There is therefore a shortfall of at least 2,000 dwellings in meeting the needs of the neighbouring authority. The issue is further complicated by the Mackworth allocation in Amber Valley (the site allocated to meet unmet needs on the edge of Derby) being undeliverable due to the landowners unequivocally stating that the majority of the site is not available for development.  4.22 A significant factor that also needs to be considered is the revised Framework and the proposed new standard method. Under the revised standard method, Derby’s local housing need would reduce from 1,244 dpa to 1,062, whilst South Derbyshire’s local housing need would increase from 507 to 606 dpa. Amber Valley’s local housing need would also increase significantly from 351 to 682 dpa. This is shown in the table below: Local Plan Representations Land South of Moira Road, Overseal, South Derbyshire 05 December 2024 11 Local Authority Current standard method (dpa) Proposed new standard method (dpa) Increase / decrease (dpa) Derby 1,244 1,062 -182 Amber Valley 351 682 331 South Derbyshire 507 606 99 Total 2,102 2,350 248 Table 4.1: Local housing need in the Derby HMA under the revised standard method  4.23 As the table shows, there is an increase of 248 dpa across the HMA (+12%). Furthermore, the change in the balance of need (i.e., the potential reduction in Derby’s unmet need but increase in South Derbyshire’s need) has significant implications for the distribution of development. The Derby HMA Sustainability Appraisal of Housing Options report identifies that meeting Derby’s unmet needs on the edge of Derby is the most sustainable option. Notwithstanding our concerns in relation to deliverability of that approach (see our response to Policies S4, STRA1 and STRA2), as a minimum the increase in South Derbyshire’s need should be met within the settlements of South Derbyshire. Therefore, the revised Framework is a significant factor and the plan should be looking to address housing needs comprehensively rather than relying upon a future review.  4.24 As set out earlier, there may also be cross-boundary issues in relation to other neighbouring authorities, which do not appear to have been considered. Joint work on such matters should commence without delay to ensure that the Regulation 19 version of the Local Plan Part 1 Review is well informed and justified through appropriate evidence. | The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three HMA authorities significantly, substantially reducing Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated using this method was 507 dwellings per annum.    The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed that the wording of Policy S1 be changed to reflect the above.  The District Council has not been formally approached by neighbouring authorities other than Derby City Council with any request that South Derbyshire accommodate any of their housing needs. |
| 1243178 | Freeths on behalf of Commercial Development Projects Ltd |  | No | No. DCC has concluded that the city offers capacity for 12,500 homes. At present, based on the existing standard methodology for calculating Local Housing Need this creates a need for 21,522 dwellings within DCC (over the plan period). This results in an unmet need of 9,022 dwellings. At present the draft Local Plan proposes that SDDC contributes 5,609 dwellings of this unmet need which amounts to 62%. Amber Valley Borough Council’s (“AVBC”) Local Plan is currently at Examination in Public and proposes 1,320 dwellings to meet DCC’s needs. This therefore leaves a shortfall of 2,093 dwellings of unmet need. The draft Local Plan does not provide an explanation as to how SDDC’s contribution has been derived, nor how the shortfall in unmet need will be delivered across the Housing Market Area (“HMA”). This issue needs to be addressed, with housing need met in full, unless it can be robustly demonstrated that this is not possible. SDDC is not an authority significantly constrained by Green Belt, and it could potentially accommodate the balance of unmet need, without releasing Green Belt land. The interim SDDC Sustainability Appraisal assesses four strategic sites for contribution to meeting DCC’s unmet need. Options for the scale and distribution of housing need for the Derby HMA were subject to a Sustainability Appraisal and a standalone report was produced for the three councils of the Derby in July 2024. This HMA wide SA concluded that the distribution options which perform most positively are those which distribute the Derby unmet need to the Urban Fringe areas (S1\_D4A?E, S2\_D2A-E and S3\_D4A-E), with an apportionment between AVBC and SDDC. However, whilst the HMA wide SA concluded through all options that an Urban Fringe Focus was the best performing distribution, this was based on varying scale of development as follows: • Scale 1 – 36,584 new homes. S1\_D4 - 9,022 unmet need in AVBC/SDDC Urban Fringe. • Scale 2 - 31,008 new homes. S2-D2 - 3,446 unmet need in AVBC/SDDC Urban Fringe • Scale 3 - 32,606 new homes. S3-D4 5,044 unmet need in AVBC/SDDC Urban Fringe The interim SDDC SA doesn’t appear to grapple with scale of development or what proportion of unmet need is being catered for in SDDC. Neither the figure of 5609 dwellings, nor the cumulative figure with AVBC (ie: 6,929 dwellings 5,609+1,320) is discussed in the Interim SDDC SA and neither of these figures correspond to the scale of development tested through the options in the HMA SA. There is an absence of analysis of why 5,609 dwellings has been proposed. Any SDDC SA should test the ability of whether the District could accommodate the remaining balance of DCC’s unmet 3 need. This would comprise the additional 2,093 dwellings, taking SDDC’s potential contribution to 7,702 dwellings. As is recognised in both the consultation questions and consultation documents, a finalised version of the revised draft NPPF, on which the Government consulted between July and September 2024, is likely to have a significant effect on housing numbers in both SDDC and the wider HMA. These will need to be reflected in any subsequent version of the draft Local Plan (subject to any finalised transitional arrangements). | The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three HMA authorities significantly, substantially reducing Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated using this method was 507 dwellings per annum.    The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed that the wording of Policy S1 be changed to reflect the above. |
| 1243182 | Hawksmoor on behalf of I Foster |  | No | The Council should allocate further land within easy commutable locations to Derby City, including Hatton, especially given its convenient railway connectivity. | To identify the most suitable locations for growth within Amber Valley Borough, Derby City and South Derbyshire District, the three authorities jointly commissioned consultants to prepare a Growth Options Study, which looked at opportunities and constraints affecting all potential development locations. This concluded that in relation to the Derby fringe, the locations within which the identified strategic sites, STRA1 and STRA2 are situated represented the most sustainable options for further growth. The subsequent Derby Housing Market Area Sustainability Appraisal confirmed that the Derby fringe was the best location for new development intended to serve Derby’s unmet needs. |
| 1242854 | Stantec on behalf of Caddick Land in relation to Land North of Ashby Road, Woodv |  | Yes |  | Noted. |
| 1243215 | Trent and Dove Housing Association |  | Yes | The infrastructure and employment links around the northern part of the district close to the A50 and A38 make sense to pick up the housing need. | Noted. To identify the most suitable locations for growth within Amber Valley Borough, Derby City and South Derbyshire District, the three authorities jointly commissioned consultants to prepare a Growth Options Study, which looked at opportunities and constraints affecting all potential development locations. This concluded that in relation to the Derby fringe, the locations within which the identified strategic sites, STRA1 and STRA2 are situated represented the most sustainable options for further growth. The subsequent Derby Housing Market Area Sustainability Appraisal confirmed that the Derby fringe was the best location for new development intended to serve Derby’s unmet needs. |
| 1242592 | Dean Lewis Estates |  | Yes | 2.5.1 DLE agree that the quantum of housing towards Derby City unmet need is correct. 2.5.2 It also is evident that the housing trajectory for the annualised delivery of new homes planned for at STRA1 & STRA2 will not yield the full requirement (5609 dwellings) by 2039. 2.5.3 The reliance on the existing Windfall allowance within the adopted Local Plan of 851 is not supported to plug this under delivery. 2.5.4 The NPPF promotes a plan led approach. This additional unmet housing need should be dispersed throughout the district on newly allocated sites in accordance with the settlement hierarchy. The SA confirms that whilst this approach might be less sustainable than the incremental growth around Derby City boundaries (STRA1 & 2), it is capable of meeting the requisite housing need and sustainability thresholds to deem the plan sound. | The new standard method for calculating housing need, which came into being in December, 2024, changes the needs of the three HMA authorities significantly, substantially reducing Derby’s overall minimum need, whilst increasing South Derbyshire’s, albeit to a much lesser degree.  However, as the Council is to submit the Pre-Submission Local Plan by 12 March, 2025, South Derbyshire’s need can be calculated using the previous standard method. In 2024 the need calculated using this method was 507 dwellings per annum.    The District Council’s current position is that although the extent of Derby’s unmet need has been reduced substantially, there remains a strong case for South Derbyshire to maintain the overall level of provision identified in its Draft Local Plan, published October, 2024.  This is to reflect a better understanding of delivery issues around the two housing led strategic sites allocated under policies STRA1 and STRA2 with neither to be built out during the proposed plan period, a recognised need to extend the time period of the Local Plan to give 15 years post adoption which is an extension of two years to 2041, current uncertainty regarding the outcome of the Amber Valley Local Plan examination particularly in relation to meeting Derby’s unmet needs; to recognise and reflect the sustainability appraisal findings that allocations in SouthDerbyshire in close proximity to the City of Derby amount to sustainable development, the high level of housing delivery recorded for South Derbyshire over the past several years, the need to match affordable housing need with delivery as closely as possible and to provide a buffer for flexibility.  It is proposed that the wording of Policy S1 be changed to reflect the above.  The review of the Local Plan Part 1 is concerned with new strategic scale housing, employment and mixed use development. The adopted Local Plan Part 2 will provide the opportunity to address any need for additional non-strategic scale housing allocations. |
| **Members of the public** | | | | | |
| 1242574 | Christian Murray-Leslie |  |  | Doesn't address climate emergency. | New strategic policies STRA1 part E and , STRA2 part E require that all necessary infrastructure, including open space, active travel provision, connectivity, community facilities including education and health provision, public transport provision, hard infrastructure including access points and highway improvements be in place before the first occupation of a dwelling/ phase of development.  The three strategic sites are each the subject of a design review to identify the most appropriate ways to respond to the constraints and needs arising from the development proposals for the purposes of establishing a new community. Criteria to be taken into consideration include those relating to ecology/ wildlife and the need for green corridors linking to the green wedges within Derby City..  Derby City Council has undertaken a study, which has been subject to independent scrutiny, to determine the extent of its capacity to accommodate additional housing needs. It has advised that it has capacity to accommodate 12500 new homes, whereas the extent of need for new homes within the city exceeds this figure. South Derbyshire District Council is obliged to work with Derby in addressing unmet needs under the national Duty to Cooperate.  The review of the Local Plan Part 1 is being prepared primarily to address unmet housing need arising from within Derby City. The adopted Local Plan Part 2 will provide the opportunity to address any need for additional non-strategic scale housing allocations.  To identify the most suitable locations for housing growth within Amber Valley Borough, Derby City and South Derbyshire District, the three authorities jointly commissioned consultants to prepare a Growth Options Study, which looked at opportunities and constraints affecting all potential development locations. This concluded that in relation to the Derby fringe, the locations within which the identified strategic sites, STRA1 and STRA2 are situated represented the most sustainable options for further growth. The subsequent Derby Housing Market Area Sustainability Appraisal confirmed that the Derby fringe was the best location for new development intended to serve Derby’s unmet needs.  Policies STRA1 part D and STRA2 part D require biodiversity net gain in association with development. This is also addressed generally in Policy BNE3: Biodiversity.  Transport modelling is to be undertaken, which will identify traffic impacts of development and how these can be mitigated. The findings of the study will be incorporated in Local Plan policy as appropriate. Any Government decision on the future of the proposed A38 grade separation scheme will be taken into account in determining whether and how trip generation from the STRA1 and STRA2 schemes can be accommodated.  In addition to the new strategic sites, housing sites on the Derby fringe which have not yet been built out are being rolled forwards in the new Local Plan. These comprise land at Boulton Moor, Elvaston; Wragley Way and Primula Way, Stenson and land to the West of Mickleover. This means that housing development will take place at a number of locations distributed around the Derby fringe.  Affordable housing need is identified in the Derby and South Derbyshire Housing Needs Assessment. This indicates high levels of affordable housing need both in Derby and South Derbyshire, although the numerical requirement is significantly higher in Derby. It should be borne in mind that sites STRA1 and STRA2 are in large part intended to assist Derby in meeting its housing needs, including for affordable accommodation. The South Derbyshire Local Plan will be subject to a Viability Study which will, among other things, identify the levels of affordable housing that can be accommodated whilst maintaining the economic viability of residential development proposals. This will be used to inform any necessary change to the level of affordable housing sought.  Whilst the STRA1 and STRA2 proposals would involve development on greenfield land, they would not result in the loss of Green Belt. Green Belt is a policy designation, which in South Derbyshire comprises part of the South East Derbyshire Green Belt (covering the area to the east of Derby between Elvaston and Shardlow) and the South Derbyshire Green Belt (which separates Swadlincote from Burton upon Trent).  The former Drakelow Power Station represents brownfield land which is currently being developed for over 2000 houses and the STRA3 allocation provides for a further 68ha of employment development on this large brownfield site.  The minimum housing needs of local authority areas are identified using the Government’s standard method the formula for which is set out in National Planning Practice Guidance. Local needs must then be considered in more detail to determine whether there is a greater overall need for housing than that identified using the formula and identify the types of accommodation that are needed. This is the purpose for which the Derby and Derbyshire Housing Needs Assessment (2023) was commissioned. It identifies needs for various types of housing in the two local authority areas. Student accommodation needs are identified for Derby City but no such needs are identified for South Derbyshire.  The extent of local government administrative boundaries is not a matter that can be addressed through the Local Plan. |
| 1242108 | Chris Wilson |  |  | This should not be South Derbyshires problem. |
| 1241896 | Margaret Holmes |  |  | I am not qualified to answer re specifics but as long as SDDC is striving to meet people's needs in South Derbyshire then unmet need in Derby City would be of benefit to many. |
| 1235572 | Lisa Marie Roberts |  | No | No Sustainability Assessment for housing and the traveller community wasn't published until after the consultation  Mickleover has already taken more than its fair share of housing growth near the ward/city boundary. The proposed development south of Mickleover will impact on the current infrastructure which is already strained with increase traffic and facilities.  Up to 40% of the housing will be social, yet SDDC civic offices are 12 miles away in Swadlincote. This again will impact on travel arrangements.  Green space is already limited due to the housing development in the area. |
| 1232861 | Jack O’Connor |  | No |  |
| 1232852 | Angus Chan |  |  |
| 1232904 | Holly Robinson |  |  |
| 1232946 | Rosemary Whitehouse |  |  |
| 1232962 | Chris Munn |  |  |
| 1233313 | Rae Louis |  |  |
| 1235316 | Geoff Lewins |  |  |
| 1236247 | Anthony Overton |  |  |
| 1240863 | Amardeep Bhopal |  |  |
| 1241947 | Sarah Glover |  |  |
| 1241989  1241873 | R Coxon  Hilary Lomas |  |  |
| 1234363 | Julie Eason | No | A city cannot keep expanding indefinately. |
| 1242135 | Matt Coxon |  | No | again, poor infrastructure, local travel links, doctors and roads should be addressed before considering adding more housing to the area. |
| 1243600 | Geoffrey Tubey |  | No | All available land in the city should be filled first if there is an incursion into South Derbyshire it should stop like Bonnie Prince Charlie at the current A50. |
| 1236474 | Alan Dixon |  | No | As answer 1   Question 1: Do not agree with the proposal for housing south of Mickleover Already enough new housing near Mickleover Ward/City boundary. There is plenty of land available elsewhere in South Derbyshire, and should be nearer Swadlincote because of the 40 percent of social housing |
| 1238115 | Fiona Bevington |  | No | As before, Derby City needs to think more creatively. |
| 1232857 | Teri Licence |  | No | Derby City cannot continue to offload its short fall onto the district councils. There is no capacity in the fringe areas, infrastructure cannot sustain it and the loss of nature and wildlife is unsustainable. |
| 1235411 | Andrew Norman |  | No | Derby City Council should try harder to meet its own housing allocation by using as range of tactics such as seeking to develop brownfield sites and bringing back into use empty properties. Allowing AVDC and SDDC to assist with meeting it's housing needs is an abrogation of responsibility. |
| 1232988 | Leigh Fearon |  | No | Derby City has sites and land available. This is being held back for private development for those such as Derby University. More deprived areas can be redeveloped to provide more housing rather than taking up more vital green space. |
| 1240252 | Ian McHugh |  | No | Derby City have not publicly published their housing needs, nor produced a co-ordinated plan to dovetail with this SDDC Local Plan Review. There are many brownfield sites within DCC that are not in the DCC currently adopted local plan. Likewise there are several greenfield sites (outside of green wedge and flood plain) within DCC boundaries that are also not within DCC currently adopted plan.  Until such plans and needs are in the public domain it is difficult are agree that SDDC Draft Local Plan review is providing the correct quantum. Historically SDDC has provided above and beyond the need - this is not the case with AVBC & DCC. |
| 1242052 | Susan Marshall |  | No | Derby City should look again at how it meets it’s housing needs to encourage more people to live in the city centre. Any sprawl at the fringes should be more evenly distributed around the city. |
| 1235648 | chris stott |  | No | Derby City's share should be built in Derby City's boundaries. There are a lot of brownfield sites within Derby City's boundaries. These should be utilised before building on agricultural land. |
| 1235132 | Frazer Murphy |  | No | Derby needs expansion, in what format I can’t comment on, but the focus should be on expanding infrastructure before building housing to congest it, derbys roads surrounding the city are at peak times incredibly congested sometimes 4x’ing a journey to and from city centre and this needs addressing before building thousands of homes. |
| 1241995 | Donna Shacklock |  | No | Excessive and the area will not cope with all the new builds in the area - when will it stop - we need to retain our greenfield space, local farms and businesses! |
| 1233824 | AYeomans |  | No | Firstly, Mickleover has already taken its fair share of housing developments close to the city/ward boundary.  Secondly, the proposed plans are not a sustainable development. Mickleover is bursting at the seams: doctors surgeries are at breaking point and residents are unable to get an appointment, ultimately putting the health of residents in extreme danger. There is no plan to build a school on the development and local schools are already struggling to meet the demands of the numbers of the community. The road and infrastructure around Mickleover is at capacity and building a further development will only add to the unsustainable traffic issues in the local area.  It is outrageous that you are proposing that 40% of the dwellings are social housing, yet the local council offices and support required by future residents is 12 miles away in Swadlincote. If there is a requirement for such significant numbers of social housing, these should be built much closer to the offices and the support services.  Additionally, proposing 2500 houses is not a sustainable nor appropriate development in an area already overrun with new build developments and lack of green space. There are other, more suitable areas in South Derbyshire.  Furthermore, SDCC are rushing their plan to local plan process. The Government are currently reviewing national policy and the future of the A38 junction scheme: SDCC should have waited for clarity on both of these. |
| 1238657 | Clare Wood |  | No | Housing should be being built in the right places, where residents can access local facilities from the moment they move in, not years later. Any additional housing built by South Derbyshire towards Derby City's unmet need should be near facilities in South Derbyshire, including schools, health services, local authority services and shops. |
| 1235279 | Gerald Arthur Bowker |  | No | I agree in principle that additional housing is needed. However I don't believe that the location decisions of that housing are sustainable. Please see my answer to question 1. |
| 1233359 | Sukhdev Bangar |  | No | I agree that more home need to be built to keep up with demand however I strongly believe South Derbyshire is being asked to share too large a burden. The area is known for its beautiful towns/villages and natural scenery. The over development especially in Mickleover is causing urban sprawl at the expense of the green belt needed to keep the population connected to nature. |
| 1242138 | Tiran Sahota |  | No | I agree with building new homes, but I don't agree with so many houses being built on green belt land. Green belt land should be protected - why not build on the brown belt land first and then there are also many derelict and empty homes across Derby city. Why not develop those sites first? |
| 1242325 | Tracy and Gordon Harrison |  | No | I cannot see in the document when searching on “formula” or “quantum” any results. I assume there is some formula to do this, from what I’ve read and noted above, student accommodation needs aren’t included (is there any other group?) so I don’t see how the numbers add up when some are missing. Some clarity on this, I think, is needed. |
| 1233131 | Mariah Senaa |  | No | I do not agree that the Draft Local Plan Part 1 Review is providing the correct quantum of housing towards Derby City’s unmet need. While it is important to address housing shortages, allocating 5,609 additional dwellings in South Derbyshire, beyond its own needs, places disproportionate pressure on local infrastructure, services, and the environment, particularly in areas like The Hollow. The plan does not adequately consider the impact this level of development will have on the quality of life for existing residents or the strain it will place on already limited resources. Alternative solutions, such as more balanced regional distribution or re-evaluating the capacity within Derby City through better use of brownfield sites, should be explored before committing to such a high allocation in South Derbyshire. |
| 1242119 | George Selby |  | No | I don’t adhere to the conclusion.  There remains several brown sites available for development in the city conurbation.  Moreover, even if you were to subscribe to that view, Mickleover has more then accommodated its share.  Hackwoood grange Hackwood park Langley park Bloor off Station Road Bloor off Ladybank Road Barratt Mickleover Court Avant Mickleover Court Lloyd Mickleover Court |
| 1238942 | Mr Brian J Harrison |  | No | I don't live in Derby, there housing shortfall sits with their local authority not mine. I live in and fund SDCC not Derby CC. They are not my problem! |
| 1232863 | Lauren Ryan |  | No | If the city can only build x amount oh housing I am sure that is due to the resources available ie doctors, schools etc  Adding more in a border still uses these facilities that cannot cater for anymore people!! |
| 1232938 | Martin Turner |  | No | If the Derby boundary was expanded South Derbyshire would not need to include Derbys allocation in their quota. |
| 1241973 | Graham Keith Sanders |  | No | Infrastructure (Doctors,Shops,Schools,Roads,Utilities) will not cope ! Councils inability to fulfill obligations (Refuse,Drains,Paths,Roads,Trees,Grass cutting) |
| 1232922 | Maureen Shenton |  | No | It is not SDDC job to provide housing for DCC particularly in areas that are already overdeveloped |
| 1240880 | Rebecca Buckley |  | No | It's about money and not people and their actual needs |
| 1234080 | Nick Pope |  | No | It's complete madness and bureaucratic nonsense |
| 1232876 | Claire Woodward |  | No | Mickleover has already taken more than its fair share of housing growth close to or on the Ward / City boundary.  The proposal south of Mickleover does not provide ‘breathing space’ / green space buffer for established Derby City communities and these new dwellings. It is not sustainable development. |
| 1241682 | Sue Glover |  | No | Not required in this area. |
| 1233335 | Ian Molyneux |  | No | same answer as 3)  I believe there is a significant number of 'brown' sites which could be re-developed to meet most/all of these needs and there are other areas around Derby (eg Spondon/Borrowash/Belper) that have not been developed as significantly as Mickleover |
| 1234342 | Julia Bather |  | No | see 3 above  Response to question 3: Derby city is now building flats and apartments to satidfy its requirements. No more building on Green field land is needed |
| 1232940 | Jon Arnott |  | No | That’s the councils job, not mine… but if that’s absolutely necessary and derby city have evidenced why they cannot meet their need, then choose a more sustainable strategic site(s) |
| 1234311 | Ian Fox |  | No | The plan is targeted at the wrong area. |
| 1241985 | Shirley Jackson |  | No | The required numbers should be met with a dividision throughout many sites, to enhance the ability of areas to accommodate the growing new population. |
| 1232937 | Margery Morgan |  | No | There has already been a great deal of extra housing built within the city area. South Derbyshire and Amber valley should do their share without further negative impact on Derby city Residents. |
| 1241240 | Jonathan Watson |  | No | There is not enough thought given to the needs of a new community, Doctors, shops, schools, dentists etc. They will just become a burden on already stretched services. The track record is not good, lots of things were planned for the Cotchett village site, but none have happened. |
| 1241860 | Innes Mary |  | No | There needs to be more council supported housing, not some 'requirement' for private builders to provide a small number of houses within their developments |
| 1235713 | Rob M |  | No | This is leading to an unacceptable level of urban sprawl. There are various "post industrial" areas in Derby and Derbyshire that could be used for housing without the adverse effects on the environment or existing populations who are impacted by additional pressure on infrastructure, facilities, etc. |
| 1241058 | Stephen Alcock |  | No | This is up to Derby City Council, but speaking to 2 local councillors, I m informed that although they need help, they have not agreed to these locations, or indeed the details within them. |
| 1234532 | Michelle Garnham |  | No | Too many |
| 1232909 | Stuart Orr |  | No | Too many houses are planned adjacent to derby city boarder. Boundary should be extended for the city so the impact and any taxes etc can be accounted for by the city. |
| 1235357 | Lorna Hodgetts |  | No | Traffic jams daily, lack of medical or school provision |
| 1241910 | Nigel Bentley |  | No | Unfortunately this is part of the wider problem associated with housing targets, ie. the setting of targets to grow housing where, within current agreed boundaries, there is simply no / insufficient capacity……. 2500 houses is, by itself, a small community and the thinking should be towards establishing it as such rather than as urban sprawl. |
| 1241773 | Joanna Ayres |  | No | Where is the evidence that SDDC has tried to meet its own "unmet need" away from Derby City's boundary? This local plan looks like a ploy to substantially develop the borders of its jurisdiction to meet its own targets without siting any substantial development more centrally. |
| 1233241 | Russell Licence |  | No | Why is it the responsibility of South Derbyshire to make up the short fall of Derby City targets. The same capacity issues are evident in the areas proposed despite them being ‘outside derby city boundaries’ |
| 1242063 | Laura Massey-Pugh |  | No | Why should a village suburb be supporting almost 45% of the city's capacity for dwellings? There are so many brownfield sites in Derby that these figures do not add up. |
| 1237912 | David Warriner |  | No | I do not believe the evidence base is sufficient to justify South Derbyshire needing to build 5609 houses to cover Derby City's shortfall. |
| 1232906 | Steve Wilson |  | No | Yourselves & Amber Valley should build where your voters live and not use Mickleover/Littleover because you'll be better off with expensive housing. |
| 1242083 | Marian Elizabeth Graves |  | No | The SDDC appears to be taking all the responsibility for appeasing the Local Plan across the SDDC, Amber Valley and Derby City Council Housing Market Area. This is a too easy way out for the other two councils and detrimental to the general and mental health of the current SDDC residents. |
| 1241686 | John Moore |  | No | South Derbyshire requirement [ 9633 units ] will be increased by 63% [ 5609 units ] to meet the Derby City requirement. This is too high a proportion in general and to propose building a significant number of these additional units on the "urban fringe" adjacent to the City boundary shows an easy solution for SD whilst adding an unsustainable burden of demands on to the City itself. |
| 1241986 | Andrea Thompson |  | No | NO MORE HOUSE DEVELOPMENTS IN MICKLEOVER |
| 1241987 | Patrick Munro |  | No | It's not the housing thats the problem. It's that it overburdens the existing infrastructure. I'll say it again - the level of investment in sustainable transport, shops, roads and facilities is inadequate in the extreme. |
| 1242116 | Jonathan Nutman |  | No | Not sure that 'dumping' large numbers of housing in South Derbyshire because Derby City is unable to contain them is the best approach.. If Derby cannot support them then perhaps the total needs looking at. ( I understand that government somehow reaches these numbers of supposed required housing but perhaps these need to be challenged?) I am not a NIMBY but I do worry about 'rural' South Derbyshire being industrialised and developed by stealth. |
| 1241749 | Mark Hoptroff |  | No | You are simply adding them to the city boundary and eventually the City boundary will be increased so this proposal isn't really taking anymore houses for South Derbyshire. |
| 1241975 | Paul Hopkin |  | No | Another smoke screen. Instead of trying to justify decision making that puts pressure on a neighbouring authories already overstretched services try firstly concentrating on providing housing and services close to your own facilities and well within your own boundaries. Putting housing in the wrong place actually increases pressure on Derby City Council. Its not just about ticking a box and meeting one target decisions need to be based on all the relevant factors...and Mickleover is already too stretched. This also doesn't take account of destrying more green sites when there are plenty of brownfield sites within SDDC. |
| 1236005 | Richard Larder |  | No | See previous answers.  Response to Question 1:Mickleover has seen too much in the way of housing development in recent years and the existing infrastructure such as roads , schools, GP surgeries , water , sewage and power supplies are under intolerable strain and in my view the prospective plans should be cancelled immediately.  Response to Question 3: The proposed developments should take place elsewhere in South Derbyshire as Mickleover is now overcrowded and the existing residents will suffer from the demands being placed on the local infrastructure |
| 1241890 | Edward Stupple |  | No | There are a lot of brown field sites within Derby city which should be used with the important added benefit of improving the city and the city gaining the council tax for city improvement Other sites nearer the centre of SDDC should be considered. |
| 1233743 | Matt Hunt |  | Yes |  |
| 1239872 | Daniel Robertson |  |
| 1241473 | Amy Simes |  |
| 1241956  1240150  1241993 | Andrew Lee  Ian Turner  Alan Mercer Jones |  |
| 1243552 | Jim Froggatt |  | Yes | Broadly yes, given that the approximate numbers are mandated by central government. |
| 1233334 | Harvey Heldreich |  | Yes | Derby city has actively been redeveloping brown sites to accommodate the need for housing, now the new city centre development seems to be going ahead, derby city is fair exceeding the development requirements, and theirs no need for a massive development on the outskirts of its boundaries with a already over developed area. |
| 1233332 | Ameila Hunt |  | Yes | South Derbyshire have a far bigger area space wise to meet that need. They also have already stuck lots of housing around the boundaries of derby city which is over and above that number needed. It needs to build in different areas and use the money from the building companies for land/planning etc to establish new health centres and schools etc |
| 1241955 | David Stockwell |  | Yes | Yes this housing is required but the location near Mickleover is not appropriate.  Secondary schooling places are in short supply, the A38 northbound to Kingsway and Markeaton are congested and the are floods. These are THREE key reasons the site is not appropriate |

# Qu. 5a: Do you agree that the following strategic sites should be allocated for development? STRA1: Infinity Garden Village

|  |  |
| --- | --- |
| Duty to Cooperate Body / Statutory Consultee | 5 |
| National Organisation | 2 |
| Regional Organisation | 2 |
| Parish Council and other Community Group | 9 |
| Councillor | 1 |
| Landowner or Developer | 22 |
| Members of the public | 64 |

| **Response Id** | **Name** | **Organisation** | **Should Infinity Garden Village be allocated for development?** | **Comment** | **Council Response** |
| --- | --- | --- | --- | --- | --- |
| **Duty to Cooperate Body / Statutory Consultee** | | | | | |
| 1244753 | Canal and River Trust |  |  | Chapter 5: Strategic Allocations The proposed additional Strategic Allocations at STRA1: Infinity Garden Village, STRA 2: Land South of Mickleover and STRA3: Former Drakelow Power Station do not appear likely to affect the canal network within the district. | Noted. |
| 1242629 | Derby City Council |  |  | While supporting the general principle of further urban extensions to the city, there is currently not enough understanding of the rationale for identifying the proposed new strategic allocations and how the related infrastructure requirements and implications for the city have been considered. We welcome opportunities to work with you to achieve a full understanding of these matters as the preparation of your plan progresses.  We note that Paragraph 22 of the NPPF requires that “Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery”. Within this context the growth planned on the edge of the city, which includes several urban extensions, should perhaps be set within a longer-term vision, and importantly include and comprehensively provide for the SDITL route (see later) .  The Council feels that it is critical that development sites on the edge of the city are carefully planned between the two authorities, with input from relevant stakeholders and the County Council, from an early stage, to ensure the right development occurs in the right place at the right time. This includes, in particular, that the necessary local and strategic infrastructure is provided in a timely manner and sustainable transport and travel connections are provided. We need to be creating communities not just functioning to meet a number of homes. It is currently unclear how some of the required infrastructure has been evidenced and considered for the proposed new strategic housing allocations, especially in terms of local and strategic highway implications. Again we welcome opportunities to work with you on these matters.  Of particular interest is a need to consider how development is connected to the existing Derby urban area. This is to ensure that any car-borne trips can make optimal route choices that do not impact on exiting congested residential areas, and more importantly, that access can be provided for public transport services and non-motorised users. It is an issue that needs to be generally considered beyond the local plan period to ensure that development does not prejudice any long-term future connections. Again see later reference and support for SDITL.  There are also concerns around how green infrastructure and particularly how the Green Wedges in Derby will be impacted by the new growth areas. Green infrastructure including biodiversity net gain needs strengthening where enhanced ‘green’ provision can demark communities providing recreation and cooling. One of the main purposes of the City’s Green Wedges is to allow the open countryside outside the city to penetrate into the heart of the city, and it is unclear how this can be continued with the current information. Detailed master planning is therefore essential in this community creation with connections across the open areas to other facilities.  These infrastructure issues were envisaged to be dealt with through a Derby HMA Strategy, which would consider a multitude of cross boundary matters, not least the dwelling splits to meet Derby’s housing needs, and to set in place agreed policies to deal with the issues. In the absence of such a strategy, we expect that a series of Statements of Common ground will be required, but in order to set these out it’s again crucial that the authorities have dialogue about the complex cross boundary issues and involvement in master planning of the specific sites.   Proposed Strategic Housing Allocation - Land at Chellaston IGV This area has generally been discussed and supported in principle by the Council as an appropriate location for further growth as part of the Infinity Garden Village and South Derby Growth Zone area. As such this general location is largely supported for further housing growth. The location will have good access to employment uses and to the wider strategic road network with the retention of the SDITL link road within successive developments. | Noted.  An updates statement of common ground is in preparation with Derby City Council and Amber Valley Borough Council which will address these issues.  A Design Review for the strategic sites is being undertaken which will include consideration of infrastructure provision (including green infrastructure) and design parameters to ensure that the sites will be developed in a sustainable manner with all relevant cross boundary matters given appropriate consideration. This will involve relevant stakeholders, including Derby City Council.  A Transport Study is to be jointly commissioned by Derby City Council and South Derbyshire District Council to consider transport impacts and mitigation for the strategic sites, including measures to encourage sustainable travel. Integration with Derby City transport infrastructure and services will be a key consideration. This will also provide sufficient robust transport evidence taking into account some sites in SDDC delivering beyond the end of the plan period and the potentially extended end date for the Derby City Local Plan given the need for a 15 year plan period.  Following the Design Review and Transport Study a plan -wide viability study and an infrastructure delivery plan will be prepared.  By the above means and by continuing joint working, concerns regarding timely delivery of necessary infrastructure and mitigation of any potential adverse impacts will be addressed. |
| 1243623 | Derbyshire County Council |  |  | Strategic Allocations  The Draft Local Plan proposes to allocate land at Infinity Garden Village for an additional 2000 homes and land south of Mickleover for 2,500 homes. As noted above, the SA work carried out by Clearlead concluded that the most sustainable locations in Amber Valley Borough and South Derbyshire District to meet the unmet needs of Derby City, is on sites as close to the City as possible as large sustainable urban extensions. These two strategic allocations are fully in accordance with the conclusions of the SA work and as such the allocation of the two sites is supported in principle, which will help to meet a sizeable proportion of Derby’s unmet need.  Government planning guidance in the NPPF recognises that one of the most sustainable ways that local planning authorities can meet their housing needs is to allocate large strategic scale urban extensions, not least because the scale of development is more likely to facilitate the necessary supporting infrastructure to deliver more sustainable self contained communities.  The two strategic sites have significant implications for a range of strategic infrastructure that is the responsibility of the County Council, as identified below. | The Council will consider the strategic infrastructure implications where detailed in the responses to questions 6, 7 & 8. |
| 1243580 | Historic England |  |  | Policy STRA1: Infinity Garden Village Mixed Use Allocation – section D) IV) identifies that development will need to respect the character and significance of heritage assets. This needs to be fully informed by appropriate evidence. Once we have had sight of the appropriate evidence base we will be able to provide advice on the suitability of the site from the perspective of the historic environment. From an initial desk based assessment, we are aware of a wide number of heritage assets in the locality, including Scheduled Monument Swarkestone Lows round barrow cemetery and aggregate field system, adjacent to the site allocation. How does the proposed concept plan on page 53 take account of the significance of heritage assets? We would welcome a meeting with the Council to discuss our comments to your Regulation 18 consultation. In particular, we would like to focus on the historic environment policy and the proposed site allocations within the Plan | Agree.  The Council will provide Historic England with Heritage Impact Assessments to detail the significance of heritage assets affected by development which will incorporate mitigation strategies to overcome any harm.  The Council welcomes engagement with Historic England on the emerging Local Plan. |
| 1243643 | Sport England |  |  | Sport England consider all of these strategic site allocation policies as currently drafted to be unsound. Sport England are extremely concerned that the strategic sites appear to have been selected for development with little/no regard to the protection of existing sports facilities. Site allocations STA2 and STA3 may include land that has not been used for pitch sports for over five years. However, this does not indicate that there is a lack of demand for pitch sport. The fact that playing fields have not been used for 5 years or more does not alter their planning status as playing field land. It is Sport England’s view that nothing has altered the lawful use of the sites. The sites could be made good, pitches marked out and brought back into use for sport and this would not require planning permission. Therefore, the sites are still playing field and should be afforded protection under paragraph 103 of the NPPF. It should also be noted that a playing field does not have to be available for community use to fall within the definition of playing field. Neither the DMPO, NPPF or Sport England Policy make any distinction between private and publicly owned or used nor is there a positive obligation (under planning law) for any playing field to be actively used as such. Both policies are applied equally, irrespective of the ownership. A number of playing fields and golf courses can also be found immediately adjacent to the strategic site allocations. However, the policies as currently drafted do not seek any assessment and/or mitigation to ensure that the proposed developments do not have a prejudicial impact on their sporting use (e.g. noise, ball strike, etc), in accordance with paragraph 193 of the NPPF. The occupiers of new residential developments would generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. In this regard and in accordance with paragraph 97 of the NPPF, new developments at all of the strategic sites should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports/Built Facilities Strategy, Playing Pitch Strategy (PPS) or other relevant needs assessment. In partnership with Active Travel England and the Office for health Improvement and Disparities, Active Design guide was produced in 2023. Many Councils have used the guide in developing their vision, strategic objectives and policies on health, sustainable travel and design. It is advised that the strategic site allocation policies seek that emerging masterplans use the guide’s principles in promoting active environments that encourage people to be active through their everyday lives in accordance with paragraph 135 of the NPPF - https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design | Agree.  The Council will ensure that any loss of playing fields will be mitigated through the provision of on-site facilities and/or off-site provision.  The Council will ensure that the strategic allocation policies will seek assessment and/or mitigation to ensure that the proposed developments do not have a prejudicial impact on neighbouring sporting use.  The Council will also ensure that development will contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision will be informed by a robust evidence base such as an up to date Sports/Built Facilities Strategy, Playing Pitch Strategy (PPS) or other relevant needs assessment. |
| **National Organisation** | | | | | |
| 1235628 | British Horse Society |  | Yes | People have to live somewhere, however;  IN regard to STRA 1 and STRA2 the present state of the infrastructure is inadequate for many more cars leading to increased risks for vulnerable road users. The construction of a new junction off the A50 is particularly troubling as it encourages large volumes of traffic onto country lanes during times of traffic delay on the A50. The Council or developer should be paying to improve road safety around both locations and allowing vulnerable road users to be able to move between both locations. The Active travel scheme can be used to achieve this objective. So we need more traffic calming measures, segregation of horse riders and cyclists from cars, controls to restrict lorries , better lighting and more pavements. | Strategic infrastructure requirements are considered in the responses to question 6. |
| 1243542 | Home Builders Federation (HBF) |  |  | HBF do not comment on individual sites, be we would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. HBF does not comment on individual sites, other than to say the Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full. The soundness of strategic and non-strategic site allocations, whether brownfield or greenfield, will be tested in due course at the Local Plan Examination.  It will be important for the new South Derbyshire Plan to be supported by evidence, monitoring and analysis to demonstrate that all the sites in the Plan, remain deliverable, if they are to continue to be relied upon. HBF are aware of potential challenges can impact on the timescales for delivery of the largest sites. Ways to address such ongoing risks could include increasing the housing requirement and/or the buffer applied. The Plan should also recognise that the time taken to bring forward larger allocations, and this underlines the need for a range of site types and sizes to ensure a five-year land supply on adoption, and an effective housing land supply over the plan period. | Noted. Please also see Council response to comments on Question 4 |
| 1240828 | Barry Thomas | Open Spaces Society | Yes |  | Noted. |
| **Regional Organisation** | | | | | |
| 1243215 | Trent and Dove Housing Association |  | Yes | STRA1 & 2 are close to infrastructure and employment, plus other conurbations. | Noted. |
| 1242640 | Derbyshire Association of Local Councils |  | Yes | Mickleover and Infinity Garden proposals appear to have better infrastructure/access to trunk roads | Noted. |
| **Parish Council and other Community Group** | | | | | |
| 1240947 | Barrow Upon Trent Parish Council |  | Yes | Living in Barrow upon Trent, all our residents are deeply concerned that the latest version of the plan shows a massive increase in the number of residential buildings that now appear in our parish. We undertook a parish boundary change to ensure that our parish remained a small, rural parish that was self-contained and discrete from the ever-increasing housing that now borders the south of Derby City. This latest plan has a large number of new residential properties in our parish, north of the A50. It would be sensible, in our view, to make the area of the IGV, north of the A50, a separate parish in its own right. This was a condition on the original application documents " A development of a Stand alone Village", This is not currently going to be the case and needs looking into . | Noted.  The quality of the IGV site is informed by Design Review and regular interaction with Homes England and various infrastructure providers.  Proposals for changes to Parish boundaries lie outside the scope of the planning system. |
| 1239943 | Castle Gresley Parish Council |  | Yes | It is unclear where any additional infrastructure and amenities will be introduced within the local plan for the current developments let alone any future builds. There is no detail regarding extra services such as Doctors, Dentists and school places. Educational mainstream places are already at full capacity. A particular concern is that at the Drakelow Development there is a lack of secondary placement support – It appears that only primary education is being incorporated. There is the additional issue of the lack of a new bridge to enable the additional traffic to commute to Burton, the A38 and other arterial roads. Most of which will be diverted through Catton and Walton and Trent. This will not only include domestic vehicles but commercial vehicles as well as the proposes bus service that would be needed for such a large development.  The other developments underway in Castle and Church Gresley will also put a great strain on its local infrastructure. Again, there have been no additional school places included in the plan, nor Doctors, Dentists, Shops or roads to take into account the additional residents and traffic. Officers need to understand that houses cannot be built on sites just because there is land to build them on. They must have the amenities, roads and services to accommodate them. We believe there should be more protection in the policy against excess traffic and traffic noise, light pollution, fumes and inappropriate developments like fast food outlets near schools etc. We are very concerned about the increased amount of traffic and traffic noise in our parish, and the lack of any additional social infrastructure which also appears not to have been added to any of the developments in the local parish. E.G community centres/halls. There have been no extra school spaces provided for Castle Gresley, either primary or High school despite local schools being full and many of the development houses being 2/3/4 bedroomed. We have seen no extra funding of Gresleydale Doctors and local Dentists are non-existent. Yet we are seeing 71 houses appear in Oak Close and 306 houses in Church Gresley approximately half a mile away. | Noted.  Details of the infrastructure requirements for each of the new strategic policies are included in the respective polices contained within the draft Local Plan document. These will be detailed further in the Infrastructure Delivery Plan.  Specific comments relating to the Former Drakelow Power Station will be considered under Question 5c and/or 8 |
| 1242585 | Egginton Parish Council |  | Yes | STRA1: Yes, suitable. | Noted. Detailed comments summarised and addressed under Question 7. |
| 1244412 | Etwall Parish Council |  |  | STRA1: We do not know the area in sufficient detail to make a worthwhile comment. | Noted. |
| 1238750 | Hilton Parish Council |  | Yes | For STRA 1 and 2 see above. | Noted. |
| 1243158 | Melbourne Civic Society |  | Yes |  | Noted. |
| 1241376 | Rosliston Parish Council |  | Yes | We note the placement of 2 strategic sites of 4500 houses on the edge of Derby, to build and support Derby Cities unmet need, building logically where there is an infrastructure to support this development. It is also noted that many of the existing sites will already accommodate much of the housing numbers for Derby City. This therefore reinforces and demonstrates the numbers being passed to SDDC should not be further increased. | Noted. |
| 1243603 | SAVE (Save Aston & Weston Village Environment) |  | Yes | As stated in the earlier answers, Derby City should review its needs and to review the HMA | See Council response to Question 4 comments. |
| 1242402 | Weston-on-Trent Parish Council |  | Yes | Again this is a qualified yes, based on the need for Derby City to review its needs and to review the HMA | Noted. See Council response to Question 4 comments. |
| **Councillor** | | | | | |
| 1242293 | Lucy Care |  |  | How land is used is as important as where. Housing needs nearby space for business (to reduce community distances), so infinity Garden is a better arrangement than Mickleover. | Noted. |
| **Landowner or Developer** | | | | | |
| 1242038 | Inspire Design & Development |  | Yes |  | Noted. |
| 1248307 | Copesticks on behalf of Alexander Bruce Estates Ltd. | Copesticks on behalf of Alexander Bruce Estates Ltd. |  | Chapter 5 - Strategic Sites 1.13 Policies STRA1 and STRA2 identify 2 strategic sites, in the form of sustainable urban extensions to Derby, at Mickleover and Chellaston. Together these SUEs propose 4500 new homes. Large SUEs are notoriously difficult to deliver because of their size and the resultant accumulation of constraints and as a result timescales are generally many years between allocation and a shovelready site. Further, that delivery will be controlled by the developers and the need to ensure they are maximising their return through controlling supply. Realistically, it may be 2030 before the first homes are occupied and 2045-2050 that the sites are complete.  1.14 It is realistic and reasonable to assume that the two SUEs may only contribute around 2500 homes during the plan period. Along with the other allocations in the draft Local Plan Part 1 Revision, strategic sites will only amount to around 60% of housing need, leaving nearly 8,000 plots to be found on non-strategic sites and windfalls. | A trajectory will be prepared showing annual delivery from each of the allocated housing sites within the plan period 2022-2041. |
| 1243227 | Carter Jonas on behalf of Miller Homes Ltd |  |  | 3.39 SDDC are proposing to retain some of the allocations contained within Local Plan Part 1 (2016) and Local Plan Part 2 (2017). At this stage, we have not reviewed those in detail. Whilst these will have been found sound at respective examinations, SDDC will be required to demonstrate the allocations are deliverable over the Plan period. 3.40 In order to meet DCC’s unmet need, SDDC are proposing two new mix-used strategic allocations; – STRA 1: Infinity Garden Village for 2,000 dwellings – STRA 2: Land South of Mickleover for 2,500 dwellings 3.41 Both sites are under numerous landownerships and whilst this is a common position for larger strategic sites, it does present greater risk to the overall deliverability of the sites which should be given due consideration by SDDC.  3.42 Whilst a trajectory has not been published, it appears the intention is for both strategic sites to be delivered over the Plan-period. It’s our understanding that no planning applications have been submitted in respect of the draft allocations.  3.43 The trajectory for the strategic sites is overly optimistic. If full planning permission is immediately granted, including a signed S106 on the adoption of the Plan in circa December 2026, this would allow 13 years to deliver both allocations which is a build out rate of circa153 dpa for STRA 1 and 192 dpa for STRA 2.  3.44 It is however unlikely that the delivery of dwellings would commence immediately given the need to deliver infrastructure required to support the mixed-use developments and the likely requirements to discharge pre-commencement conditions. 3.45 Furthermore, typically, Applicants for large scale strategic sites would only seek outline planning permission in the first instance and secure reserved matters approval for parcels as it progresses, which adds further time to the overall planning process. We understand that both sites are being promoted by promoters rather than developers which increases the likelihood of an outline application being submitted in the first instance 3.46 According to the Start to Finish (Third Edition) (March 2024) prepared by Lichfields, the average time for obtaining planning consent for a scheme of 2000 units or above is 5.1 years which is followed by a planning to delivery period of circa 1.6 years. Thus, on the basis the Applicant submits an early application in summer 2025, it’s likely that delivery on site would not commence until winter 2031/32. Given the sites are being promoted by promoters, there will be additional time spent on bringing the land to market, which could be complex given the number of landowners and securing a house builder. 3.47 The analysis undertaken by Lichfields found that for sites of 2,000 or more dwellings, the lower to upper quartile range for build-out rates is 100 to 188 dpa. Using these figures, STRA 1 would have an approximate build out time period of 10.6 to 20 years and STRA 2 would be between 13.2 and 25 years. 3.48 Taking into account the time required to obtain planning permission, undertake the planning to delivery period and the build out rates, it is highly unrealistic all dwellings will be delivered over the plan period. 3.49 It is not an issue that delivery extends beyond the plan period, indeed we encourage SDDC’s approach to longer-term planning for the District. However, given the likely trajectory of the sites, further allocations will be required to meet the local housing need over the plan period. 3.50 In addition to the above, SDDC are placing reliance on two large scale strategic sites. Whilst strategic sites are beneficial for delivery over the longer term, they are fraught with risk, particularly in terms of delays as set out above. 3.51 Over-relying on 2 sites is an unsound approach as it risks the Plan not delivering the required housing to meet need. We therefore strongly recommend that in addition to the strategic sites, SDDC consider the allocation of smaller sites such as Land South of Burton Road, Repton which is available to deliver circa 160 dwellings over the next 5-year period. Overarching Development Strategy | A trajectory will be prepared showing annual delivery from each of the allocated housing sites within the plan period 2022-2041. |
| 1243582 | CBRE Ltd on behalf of Land Project UK (LPUK) |  |  | Question 5 response: LPUK do not object to the principle of strategic sites for development. However, it is vital that the emerging Local Plan caters for development needs now, and in the absence of Planning Decision Notices, it cannot be guaranteed that the sites can be delivered in the short term (0-5 years), and we have concern that the immediate employment needs of the borough are not being efficiently planned for. Furthermore, it is clear from the draft allocations that further technical work is still required to ensure the feasibility of the scale of growth envisaged within the allocations, with reference to the need for the Council to work with infrastructure providers to address issues such as transport, health and school provision. Given the questions we’ve raised around deliverability and timescales of the new allocations, we recommend other sites are also allocated in the emerging Local Plan for employment purposes that are deliverable now and of a small-medium scale | Concerns relate to the overall potential delivery of the site (with particular regards to employment land) which will be considered under Question 3.  Further technical work is to be carried out including design reviews, a transport study and a viability study. |
| 1243190 | David Lock Associates on behalf of Hallam Land |  | Yes | The allocation of Infinity Garden Village in particular is strongly supported by Hallam Land, who are the Applicants for the live outline planning application on the Wragley Way part of the allocation (subject to separate policy H15, on which specific representations are also submitted). Please note that Hallam Land are also the Applicants of a live outline planning application for employment development on the south-western portion of the ‘employment site’ as shown on the masterplan diagram (page 54 of the draft Plan). Please see full Hallam Land representation letter specific to Infinity Garden Village, prepared by David Lock Associates. | Noted. |
| 1242592 | Dean Lewis Estates |  | Yes | DLE agree that the identified Strategic Sites STRA1, 2 & 3 should be allocated in the Partial Review | Noted. |
| 1243628 | Define Planning on behalf of Bloor Homes Ltd |  |  | BHL do not object to the allocation of the two housing led urban extensions, and the strategic employment allocation. However, the Council are clearly over-relying on urban extensions in one area to address the unmet needs of Derby City. In doing so, the Council could fail to address other unmet needs where and when they arise. The development of Sustainable Urban Extensions of the scale proposed can take a significant amount of time to begin to deliver homes due to their scale and complexities. This includes the requirements to mitigate impacts and provide necessary facilities and services. Therefore, as set out in the response to question 4, the Council should apply a buffer to the housing requirement and allocation of additional development sites to balance out the delivery of the homes that are needed. The production of a Housing Implementation Strategy, as set out in the Draft Plan, clearly demonstrates that there are significant constraints to delivering much needed homes against the proposed spatial strategy. Significantly, this would defer decisions about the location of new development that could be reasonably made during the current Review. A more flexible approach could also be taken towards other sites coming forward. This could include identifying additional sites in general accordance with the spatial strategy and hierarchy of settlements, such as BHL’s site at Land west of Castle Gresley. This option is identified in the consultation document which acknowledges that a Housing Implementation Strategy is required as “there is always a risk that sites may not come forward as planned during the anticipated timescale”. | In regard to comments concerning the application of a buffer to the housing requirement see Council response to comments on Question 4.  In regard to land at Castle Gresley, see response to Q13. |
| 1243664 | Deloitte LLP on behalf of Church Commissioners for England |  |  | 6.1.1. The Commissioners are supportive of South Derbyshire assisting Derby City in meeting it’s unmet need, as this concurs with NPPF paragraph 26 which states that “joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.” However, when considering the strategy in which this unmet need is intended to be met, the Commissioners do not consider that strategic sites STRA 1, STRA 2 and STRA 3 provide the most sustainable development opportunities. 6.1.2. Firtly, as noted in response to Question 3, updates to the Local Plan Part 1 in isolation poses a risk of disconnect between the strategic and non-strategic elements inclusive of allocations. The Commissioners consider that, despite some work being undertaken to determine the preferred distribution options such as the Derby Housing Market Area Growth Options Study and Sustianability Appraisal, without undertaking a wholsescale update to the Local Plan inclusive of Settlement Hierarchy and non-strategic allocations, the preferred distribution options cannot fully be determined. 6.1.3. In addition to this, paragraph 31 of the NPPF notes that “the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals”. With regards to the Local Plan Part 1 Review’s strategy for meeting Derby City’s unmet need, SDDC conclude that a range of distribution options have been explored through the Derby Housing Market Area Growth Options Study as prepared by AECOM, the Derby Capacity Study as prepared by AECOM, the Employment Land Review and through the HMA-wide Sustainability Appraisal, which have all fed into the conclusion that the best suited strategic sites are within the Urban Extension typology and “meeting the unmet need arising from Derby as close as possible to the City amounts to sustainable development”. 6.1.4. Although this identifies that some work to the evidence base has been undertaken, vital documentation central to the justification for the allocation of strategic sites STRA 1, STRA 2 and STRA 3 such as the Infrastructure Development Plan update, Design Review for updated plan’s strategic allocations, Local Plan Viability Assessment and Housing Implementation Strategy have not been undertaken or completed. Without the completion and subsequent utilisation of these documents in assessing the viability and deliverability of these strategic allocations, the Commissioners consider that the Local Plan Part 1 cannot be considered justified in line with NPPF paragraph 35, and is therefore unsound. As it is currently unclear whether there would be any barriers to the development of these large-scale sites such as the provision of additional large-scale supportive infrastructure, possible complications with multiple ownerships as well as speed of delivery, as mentioned in the Commissioners response to Question 4. 6.1.5. The Commissioners appreciate SDDC’s commitment to providing a Housing Implementation Strategy (HIS) which explains what SDDC would do should there be any barriers to delivering development as proposed in the Plan, and how to respond to changing circumstances. However, it is noted that the HIS will be part of the work leading up to the Regulation 19 consultation on this Local Plan Part 1 Review. The Commissioners consider that there needs to be further robust evidence available to firstly ensure that the preferred distribution options presented within the Local Plan is deliverable and achievable to where the mitigation measures within the HIS will not need to be utilised. SDDC should be confident that these large-scale sites are deliverable, or consider alternative and more balanced distribution strategies that respond to differing market areas and support the long term sustainability of the districts existing settlements.  6.2. Alternative Distribution Options 6.2.1. The Commissioners consider that, alternatively to the strategic allocations STRA 1, STRA 2 and STRA 3, a more balanced development distribution approach that spreads some of the housing provision across Key and Local Service Villages, as well as Rural Villages, would provide a more sustainable distribution of Derby City’s unmet need within the district. This distribution option would provide the most flexibility for housing location and subsequent resident choice within the HMA in line with NPPF paragraph 60 which notes that “it is important that a sufficient amount and variety of land can come forward where it is needed” and that it “should be to meet as much of an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community”. In addition, the Commissioners consider that a focus on meeting Derby City’s unmet need within existing settlements will ultimately be more effective as it will favour sites with more certainty with regards to deliverability. Larger-scale sites hold more barriers to delivery, including the provision of additional large-scale supportive infrastructure. In contrast, smaller sites and Rural Development sites are able to achieve a timelier delivery of housing within the plan period and are vital to ensure a sufficient supply of housing within the district. This will be even more important for South Derbyshire when accommodating some of Derby City’s housing need as part of the Derby HMA. As noted previously, the Commissioners note the lack of robust evidence supporting the deliverability of these large-scale sites, and consider that a focus on increasing sustainable development within existing developments would provide a much more effective approach to the delivering the unmet need. 6.2.2. Additionally, large-scale sites tend to bring with them much bigger infrastructure costs and therefore are less likely to meet affordable housing needs, which SDDC should also be ensuring they deliver as part of the additional unmet need of Derby City. The allocation of smaller sites in the specific strategic context of meeting Derby City’s unmet need would provide greater certainty to the provision of affordable housing, aligning with NPPF paragraph 62 which notes that “the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies” inclusive of affordable housing. 6.2.3. SDDC has been led by the Sustainabilty Appraisals at both the HMA and local authority levels, which indicated that it would be most sustainable to deliver unmet housing need arising from Derby City as close as possible to the City; to utilise existing infrastructure and reduce travel distances. The Commissioenrs do not disagree in general with this conclusion, but rather consider that new housing land intended to meet the unmet need should be provisioned towards existing settlements as a priority before directing it towards the creation of news settlement and larger urban extensions, in order to retain and expand upon the vitality of these settlements. The Commissioners note that villages such as Milton and Repton are still wthin close proximity to the Derby City district, and have the opportunity to provide additional sustainable development in the short term further to that which is currently within the adopted Local Plan. Church Commissioners for England | South Derbyshire Local Plan Part 1 Review 10 6.2.4. Sites such as the Commissioners sites, Land south of Milton Road, Repton (SHELAA ref 040), and sites at Land at Ex Common Farm, Milton (SHELAA ref 223) and Land east of Main Street, Milton (SHELAA ref 222) would provide achievable and suitable developments within the next 0-5 years, enabling elements of the unmet housing need arising from Derby City to be built-out quickly. | See Council response to comments on Question 4.  In regard to land at Repton and Milton see also Council response to comments on Q13. |
| 1242621  1243572  1243598 | Fisher German on behalf of David Wilson Homes East Midlands; Mrs E Goodson; Mr Grantham (Newton Solney) |  |  | 2.26 Residential development is proposed to be delivered within STRA1 and STRA2. We provide comments to both below. We have no specific comments on STRA3 at this stage. We do not specifically object to the allocations proposed, but do object to the assumptions in respect of likely capacity and the process to identify these sites against reasonable alternatives.  2.27 STRA1: Infinity Garden Village represents a continuation of existing commitments on the southern Derby urban fringe within South Derbyshire. Within the evidence there is no commentary as to the anticipated delivery rates, lead in times, etc, so it is difficult to fully comment. It is not clear whether work has yet commenced on undertaking a planning application.  2.28 For sites of this size, Lichfield’s Start to Finish Volume 3 (March 2024) sets out detailed analysis of likely lead in times and assumed delivery rates. This evidence explored the progression of 179 sites of over 500 dwellings. This evidence can therefore be assumed to at worst represent a reasonable assumption of likely lead in times on which to base an on which to base any assumptions. Table 3.1 of this document sets out that sites of 2,000 dwellings such as the proposed STRA1 Infinity Garden Village allocation, can reasonably expect to take circa 5.1 years to gain a planning approval (from validation of an outline to first detailed reserved matters approval). This does not of course account for the significant time at pre-planning phase, assembling the application, pre-app, community consultation etc, which could reasonably take 3 years alone, meaning it reasonably be 8 years from work commencing to a phase 1 Reserved Matters application being approved. It is clearly pertinent therefore as to the progress made towards an application, as this will impact assumptions on lead in times.  2.29 To deliver the full site (2,000 dwellings) there will need to be an average delivery of circa 118 dwellings per annum, throughout the full proposed 17 year Plan period (notwithstanding our comments that the Plan period should be extended), however clearly there is still significant time until the commencement of delivery and as such delivery rates will need to be higher, once commenced.  2.30 The chart overleaf shows the average annual delivery required by start date. Clearly the later delivery commences, the more difficult achieving the 2,000 dwelling delivery will be. In accordance with Start to Finish, delivery rates of over 188 are rarely achieved, thus delivery would reasonably have to commence prior to 2029/30 for the dwelling rate to be reasonably achieved, requiring a planning application to be submitted imminently and determined ahead of assumed timescales to be feasible. Unless evidence is provided otherwise, or an application submitted, it is not clear whether an application could be submitted within those timescales  However, even if this was possible, it is not a given that delivery rates of circa 180 dwellings per annum will be deliverable, not least in that the site will be directly competing with the outstanding residential commitments within Infinity Garden Village deriving from the extent Part 1 Local Plan(Phase 2 Wragley Way discussed above). This competition may limit developer interest, or slow market absorption. This could have a compounding effect where the assumptions for both the committed development and proposed new residential allocation are both overly ambitious given the quantum of supply to be delivered serving effectively one geographic market from a single SUE.  2.32 It is noted that despite being submitted in 2019, an application on land to the west of the proposed new allocation, which also forms part of the broad Infinity Garden Village area, remains undetermined. The application has all matters reserved except part access for up to 1,850 dwellings, a 2 form entry primary school, a local centre (including community hall, retail and other local services and facilities), public house, drive-through restaurant, petrol filling station, strategic highway infrastructure including new junction of the A50 and associated road links, public open space including children's play provision, surface water drainage infrastructure, landscaping, earthworks and ancillary supporting infrastructure (DMPA/2019/1097). This demonstrates that the 5.1 years anticipated in Start to Finish is likely to be accurate for applications of this scale and is likely to underestimate the previous Phase, but given this is delivering the new link with the A50 this may explain a slightly longer determination period.  2.33 Whilst it is noted government funding has been secured to help deliver the broad Infinity Garden project, and this may help with delivery, it will not in isolation improve market absorption and realistically the number of outlets willing to deliver concurrently may be lower than anticipated once the new phase comes on stream due to the increased competition. At Regulation 19 stage, the Council must present its data in relation to assumed delivery rates for both phases, and a realistic approach to lead in and delivery rates for both. We believe it is highly likely that some reductions will need to be made, and that 2,000 additional dwellings proposed within this Plan period will not be realistic.  2.36 At Regulation 19, the Council should publish evidence detailing the Council’s assumptions in terms of lead in time and subsequent build rates. This should not simply by an unsubstantiated Statement of Common Ground with the landowner and should instead be led by real evidence on matters such as infrastructure and service delivery and phasing, and how this will impact build out rates.  2.37 Your attention is again drawn to recent correspondence of the Bedford Local Plan Examination where Inspectors concluded recently that build out rates assumed by the Council on the two proposed strategic sites were wholly unrealistic and that there was very little flexibility in the remainder of the Plan. The result being the Council now need to find additional sites to give the Inspector’s assurances that the housing requirements can reasonably be met.  2.38 The Inspector’s letter of the 27 November 2023 sets out these fundamental concerns. Paragraph 53 states “the delivery rate for larger sites is also naturally constrained by traditional factors that would exist regardless, such as master planning and arriving at an acceptable scheme, opening up, providing infrastructure, and resource availability. As such, attaching a high level of premium to delivery rates due to Corridor growth is not a justified approach. It is instead more logical to take a cautious attitude to this issue”. Paragraph 54 continues “Overall, I am not satisfied that the assumed build out rates for either Little Barford or Kempston Hardwick are based on justified assumptions that are soundly based. This is the case before factoring in the uncertainty around infrastructure delivery timings discussed above and is a view that only hardens once the two issues are considered alongside each other”.  2.39 With regards for implications, paragraph 55 states “as discussed above, the soundness of the spatial strategy (and therefore the Plan) is fundamentally linked to the deliverability of strategic infrastructure and the reasonableness of the assumptions on alignment with anticipated growth”. It continues “in addition, the assumed build out rates for the two new settlements on which so much of the Plan’s growth relies upon are not based on justified assumptions”.  2.40 Taking all relevant factors into consideration, the Inspector’s letter concludes at paragraph 57 and 58 that “from the evidence presented, I am not satisfied that housing needs after 2030 would be addressed as anticipated, leaving an overall gap in provision against assessed needs within the Borough across the entire plan period (including affordable housing)… Taking the three issues of assumptions around infrastructure delivery, build out rates, and the reliance on a stepped trajectory together, I am unable to conclude that the Plan meets the tests of soundness at paragraph 35 of the NPPF”.  2.41 It is apparent any strategy which places overreliance on such delivery risks falling foul of the same issues at EiP. A cautious approach is therefore entirely sensible if there is to be the identification of any strategic sites as part of the emergent spatial strategy.  2.42 Taking the above matters into consideration, it is again apparent the Council will likely need to increase its supply, including new allocations. Given the aforementioned Derby urban fringe sites are predominantly allocated to contribute to Derby City’s unmet need, it would make complete spatial sense for any replacement provision required to be geographically and spatially close to the Derby City urban fringe, such as our client’s interests in Findern and Hilton.  2.43 In more general terms, we are not clear that the Council have undertaken the appropriate due process when proposing these sites for allocation. There is no explanation in the Plan, or the Local Plan Review Evidence Base as to the assessment process and reason for allocating sites ahead of other reasonable alternatives. The same is true in the SA, where there has been an assessment into choosing the spatial distribution method, but only limited consideration of site selection which may be argued to accord with the preferred method of distribution. We note the Derby HMA Growth Options Study 2020, but this does not appraise all sites which have been submitted to the Authority, nor does it in isolation represent sufficient justification for site selection, without a clear established methodology and process so individual site promotors could establish the reasons why their land failed.  2.44 Whilst the Council may have justification for wanting to minimise the number of allocations, any allocations would still need to be selected through a robust process against reasonable alternatives, including within the SA. This issue is highly pertinent to the process undertaking in establishing the strategy and will cast major aspirations over any evidence which is produced subsequently which could be argued to essentially meet a pre-determined outcome. The SA explored only 4 options, which excluded a number of potential reasonable alternatives. It is also not clear how the Council identified the 4 sites tested through the SA, and again whether that process was robust and fairly tested reasonable options | Noted. The Council has confidence in the evidence base, which will be supplemented by further material including a transport study, viability assessment and infrastructure delivery plan.  See Council’s response to comments on Question 4. |
| 1243182 | Hawksmoor on behalf of I Foster |  |  | Whilst no objections are made to the above, consideration should be given by the Council towards additional smaller housing allocations capable of earlier delivery, thus providing market, affordable tenure and specialist housing in lower concentrations. Concerns are expressed on the delivery speed of large allocations and the subsequent shortfall in housing delivery in the proposed Plan period. | The Review of the Local Plan Part 1 will be followed by a review of the policies contained in the Local Plan Part 2, which will present the opportunity to address any non-strategic residential development needs.  See also Council response to comments made under Question 4. |
| 1243634  1242632 | Lichfields on behalf of St Modwen - Land south of Station St Castle Gresley; Egginton Rd Hilton |  | No | Whilst St Modwen does not object to the STRA1 and STRA2 allocations in principle, St Modwen has concerns relating to the spatial strategy proposed and the lack of sufficient evidence to support the allocations at this time. Please see St Modwen’s detailed response to draft Policy S4 in the appended St Modwen Homes Representations – South Derbyshire Part 1 Local Plan Review | Design Reviews and Transport and Viability studies and an Infrastructure Delivery Plan are to be prepared as further evidence to inform strategic site allocations and will be reflected in changes to policy wording as necessary. |
| 1242408 | Lichfields (on behalf of St Philips Land Ltd) |  | No | The Council has allocated strategic sites STRA1 (Infinity Garden Village Mixed Use Allocation) and STRA2 (Land south of Mickleover) for 2,000 dwellings and 2,500 dwellings respectively. In this regard, St Philips recognises that the NPPF states (Paragraph 74): “The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including genuine choice of transport modes).” 2.38 Importantly, the NPPF also sets out that plans should be prepared positively, in a way that is aspirational but deliverable (Para 16b), and should identify specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan (Para 69b). 2.39 St Philips is concerned that the Council has not sufficiently evidenced that these allocations will deliver 4,500 homes (in total) across the plan period. In this regard, St Philips wishes to draw the Councils attention to research produced by Lichfields (‘Start to Finish’ third edition 2024), which examines evidence on the speed and rate of delivery of housing on sites across England and Wales (excluding London). It has informed several Independent Examinations (including the adopted North Essex Shared Strategic Plan; the adopted Ashford Local Plan; and the Doncaster Local Plan). 2.40 Start to Finish establishes that for schemes of over 2,000 dwellings, the average time from the validation of the first planning application to the first dwelling being completed is 6.6 years. It further finds that the average (median) buildout rate for developments of over 2,000 dwellings is 136 dpa. 2.41 St Philips has been unable to identify any planning applications or permissions (for residential development) which relate to the strategic allocations STRA1 and STRA2. If a planning application for either of these allocations were to be validated by the end of the year, the evidence contained within ‘Start to Finish’ suggests that it is unlikely that any dwellings would be delivered before 2030. 2.42 St Philips notes that Housing Allocation H15 (which lies to the west of allocation STRA1) is subject to planning application DMPA/2019/1097, which seeks outline permission for up to 1,850 dwellings. The application was validated on the 18th of September 2019 and remains under consideration according to the LPAs online planning records. It has now been over five years since the application was submitted and it remains undetermined; this demonstrates that applications for large scale developments can take years to be approved. 2.43 If the allocations began delivering in 2030 and built out at the rates evidenced by ‘Start to Finish’, they would only deliver 2,720 dwellings (in total) by the end of the plan period, South Derbyshire Draft Local Plan Part 1 Consultation : Representations on behalf of St Philips Pg 12 resulting in a 1,780-dwelling shortfall. If the plan period were to be rolled forward to 2042, the sites would deliver 3,536 dwellings; still well below the 4,500 dwellings allocated within the plan. St Philips has been unable to identify a housing trajectory prepared by the Council which disputes the above projection. 2.44 Additionally, the Council has not yet published a viability assessment, strategic highways model or infrastructure delivery plan to evidence the deliverability of these key allocations which underpin South Derbyshire’s spatial strategy. In this regard, St Philips would highlight to the Council that there are legitimate issues in respect of the delivery of large scale sites such as Sustainable Urban Extensions and Garden Villages. The EiP of Hart District Council’s ‘Hart Local Plan (Strategy and Sites) 2032’ in June 2018 gives insight into these issues. Policy SS3 (New Settlement) identified an Area of Search at Murrell Green / Winchfield for up to 5,000 dwellings through the production of a New Settlement Development Plan Document [DPD] after the adoption of this Plan. 2.45 The Inspector noted that the evidence submitted only provided “very high-level broad overviews, with little in the way of detail” (IR 61), and also raised concerns regarding the deliverability of the new settlement. The Inspector found that the Council’s Infrastructure Delivery Plan did not adequately consider the infrastructure requirements, and that the viability of the development had not been assessed through the viability assessment (IR 64). 2.46 In the context of the above, St Philips considers that the strategic allocation policies are neither justified nor effective (NPPF paragraph 35). St Philips would therefore urge the Council to prepare further evidence and review its spatial strategy in order to ensure that its approach is sustainable and deliverable. The Council will need to re-assess its position in light of the proposed changes to the NPPF, SM and emerging positions within the DHMA. The consequence of this is that the Council will need to test reasonable alternatives to meet these needs, beyond relying solely on the strategic allocations on the edge of Derby. | Design Reviews and Transport and Viability studies and an Infrastructure Delivery Plan are to be prepared as further evidence to inform strategic site allocations and will be reflected in changes to policy wording as necessary ..  See Council response to comments made under Question 4. |
| 1242103 | Marrons on behalf of Rainier Developments |  | No | Policy STRA1 Infinity Garden Village Mixed Use Allocation  The proposed allocation expects to deliver 2,000 homes, secondary school, a new junction on the A50, and associated uses and infrastructure by 2039. Evidence is required to demonstrate that 2,000 homes can be accommodated within the residential areas proposed within the allocation alongside other uses and policy standards and requirements. Furthermore, evidence will be required to demonstrate the new junction is suitable, deliverable, and capable of being funded by development without harming viability and the delivery of affordable housing. The implications of any infrastructure requirements and off site works on the housing trajectory will also need to be evidenced so the housing supply is justified. In the absence of this evidence, the allocation will not be justified or sound. | Design Reviews and Transport and Viability studies and an Infrastructure Delivery Plan are to be prepared as further evidence to inform strategic site allocations |
| 1243226 | Marrons Planning on behalf of Redrow Homes |  |  | OTHER COMMENTS ON THE SPATIAL STRATEGY We note that despite the inclusion of two large-scale and strategic urban extensions at South of Mickleover and Infinity Garden Village, no housing trajectory or objective assessment of the deliverability of these sites has been produced. It is therefore uncertain as to whether the Draft Plan will establish a five year housing land supply on adoption or throughout the Plan period. We expect that this information will be produced at Regulation 19 stage and reserve our right to make further representations on the soundness of strategic allocations and housing land supply matters generally at that point. At this stage, we have key concerns over the deliverability of the South of Mickleover strategic allocation in highways terms and set out our observations below.  SPATIAL STRATEGY The Draft Plan’s scope has driven the site selection process. The sites taken forward for allocation on the edge of Derby have not been chosen following a robust, transparent and objective process through the Sustainability Appraisal. The Growth Options Study 2021 and the associated HMA-wide SA have considerable methodological flaws and the ISA’s assessment of strategic options is not robust. The result is the Draft Plan and it evidence base fails to justify its overall spatial strategy or the quantity of growth it plans for. | See Council response to comments made under Question 4.  Design Reviews and Transport and Viability studies and an Infrastructure Delivery Plan are to be prepared as further evidence to inform strategic site allocations. |
| 1242570 | Nineteen47 on behalf of Hallam Land (land at Blackwell Lane) |  |  | Question 5: Do you agree that the following strategic sites should be allocated for development? 3.27 The strategic sites identified within the draft Part 1 update may have a role to play in contributing to the South Derbyshire and Derby HMA  The roll requirement. However, the appropriate level of development to be allocated to these sites cannot be appropriately assessed without evidence of the up to date need in the remainder of the District. 3.28 The Interim Sustainability Appraisal 2024 acknowledges a potential negative cumulative effect in landscape and infrastructure terms that may arise from the delivery of such significant sites. It is possible that these impacts could be reduced if an alternative quantum of development was deemed more appropriate within the context of a comprehensive review of available sites across the whole South Derbyshire area, including genuinely alternative sites in other settlements. 3.29 This approach would also support the distribution of employment opportunities across the District, as appose to the likely outmigration of the workforce to Derby resulting from the proposed strategy, to allocate additional strategic sites on the edge of Derby only. 3.30 It is therefore recommended that the appropriate mechanism through which to allocate strategic sites is as part of a comprehensive new Local Plan, to be prepared in accordance with the relevant NPPF at that time. | The overall housing need for South Derbyshire is established using the new standard method (see Council response to comments on Question 4.)    The Derby and South Derbyshire Employment Land Review identifies an existing quantitative surplus of employment land provision within the District, but the Local Plan nevertheless proposes further allocations to address qualitative needs including for strategic scale and small to medium scale accommodation provision. STRA1, STRA2 and STRA3 employment proposals, together with employment sites identified in the adopted South Derbyshire Local Plan Part 1 and rolled forward in the draft Local Plan Part 1 together provide for new employment provision in both the north and south of the District on a variety of sites. |
| 1243194 | Pegasus on behalf of Richborough - Kings Newton Melbourne Estates Limited |  |  | Chapter 5 Strategic Allocations 2.41. Whilst providing homes for local people within the district and responding to the local housing need, the two strategic allocations at Infinity Garden Village (Policy STRA1) and Land South of Mickleover (Policy STRA2) also contribute significantly to meeting Derby City’s unmet housing need. 2.42. Paragraph 11a of the NPPF states that all plans should ‘meet the development needs of their area’. Our client considers that the allocation of additional, smaller, sites for residential development, which responds to the additional housing need of the district only, is required to ensure the Local Plan is compliant with the NPPF and its soundness tests. 2.43. As set out throughout these representations, it is imperative that more specific deliverable and developable sites are included within the development strategy to ensure that there is adequate flexibility to account for any delay in delivery and to genuinely respond to the need of the South Derbshire district | See Council response to comments made under Question 4. |
| 1242100 | RPS on helaf of Bellway and Clowes (Thulston Fields) |  |  | STRA1: Infinity Garden Village The SHELAA assessment of the Site identifies a significant number of constraints that pose a risk to the suitability of the site STRA1. These include protected sites, namely Regionally Important Geological Sites within the Site and the Derby Canal. Additionally, there are several matters relating to utilities that need to be overcome or require mitigation. STRA2: Land south of Mickleover RPS consider the SHELAA assessment of the Land south of Mickleover has a number of suitability criteria issues that are fundamental to resolve. Namely, with regards to highway access which County Highways have identified the site is constrained in respect of the criteria. The Council state this is considered to be achievable without justification for as to how. Additionally, material assets (such as public transport, pedestrian and cycle links, highways safety and highways access) and matters relating to utility provision at STRA2 indicate apparent constraints to development without an understanding of the mitigation to be delivered. The Council do not set out what the required mitigation may entail. STRA3: Former Drakelow Power Station RPS considers the assessment of availability of the Former Drakelow Power Station within the SHELAA to be insufficient. The proforma sets out that the site would be available once existing uses have vacated. However, the Council have provided no certainty that engagement has been had with the landowner – with regards to the temporary use of the site – and that phasing and options have been considered to show how the site could become available in the short term and the long term. The Council has stated its intention for the new strategic sites that have been identified. This appears to be the sum total of information and evidence that has informed the identification and selection of these locations as potential new settlements up to this point. Significant uncertainty remains given the lack of progress in developing an appropriate evidence base for the sites, therefore substantial doubts remain as to the suitability or deliverability of these potential locations as being able to deliver the new strategic sites particularly in the short-term. Consequently, a significant measure of caution must therefore be applied to any of the outputs from the SA process at this stage, until the vacuum in the evidence base to support these new settlement locations is prepared and made available to the public. The Plan does not contain any flexibility should larger sites not come forward. If a flexibility allowance is required then additional sites would need to be allocated in order to allow for this. Given these uncertainties, the plan must make allowances for other demonstrably deliverable sites to come forward early in the plan period, and additional allocations should therefore be considered. Sites such as the land at Thulston Fields, represent an opportunity to deliver much needed homes early in the plan period. The Council should be proactively considering incorporating more sustainable sites to truly safeguard delivery should the strategic sites or windfall sites identified be delayed / not be forthcoming. | The new strategic allocations are each to be subject to a design review, which will take account of site constraints. Viability and transport studies will be prepared as part of the Local Plan Part 1 evidence base.  The Review of the Local Plan Part 1 will be followed by a review of the policies contained in the Local Plan Part 2, which will present the opportunity to address any non-strategic residential development needs. |
| 1242854 | Stantec on behalf of Caddick Land in relation to Land North of Ashby Road, Woodv |  | No |  | Noted. |
| 1243648 | Tensi Properties Ltd |  |  | 2.4. The two new allocations at Infinity Garden Village and Land South of Mickleover are likely to require a longer-term vision extending beyond 2039. This could have serious implications for both the delivery or necessary development.  3.1. Tesni has concerns around the focus and over-reliance on large allocation such as Infinity Garden Village (STRAT1) and Land South of Mickleover (STRA2), which could create an over-concentration of development located to the north of the borough and directly adjacent to the city of Derby. 3.2. This approach neglects smaller settlements and more rural parts of the district, which could benefit from proportionate growth to support local economies, services and infrastructure. As alluded to previously, over-reliance on large sites such as these could lead to delays in housing delivery due to their complexity. Therefore, a diversity in the proposed strategy around allocations is likely to be more sustainable for the wider area. 3.3. Even though it is acknowledged that the borough and the local housing market has a strong relationship with this conurbation. The strategy of focusing development towards Derby risks exacerbating disparities within wider South Derbyshire, leaving smaller communities without adequate investment or development in order to sustain their viability. | The Review of the Local Plan Part 1 will be followed by a review of the policies contained in the Local Plan Part 2, which will present the opportunity to address any non-strategic residential development needs. |
| 1242865 | Turley on behalf of Hallam Land |  | Yes | Policy S4 “Housing Strategy” sets out that housing will be delivered through two new housing led strategic sites, comprising at least 13,347 dwellings, completions on “saved” allocated sites providing 285 dwellings and a “minimum” of 851 dwellings on windfall development sites. Firstly, it is considered that a substantial proportion of housing delivery is being directed towards strategic sites. Although in principle, this may be considered an appropriate approach there shouldn’t be an overreliance on strategic sites given the significant infrastructure required and lead in time for this to be delivered. The Plan Review should be identifying sites that can provide homes quickly and early in the plan period, particularly given the acute HMA and national need. This is considered to be a more sustainable approach. Further detail is provided in our submitted representations (December 2024). | See Council response to comments made under Question 4.  The Council is currently able to demonstrate a five year housing land supply in relation to the proposed Local Plan housing requirement. The Review of the Local Plan Part 1 will be followed by a review of the policies contained in the Local Plan Part 2, which will present the opportunity to address any non-strategic residential development needs. |
| **Members of the public** | | | | | |
| 1236474 | Alan Dixon |  | Yes |  | The Draft Local Plan Part 1 Review carries forward remaining Adopted Local Plan Part 1 allocations and in terms of housing proposes two strategic mixed-use sites.  The proposed strategic allocations are in line with the evidence base.  The Derby Capacity Study identifies an unmet need of 9022 dwellings. The Local Plan Part 1 Review looks to update strategic policies and help address Derby City’s unmet need.  The Derby HMA Growth Options Study identifies potential locations for future growth in the HMA and considers at a strategic level, their pros and cons.  The study defines strategic growth locations of accommodating a minimum of approximately 1000 homes). The study identified ‘Unsuitable Areas of Strategic Growth’ ‘Potential Areas for Strategic Growth’ and ‘Suitable Areas for Strategic Growth’. Within South Derbyshire four broad areas were identified as being Suitable for Strategic Growth, Land to the west of Derby urban area, Hilton northern expansion, Derby A50 Corridor South Expansion, North-East of Swadlincote.  The HMA wide Sustainability Appraisal looked at the distribution of Derby’s unmet need, including between sites adjoining Derby (the Derby Urban Area), Towns and Key Villages). The conclusion of the SA is that meeting the unmet need arising from Derby as close as possible to the City amounts to Sustainable Development.  South Derbyshire’s Sustainability Apprisal Report looked at four strategic site options for distributing housing need for the Derby HMA.  Development at Thulston Fields was not progressed at there was not exceptional circumstances to develop Green Belt land and Land south of Littleover was not progressed as it was considered that the housing need could be met in more sustainable locations when taking the consideration of the SA assessment as well as the outcome of the AECOM Study.  The two remaining options (Infinity Garden Village and Land south of Mickleover) are proposed for allocation.  Non-Strategic growth will be considered in the Local Plan Part 2 or the future Local Plan Review.  South Derbyshire Gypsy and Traveller pitch need is high, with a need of 59 pitches between 2020-2040 (as set out within the Derby, Derbyshire, Peak District National Park and East Staffordshire Gypsy and Traveller Accommodation Assessment. The District Council is taking a proactive approach to secure provision. This involves providing gypsy and traveller pitches on strategic mixed-use allocations (or the developers of these sites providing alternative land (as set out within Policy H22)), making future Local Plan allocations and determining planning applications for Gypsy and Traveller pitches.  Securing provision on strategic allocations or providing developers with an option to find suitable alternative land has been assessed by the Sustainability Apprisal and found to be sustainable development.  The local plan will be supported by an updated Infrastructure Delivery Plan at submission which (in consultation with service providers) assesses and identifies the infrastructure needed for new development and considers how this will be delivered. The Council will consider the strategic infrastructure implications where detailed in the responses to questions 6, 7 & 8.  Specific comments relating to Mickleover will be considered under Question 5b and/or 7 and specific comments relating to the Former Drakelow Power Station will be considered under Question 5c and/or 8.  The District Council will be undertaking Transport Modelling which will look at the impact of the proposed allocations and any necessary mitigation. This will be in consultation with National Highways.  In terms of flooding, the District Council will be undertaking a Flood Risk Assessment which will form part of the evidence base for the Local Plan. In addition, policy STRA1 requires that appropriate flood risk management in accordance with policy SD2 across the site is provided and that all more vulnerable development is located wholly within flood zone 1.  In terms of Derby City capacity and the use of brownfield sites, as mentioned above Derby City undertook a capacity study, which identified an unmet of 9022 dwellings.  Alterations to Local Authority boundaries and outside of the Local Plan process. In addition, the setting of Parish Boundaries is outside the Local Plan process.  In terms of the Derby Housing Market Area (HMA), a HMA  Boundary Study was undertaken, which confirmed that Derby City, South Derbyshire District Council and Amber Valley Borough Council make up the Derby HMA.  The District Council is working towards submitting the Local Plan Part 1 Review to the Inspector on or before to the 12th March, inline with the transitional arrangements set out within the December 2024 NPPF.  None of the proposed strategic allocations (STRA1, STRA2, STRA3) are on greenbelt land. |
| 1241993 | Alan Mercer Jones |  | Yes |  |
| 1240863 | Amardeep Bhopal |  | No | Mickleover has already seen extensive housing development and no improvement to the services or local transport. There is no reason to see any different with this development. We already see congestion on staker lane which will only gett worse if this plan goes ahead. |
| 1233332 | Ameila Hunt |  | Yes | The land south of mickleover is saturated, is currently green fields and floods. This will be a real issue for people living there.  The traveller site also doesn't need to be near to housing, they just need somewhere big enough for thier community. Not opposed to them being near to the staker lane area but again not in an area that floods as that would be miserable for them. There's plenty of places that don't flood that could be better. Hilton is over saturated and has a very high water table but maybe etwall?  The former power station is good land to develop as it needs something doing with it.i don't know enough about that area to comment further  The infinity park looks like a lot of good use of space if it was totally developed and looks a well thought out plan. With the commercial use in the middle being a nice distinction between the areas allowing for areas to maintain their identity. And close to Royce's which is great for thier workers.  Why nothing around findern, Melbourne, ticknall etc, |
| 1241986 | Andrea Thompson |  | Yes |  |
| 1241956 | Andrew Lee |  | No |  |
| 1235411 | Andrew Norman |  | No | The former Drakelow Power Station is, I assume, a brownfield site eminently suitable for housing development. |
| 1239219 | Anne Heathcote |  | Yes | Living in Barrow upon Trent, I am deeply concerned that the latest version of the plan shows a massive increase in the number of residential buildings that now appear in our parish. We undertook a parish boundary change to ensure that our parish remained a small, rural parish that was self-contained and discrete from the ever-increasing housing that now borders the south of Derby City. This latest plan has a large number of new residential properties in our parish, north of the A50. It would be sensible, in my view, to make the area of the IGV, north of the A50, a separate parish in its own right. |
| 1233824 | AYeomans |  | No | Firstly, Mickleover has already taken its fair share of housing developments close to the city/ward boundary.  Secondly, the proposed plans are not a sustainable development. Mickleover is bursting at the seams: doctors surgeries are at breaking point and residents are unable to get an appointment, ultimately putting the health of residents in extreme danger. There is no plan to build a school on the development and local schools are already struggling to meet the demands of the numbers of the community. The road and infrastructure around Mickleover is at capacity and building a further development will only add to the unsustainable traffic issues in the local area.  It is outrageous that you are proposing that 40% of the dwellings are social housing, yet the local council offices and support required by future residents is 12 miles away in Swadlincote. If there is a requirement for such significant numbers of social housing, these should be built much closer to the offices and the support services.  Additionally, proposing 2500 houses is not a sustainable nor appropriate development in an area already overrun with new build developments and lack of green space. There are other, more suitable areas in South Derbyshire.  Furthermore, SDCC are rushing their plan to local plan process. The Government are currently reviewing national policy and the future of the A38 junction scheme: SDCC should have waited for clarity on both of these. |
| 1232962 | Chris Munn |  | No | Mickleover has had its fair share of developments. We don’t have the infrastructure to continue with this |
| 1235648 | chris stott |  | Yes |  |
| 1242108 | Chris Wilson |  | No | This is a sensible use of disused/ brown field land that can bring needed housing without directly impacting on current communities. Roads are already there. Anyone with half a brain would choose disused sites as a priority. |
| 1243592 | Christine Allen |  | No | STRA3 number is too large area of natural beauty roadwork poor protection of wildlife.  STRA1 and 2 Numbers too high – housing. Until a new bridge is built over the Trent the roads and network is unsustainable. |
| 1232876 | Claire Woodward |  | No | As previously mentioned, the proposed 2,500 dwellings as another urban extension to Mickleover is not sustainable or appropriate development, especially when suitable and abundant land is available elsewhere in South Derbyshire. |
| 1238657 | Clare Wood |  | No | All of these are car-dependent housing estates which will increase carbon emissions, pollution and noise as well as contributing to the decline of biodiversity. |
| 1241955 | David Stockwell |  | Yes & No | Secondary schooling places are in short supply around the Mickleover site, the A38 northbound to Kingsway and Markeaton are congested now and will be impassable with extra houses and the are regular floods in this area. These are THREE key reasons the site is not appropriate |
| 1237912 | David Warriner |  | Yes | There still appears to be insufficient effort to develop Brown field sites in Derby City before allocating higher quality greenfield sites for South Derbyshire development. |
| 1241890 | Edward Stupple |  | Yes | STRA1 - appears to give greater opportunities for employment in an area of high housing density STRA2 - This is over development of land south of Mickleover on farmland, destroying a green field farmland site not taking into account the impact of recent large developments in the area and food security STRA3 - appears to be good use of a brownfield site |
| 1236731 | Ewan Thompson |  | Yes |  |
| 1238115 | Fiona Bevington |  | Yes | The infinity garden village at least has plans for improved transport links. The power station regeneration utilises a brown field site. I struggle to see how the Mickleover plan can be supported by the current road network or local facilities. |
| 1243600 | Geoffrey Tubey |  | Yes | Again transport links to other infrastructure agreed with planning consent must be achieved. New Walton Bridge would have less than half current cost if built on time. |
| 1242119 | George Selby |  | No |  |
| 1235279 | Gerald Arthur Bowker |  | No | Re-using brown field for housing, while not ideal is a much better option environmentally than using green belt land. I would hope that STRA3 would have the appropriate and adequate services provided, including schools, doctors surgeries, local shops, bus services etc. I am also assuming that STRA3 is a brown field site - I am going off the description alone. If it is green belt then my answer would be no to that also. |
| 1242367 | Grace McCullouch |  | Yes | Housing developers must ensure that their housing developments include the right infrastructure.  Obviously, this needs to include: Schools GP surgeries Sports facilities Healthy food outlets Recreational areas e.g. parks Playgrounds  Of these, sports and recreational infrastructure should be a top priority. For example tennis courts, basketball courts, athletics tracks, football pitches. We have an increasing obesity crisis, problem with severe inactivity and poor lifestyle choices and poor mental health amongst families and children and this has to be addressed with infrastructure provision. The link between infrastructure and lifestyle is well evidenced in public health reports.  The idea is simple. Surrounding people with takeaways, in housing estates where they drive everywhere and have no recreational areas leads to poor health. Surrounding people with recreational areas for exercise and socialisation leads to better health.  Alongside this, it would help to have more greengrocers rather than takeaways. Do developers get to have a say on the type of retail units they allow?  Let's use housing development as an opportunity to boost the health of Mickleover. |
| 1233334 | Harvey Heldreich |  | No | Mickleover has been over developed, Drake low would be the perfect example of redeveloping a brown site and could easily accommodate the housing requirements, the infinity development is just tearing up more green belt, the area is being hammered in that area from chellaston to littleover. Enough is enough. |
| 1232904 | Holly Robinson |  | No |  |
| 1240252 | Ian McHugh |  | Yes | STRA3 (Yes) This is a brownfield site (ie no loss of green)  STRA1 (Yes) This is a well developed plan, with Central Government Infinity approval close to existing employment and with key infrastructure improvements (A50 junction, Secondary School, South Derby Integrated Transport Link, Retail and Medical etc)  STRA2 (No) This represents a loss of green space over brownfield space, whilst also further congesting the surrounding local roads. The plan considers the site in isolation without considering compound effects of the adjoining new and proposed developments at H18, H19 and within DCC.  The local roads in and around this site are already beyond capacity. Without the A38 GSJ upgrade, upgrades to Staker Lane, Station Road, Uttoxeter Road etc, Mickleover will grind to a halt. |
| 1240150 | Ian Turner |  | Yes |  |
| 1241860 | Innes Mary |  | No | As previously stated |
| 1232861 | Jack O’Connor |  | No | Mickleover is over crowded. Clearly it doesn’t take a genius to know the infrastructure around Mickleover cannot cope with extra houses. |
| 1241773 | Joanna Ayres |  | No | All of these developments are in danger of creating urban sprawl, loss of green areas, loss of habitat, loss of wildlife and traffic problems. The developments in Mickloever will encourage car use and increase traffic problems. Staker Lane is completely unsuitable for the increased traffic generated by people entering and exiting the housing estate. It is also completely unsuitable and dangerous for pedestrians and cyclists. |
| 1241686 | John Moore |  | Yes | STRA1 : Balanced plan to add to already existing high quality employment and residential area. Infrastructure able to cope with proposed increased demands.  STRA2 : Area is already overdeveloped; limited local employment without external travel; irreversible, high quality, greenfield site; existing infrastructure already stressed.  STRA3 : Necessary re-development of brownfield site; will bring improvements to local communities. |
| 1242116 | Jonathan Nutman |  | No | Not convinced that the 'Village' will be anything like a village but more a vast housing estate. Drakelow Power station is previously developed land so I guess that is one way to find land. Mickleover is big enough and unconvinced that existing infrstructure could cope. |
| 1241240 | Jonathan Watson |  | Yes | Mickleover has already taken more than its fair share of housing growth near the Ward/City boundary. The proposed development south of Mickleover lacks ‘breathing space’ / green space buffer for established Derby City communities.  Proposing 2,500 more homes as an urban extension to Mickleover is neither sustainable nor appropriate development, especially with ample land available elsewhere in South Derbyshire.  Up to 40% of the housing will be social, yet SDDC offices are 12 miles away in Swadlincote. This housing should be closer to SDDC services. There's also no reason to place SDDC Gypsy & Traveller pitches near Derby when suitable land exists in South Derbyshire.  SDDC is rushing the local plan process. The government is reviewing national planning policy and the future of the A38 Derby junction upgrade. SDDC should have waited for clarity on both.  The Sustainability Assessment Report, critical for validating housing and traveller site choices, wasn't published until after the consultation began, which undermines the process.  The new plans don't include any form of sustainable transport, e.g. for cycling. Staker lane is already dangerous, any new development must make cycling these areas easier, the best solution being, suitable off-road cycle paths to encourage this sustainable travel.  There is not enough thought given to the needs of a new community, Doctors, shops, schools, dentists etc. They will just become a burden on already stretched services. The track record is not good, lots of things were planned for the Cotchett village site, but none have happened. |
| 1240207 | Kevan Sutherns |  | No | Overloading of local facilities in STRA1 & STRA2 which in the case of Mickleover has it's services which were barely coping before recent developments are not inundated as things are.  STRA3 why is it down for what could be industrial when it could possibly be used for housing.  Some of my objections to the proposed developments bordering the boundary of Mickleover and Littleover:  1) There has been too much development in the area already and South Derbyshire has taken more housing development in Derbyshire since 2011 which has overloaded the local infrastructure without any great improvement in facilities, planning may state such things as Doctors surgery and shops to be built in some of these areas but few appear or operate this has lead to Mickleover becoming a hub which it cannot support without itself being developed.  2) Local roads are unable to cope with the existing traffic particularly concerning the A516 and adjacent roads, any additional traffic will have a disastrous effect on journey times.  4) Mickleover and Littleover are heavily congested causing increasing air and noise pollution, danger to pedestrians, cyclists and children and time delays for journeys, parking is now inadequate in both areas and while they are not your responsibility the planning of the new developments is the major cause. A few years ago I could get into Derby or Burton in less than 15 minutes and be parked, I now have to allow 30 and every modification slows the flow of traffic.  5) Any flooding in and around the area will in many cases affect the areas where building development is taking place. |
| 1242063 | Laura Massey-Pugh |  | No | Enough consideration has not been given to brownfield sites in the city. |
| 1232988 | Leigh Fearon |  | Yes |  |
| 1235357 | Lorna Hodgetts |  | No |  |
| 1232937 | Margery Morgan |  | Yes |  |
| 1233131 | Mariah Senaa |  | No | I do not agree that the following strategic sites should be allocated for development:  STRA1: Infinity Garden Village – No • The scale of this development risks overburdening the local infrastructure and could lead to increased traffic congestion and environmental strain. While there are benefits in terms of job creation and housing, I believe that more consideration is needed to balance development with the preservation of local character and the needs of existing residents.  STRA2: Land south of Mickleover – No • Developing this area could significantly impact the local community, including increased pressure on schools, healthcare services, and roads. Mickleover is already a well-established residential area, and adding more housing could lead to overdevelopment, diminishing the quality of life for existing residents.  STRA3: Former Drakelow Power Station – No • Although the redevelopment of brownfield sites is generally preferable, the proposed scale of development here may overwhelm local infrastructure and lead to environmental concerns. The impact on the surrounding natural areas and communities must be fully assessed, and I believe the proposal requires further review to ensure it meets sustainability goals without excessive negative consequences.  In all cases, the focus should be on sustainable development that does not harm existing communities or strain local infrastructure. |
| 1241749 | Mark Hoptroff |  | Yes |  |
| 1232938 | Martin Turner |  | No | Expand Derbys boundary & it would be of no concern to south derbyshire. |
| 1242135 | Matt Coxon |  | Yes | Mickleover has had many developments created over the last few years with more already coming. There is already a development falling under SDC which is on the A516. This is far away from any other SDC facilities so the residents use DCC provided services.  There has been a huge influx of social housing on each development as it is which has bought a steep rise in anti-social behaviour in the local area. A traveller site would bring even more, not necessarily from its occupants but when others come to visit/ stay as witnessed on other places. The huge increase in local traffic is also a concern with routes in and out of Mickleover now becoming already swolen and bottlenecked.  The safety and wellbeing of the people who already occupy this are should be the first priority when planning these new developments. NOT dragging the area down with huge social housing clusters and traveller sites. TERRIBLE IDEA.  This new section of development is also under a different council to Mickleover. This would mean that people from the new estates would be using the Derby City councils facilities such as doctors and the local schools which are already at breaking point.  The other Infinity Garden site does not seem a bad option for a new development. |
| 1233743 | Matt Hunt |  | No | Too close to A50, who wants to live next to a major arterty road, with associated pollution and noise. I guarantee none of the councillors will. |
| 1232922 | Maureen Shenton |  | Yes | Infinity and Drakelow are areas that are not overdeveloped. The Mickleover area is already grossly overdeveloped and struggles to provide services such as GPs and school to those already resident in the area. The roads around Mickleover are already at breaking point with traffic volume and simply cannot cope with more. |
| 1234532 | Michelle Garnham |  | No | Mickleover is over populated for the community resources provided: GPs and schools. Made harder (from experience) as someone who lives on the border of Mickleover but falls in South Derbyshire council. |
| 1238942 | Mr Brian J Harrison |  | Yes & No | Drakelow is a brownfield redevelopment, thus a good use of available land. Infinity Garden Village is part of a wider redevelopment with the proposed business upscaling |
| 1234080 | Nick Pope |  | Yes | Mickleover cannot take this additional strain. |
| 1241910 | Nigel Bentley |  | No | I’m only directly concerned with land south of mickleover and comment as follows: - access to / from Staker Lane is limited; it is unreasonable to expect that traffic from this development will automatically choose to travel via the A38 - therefore significant amounts of traffic will be thrown onto an unsuitable road infrastructure (the area bordering Hedingham Way, Brierfield Way and The Hollow already suffers major congestion at school drop off / pickup times; the route thence into Derby is via Uttoxeter Road which again already suffers major congestion at peak times; Staker Lane is, itself, a ‘rat run’ from the A38 whenever there is major congestion on the latter). - public transport is already nonexistent for the established dwellings on the south side of Uttoxeter Road, nor any of the recent developments beyond the village centre, eg, Pastures, New Farm and Hackwood estates. It is unlikely that this will ever change given that the design of modern estates is not conducive to the provision of bus services. - lack of schooling provision; the proposed development only has provision for early years learning and fails to take into account the inability of the two nearest senior schools, Murray Park & John Port, to cater for a significant increase in students. - flood risk: Staker Lane is already prone to flooding due to the local topography - building over the fields will only serve to increase that risk due the amount of run off generated. - unsuitability of land for housing: a large proportion of the land identified for housing will be unavailable / economically unviable for housing due to the presence of overhead power cables. Hypocrisy: a resident of Staker Lane has historically been refused planning permission due to the nature of the area surrounding their property, ie. it would spoil the countryside!!!! Absence of healthcare provision: Mickleover already only has two overstretched GP surgeries - promises of a further practise to support the Hackwood development have failed to materialise. |
| 1241987 | Patrick Munro |  | No | Because almost certainly they'll follow the same format as the existing developments which over burden the local area. |
| 1241975 | Paul Hopkin |  | Yes | Those areas will benefit without destrying more green land and putting pressure on over stretched DCC areas |
| 1241989 | R Coxon |  | No | The proposals do not offer additional services such as GP practices or schools to support the new developments. |
| 1236005 | Richard Larder |  | No | Mickleover and the immediate surrounding area are overcrowded and the existing infrastructure is under pressure. The site over former industrial sites such as Drakelow and possibly Willington power stations should be considered as potential housing sites. |
| 1235713 | Rob M |  | No | Mickleover is already struggling due to pressure on infrastructure, transport in particular. Traffic on Uttoxeter road, Station road and the surrounding areas is already excessive due to various large developments in the area. We also lack retail businesses and employment opportunities around Mickleover, resulting in Tesco being constantly extremely busy, there are few school places for children and there are no Doctor's surgeries or Dentist's surgeries in Mickleover than can accept further patients. Even noise pollution from the A38 has increased drastically over recent years. Mickleover residents have suffered enough due to recent large housing developments being heaped on us despite many objections. |
| 1232946 | Rosemary Whitehouse |  | Yes |  |
| 1233241 | Russell Licence |  | No | I have responded yes to former drakelow. This is an example of a site riff for redevelopment.  Infinity village and Mickleover are pure greenfield sites. You cannot make more land so cherish it and stop developing on virgin soils.  As stated previous, farm land is sparse, farming needs to be encouraged in the UK, we need to be more sustainable. Building in greenfield must be a negative impact against carbon neutral targets.  The road and public transport infrastructure cannot cope now  Roads are in a terrible state now  There are not enough school places for Children now  You cannot get a doctors appointment now |
| 1241947 | Sarah Glover |  | No | There's not the infrastructure in place, such as adequate road network to deal with increases in traffic. There's also a lack of primary care facilities currently and adding further housing in this area is just going to put extra pressure on the services already in place. |
| 1232906 | Steve Wilson |  | No | I've worked at Drakelow and know how large the site is with good roads. Unlike the Mickleover site served by minor narrow roads. |
| 1241682 | Sue Glover |  | No | As above  Question 1 response: I feel that Mickleover has had more than it's fair share of development over the last few years. The infrastructure can not cope with any extra pressure/burdens ie Doctors surgeries, schools, roads, shops, local parking etc. The local roads are a lot busier than they used to be.  Question 2 response: 2,500 dwellings is a hell of a lot to stick on the edge of Mickleover an already burgeoning suburb of Derby. Locally we have had enough.  Question 4 response: Not required in this area. |
| 1233359 | Sukhdev Bangar |  | Yes | STRA1: The site is suitable location as it has little impact on the surrounding area (minimal traffic impact as area not over congested as no nearby homes)  STRA2: This site is unsuitable for such a large number of homes as not only does it impact the view from the nearby homes it will increase the traffic in and around the A38 which is a regular traffic hot spot. Also the area lacks sufficient NHS Dentists and Doctors. The inclusion of a traveler site is not in keeping with the area and its inclusion feels like a snap decision/thought.  STRA3: The site is suitable location as it has little impact on the surrounding area (minimal traffic impact as area not over congested as no nearby homes). This is also re-purposing of land so will only enhance the area from its previous use |
| 1242052 | Susan Marshall |  | Yes | As stated in the earlier answers, Derby City should review its needs and to review the HMA. |
| 1232857 | Teri Licence |  | No | Former Brownfield sites are perfect for development. |
| 1242138 | Tiran Sahota |  | No | I strongly oppose the proposed Infinity Garden Village development. The area has already had new housing developments in recent years and as someone who lives in this area, I understand the impact that the increased housing has had on our services at the Sinfin District Centre. It's now very difficult to make an appointment to see a doctor at Sinfin Surgery - you have to call at 8am to book an appointment for that day and often the appointments have been taken by the time you get through to reception. My elderly parents, who also live in this area, usually go to the surgery at 7am and wait in the queue so that they can get an appointment on that day. They tell me that often other unwell patients in the back of the queue are turned away because there are no more appointments left. Also, there is currently a four year wait to be seen by an NHS dentist at this surgery!!! Building 2000 more houses in this area is only going to make this situation worse!! People won't be able to access adequate healthcare and this will reduce people's quality of life. The Sinfin shopping centre is usually busy and there aren't always enough parking spaces in the shopping centre car park. Even if you do build more infrastructure and services in this new proposed development, the volume of traffic will increase in this area and there will be more people travelling in the area and to other surrounding areas. This will increase pollution which will have a detrimental impact on people's health - I suffer from Asthma and pollution triggers my Asthma symptoms. Increasing pollution will lead to significant increase in health problems which will further stretch the health service. Currently the roads are very congested in this area. A recent trip to a nearby supermarket, which should normally take 10-15 minutes in the car, took me approximately 45 minutes due to the sheer volume of traffic on the road! This will get significantly worse if the Infinity Garden Village goes ahead. I understand that there are plans to build a new A50 junction, but again, this will be overwhelmed with traffic leading to more strain on the infrastructure in addition to environmental issues. This land should not be built on as it provides a boundary between the Derby suburbs and the local villages. It's not just the immediate area that will be overwhelmed by these proposals, the surrounding villages will be overwhelmed and impacted by these proposals too.  In terms of the proposed development in Mickleover, I also strongly oppose this. In recent years Mickleover has absorbed a significant number of new houses and this has completely overwhelmed the area. Again, the area is massively congested with traffic and the services are completely overstretched. So much development is such a short time has had a hugely detrimental impact on this area. Please leave what green land is left in this area - we don't want to see our green space concreted over!  I don't oppose building on brown belt land, so I do feel that the former Drakelow Power Station site would be a good place to build, however, the impact on local services should be considered. Any development here shouldn't have a detrimental impact on the environment and the surrounding countryside. |
| 1242325 | Tracy and Gordon Harrison |  | No | My detailed answers are below. |
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# Qu. 5b: Do you agree that the following strategic sites should be allocated for development? STRA2: Land south of Mickleover

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| --- | --- |
| Duty to Cooperate Body / Statutory Consultee |  |
| National Organisation |  |
| Regional Organisation |  |
| Parish Council and other Community Group |  |
| Councillor |  |
| Landowner or Developer |  |
| Members of the public |  |

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Response Id** | **Name** | **Organisation** | **Should STRA2: Land south of Mickleover be allocated?** | **Comment** | **Council Response** |  |  |  |  |  |  |  |  |  |  |  |  |
| **Duty to Cooperate Body / Statutory Consultee** | | | | | |  |  |  |  |  |  |  |  |  |  |  |  |
| 1244753 | Canal and River Trust | Canal and River Trust |  | Chapter 5: Strategic Allocations The proposed additional Strategic Allocations at STRA1: Infinity Garden Village, STRA 2: Land South of Mickleover and STRA3: Former Drakelow Power Station do not appear likely to affect the canal network within the district. | Noted. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242629 | Derby City Council | Derby City Council |  | While supporting the general principle of further urban extensions to the city, there is currently not enough understanding of the rationale for identifying the proposed new strategic allocations and how the related infrastructure requirements and implications for the city have been considered. We welcome opportunities to work with you to achieve a full understanding of these matters as the preparation of your plan progresses.  We note that Paragraph 22 of the NPPF requires that “Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery”. Within this context the growth planned on the edge of the city, which includes several urban extensions, should perhaps be set within a longer-term vision, and importantly include and comprehensively provide for the SDITL route (see later) .  The Council feels that it is critical that development sites on the edge of the city are carefully planned between the two authorities, with input from relevant stakeholders and the County Council, from an early stage, to ensure the right development occurs in the right place at the right time. This includes, in particular, that the necessary local and strategic infrastructure is provided in a timely manner and sustainable transport and travel connections are provided. We need to be creating communities not just functioning to meet a number of homes. It is currently unclear how some of the required infrastructure has been evidenced and considered for the proposed new strategic housing allocations, especially in terms of local and strategic highway implications. Again we welcome opportunities to work with you on these matters.  Of particular interest is a need to consider how development is connected to the existing Derby urban area. This is to ensure that any car-borne trips can make optimal route choices that do not impact on exiting congested residential areas, and more importantly, that access can be provided for public transport services and non-motorised users. It is an issue that needs to be generally considered beyond the local plan period to ensure that development does not prejudice any long-term future connections. Again see later reference and support for SDITL.  There are also concerns around how green infrastructure and particularly how the Green Wedges in Derby will be impacted by the new growth areas. Green infrastructure including biodiversity net gain needs strengthening where enhanced ‘green’ provision can demark communities providing recreation and cooling. One of the main purposes of the City’s Green Wedges is to allow the open countryside outside the city to penetrate into the heart of the city, and it is unclear how this can be continued with the current information. Detailed master planning is therefore essential in this community creation with connections across the open areas to other facilities.  These infrastructure issues were envisaged to be dealt with through a Derby HMA Strategy, which would consider a multitude of cross boundary matters, not least the dwelling splits to meet Derby’s housing needs, and to set in place agreed policies to deal with the issues. In the absence of such a strategy, we expect that a series of Statements of Common ground will be required, but in order to set these out it’s again crucial that the authorities have dialogue about the complex cross boundary issues and involvement in master planning of the specific sites. | Noted.  A Design Review for the strategic sites is being undertaken which will include consideration of infrastructure provision (including green infrastructure) and design parameters to ensure that the sites will be developed in a sustainable manner with all relevant cross boundary matters given appropriate consideration. This will involve relevant stakeholders, including Derby City Council.  A Transport Study is to be jointly commissioned by Derby City Council and South Derbyshire District Council to consider transport impacts and mitigation for the strategic sites, including measures to encourage sustainable travel. Integration with Derby City transport infrastructure and services will be a key consideration.  Following the Design Review and Transport Study a plan -wide viability study and an infrastructure delivery plan will be prepared.  By the above means and by continuing joint working, concerns regarding timely delivery of necessary infrastructure and mitigation of any potential adverse impacts will be addressed. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243623 | Derbyshire County Council | Derbyshire County Council |  | The Draft Local Plan proposes to allocate land at Infinity Garden Village for an additional 2000 homes and land south of Mickleover for 2,500 homes. As noted above, the SA work carried out by Clearlead concluded that the most sustainable locations in Amber Valley Borough and South Derbyshire District to meet the unmet needs of Derby City, is on sites as close to the City as possible as large sustainable urban extensions. These two strategic allocations are fully in accordance with the conclusions of the SA work and as such the allocation of the two sites is supported in principle, which will help to meet a sizeable proportion of Derby’s unmet need.  Government planning guidance in the NPPF recognises that one of the most sustainable ways that local planning authorities can meet their housing needs is to allocate large strategic scale urban extensions, not least because the scale of development is more likely to facilitate the necessary supporting infrastructure to deliver more sustainable self-contained communities.  The two strategic sites have significant implications for a range of strategic infrastructure that is the responsibility of the County Council, as identified below. | Noted.  The Council will consider the strategic infrastructure implications where detailed in the responses to questions 6, 7 & 8. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243580 | Historic England | Historic England |  | Policy SRA2: Land South of Mickleover – identifies in clause D) V) that heritage is a consideration and references specific heritage assets. If we can have sight of the heritage evidence base for this site allocation this will be useful to inform our advice and to understand the harm to the significance of heritage assets. We consider that there will be harm to the heritage assets cited and would require site of the appropriate evidence base. Additionally, there are a number of heritage assets in the Burnaston settlement that will need to be assessed. How does the concept plan take account of the significance of heritage assets?  Strategic allocations section – we would require sight of Heritage Impact Assessment to understand the harm to the significance of the affected heritage assets, to understand if the principle of development on these sites is acceptable, we would like to understand what specific mitigation strategies can be incorporated and if these can overcome any harm. We would welcome a meeting with the Council to discuss our comments to your Regulation 18 consultation. In particular, we would like to focus on the historic environment policy and the proposed site allocations within the Plan | Agree.  The Council will provide Historic England with Heritage Impact Assessments to detail the significance of heritage assets affected by development which will incorporate mitigation strategies to overcome any harm. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243643 | Sport England | Sport England |  | Sport England consider all of these strategic site allocation policies as currently drafted to be unsound.  Sport England are extremely concerned that the strategic sites appear to have been selected for development with little/no regard to the protection of existing sports facilities.  Site allocations STA2 and STA3 may include land that has not been used for pitch sports for over five years. However, this does not indicate that there is a lack of demand for pitch sport. The fact that playing fields have not been used for 5 years or more does not alter their planning status as playing field land. It is Sport England’s view that nothing has altered the lawful use of the sites. The sites could be made good, pitches marked out and brought back into use for sport and this would not require planning permission. Therefore, the sites are still playing field and should be afforded protection under paragraph 103 of the NPPF. It should also be noted that a playing field does not have to be available for community use to fall within the definition of playing field. Neither the DMPO, NPPF or Sport England Policy make any distinction between private and publicly owned or used nor is there a positive obligation (under planning law) for any playing field to be actively used as such. Both policies are applied equally, irrespective of the ownership.  A number of playing fields and golf courses can also be found immediately adjacent to the strategic site allocations. However, the policies as currently drafted do not seek any assessment and/or mitigation to ensure that the proposed developments do not have a prejudicial impact on their sporting use (e.g. noise, ball strike, etc), in accordance with paragraph 193 of the NPPF.  The occupiers of new residential developments would generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. In this regard and in accordance with paragraph 97 of the NPPF, new developments at all of the strategic sites should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports/Built Facilities Strategy, Playing Pitch Strategy (PPS) or other relevant needs assessment.  In partnership with Active Travel England and the Office for health Improvement and Disparities, Active Design guide was produced in 2023. Many Councils have used the guide in developing their vision, strategic objectives and policies on health, sustainable travel and design. It is advised that the strategic site allocation policies seek that emerging masterplans use the guide’s principles in promoting active environments that encourage people to be active through their everyday lives in accordance with paragraph 135 of the NPPF - <https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design> | Agree.  The Council will ensure that any loss of playing fields will be mitigated through the provision of on-site facilities and/or off-site provision.  The Council will ensure that the strategic allocation policies will seek assessment and/or mitigation to ensure that the proposed developments do not have a prejudicial impact on neighbouring sporting use.  The Council will also ensure that development will contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision will be informed by a robust evidence base such as an up to date Sports/Built Facilities Strategy, Playing Pitch Strategy (PPS) or other relevant needs assessment.  The overall quantum of outdoor space including that to be used for outdoor sports in the allocation is significantly greater than any likely requirement. The Design Review will masterplan the site to ensure provision. The Council will ensure that the evidence is updated and that this is viability tested to ensure delivery. |  |  |  |  |  |  |  |  |  |  |  |  |
| **National Organisation** | | | | | |  |  |  |  |  |  |  |  |  |  |  |  |
| 1235628 | British Horse Society |  | Yes | People have to live somewhere, however;  the present state of the infrastructure is inadequate for many more cars leading to increased risks for vulnerable road users. The construction of a new junction off the A50 is particularly troubling as it encourages large volumes of traffic onto country lanes during times of traffic delay on the A50. Staker Lane is an old country lane with no lights or pavement and most of the roads between Infinity Village and Staker Lane are also inadequate. The Council or developer should be paying to improve road safety around both locations and allowing vulnerable road users to be able to move between both locations. The Active travel scheme can be used to achieve this objective. So we need more traffic calming measures, segregation of horse riders and cyclists from cars, controls to restrict lorries , better lighting and more pavements. | Noted.  The Council will consider the strategic infrastructure requirements in the responses to question 7. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243542 | Home Builders Federation (HBF) | Home Builders Federation (HBF) |  | HBF does not comment on individual sites, other than to say the Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full. The soundness of strategic and non-strategic site allocations, whether brownfield or greenfield, will be tested in due course at the Local Plan Examination.  It will be important for the new South Derbyshire Plan to be supported by evidence, monitoring and analysis to demonstrate that all the sites in the Plan, remain deliverable, if they are to continue to be relied upon. HBF are aware of potential challenges can impact on the timescales for delivery of the largest sites. Ways to address such ongoing risks could include increasing the housing requirement and/or the buffer applied. The Plan should also recognise that the time taken to bring forward larger allocations, and this underlines the need for a range of site types and sizes to ensure a five-year land supply on adoption, and an effective housing land supply over the plan period. | Noted.  Please also see Council response to comments on Question 4 |  |  |  |  |  |  |  |  |  |  |  |  |
| 1240828 | Barry Thomas | Open Space Society | Yes |  | Noted. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243215 | Trent and Dove Housing Association | Trent and Dove | Yes | STRA1 & 2 are close to infrastructure and employment, plus other conurbations. | Noted. |  |  |  |  |  |  |  |  |  |  |  |  |
| **Regional Organisation** | | | | | |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242640 | Derbyshire Association of Local Councils | Derbyshire Association of Local Councils | Yes | Mickleover and Infinity Garden proposals appear to have better infrastructure/access to trunk roads | Noted. |  |  |  |  |  |  |  |  |  |  |  |  |
| **Parish Council and other Community Group** | | | | | |  |  |  |  |  |  |  |  |  |  |  |  |
| 1240947 | Barrow Upon Trent Parish Council | Barrow upon Trent Parish Council | Yes | Living in Barrow upon Trent, all our residents are deeply concerned that the latest version of the plan shows a massive increase in the number of residential buildings that now appear in our parish.  We undertook a parish boundary change to ensure that our parish remained a small, rural parish that was self-contained and discrete from the ever-increasing housing that now borders the south of Derby City.  This latest plan has a large number of new residential properties in our parish, north of the A50. It would be sensible, in our view, to make the area of the IGV, north of the A50, a separate parish in its own right.  This was a condition on the original application documents " A development of a Stand alone Village", This is not currently going to be the case and needs looking into . | Noted.  The Council will consider the response relating to the Infinity Garden Village allocation in the responses to questions 5a and/or 6. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242563 | Burnaston Parish Council | Burnaston Parish Council | No | Burnaston Parish Council wishes to formally object to the South Derbyshire Draft Local Plan Part 1. It objects to the overall approach and methodology used to allocate development land and to Policy STRA2: Land South of Mickleover.  The basis of the parish council objections are as follows:-  TRAFFIC The principal accesses to the sites are stated to be from a) Principal site - access to be off the A38 roundabout; b) East of the A38 - access to be off Rykneld Road; The parish council is not aware that a traffic impact assessment has been undertaken about the impact and needs of such proposals nor if these access points are the best for the site and for residents, present and future. The A38 currently has significant daily queues of traffic as people travel into Derby for work and also to the schools along Rykneld Road. The A38 itself being a major road connecting the north and south west, suffers from congestion and delays without the addition of a further point of connection for possibly an extra 10,000+ vehicles movements a day (2500 houses with 2 cars each, making 2 journeys – one to work and one returning home). The road network currently cannot cope – this is recognised by improvement works being scheduled along the A38, and the Local Plan provides no indication as to how the additional volume of traffic will be mitigated. If successful, the Local Plan would provide additional housing needs for the City, however the employment areas of the City are on the opposite side (Nottingham side), the increase in housing will lead to an increase in traffic crossing the City from their homes to places of employment; the City is already congested and the proposed location of additional homes to service the City will exacerbate this significant problem. In addition, such a large development will increase noise and air pollution for residents from the increase in vehicles; the proposal does not fit with any carbon neutral objectives. It is proposed that housing is allocated to the east of the City, this being closer to employment opportunities which will be a better fit with the travel to work objectives. Traffic alleviation schemes and travel plans have not been identified, the proposal for the site is to have a major link road with the potential to link to the A516. The link road will create a rat run and the A516 like other routes into Derby, already experiences significant traffic volume and congestion. Cycle routes have been identified but none are safe routes into the employment areas of the City.  ENVIRONMENTAL On site biodiversity net gain in line with national legislation and protection and management of key biodiversity assets such as trees and hedgerows is on first reading something that could be supported, however the parish council objects to the location as the large housing allocation will result in a loss of agricultural land plus existing habitats for wildlife. It is well known that biodiversity has generally been devastated nationally over a number of years yet there are already wildlife corridors in place at this proposed site and the existing wildlife will be uprooted and decimated by the development resulting wildlife having to restart from a lower base than it currently is. This restart of nature and wildlife will be difficult as to complete as the total number of houses suggested could take up to 10 years, during which time wildlife will not become established, let alone flourish; the proposal of such a large estate as opposed to organically increasing existing villages, is likely to have a huge detrimental impact upon the environment for more than the decade that building will take place. It is known that net bio gain can be offset, and there are no guarantees that trees and hedgerows will be protected.   INFRASTRUCTURE There is a bland statement about provision of appropriate scale community facilities however no context has been provided.  The draft Local Plan makes mention of the delivery of healthcare infrastructure sufficient to meet need, either on site or off site through contributions. These contributions towards healthcare facilities will be commensurate with the scale of the development, and in accordance with INF1 and the Planning Obligations SPD. Healthcare is a vital essential requirement for such a large development, but experience has demonstrated that despite providing funding, the NHS and GP surgeries are not found in the large developments. The parish council supports the need for healthcare to be onsite, to be provided elsewhere would leave the potential large community short of an essential service, would increase travel and traffic movements. Without any firm guarantees/commitments that healthcare facilities are to be provided, the additional large number of residents will place an unmanageable burden upon the existing local GP surgeries which are overstretched by the large developments at Hilton, New House Farm, Hatton and now the new residential 66 bed care home at the former Salt Box Café.  Provision of a local retail centre commensurate with the size of the development to provide for the day to say needs of the development and surrounding area. The parish council enquires if this local retail centre is part of the District Council’s employment provision; if so, then the location of the employment provision is wrong, such a retail centre needs to be more central.  Green Infrastructure. A network of interconnected Green Infrastructure which as a minimum shall include the following: i)The provision of a wide green buffer around the pastures hospital estate and along the boundary of the A38; greater detail is required.  ii) The provision of a Country Park, to be located within the site to the north, west and in part of the land immediately to the south of the pastures hospital estate and the provision of a Country Park which will aim to achieve Green Flag status. Further explanation is required from SDDC as to its understanding of what a Country Park is – information sought from the officers at the event held at Mickleover Country Park was vague and officers understanding of what a country park is, was conflicting. Green Flag status in practise equates to having a maintenance plan for a site; whilst it is good to have the site maintained the maintenance of the area is only to be expected and Green Flag status is not necessarily a high standard.  iii) The green infrastructure network should allow active travel connections though and across the site to points of interest and recreation; queries are raised as to what points of interest SDDC is referring to be able to assess if these travel connections are appropriate.  iv) High quality continuous pedestrian and cycle routes shall be provided within the site and links between the site and Burnaston village, and development within Derby City. The proposal is for links between the site and Burnaston Village; there are already public footpaths to link the sites. The parish council is concerned about the proposal for the pedestrian and cycle routes as it is essential to maintaining the character of the village that the buffer between the community of Burnaston village from the large development on the edge of the city is retained. There is currently no obvious link to the village other than via the public footpaths and the creation of pedestrian and cycle routes will lead to the incorporation rather than protection of the village from being subsumed by the expanding estate.  v) Built development within the green infrastructure locations shall be restricted to that ancillary to and necessary to support green infrastructure (such as grounds maintenance huts, small changing rooms etc); the parish council acknowledges green infrastructure is required should the site be allocated.  LOCATION AND WORK WITH DERBY CITY It is stated that SDDC and the developers will work together with Derby City to ensure that development of the site is delivered in a comprehensive manner. The parish council was shocked to learn that SDDC and potential developers have been working together for the last 2 years about the potential for this site with no reference or notice being given to the parish council nor to the community; there is little wonder therefore that the community considers this proposal from SDDC to be a “done deal” when so much discussions have taken place behind closed doors. The parish council also has grave concerns about the level of influence Derby City Council will have over the layout and input of any potential development. The proposed site is within South Derbyshire but is being used to deliver the housing needs for the city; which the parish council understands the city’s need are for rented accommodation and flats; this is different to the needs of the district and the local area which is for family homes and housing suitable for people with limited mobility, eg bungalows. The needs of the city are very different to the needs of the local community and concerns surround as to whether it is the needs of Derby City or the needs of the District Council that will take priority. The housing allocation report from the City Council has, to the parish council’s knowledge, not been made available to cllrs nor made available for public scrutiny; therefore the strategic allocation for the land south of Mickleover is skewed to the needs of the City rather than to the district.  The Strategic Allocation identified as Land South of Mickleover will be expected to deliver the following requirements and be in accordance with other Local Plan Policies including approximately 2500 new homes. This suggested number of homes will be subject to review and change but the principle is one of following a trend of large developments being bolted onto existing settlements, particularly in the north of the district (Hilton, Hatton, New House Farm); organic growth does not appear to be an option that the District Council has considered; if consideration has taken place, the rationale for the creation of large developments has not been explained. The parish council knows the district is one of the fastest growing areas in the country and the speed of growth in this area of the district does not allow for communities to assimilate the large developments that are bolted onto the edge of their communities.  EMPLOYMENT The location of approximately 5-10 ha of employment generating land is tucked away on the edge of the site; it is unclear what the District Council has in mind to be located in this area and therefore the suitability of the location and size cannot be assessed.  EXPLORE THE PROVISION OF A RETIREMENT VILLAGE WITHIN THE SCHEME This suggestion is unacceptable, such a facility would have a significant impact on the facilities and infrastructure of the area; it has the potential to swamp the medical facilities, as identified by the GP comments made relating to the planning application for a residential home at Hatton. The residential home in Hatton was for 66 residents; the creation of a retirement village will have significantly more residents who are likely to have medical needs and without proper medical provisions on site, the provision of a retirement village will add further stress and strains on already overstretched first tier medical provisions in the area and which have been raised above.  TRAVELLER PITCHES in line with Policy H21 The parish council questions the appropriateness of such a site in a large residential area. The draft Local Plan does not make any plans to protect the Green Belt from inappropriate development, the Local Plan does not include any proposals about enforcement being effective, efficient nor how this site will meet inclusivity. The level of demand for such sites has not been identified in the documentation accompanying the draft Local Plan nor how tensions between the various communities will be managed. SDDC has not explained how educational and medical provisions will be allocated to ensure the welfare of travellers when both education and medical provision are already overstretched.  HEALTH CONCERNS The Provision of appropriate scale community facilities as stated in the draft Plan; is a bland statement and no context has been provided.  As mentioned above, the parish council has concerns about adequate healthcare provisions being made available on the site; healthcare is a vital essential requirement for such a large development, but experience has demonstrated that despite providing funding, the NHS and GP surgeries are not found in the large developments. Without any firm guarantees/commitments that healthcare facilities are to be provided, the additional number of residents will place an unmanageable burden upon the existing local GP surgeries which are overstretched by the large developments at Hilton, New House Farm, Hatton and now the new residential 66 bed care home at the former Salt Box Café.  EDUCATION A simple statement is made about the delivery of primary and secondary education sufficient to meet need, either on site or off site through contributions. These contributions towards primary and secondary education, schools and facilities will be commensurate with the scale of the development, and in accordance with INF1 and the Planning Obligations SPD. This will include; a) The provision of a three form entry primary school with nursery; and b) Financial Contributions towards secondary education; Again, the provision of these educational establishments is a must. Currently primary age children from the New House Farm estate are to be bused to schools in Chelleston; which is unacceptable. Providing contributions to schools which are already large and full is not necessarily in the best interest of the children who attend these schools. Schools and nurseries are sought to be built and ready on completion of the first 100 houses on the site, the current demand for primary and secondary schools from the New House Farm development makes such provision viable. The parish council does not agree that financial contributions towards secondary education is acceptable, a new secondary school would be required for such a large development. This may limit the number of shorter school runs being made; but would likely increase the overall traffic congestion and pollution by bringing people into the area from further afield. Super sized schools will be created by off site contributions.  FLOODING Appropriate flood risk management in accordance with policy SD2 across the site and ensure that all more vulnerable development is located wholly within flood zone 1 and iv) SUDS will be provided in accordance with Policy SD3. The proposed site would require significant attention as this area is known to have surface water flooding issues. During period of heavy rainfall, water flows down from the site to Grassey Lane; these incidents have already been reported to SDDC and are subject to investigations by SDDC. The increase in housing plus the increase in hard standing areas will exacerbate the current problem of surface water flooding. During heavy rainfall, surface water lies on the A38, the A516 and within Burnaston village, the village has been cut off as a result with all the roads in/out of the village being impassable due to flood water; the proposal for such large number of housing grouped into a relatively small area will increase the localised flooding already being experienced. Flood prevention has not been considered as part of the proposal for such large volume of housing in this location.  GENERAL The proposal if adopted, is to meet Derby City Council’s requirements and will accelerate house building in a very small area of the district. This area of the district has seen significant upheaval with the developments at New House Farm and at Hilton. Promises of upgrades to the infrastructure have not come forward. The roads into Derby are already gridlocked and to put further traffic from hosing and employment allocations, will only increase the problems. During construction the upheaval and inconvenience and distress to existing residents will be great; a development of the size proposed is likely to take 10 years to construct; leaving the quality of life for the current residents, blighted.  No evidence has been provided as to what is appropriate sound attenuation/noise mitigation for both dwellings and recreation/ habitats from the A38 and A516.  Mickleover itself currently suffers from significant traffic congestion and from large developments at the top of Station Road, Staker Lane, Haven Baulk Lane and The Hollow have daily tail backs particularly at school drop off, collections and at rush hour and any development around the edge of Mickleover will add to this. No proposal in the draft local Plan is identified to mitigate the congestion let alone to improve the quality of life for existing residents.  The parish council cannot see how the impact of global warming upon the site has been mitigated; the impact of storms and torrential downpours will be significantly increased through the loss of permeable land to absorb rainfall.  The expectations of the site is to cover all requirements of the District Council and much of Derby City Council; these being to meet residential requirements of an aging population through a residential village, to meet the needs of the travelling community via a site, to meet housing needs and employment, but the information as to how these would to be successfully integrated, how they would be achieved, how the quality of life of existing and future residents would be improved has not been provided and experiences (both good and bad) of large developments already built in the north west of the district at New House Farm and Hilton do not appear to have been considered and lessons have not been learnt. | Noted.  The Council will consider the strategic infrastructure requirements in the responses to question 7. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1239943 | Castle Gresley Parish Council | Castle Gresley Parish Council | Yes | It is unclear where any additional infrastructure and amenities will be introduced within the local plan for the current developments let alone any future builds. There is no detail regarding extra services such as Doctors, Dentists and school places. Educational mainstream places are already at full capacity.  A particular concern is that at the Drakelow Development there is a lack of secondary placement support – It appears that only primary education is being incorporated. There is the additional issue of the lack of a new bridge to enable the additional traffic to commute to Burton, the A38 and other arterial roads. Most of which will be diverted through Catton and Walton and Trent. This will not only include domestic vehicles but commercial vehicles as well as the proposes bus service that would be needed for such a large development.  The other developments underway in Castle and Church Gresley will also put a great strain on its local infrastructure. Again, there have been no additional school places included in the plan, nor Doctors, Dentists, Shops or roads to take into account the additional residents and traffic. Officers need to understand that houses cannot be built on sites just because there is land to build them on. They must have the amenities, roads and services to accommodate them. We believe there should be more protection in the policy against excess traffic and traffic noise, light pollution, fumes and inappropriate developments like fast food outlets near schools etc. We are very concerned about the increased amount of traffic and traffic noise in our parish, and the lack of any additional social infrastructure which also appears not to have been added to any of the developments in the local parish. E.G community centres/halls. There have been no extra school spaces provided for Castle Gresley, either primary or High school despite local schools being full and many of the development houses being 2/3/4 bedroomed. We have seen no extra funding of Gresleydale Doctors and local Dentists are non-existent. Yet we are seeing 71 houses appear in Oak Close and 306 houses in Church Gresley approximately half a mile away. | Noted.  Details of the infrastructure requirements for each of the new strategic policies are included in the respective polices contained within the draft Local Plan document. These will be detailed further in the Infrastructure Delivery Plan.  Specific comments relating to the Former Drakelow Power Station will be considered under Question 5c and/or 8 |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242585 | Egginton Parish Council | Egginton Parish Council | No | See response to Q7 | Noted.  The Council will consider the strategic infrastructure requirements in the responses to question 7. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1244412 | Etwall Parish Council | Etwall Parish Council | No | Our comments are detailed in Question 7 | Noted.  The Council will consider the strategic infrastructure requirements in the responses to question 7. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242587 | Findern Parish Council | Findern Parish Council |  | The large development proposed to the south of Mickleover, whilst not within our Parish, will impact on the highways around in terms of number of vehicles on the roads and at junctions; members are concerned about how the existing road layout will cope, particularly access at the A38 junction; and therefore do not support such a large development being built close to the Derby City boundary. | Noted.  The Council will consider the strategic infrastructure requirements in the responses to question 7. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1238750 | Hilton Parish Council | Hilton Parish Council | Yes | For STRA2 see above.  Response to question 4:  Provided the large developments are all adjoin to the Derby fringes, this will provide the flexibility to provide whatever is the real need for Derby turns out to be. | Noted. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243158 | Melbourne Civic Society | Melbourne Civic Society | Yes |  | Noted. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241376 | Rosliston Parish Council | Rosliston Parish Council | Yes | We note the placement of 2 strategic sites of 4500 houses on the edge of Derby, to build and support Derby Cities unmet need, building logically where there is an infrastructure to support this development. It is also noted that many of the existing sites will already accommodate much of the housing numbers for Derby City. This therefore reinforces and demonstrates the numbers being passed to SDDC should not be further increased. | Noted. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243603 | SAVE (Save Aston & Weston Village Environment) | SAVE Aston and Weston Residents Group | Yes | As stated in the earlier answers, Derby City should review its needs and to review the HMA | Noted.  See response to question 4. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242402 | Weston-on-Trent Parish Council | Weston-on-Trent Parish Council | Yes |  |  |  |  |  |  |  |  |  |  |  |  |
| **Councillor** | | | | | |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242293 | Lucy Care | Derby City Council Councillor |  | How land is used is as important as where. Housing needs nearby space for business (to reduce community distances), so infinity Garden is a better arrangement than Mickleover. There is very little employment at the west of Derby, so the Mickleover land , between good highways and with lots of nearby housing, could be a better employment option than for housing. | Noted.  It is proposed to identify an employment land requirement for the District based upon that identified in the Derby and South Derbyshire Employment Land Review. The Employment Land Study indicates that the quantitative employment land need for the District for the plan period 2022-41 is 39.12ha. Whilst this is met by sites rolled forward from the adopted Local Plan Part 1 (40.53ha), all but one of which have been granted planning permission, further allocations have been made in order to support sustainable growth as part of mixed use strategic development on the southern edge of Derby comprising Infinity Garden Village (STRA1, 70ha) and land to the south of Mickleover (STRA2 5-10ha). |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242603 | Cllr Matthew Holmes, Cllr Miles Pattison, Cllr Alison Homes | Mickleover Ward, Derby City Council | No | SA1 (Biodiversity): Considering the following statement (claim), “Potential significant positive effect on biodiversity” we make these observations:   * The statement lacks specific evidence or measures demonstrating how biodiversity would be enhanced. Developing greenfield land typically results in habitat loss and ecosystem disruption, undermining claims of biodiversity benefits. * The site is likely to fragment wildlife corridors, affecting species movement and connectivity, particularly in the transition between rural and urban areas. * Any proposed biodiversity offsetting (e.g., new habitats or green spaces) often takes years to establish and may not fully compensate for the destruction of existing ecosystems.   SA2 (Housing): Considering the following statement (claim), “Significant positive effect on housing provision.” we make these observations:   * While the site contributes to housing targets, its greenfield nature contradicts sustainability principles favouring urban regeneration or brownfield redevelopment. This undermines the long-term goal of preserving agricultural and natural assets. * Adding housing here could lead to oversupply in South Derbyshire, particularly if other nearby developments are also approved, resulting in unoccupied units or unbalanced growth. * Without explicit commitments to robust infrastructure upgrades (transport, schools, healthcare), new housing risks exacerbating pressure on existing systems, undermining quality of life.   SA6 (Economy) and SA7 (Employment): Considering the following statement (claim), “Potential significant positive effect on economy and employment.” we make these observations:   * The analysis lacks evidence of how this site specifically stimulates economic growth or creates employment opportunities. Projections might rely on generic assumptions that do not account for competition with other developments. * If the site predominantly caters to commuters working outside South Derbyshire, it does little to support the local economy or job creation within the district. * Housing developments that primarily serve as commuter suburbs often fail to establish vibrant, self-sustaining economies.   SA15 (Historic Environment): Considering the following statement (claim), “Potential positive impact on the historic environment.” we make these observations:   * No specific examples are provided of how the development would benefit the historic environment. The claim might be overstated or misinterpreted. * The transformation of a rural landscape into urban sprawl could negatively affect the setting of nearby historic features, diminishing their cultural and visual significance.   SA11 (Resources): Considering the following statement (claim), “Loss of greenfield / grade 3 agricultural land cannot be mitigated.” we make these observations:   * Developing “best and most versatile” agricultural land has significant long-term implications for food security and sustainability, especially given increasing global pressures on arable land. * The National Planning Policy Framework (NPPF) emphasises prioritising brownfield land over greenfield. Choosing this site undermines these principles. * Incremental losses of agricultural land in South Derbyshire contribute to a broader erosion of rural assets, magnifying regional and national consequences.   SA12 (Pollution): Considering the following statement (claim), “Unclear whether mitigation would address air, noise, and light pollution.” we make these observations:   * Without detailed mitigation plans, it is reasonable to assume that pollution levels will increase due to construction, increased vehicular traffic, and residential activity. This is particularly concerning for air quality and noise near existing settlements. * Increased pollution negatively impacts public health, particularly for vulnerable populations, and could strain healthcare services. * Even with mitigation measures, monitoring and enforcing compliance post-development can be challenging, leaving the area vulnerable to unchecked pollution.   SA16 (Landscape): Considering the following statement (claim), “Development may alter green wedges and surrounding landscape.” we make these observations:   * The potential enclosure of green wedges would erode the rural character of the area, leading to an urban sprawl effect that diminishes the distinctiveness of both South Derbyshire and Derby City. * The site’s development would likely disrupt long-standing views and open landscapes, which are critical to the identity and aesthetic value of the area. * Landscape alterations are often difficult to mitigate effectively, especially in areas with established rural and semi-natural characteristics. | Noted.  Comments relating specifically to the SA have been considered in question 12.  The Council will consider the strategic infrastructure requirements in the responses to question 7. |  |  |  |  |  |  |  |  |  |  |  |  |
| **Landowner or Developer** | | | | | |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242643 | Andrew Large Surveyors Ltd & The Staunton Harold Estate | Andrew Large Surveyors Ltd & The Staunton Harold Estate | Yes | SHELAA Reference 120 – Land southwest of Micklemeadow B The site identified main constraints are landscape constrains and highway safety. The site is located between the A38 and Rykeneld Road. Biodiversity enhancements reinforcing the existing mature planting belt around the site will also help mitigate any landscape constraints.  Modification of the signal junction with Tutbry Avenue would provide safe access to and from the site. Therefore, it is considered the sites limited identified constraints are capable of being designed out of any proposed development and the site be immediately achievable. | Noted.  A Transport Study is to be jointly commissioned by Derby City Council and South Derbyshire District Council in consultation with the County Council to consider transport impacts and mitigation for the strategic sites, including measures to encourage sustainable travel. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242615 | Carney Sweeney on behalf of Peveril Homes Ltd and Kingsmere Holdings Ltd | Carney Sweeney on behalf of Peveril Homes Ltd and Kingsmere Holdings Ltd | Yes | We are supportive of the proposed allocation STRA2: Land south of Mickleover.  Our client’s land interests, and the interests of the surrounding landowner/s, which form part of proposed allocation STRA2 provides an opportunity to deliver a strategic scale of development in a non-Green Belt location situated on the edge of Derby City, and close to the boundary of Amber Valley, which is capable of accommodating both housing need for the District and the unmet need of Derby City, and within the Derby HMA. The proposed allocation will also provide the necessary economies of scale to deliver any associated services and facilities to support new housing growth, and infrastructure requirements.  The location for the scale of development proposed through strategic allocation STRA2: Land south of Mickleover is further noted to be justified by several evidence base documents summarised as follows:  • Firstly, the proposed allocation lies within the ‘C1 Land to the west of Derby urban area’ ‘Broad Area of Search’ identified in the Derby Growth Options Study (AECOM, August 2021 (referred to as ‘Growth Options Study’ hereafter) as a ‘Suitable Area for Strategic Growth’. The study also recognises that all growth options for this area would require large-scale upfront infrastructure investments, which the scale of development proposed for STRA2 would be capable of supporting.  • Secondly, the proposed allocation is justified by the findings of the HMA SA which concludes that the options which distribute Derby City’s unmet need to the urban fringe areas, with an apportionment between South Derbyshire and Amber Valley, performed most favourably. The HMA SA also found that “Options which direct more of the Derby unmet need to the SDDC Urban Fringe would benefit from good potential for accessibility to services and facilities through achieving a good degree of self-sufficiency within large urban extension and through accessibility into Derby by sustainable transport.” [Chapter 4, Derby HMA Sustainability Appraisal, dated September 2024. Section 4.3.3 (page 38)]. The proposed allocation under STRA2 Land south of Mickleover again delivers this growth option and would be capable of achieving self-sufficiency, with the location also benefiting from good accessibility by sustainable transport into Derby City.  • Thirdly, the proposed allocation is justified by the findings of the ‘South Derbyshire Local Plan Sustainability Appraisal: Regulation 18 Interim Sustainability Appraisal Report’ (referred to as ‘Interim SA’ hereafter), which identifies at Table 6-2, that the proposed allocation assessed as ‘Site 3 – Land South of Mickleover’ performs equally, or favourably, in comparison to the other three options in relation to the Sustainability Objectives.  Overall, we agree with the proposed strategic allocation of STRA2: Land south of Mickleover. We have made separate comments regarding the policy requirements, extent of site and infrastructure etc. under Question 7. | Noted. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243227 | Carter Jonas on behalf of Miller Homes Ltd | Carter Jonas on behalf of Miller Homes Ltd |  | 3.39 SDDC are proposing to retain some of the allocations contained within Local Plan Part 1 (2016) and Local Plan Part 2 (2017). At this stage, we have not reviewed those in detail. Whilst these will have been found sound at respective examinations, SDDC will be required to demonstrate the allocations are deliverable over the Plan period.  3.40 In order to meet DCC’s unmet need, SDDC are proposing two new mix-used strategic allocations; – STRA 1: Infinity Garden Village for 2,000 dwellings – STRA 2: Land South of Mickleover for 2,500 dwellings  3.41 Both sites are under numerous landownerships and whilst this is a common position for larger strategic sites, it does present greater risk to the overall deliverability of the sites which should be given due consideration by SDDC.  3.42 Whilst a trajectory has not been published, it appears the intention is for both strategic sites to be delivered over the Plan-period. It’s our understanding that no planning applications have been submitted in respect of the draft allocations.  3.43 The trajectory for the strategic sites is overly optimistic. If full planning permission is immediately granted, including a signed S106 on the adoption of the Plan in circa December 2026, this would allow 13 years to deliver both allocations which is a build out rate of circa153 dpa for STRA 1 and 192 dpa for STRA 2.  3.44 It is however unlikely that the delivery of dwellings would commence immediately given the need to deliver infrastructure required to support the mixed-use developments and the likely requirements to discharge pre-commencement conditions.  3.45 Furthermore, typically, Applicants for large scale strategic sites would only seek outline planning permission in the first instance and secure reserved matters approval for parcels as it progresses, which adds further time to the overall planning process. We understand that both sites are being promoted by promoters rather than developers which increases the likelihood of an outline application being submitted in the first instance  3.46 According to the Start to Finish (Third Edition) (March 2024) prepared by Lichfields, the average time for obtaining planning consent for a scheme of 2000 units or above is 5.1 years which is followed by a planning to delivery period of circa 1.6 years. Thus, on the basis the Applicant submits an early application in summer 2025, it’s likely that delivery on site would not commence until winter 2031/32. Given the sites are being promoted by promoters, there will be additional time spent on bringing the land to market, which could be complex given the number of landowners and securing a house builder.  3.47 The analysis undertaken by Lichfields found that for sites of 2,000 or more dwellings, the lower to upper quartile range for build-out rates is 100 to 188 dpa. Using these figures, STRA 1 would have an approximate build out time period of 10.6 to 20 years and STRA 2 would be between 13.2 and 25 years.  3.48 Taking into account the time required to obtain planning permission, undertake the planning to delivery period and the build out rates, it is highly unrealistic all dwellings will be delivered over the plan period.  3.49 It is not an issue that delivery extends beyond the plan period, indeed we encourage SDDC’s approach to longer-term planning for the District. However, given the likely trajectory of the sites, further allocations will be required to meet the local housing need over the plan period.  3.50 In addition to the above, SDDC are placing reliance on two large scale strategic sites. Whilst strategic sites are beneficial for delivery over the longer term, they are fraught with risk, particularly in terms of delays as set out above.  3.51 Over-relying on 2 sites is an unsound approach as it risks the Plan not delivering the required housing to meet need. We therefore strongly recommend that in addition to the strategic sites, SDDC consider the allocation of smaller sites such as Land South of Burton Road, Repton which is available to deliver circa 160 dwellings over the next 5-year period. | Noted.  A housing trajectory will be prepared taking account of any significant constraints that will need to be addressed. It is not expected that the strategic sites will deliver in full within the plan period (as consulted).  A number of housing allocations identified in the adopted Local Plan Part 1, including sites in Hatton, Hilton, Drakelow and the Swadlincote Urban Area, have been rolled forward as part of the Local Plan Part 1 review and continue to deliver significant numbers of homes away from the Derby urban area. It should also be noted that housing sites identified in the adopted Local Plan Part 2 continue to deliver new homes and a review of that document will provide the opportunity to address any need for additional non-strategic scale housing allocations.  Omission sites will be considered in question 13. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243582 | CBRE Ltd on behalf of Land Project UK (LPUK) | CBRE Ltd |  | LPUK do not object to the principle of strategic sites for development. However, it is vital that the emerging Local Plan caters for development needs now, and in the absence of Planning Decision Notices, it cannot be guaranteed that the sites can be delivered in the short term (0-5 years), and we have concern that the immediate employment needs of the borough are not being efficiently planned for.  Furthermore, it is clear from the draft allocations that further technical work is still required to ensure the feasibility of the scale of growth envisaged within the allocations, with reference to the need for the Council to work with infrastructure providers to address issues such as transport, health and school provision. Given the questions we’ve raised around deliverability and timescales of the new allocations, we recommend other sites are also allocated in the emerging Local Plan for employment purposes that are deliverable now and of a small-medium scale. | Noted.  A number of housing allocations identified in the adopted Local Plan Part 1, including sites in Hatton, Hilton, Drakelow and the Swadlincote Urban Area, have been rolled forward as part of the Local Plan Part 1 review and continue to deliver significant numbers of homes away from the Derby urban area. It should also be noted that housing sites identified in the adopted Local Plan Part 2 continue to deliver new homes and a review of that document will provide the opportunity to address any need for additional non-strategic scale housing allocations. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1248307 | Copesticks on behalf of Alexander Bruce Estates Ltd. | Copesticks on behalf of Alexander Bruce Estates Ltd. | Q5 | Chapter 5 - Strategic Sites 1.13 Policies STRA1 and STRA2 identify 2 strategic sites, in the form of sustainable urban extensions to Derby, at Mickleover and Chellaston. Together these SUEs propose 4500 new homes. Large SUEs are notoriously difficult to deliver because of their size and the resultant accumulation of constraints and as a result timescales are generally many years between allocation and a shovelready site. Further, that delivery will be controlled by the developers and the need to ensure they are maximising their return through controlling supply. Realistically, it may be 2030 before the first homes are occupied and 2045-2050 that the sites are complete.  1.14 It is realistic and reasonable to assume that the two SUEs may only contribute around 2500 homes during the plan period. Along with the other allocations in the draft Local Plan Part 1 Revision, strategic sites will only amount to around 60% of housing need, leaving nearly 8,000 plots to be found on non-strategic sites and windfalls. | A housing trajectory will be prepared taking account of any significant constraints that will need to be addressed. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242592 | Dean Lewis Estates | Dean Lewis Estates | Yes | DLE agree that the identified Strategic Sites STRA1, 2 & 3 should be allocated in the Partial Review | Noted. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242595 | DTH Services Ltd | DTH Services Ltd | No | objects to the overall approach and methodology used to allocate development land and to Policy STRA2: Land South of Mickleover.  The basis of our objection is below:-  The local area is not equipped for the sheer volume of traffic as it stands with the A516 and the roads around Mickleover already seeing a heavy presence of vehicles throughout the day resulting it poor road conditions and many gridlock situations.  There has been a proposal for a green area to the west by grassy lane, it has been suggested that it will be a country park. My concern with this is the water supply for several properties is an old lead pipe that is fed from the old mortuary and is the responsibility of the landowner to maintain and repair this – what happens next time it ruptures? There will be families with no access to drinking water so there needs to be some provisions in place.  With the country park there is a suggestion of cycle routes even though there are currently bridal paths used by the local community. Please see my concerns for this as it is next to our property in bullet points.  • Increased human traffic – We already have issues with the mount of litter on the lane and surrounding areas, the majority is alcohol containers in the ditches and hedgerows. • Crime – We have witnessed via a camera door bell a regular presence of non residents late at night walking / driving / riding up and down the lane at all hours of the night. We have been a victim of theft in the past 12 months which has been recorded with the police. We don’t want a repeat of this and an increase in footfall will allow prying eyes to evaluate the pickings of the area undetected. • Impact on the local wildlife- I will elaborate more further in my objection with regards to the wildlife aspect. • Anti social behaviour – I have experienced many examples of anti social behaviour on the lane. People parked in gateways drinking, taking drugs and having sex leaving behind their mess which is dangerous and unsanitary. There is a presence of scooters and motorcycles passing through with myself even encountering a scooter with 3 youths on it passing my house around 2.30am when I finished a late shift one night. We are always on edge of a threat to our family from unwanted visitors. • Unknown visitors to the area – We are surrounded by the land proposed and have great concerns for our family, pets and livestock. We have children and are fully aware of the danger they are in daily by deviants and this proposal makes us feel very vulnerable and uncomfortable for us and our children’s safety. • Adoption of the lane – The lane is currently unadopted and we repair it between the residents for our own benefit. We receive no assistance from the council, even when we reported the fly tipping last year. Will the lane be adopted for the proposed cycle paths? Who will be responsible for it as we would refrain from repairs if it is part of a cycle network in fear of prosecution in case of accident or injury of someone using it. • Dog waste – we have an ongoing battle with dog walkers either not picking up after their animals or picking it up leaving it in bushes or hedgerows.  The local area and wildlife As a country already struggling to meet the requirements of supplying the country with produce to feed the nation, the loss of this area of farm land would be another nail in the coffin to the local farming community.  Locally we are surrounded by an abundance of healthy wild life and habitats that would suffer greatly to the point of local extinction if there habitats are destroyed by the loss of the land & hedgerows, increase in human traffic, flooding and many more environmental changes that will occur with the plans. We have hedgehogs, bats, newts, buzzards, bees, migratory birds to name but a few and to threaten their existence would be a catastrophe. Along the proposed cycle paths we have extensive traditional vegetation which are fruitful and have existed locally for many years, with increase of human interference and building these are also threatened.  Flooding During periods of rainfall, water runs down from the east to Grassy Lane causing flooding of the residents properties. The increase in housing plus the increase in hard standing areas on top of what we already have at the Pastures will Increase the current problem of surface water flooding. With more permeable land being lost the water run off will be horrendous.  Over the past few years we have witnessed flooding along the A516 in the area of the Grass Lane & Dee Lane with the road being closed by the police several times. This was never the issue a short time ago but it is getting worse as the land is developed locally. It is the situation of pass the problem down the line and let someone else deal with it. I do know of 2-3 occasions where the seven wells pub has been flooded in the past few years which is devastating for the business and staff.  Safety  The area has a significant number of businesses and local farmers creating an already heavy vehicle load for an unadopted lane. From the A516 to the end of Grassy Lane the are over 18 business in existence + farmers creating a consistent flow of vehicles passing through. I fear that with an increase of human traffic there will be an accident resulting in serve injury or death.  The traffic on the A516 is constant issue with the vehicles cutting the central divide at great speed and also entering the fuel station using the end of grassy lane as a slip road resulting in a constant stream of near misses.  Traveller Site  I am failing to see the need for a traveller site locally with sites in Foston, Hilton, Swadlincote, Linton to name a few. We don’t encounter travellers in the area very often so I’m at a loss to why we need to build a site for them. | Noted.  The Council will consider the strategic infrastructure requirements in the responses to question 7. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243664 | Deloitte LLP on behalf of Church Commissioners for England | Deloitte LLP on behalf of Church Commissioners for England |  | 6.1.1. The Commissioners are supportive of South Derbyshire assisting Derby City in meeting it’s unmet need, as this concurs with NPPF paragraph 26 which states that “joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.” However, when considering the strategy in which this unmet need is intended to be met, the Commissioners do not consider that strategic sites STRA 1, STRA 2 and STRA 3 provide the most sustainable development opportunities.  6.1.2. Firstly, as noted in response to Question 3, updates to the Local Plan Part 1 in isolation poses a risk of disconnect between the strategic and non-strategic elements inclusive of allocations. The Commissioners consider that, despite some work being undertaken to determine the preferred distribution options such as the Derby Housing Market Area Growth Options Study and Sustianability Appraisal, without undertaking a wholsescale update to the Local Plan inclusive of Settlement Hierarchy and non-strategic allocations, the preferred distribution options cannot fully be determined.  6.1.3. In addition to this, paragraph 31 of the NPPF notes that “the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals”. With regards to the Local Plan Part 1 Review’s strategy for meeting Derby City’s unmet need, SDDC conclude that a range of distribution options have been explored through the Derby Housing Market Area Growth Options Study as prepared by AECOM, the Derby Capacity Study as prepared by AECOM, the Employment Land Review and through the HMA-wide Sustainability Appraisal, which have all fed into the conclusion that the best suited strategic sites are within the Urban Extension typology and “meeting the unmet need arising from Derby as close as possible to the City amounts to sustainable development”.  6.1.4. Although this identifies that some work to the evidence base has been undertaken, vital documentation central to the justification for the allocation of strategic sites STRA 1, STRA 2 and STRA 3 such as the Infrastructure Development Plan update, Design Review for updated plan’s strategic allocations, Local Plan Viability Assessment and Housing Implementation Strategy have not been undertaken or completed. Without the completion and subsequent utilisation of these documents in assessing the viability and deliverability of these strategic allocations, the Commissioners consider that the Local Plan Part 1 cannot be considered justified in line with NPPF paragraph 35, and is therefore unsound. As it is currently unclear whether there would be any barriers to the development of these large-scale sites such as the provision of additional large-scale supportive infrastructure, possible complications with multiple ownerships as well as speed of delivery, as mentioned in the Commissioners response to Question 4.  6.1.5. The Commissioners appreciate SDDC’s commitment to providing a Housing Implementation Strategy (HIS) which explains what SDDC would do should there be any barriers to delivering development as proposed in the Plan, and how to respond to changing circumstances. However, it is noted that the HIS will be part of the work leading up to the Regulation 19 consultation on this Local Plan Part 1 Review. The Commissioners consider that there needs to be further robust evidence available to firstly ensure that the preferred distribution options presented within the Local Plan is deliverable and achievable to where the mitigation measures within the HIS will not need to be utilised. SDDC should be confident that these large-scale sites are deliverable, or consider alternative and more balanced distribution strategies that respond to differing market areas and support the long term sustainability of the districts existing settlements.  6.2. Alternative Distribution Options 6.2.1. The Commissioners consider that, alternatively to the strategic allocations STRA 1, STRA 2 and STRA 3, a more balanced development distribution approach that spreads some of the housing provision across Key and Local Service Villages, as well as Rural Villages, would provide a more sustainable distribution of Derby City’s unmet need within the district. This distribution option would provide the most flexibility for housing location and subsequent resident choice within the HMA in line with NPPF paragraph 60 which notes that “it is important that a sufficient amount and variety of land can come forward where it is needed” and that it “should be to meet as much of an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community”. In addition, the Commissioners consider that a focus on meeting Derby City’s unmet need within existing settlements will ultimately be more effective as it will favour sites with more certainty with regards to deliverability. Larger-scale sites hold more barriers to delivery, including the provision of additional large-scale supportive infrastructure. In contrast, smaller sites and Rural Development sites are able to achieve a timelier delivery of housing within the plan period and are vital to ensure a sufficient supply of housing within the district. This will be even more important for South Derbyshire when accommodating some of Derby City’s housing need as part of the Derby HMA. As noted previously, the Commissioners note the lack of robust evidence supporting the deliverability of these large-scale sites, and consider that a focus on increasing sustainable development within existing developments would provide a much more effective approach to the delivering the unmet need.  6.2.2. Additionally, large-scale sites tend to bring with them much bigger infrastructure costs and therefore are less likely to meet affordable housing needs, which SDDC should also be ensuring they deliver as part of the additional unmet need of Derby City. The allocation of smaller sites in the specific strategic context of meeting Derby City’s unmet need would provide greater certainty to the provision of affordable housing, aligning with NPPF paragraph 62 which notes that “the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies” inclusive of affordable housing.  6.2.3. SDDC has been led by the Sustainabilty Appraisals at both the HMA and local authority levels, which indicated that it would be most sustainable to deliver unmet housing need arising from Derby City as close as possible to the City; to utilise existing infrastructure and reduce travel distances. The Commissioenrs do not disagree in general with this conclusion, but rather consider that new housing land intended to meet the unmet need should be provisioned towards existing settlements as a priority before directing it towards the creation of news settlement and larger urban extensions, in order to retain and expand upon the vitality of these settlements. The Commissioners note that villages such as Milton and Repton are still wthin close proximity to the Derby City district, and have the opportunity to provide additional sustainable development in the short term further to that which is currently within the adopted Local Plan.  6.2.4. Sites such as the Commissioners sites, Land south of Milton Road, Repton (SHELAA ref 040), and sites at Land at Ex Common Farm, Milton (SHELAA ref 223) and Land east of Main Street, Milton (SHELAA ref 222) would provide achievable and suitable developments within the next 0-5 years, enabling elements of the unmet housing need arising from Derby City to be built-out quickly. | Noted.  See Council response to comments on Questions 3 & 4.  Omission sites will be considered in question 13.  An Infrastructure Delivery Plan, Viability Assessment and Design Review will all be undertaken to support the plan. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242621 | Fisher German on behalf of David Wilson Homes East Midlands | Fisher German |  | We do not specifically object to the allocations proposed, but do object to the assumptions in respect of likely capacity and the process to identify these sites against reasonable alternatives.  2.27 STRA1: Infinity Garden Village represents a continuation of existing commitments on the southern Derby urban fringe within South Derbyshire. Within the evidence there is no commentary as to the anticipated delivery rates, lead in times, etc, so it is difficult to fully comment. It is not clear whether work has yet commenced on undertaking a planning application.  2.28 For sites of this size, Lichfield’s Start to Finish Volume 3 (March 2024) sets out detailed analysis of likely lead in times and assumed delivery rates. This evidence explored the progression of 179 sites of over 500 dwellings. This evidence can therefore be assumed to at worst represent a reasonable assumption of likely lead in times on which to base an on which to base any assumptions. Table 3.1 of this document sets out that sites of 2,000 dwellings such as the proposed STRA1 Infinity Garden Village allocation, can reasonably expect to take circa 5.1 years to gain a planning approval (from validation of an outline to first detailed reserved matters approval). This does not of course account for the significant time at pre-planning phase, assembling the application, pre-app, community consultation etc, which could reasonably take 3 years alone, meaning it reasonably be 8 years from work commencing to a phase 1 Reserved Matters application being approved. It is clearly pertinent therefore as to the progress made towards an application, as this will impact assumptions on lead in times.  2.29 To deliver the full site (2,000 dwellings) there will need to be an average delivery of circa 118 dwellings per annum, throughout the full proposed 17 year Plan period (notwithstanding our comments that the Plan period should be extended), however clearly there is still significant time until the commencement of delivery and as such delivery rates will need to be higher, once commenced.  2.30 The chart overleaf shows the average annual delivery required by start date. Clearly the later delivery commences, the more difficult achieving the 2,000 dwelling delivery will be. In accordance with Start to Finish, delivery rates of over 188 are rarely achieved, thus delivery would reasonably have to commence prior to 2029/30 for the dwelling rate to be reasonably achieved, requiring a planning application to be submitted imminently and determined ahead of assumed timescales to be feasible. Unless evidence is provided otherwise, or an application submitted, it is not clear whether an application could be submitted within those timescales  However, even if this was possible, it is not a given that delivery rates of circa 180 dwellings per annum will be deliverable, not least in that the site will be directly competing with the outstanding residential commitments within Infinity Garden Village deriving from the extent Part 1 Local Plan(Phase 2 Wragley Way discussed above). This competition may limit developer interest, or slow market absorption. This could have a compounding effect where the assumptions for both the committed development and proposed new residential allocation are both overly ambitious given the quantum of supply to be delivered serving effectively one geographic market from a single SUE.  2.32 It is noted that despite being submitted in 2019, an application on land to the west of the proposed new allocation, which also forms part of the broad Infinity Garden Village area, remains undetermined. The application has all matters reserved except part access for up to 1,850 dwellings, a 2 form entry primary school, a local centre (including community hall, retail and other local services and facilities), public house, drive-through restaurant, petrol filling station, strategic highway infrastructure including new junction of the A50 and associated road links, public open space including children's play provision, surface water drainage infrastructure, landscaping, earthworks and ancillary supporting infrastructure (DMPA/2019/1097). This demonstrates that the 5.1 years anticipated in Start to Finish is likely to be accurate for applications of this scale and is likely to underestimate the previous Phase, but given this is delivering the new link with the A50 this may explain a slightly longer determination period.  2.33 Whilst it is noted government funding has been secured to help deliver the broad Infinity Garden project, and this may help with delivery, it will not in isolation improve market absorption and realistically the number of outlets willing to deliver concurrently may be lower than anticipated once the new phase comes on stream due to the increased competition. At Regulation 19 stage, the Council must present its data in relation to assumed delivery rates for both phases, and a realistic approach to lead in and delivery rates for both. We believe it is highly likely that some reductions will need to be made, and that 2,000 additional dwellings proposed within this Plan period will not be realistic.  2.34 Turning to STRA2, clearly the above concerns continue to apply, particularly given the higher quantum of housing proposed to be delivered within the Plan period than STRA1 discussed above, albeit it is likely to serve a slightly different market to Infinity Village and thus will not compete as directly with the existing commitments there. Regardless, despite this, in light of the conclusions above the proposition that this site, which does not currently have a planning application submitted, will deliver 2,500 dwellings by the end of the Plan period is again challenged.  2.35 To achieve a 180 per annum average build out, which is considered to be the upper ends of what can be assumed to be deliverable in Start to Finish Volume 3, the site would need to commence delivery in 2025/26, (as shown in Figure 4), which is only a few months away. This is certainly not feasible and whilst we await further detail from the Council in terms of assumptions, it is clear based on the above that the site is highly unlikely to deliver 2,500 dwellings in the Plan period, and this should be suitably amended.  2.36 At Regulation 19, the Council should publish evidence detailing the Council’s assumptions in terms of lead in time and subsequent build rates. This should not simply by an unsubstantiated Statement of Common Ground with the landowner and should instead be led by real evidence on matters such as infrastructure and service delivery and phasing, and how this will impact build out rates.  2.37 Your attention is again drawn to recent correspondence of the Bedford Local Plan Examination where Inspectors concluded recently that build out rates assumed by the Council on the two proposed strategic sites were wholly unrealistic and that there was very little flexibility in the remainder of the Plan. The result being the Council now need to find additional sites to give the Inspector’s assurances that the housing requirements can reasonably be met.  2.38 The Inspector’s letter of the 27 November 2023 sets out these fundamental concerns. Paragraph 53 states “the delivery rate for larger sites is also naturally constrained by traditional factors that would exist regardless, such as master planning and arriving at an acceptable scheme, opening up, providing infrastructure, and resource availability. As such, attaching a high level of premium to delivery rates due to Corridor growth is not a justified approach. It is instead more logical to take a cautious attitude to this issue”. Paragraph 54 continues “Overall, I am not satisfied that the assumed build out rates for either Little Barford or Kempston Hardwick are based on justified assumptions that are soundly based. This is the case before factoring in the uncertainty around infrastructure delivery timings discussed above and is a view that only hardens once the two issues are considered alongside each other”.  2.39 With regards for implications, paragraph 55 states “as discussed above, the soundness of the spatial strategy (and therefore the Plan) is fundamentally linked to the deliverability of strategic infrastructure and the reasonableness of the assumptions on alignment with anticipated growth”. It continues “in addition, the assumed build out rates for the two new settlements on which so much of the Plan’s growth relies upon are not based on justified assumptions”.  2.40 Taking all relevant factors into consideration, the Inspector’s letter concludes at paragraph 57 and 58 that “from the evidence presented, I am not satisfied that housing needs after 2030 would be addressed as anticipated, leaving an overall gap in provision against assessed needs within the Borough across the entire plan period (including affordable housing)… Taking the three issues of assumptions around infrastructure delivery, build out rates, and the reliance on a stepped trajectory together, I am unable to conclude that the Plan meets the tests of soundness at paragraph 35 of the NPPF”.  2.41 It is apparent any strategy which places overreliance on such delivery risks falling foul of the same issues at EiP. A cautious approach is therefore entirely sensible if there is to be the identification of any strategic sites as part of the emergent spatial strategy.  2.42 Taking the above matters into consideration, it is again apparent the Council will likely need to increase its supply, including new allocations. Given the aforementioned Derby urban fringe sites are predominantly allocated to contribute to Derby City’s unmet need, it would make complete spatial sense for any replacement provision required to be geographically and spatially close to the Derby City urban fringe, such as our client’s interests in Findern and Hilton.  2.43 In more general terms, we are not clear that the Council have undertaken the appropriate due process when proposing these sites for allocation. There is no explanation in the Plan, or the Local Plan Review Evidence Base as to the assessment process and reason for allocating sites ahead of other reasonable alternatives. The same is true in the SA, where there has been an assessment into choosing the spatial distribution method, but only limited consideration of site selection which may be argued to accord with the preferred method of distribution. We note the Derby HMA Growth Options Study 2020, but this does not appraise all sites which have been submitted to the Authority, nor does it in isolation represent sufficient justification for site selection, without a clear established methodology and process so individual site promotors could establish the reasons why their land failed.  2.44 Whilst the Council may have justification for wanting to minimise the number of allocations, any allocations would still need to be selected through a robust process against reasonable alternatives, including within the SA. This issue is highly pertinent to the process undertaking in establishing the strategy and will cast major aspirations over any evidence which is produced subsequently which could be argued to essentially meet a pre-determined outcome. The SA explored only 4 options, which excluded a number of potential reasonable alternatives. It is also not clear how the Council identified the 4 sites tested through the SA, and again whether that process was robust and fairly tested reasonable options | Noted.  South Derbyshire has a track record of delivering large numbers of dwellings per annum on individual allocations, comfortably exceeding 200 completions per year on sites such as the now complete Highfields Farm development and the former Drakelow Power Station, currently under construction.  See Council’s response to comments on Question 4.  The Council agrees that it is unlikely that the strategic site will deliver in full within the plan period (to 2041). A Housing Trajectory detailing the expected delivery timescales will be included in the next iteration of the plan for consultation. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243598 | Fisher German on behalf of Mr Grantham Newton Solney | Fisher German |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243572 | Fisher German on behalf of Mrs E Goodson | Fisher German |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243182 | Hawksmoor on behalf of I Foster | Hawksmoor |  | Whilst no objections are made to the above, consideration should be given by the Council towards additional smaller housing allocations capable of earlier delivery, thus providing market, affordable tenure and specialist housing in lower concentrations. Concerns are expressed on the delivery speed of large allocations and the subsequent shortfall in housing delivery in the proposed Plan period. | Noted.  Please see response to question 3. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1248316 | Heatons on behalf of Tarmac Trading | Heatons on behalf of Tarmac Trading |  | In terms of the proposed allocations, we are pleased to see a good buffer between the Infinity Garden Village Allocation (STRA1) and the Swarkstone Quarry allocation, permitted reserves and expansion areas. We would like to reiterate here that the proposed housing allocation, should not be permitted to expand any further south than as set out at present, due to the potential implications on mineral extraction. | Noted. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242038 | Calum Reford | Inspire Design & Development | Yes |  | Noted. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243628 | Define Planning on behalf of Bloor Homes Ltd |  |  | BHL do not object to the allocation of the two housing led urban extensions, and the strategic employment allocation. However, the Council are clearly over-relying on urban extensions in one area to address the unmet needs of Derby City. In doing so, the Council could fail to address other unmet needs where and when they arise.  The development of Sustainable Urban Extensions of the scale proposed can take a significant amount of time to begin to deliver homes due to their scale and complexities. This includes the requirements to mitigate impacts and provide necessary facilities and services. Therefore, as set out in the response to question 4, the Council should apply a buffer to the housing requirement and allocation of additional development sites to balance out the delivery of the homes that are needed. The production of a Housing Implementation Strategy, as set out in the Draft Plan, clearly demonstrates that there are significant constraints to delivering much needed homes against the proposed spatial strategy. Significantly, this would defer decisions about the location of new development that could be reasonably made during the current Review.  A more flexible approach could also be taken towards other sites coming forward. This could include identifying additional sites in general accordance with the spatial strategy and hierarchy of settlements, such as BHL’s site at Land west of Castle Gresley. This option is identified in the consultation document which acknowledges that a Housing Implementation Strategy is required as “there is always a risk that sites may not come forward as planned during the anticipated timescale”. | Noted.  Please see response to question 3.  Omission sites will be considered in question 13. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242598 | GRL Planning on behalf of Robert Walmsley | GRL Planning on behalf of Robert Walmsley |  | These submissions to the Draft Local Plan Part 1 Review consultation are made on behalf of Robert Walmsley who has an interest in circa 10.6 hectares of land on land at Hospital Lane, Mickleover, as identified below (the ‘subject land’): The subject land is included as part of a much larger proposal to deliver a sustainable urban extension (SUE) to Mickleover under proposed Policy STRA2. Whilst we are fully supportive of the principle of this allocation, we object to the inclusion of the subject land as part of the allocation on the basis that this is not required for the plan/policy to be justified or effective, for the following reasons.  Paragraph 5.17 preceding the policy states that the indicative layout on the plan is to guide the development of the site. The indicative layout plan identifies the subject land as ‘Country Park/Green Wedges’. The policy requirements section of proposed Policy STRA2 refers to Green Infrastructure and the ‘provision of a wide green buffer around the pastures hospital estate’. No justification is provided for such a green buffer and it is difficult to understand why this would be required. The pastures hospital estate was redeveloped for housing circa 20 years ago, there is no conservation area and only two Grade II listed buildings in the form of the Church and Winter Gardens, buildings that are already impacted by the existing residential redevelopment that lies between the heritage assets and subject land. There is thus no requirement to keep the subject land free from development from a heritage setting perspective.  The subject land is surrounded by existing built form and does not physically link to the main proposed allocation site. It is also significantly separated from the proposed housing as part of the SUE, with no pedestrian/cycle links possible due to the intervening existing built form. Also being physically separated, the subject land is not required to deliver any new green infrastructure corridor. The subject site is thus not needed to deliver a green buffer; it is not needed to deliver a green corridor; and it is not needed to deliver any open space to serve the needs of the proposed new population.  Including the subject land and a further land owner when it is not necessary will only serve to frustrate the delivery of the wider SUE. The inclusion of the subject land as part of proposed allocation STRA2 is unsound as it fails the justified and effective tests of soundness. It is respectfully requested that the subject land is omitted from the proposed SUE allocation in the next iteration of the Plan | Noted.  The Council has commissioned an independent Design Review to consider the site as a whole. When the findings of the Design Review have been published the Council will consider the implications for individual parts for the site.  Notwithstanding this, the principal of providing high quality green infrastructure is an important aspect of the overall aspiration for the site. The Council has also produced a Heritage Impact Assessment for the site which considers the importance of the heritage assets and their settings and will inform how development of the site as a whole takes place. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242632 | Lichfields on behalf of St Modwen (Egginton Rd Hilton) | Lichfields on behalf of St Modwen (Egginton Rd Hilton) | No | Whilst St Modwen does not object in principle to the STRA1 and STRA2 allocations in principle, St Modwen has concerns relating to the spatial strategy proposed and the lack of sufficient evidence to support the allocations at this time. Please see St Modwen’s detailed response to draft Policy S4 in the appended St Modwen Homes Representations – South Derbyshire Part 1 Local Plan Review. | Noted.  Please see the response to question 3. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243634 | Lichfields on behalf of St Modwen - Land south of Station St Castle Gresley | Lichfields on behalf of St Modwen - Land south of Station St Castle Gresley | No |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242408 | Lichfields (on behalf of St Philips Land Ltd) | Lichfields | No | The Council has allocated strategic sites STRA1 (Infinity Garden Village Mixed Use Allocation) and STRA2 (Land south of Mickleover) for 2,000 dwellings and 2,500 dwellings respectively. In this regard, St Philips recognises that the NPPF states (Paragraph 74): “The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including genuine choice of transport modes).”  2.38 Importantly, the NPPF also sets out that plans should be prepared positively, in a way that is aspirational but deliverable (Para 16b), and should identify specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan (Para 69b).  2.39 St Philips is concerned that the Council has not sufficiently evidenced that these allocations will deliver 4,500 homes (in total) across the plan period. In this regard, St Philips wishes to draw the Councils attention to research produced by Lichfields (‘Start to Finish’ third edition 2024), which examines evidence on the speed and rate of delivery of housing on sites across England and Wales (excluding London). It has informed several Independent Examinations (including the adopted North Essex Shared Strategic Plan; the adopted Ashford Local Plan; and the Doncaster Local Plan).  2.40 Start to Finish establishes that for schemes of over 2,000 dwellings, the average time from the validation of the first planning application to the first dwelling being completed is 6.6 years. It further finds that the average (median) buildout rate for developments of over 2,000 dwellings is 136 dpa.  2.41 St Philips has been unable to identify any planning applications or permissions (for residential development) which relate to the strategic allocations STRA1 and STRA2. If a planning application for either of these allocations were to be validated by the end of the year, the evidence contained within ‘Start to Finish’ suggests that it is unlikely that any dwellings would be delivered before 2030.  2.42 St Philips notes that Housing Allocation H15 (which lies to the west of allocation STRA1) is subject to planning application DMPA/2019/1097, which seeks outline permission for up to 1,850 dwellings. The application was validated on the 18th of September 2019 and remains under consideration according to the LPAs online planning records. It has now been over five years since the application was submitted and it remains undetermined; this demonstrates that applications for large scale developments can take years to be approved.  2.43 If the allocations began delivering in 2030 and built out at the rates evidenced by ‘Start to Finish’, they would only deliver 2,720 dwellings (in total) by the end of the plan period, resulting in a 1,780-dwelling shortfall. If the plan period were to be rolled forward to 2042, the sites would deliver 3,536 dwellings; still well below the 4,500 dwellings allocated within the plan. St Philips has been unable to identify a housing trajectory prepared by the Council which disputes the above projection.  2.44 Additionally, the Council has not yet published a viability assessment, strategic highways model or infrastructure delivery plan to evidence the deliverability of these key allocations which underpin South Derbyshire’s spatial strategy. In this regard, St Philips would highlight to the Council that there are legitimate issues in respect of the delivery of large-scale sites such as Sustainable Urban Extensions and Garden Villages. The EiP of Hart District Council’s ‘Hart Local Plan (Strategy and Sites) 2032’ in June 2018 gives insight into these issues. Policy SS3 (New Settlement) identified an Area of Search at Murrell Green / Winchfield for up to 5,000 dwellings through the production of a New Settlement Development Plan Document [DPD] after the adoption of this Plan.  2.45 The Inspector noted that the evidence submitted only provided “very high-level broad overviews, with little in the way of detail” (IR 61), and also raised concerns regarding the deliverability of the new settlement. The Inspector found that the Council’s Infrastructure Delivery Plan did not adequately consider the infrastructure requirements, and that the viability of the development had not been assessed through the viability assessment (IR 64).  2.46 In the context of the above, St Philips considers that the strategic allocation policies are neither justified nor effective (NPPF paragraph 35). St Philips would therefore urge the Council to prepare further evidence and review its spatial strategy in order to ensure that its approach is sustainable and deliverable. The Council will need to re-assess its position in light of the proposed changes to the NPPF, SM and emerging positions within the DHMA. The consequence of this is that the Council will need to test reasonable alternatives to meet these needs, beyond relying solely on the strategic allocations on the edge of Derby. | Noted.  Please see the response to question 3.  Note: It is not expected that the strategic allocations will deliver in full during the plan period. A housing trajectory will be produced which details this further. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243653 | Marrons on behalf of Brackley Properties (Burnaston Cross) | Marrons on behalf of Brackley Properties (Burnaston Cross) |  | 3.4.3 The Draft Plan proposes approximately 5-10 hectares of employment land at Land South of Mickleover as part of Draft Policy STRA2, alongside 2,500 new homes, a retirement village, and related social infrastructure. The Employment Land Review (ELR) assesses this site under reference 136 and ranks it as "C" in terms of performance, indicating that it should be considered for allocation to meet local needs. However, the ELR advises that confirmation is needed as to whether the wider development package is both acceptable and deliverable. The ELR expresses significant concerns regarding the deliverability of the employment land at Land South of Mickleover, as it is part of a much larger housing-led development that would require substantial investment. Additionally, the ELR highlights that no information has been provided about where the employment land would be located within the overall site or whether it can be adequately connected to the SRN | Noted.  The Derby and South Derbyshire Employment Land Review identified an overall surplus of employment land in both local authority areas for the plan period. It is expected that the Design Review will inform the location of the employment development but that it is likely to support small and ‘grow on’ units that can take advantage of the proximity to the workforce but also the strategic road network. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242103 | Marrons on behalf of Rainier Developments | Rainier Developments | No | Policy STRA2 Land South of Mickleover  The proposed allocation expects to deliver 2,500 homes, a new junction on the A38, and associated uses and infrastructure by 2039. Evidence is required to demonstrate that 2,500 homes can be accommodated within the residential areas proposed within the allocation alongside other uses and policy standards and requirements. Furthermore, evidence will be required to demonstrate the new junction is suitable, deliverable, and capable of being funded by development without harming viability and the delivery of affordable housing. The implications of any infrastructure requirements and off site works on the housing trajectory will also need to be evidenced so the housing supply is justified. In the absence of this evidence, the allocation will not be justified or sound. | Noted.  Please see the response to question 3.  The Council will produce an infrastructure Delivery Plan which details the infrastructure required, the cost of provision and expected delivery. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243226 | Marrons Planning on behalf of Redrow Homes | Marrons Planning |  | OTHER COMMENTS ON THE SPATIAL STRATEGY We note that despite the inclusion of two large-scale and strategic urban extensions at South of Mickleover and Infinity Garden Village, no housing trajectory or objective assessment of the deliverability of these sites has been produced. It is therefore uncertain as to whether the Draft Plan will establish a five year housing land supply on adoption or throughout the Plan period. We expect that this information will be produced at Regulation 19 stage and reserve our right to make further representations on the soundness of strategic allocations and housing land supply matters generally at that point. At this stage, we have key concerns over the deliverability of the South of Mickleover strategic allocation in highways terms and set out our observations below.  In respect of South of Mickelover, the assessment within the SHELAA indicates that the site’s access is potentially constrained. That is underpinned by our own observations, which are set out below.  Vehicular access is shown to be taken from Staker Lane. Staker Lane is currently a rural lane, which is suitable for two-way traffic but is unlit and does not have any dedicated pedestrian and cycle facilities. The width of Staker Lane is also unlikely to be suitable for use by public transport. Whilst Staker Lane can probably accommodate an increase in traffic, it is unlikely to be suitable for the full scale of development proposals. Staker Lane is therefore unlikely to be suitable to serve the full development proposals, and significant improvements or entirely new infrastructure will be required.  Staker Lane connects to the A38 to provide access to the Strategic Road Network. Staker Lane also connects to Haven Baulk Lane and The Hollow, which provide access to the local highway network and onward connections into the centre of Derby. Haven Baulk Lane is an existing residential road and connects to Rykneld Road at a simple priority T-junction. Haven Baulk Lane is not suitable to accommodate a significant increase in traffic flows, and the Rykneld Road junction will likely require capacity improvements, which may not be practical given the constrained nature of the junction. Noise and amenity issues may also be created by the potential increases in traffic flows. The Hollow also serves a number of existing residential properties. The Hollow terminates at the Brierfield Way/Hedingham Way junction, where The Hollow is the minor arm of a simple priority T-junction. The Brookfield Primary School is located opposite the junction. The Hollow is not suitable to accommodate a significant increase in traffic flows, and the Brierfield Way/Hedingham Way junction will likely require capacity improvements, which may not be practical given the constrained nature of the junction and may lead to conflicts with the existing primary school.  4.5.5 The site is located to the south and west of two high speed dual carriageways. Pedestrian and cycle connectivity across these two roads is required to provide access to the facilities in the local area. The nature of the roads means the opportunities to cross are limited nto the existing underpasses at Haven Baulk Lane and The Hollow. There is an existing public right of way just south of the A516 that crosses the A38, but this isn’t suitable for use by all. Haven Baulk Lane and The Hollow are also designated as National Cycle Route 66. There are no dedicated cycle facilities along Haven Baulk Lane or The Hollow, and therefore cyclists are going to be on the carriageway. The increase in traffic on these roads is going to materially worsen the conditions for cycles and dedicated cycle facilities will need to be provided, which are unlikely to be deliverable along the entirety of the route.  Promotion of Land South of Highways.  The site is located to the south and west of two high speed dual carriageways. Pedestrian and cycle connectivity across these two roads is required to provide access to the facilities in the local area. The nature of the roads means the opportunities to cross are limited to the existing underpasses at Haven Baulk Lane and The Hollow. There is an existing public right of way just south of the A516 that crosses the A38, but this isn’t suitable for use by all. Haven Baulk Lane and The Hollow are also designated as National Cycle Route 66. There are no dedicated cycle facilities along Haven Baulk Lane or The Hollow, and therefore cyclists are going to be on the carriageway. The increase in traffic on these roads is going to materially worsen the conditions for cycles and dedicated cycle facilities will need to be provided, which are unlikely to be deliverable along the entirety of the route.  This 70 hectare site, known as Land south of Highfields, offers a sustainable location to accommodate an urban extension to the edge of Derby City to meet South Derbyshire’s own housing need and to meet any unmet need arising from within Derby City. The Site has also been known as Land South of Littleover, which is the name used in the most recent SHELAA, where it was assessed under reference 231.  The Site is located south of the built form of the Highfields Farm allocation (Policy H12) and consists of a number of agricultural fields and farm complex. The Site’s northern boundary aligns with the administration boundary of Derby City. An annotated aerial view of the Site is included below:  Due to the Site’s location, it will help deliver phase 2 of the proposed South Derbyshire Integrated Transport Link (SDITL) which is identified as a key piece of strategic highways infrastructure in the adopted Local Plan Part 1 (Policy INF4) and the accompanying policies maps.  In particular we note that the Council’s Part 1 Local Plan states “the Council will work in partnership with Derbyshire County Council, Derby City Council developers and other organisations to deliver these schemes”, before further stating that “the South Derby Integrated Transport Link Phase 2 would connect the A38 Junction at Rykneld Road with Phase 1. Together phases 1 and 2 would provide a complete highway connection between the A38 and A50, Although Transport modelling indicates Phase 2 will not be required to mitigate traffic Impacts of the proposed new development within the Plan Period, the indicative alignment is protected to serve any future growth in travel demand which cannot be satisfactorily mitigated by other means”  Redrow consider that the delivery of a sustainable urban extension south of the Highfields Farm allocation (Policy H12) provides an opportunity for developers and public bodies to work collaboratively to deliver this key piece of strategic highways infrastructure.  Presently we expect the strategic route to comprise a 7.3m wide carriageway road, at least one 5m wide footway/cycleway (aligned with LTN 1/20) and at least one 7m wide swale to address surface water runoff. We also expect that any new highway will need to provide a strong boundary to contain development to the north and act to restrict the further sprawl of development contiguous with Derby City to the south. We therefore expect any new built development delivered as part of a new Sustainable Urban extension to be contained within land north of the new link road.  It is also worth emphasising that the delivery of a new link road south of Derby City could open up additional land in the City itself which could help Derby City meet a greater proportion of its own housing need by providing an alternative access route into land to the east of Moorways Lane and sustainability improvements to the surrounding area through new and improved services and facility. Put simply the SDITL could help Derby City to maximise its own housing delivery within its boundary in this location.  The scale of development at the site which will facilitate the strategic link road is also expected to deliver new facilities including education, health and sports provision as required, or in collaboration with adjoining landowners, and will look to ensure and improve connectivity to existing facilities where achievable.  The current South Derbyshire Local Plan, Adopted in 2016 and 2017, directed 8,000 homes to the southern edge of Derby City in South Derbyshire and recognised the potential for a further 3,000 or so at Infinity Garden Village south of Chellaston. This growth reflects the status of Derby City as the main driver of growth in the Derby HMA. Sites on the southern edge of Derby, including Highfields Farm to the north and Stenson Fields to the west have typically delivered around 200-250 homes each year, indicating the strong market demand for new homes in this area and have made a significant contribution towards meeting local housing needs.  Recent housing growth on the southern edge of Derby is being supported by significant investment in local infrastructure. Development south of Sinfin on the Wragley Way site will be supported by the delivery of the Phase 1 South Derbyshire Integrated Transport Link (SDITL), which itself will connect into a new £50m Junction to the A50 and the recently completed T12 link (Millennium Way),  There are also proposals to deliver a new secondary school within the Infinity Garden Village site south of Chellaston as well as proposals to deliver a new Freeport Site just 3km to the south which will contribute to the creation of 61,000 jobs locally with over 10,000 being located on the new Freeport Site. Further residential development in this location could therefore help contribute towards the delivery of balanced communities.  Within the most recent SHELAA Assessment, the Site was referenced as Site 231. Therein, the Site was considered to be achievable and available, and suitable for development. It was however noted that a number of criteria would need to be overcome or require mitigation- those which were rated red or amber on the “RAG” rating system of red, orange and green.  With reference to the SHELAA “RAG” ratings, the Site scored a green rating for the following areas; not containing protected sites; not being within the Green Belt; access to public transport; Site access; not being located within a minerals safeguarding area; not being considered to have an impact on Air Quality Management Areas; less than 5% of the Site being at risk from fluvial flooding; and having a mainly flat topography. Redrow would agree with these ratings and report that the situation remains unchanged in those respects in the intervening period since the assessment was made.  There were some areas which the assessment scored amber, indicating that there may be some factors of slight concern but that mitigation should be possible. On the whole we agree with these assessments.  However, we would assert that the ability to discuss the need for, and provision of, additional services within the scheme offers the opportunity for ‘Green’ scores for Retail, Education, Employment and Sports Pitch provision, as well as in relation to Health Facilities and availability of Local Park and play areas. The SHELAA recognises the ability of the Site to mitigate the existing position albeit this is caveated with the need for further discussions with statutory bodies. In this regard, we would welcome further dialogue with both the District and the City Council to understand how best to address wider infrastructure needs in this area.  We agree that there are very few environmental constraints in this area. There are no landscape designations or environmental designations in the vicinity of our client’s Site that would restrict deliverability. The SHELAA identifies a number of Tree Preservation Orders (TPOs) within the Site boundary but our work at this stage proves that development should be able to proceed without removal or threat to the vast majority, if not all, of the protected trees. Redrow are committed to ensuring that they are considered that these will be retained and integrated into the site design where possible. Similarly, the existing hedgerows would also retained wherever practicable in order to help assimilate any proposed development into the wider environment and reduce the environmental/ecological impact of development.  Early work has been undertaken in respect of ecological constraints and opportunities to assess the ecological value of on-site habitats. The main habitat features noted that this stage are low value grassland and arable farmland, with the fields largely in-use for cattle grazing on a rotational basis, with a small proportion as arable. A small area of semi natural broadleaved woodland is present to the northwest of the Site and sections of bramble scrub are also scattered throughout the Site. A single overgrown pond is present as well as hedgerows and trees as previously mentioned. A biodiversity baseline has been calculated which has established a gauge for the units which will need to be achieved post-development, which is considered to be achievable.  In addition to this ecological work, considerable high-level work has also been undertaken in respect of transport and highways.  In respect of active travel, Rykneld Road benefits from a 2m wide footway on both sides of the carriageway, with the northern side extending to the Findern Interchange junction. To the west, dropped kerb crossings provide pedestrian access to the southern side of Findern Interchange onto Burton Road. To the east of the site, pedestrian signalised crossing points are available, crossing Rykneld Road with the junction at Tutbury Avenue.  Key local amenities within 2km from the development site include; • Derby Hospital • Hollybrook Medical Centre • Aldi & Co-op supermarkets • Derby Grammar School • Littleover Community School • Derby Moor Academy • Griffe Field Primary School • Heatherton District Centre • Dobbies Garden Centre • Tutbury Avenue retail units  A traffic-free cycle path is located approximately 1km northeast of the proposed development on Bakeacre Lane. This cycle route provides access to National Cycle Network (NCN) route 66 that then subsequently connects to NCN routes 54/68 and 6 as well as recommended on-road cycle routes. These cycle routes provide onward connections and access to Derby City Centre. Approximately 1.4km to the north of the proposed site on Rykneld Road, an on-carriageway facility is available that also routes towards Derby City Centre.  There existing Active Travel facilities local to the site and there are opportunities to connection to and to enable improvements to enhance the local pedestrian and cycle infrastructure network in the local area. Green travel corridors throughout the site can also be incorporated to link in with existing nearby infrastructure, primarily to the north-east of the site. This will enhance the permeability of the site to sustainable modes of travel in the direction of Derby and local facilities located within Heatherton Village.  In terms of provision of the SDILT, Initial testing of the proposed Redrow and surrounding development, including for Phase of SDITL, has been completed in the Derby Area Strategic Traffic Model. The traffic model testing demonstrates that the SDITL provides a strategic benefit to the local highway network while also providing access to new residential development and the SDITL.  The Redrow site will deliver access to the site, which will also serve as the SDILT access junction and an initial section of the SDITL. Capacity modelling of the site access junction has demonstrated that a large roundabout can provide sufficient capacity to serve the Redrow site, the traffic flows associated with the SDITL, and the traffic flows associated with the potential wider allocation.  It is necessary, realistic, and likely that early housing delivery will be required for any strategic housing allocations. The land south of the Rykneld Road site will be able to enable early housing delivery while also delivering the initial sections of key infrastructure. An initial assessment of some early housing delivery totalling up to 750 units has been undertaken and confirmed that there are no highway capacity barriers to the allocation of the proposed development or the proposed volume of early housing delivery. The roundabout on Rykneld Road, that provides access to the site, is designed to accommodate the whole allocation site and SDITL traffic, The roundabout there has more capacity and therefore more early housing delivery if required is feasible.  Ultimately, as part of any future planning application, the detailed impacts of the proposed development will need to be tested in further detail; however, based on the initial assessment completed, the allocation of the Redrow Site for residential is sound in terms of highway impact.  Moving on, the necessary water and electricity infrastructure to support strategic development is capable of being delivered alongside development and providers network operators with the certainty to plan for the further reinforcement of local infrastructure. We do not consider that the lack of current provision to be a major issue.  Whilst we acknowledge that development would lead to the loss of greenfield land, South Derbyshire, as a rural district, does not have significant areas of previously developed land available to accommodate new growth. For context, it is noted that just 13% of housing was delivered on previously developed land in 2020-211 . However a review of the strategic level agricultural land quality maps indicate that agricultural land quality in the vicinity of the Site is likely to comprise of grade 3 land rather than higher quality grade 1 or 2 land. Moreover, the development of land on the edge of a large urban area such as Derby City will allow site density to be maximised in line with government policy and could therefore help reduce the need for greater losses elsewhere in the District including in locations with higher quality agricultural land.  Finally, as well as our clients site being located in an otherwise sustainable location on the edge of Derby City it is also well located to address future housing needs related to large scale economic growth proposed in the District. The site is located less than 4km from the East Midland Intermodal Park (EMIP) which is part of the East Midlands Freeport. The EMIP site is located off the A38/A50 (Burnaston Interchange) and the SDITL and A38 will provide a direct route to this very large scale site which once built will provide a strategic rail freight interchange serving 5.2million square feet of state-of-the-art manufacturing and distribution space2 . Clearly economic development at this scale will need to be balanced by significant housing growth close to the EMIP site to provide the local labour force needed. The Freeport site is surrounded by a number of mostly small scale key service villages that are relatively sustainable although it is unlikely that these could grow to the extent required to address local labour force needs without their character being adversely affected. The Hall Pastures Farm site and the wider land south of Littleover area provide opportunities to deliver a new large scale community to address local labour force needs close to the EMIP Site whilst protecting the rural character of surrounding settlements.  LAND SOUTH OF HIGHFIELDS, DERBY The development of Land South of Highfields provides the opportunity, alongside adjoining land parcels, to bring forward the delivery of the Phase 2 South Derbyshire Integrated Transport Link. This is a key piece of highways infrastructure which is supported by both South Derbyshire District Council and Derby City Council through their Adopted Part 1 Local Plans. The SDITL phase 2 would provide a strategic highways connection from the Findern Interchange and would run eastwards towards Wragley Way where it would connect to the Phase 1 SDITL which itself connects into the recently delivered T12 transport Link (now known as Infinity Park Way). The route would also sit within the wider transport infrastructure being delivered on the Southern edge of Derby City including the new junction on to the A50(T) proposed south of Sinfin to serve the Infinity Garden Village and Wragley Way developments. Richborough welcome dialogue with the District, City and County Council regarding the SDITL route as the Local Plan continues to progress.  Reflecting on the Site itself, there are no significant historical designations located on the Site. With the exception of a number of TPOs the site is unconstrained from environmental designations. These features, alongside the hedgerows and boundary trees can be integrated into the site design to maximise landscape and biodiversity improvements. Furthermore, given the highways works proposed there are no significant technical issues which would make this Site unsuitable for development in planning terms.  The Site will contribute to the delivery of a key piece of strategic infrastructure in regards the SDITL but also provides an opportunity to safeguard and thereby ensure the delivery of train station in the vicinity of the site in line with the aspirations within the adopted Local Plan and therefore improve transport facilities and local connections in the long term.  The Site is therefore considered to be a deliverable housing allocation, is available, suitable and should be taken forward as an allocation in the local plan. The Site will contribute towards a five year supply in future and we respectfully request that Land South of Highfields be identified as a housing allocation in the emerging South Derbyshire Local Plan.  SPATIAL STRATEGY The Draft Plan’s scope has driven the site selection process. The sites taken forward for allocation on the edge of Derby have not been chosen following a robust, transparent and objective process through the Sustainability Appraisal. The Growth Options Study 2021 and the associated HMA-wide SA have considerable methodological flaws and the ISA’s assessment of strategic options is not robust. The result is the Draft Plan and it evidence base fails to justify its overall spatial strategy or the quantity of growth it plans for. | Noted.  Please see response to question 3.  The Council will produce a housing trajectory.  Infrastructure requirements will be considered under question 7. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242570 | Nineteen47 on behalf of Hallam Land (land at Blackwell Lane) | Nineteen47 on behalf of Hallam Land (land at Blackwell Lane) |  | Question 5: Do you agree that the following strategic sites should be allocated for development?  3.27 The strategic sites identified within the draft Part 1 update may have a role to play in contributing to the South Derbyshire and Derby HMA requirement. However, the appropriate level of development to be allocated to these sites cannot be appropriately assessed without evidence of the up-to-date need in the remainder of the District.  3.28 The Interim Sustainability Appraisal 2024 acknowledges a potential negative cumulative effect in landscape and infrastructure terms that may arise from the delivery of such significant sites. It is possible that these impacts could be reduced if an alternative quantum of development was deemed more appropriate within the context of a comprehensive review of available sites across the whole South Derbyshire area, including genuinely alternative sites in other settlements.  3.29 This approach would also support the distribution of employment opportunities across the District, as appose to the likely outmigration of the workforce to Derby resulting from the proposed strategy, to allocate additional strategic sites on the edge of Derby only.  3.30 It is therefore recommended that the appropriate mechanism through which to allocate strategic sites is as part of a comprehensive new Local Plan, to be prepared in accordance with the relevant NPPF at that time. | Noted.  See response to question 3. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1248322 | Oxalis Planning on behalf of Chesshire Partnership | Oxalis Planning on behalf of Chesshire Partnership |  | We support the proposed allocation of STRA2. The site is located in a sustainable location well-related to the Derby City urban fringe and A38, and offers sustainable transport modes. It can also deliver significant green infrastructure inclusive of a new country park and provides the opportunity for a comprehensive development with the provision of new community facilities.  However, we object to the extent of the proposed allocation site, and to the proposed disposition of land uses shown on the proposed allocation plan. The extent of the proposed allocation should include the remaining land west of the Findern Interchange. In our view, the exclusion of this land makes the allocation unsound as it would compromise the ability to comprehensively plan the development of the area and leave an isolated parcel of land surrounded by a large development allocation.  Inclusion of this isolated land parcel would appropriately round off the allocation site and allow for comprehensive development, particularly of the important location adjacent to the Findern interchange. Furthermore, the inclusion of this additional land would allow for the policy to be amended to increase the deliverability of employment generating land, and to therefore help meet the employment needs of the area (please see our response to the employment needs evidence in section 3 below).  As Agents acting on behalf of the Landowners of this site, we put forward and support the inclusion of this land within the proposed allocation, to offer additional land for comprehensive development that would not result in additional wider impacts of the proposed allocation as a whole. The site area is circa 20 acres.  The plan below in figure 1 (and at Appendix 1) identifies the site referred to that has been excluded from the allocation, and we now put forward for its inclusion within the allocation.  Chesshire Partnership control other land within the proposed STRA2 boundary. They are also concerned about the approach to the disposition of land uses across the site, which does not reflect specific conditions on particular areas of the site and is at this very broad brush. In particular a parcel of land situated between the A38 and Staker Lane is identified to be a country park, and this does not respond appropriately to the circumstance of this land parcel. The Plan found at Appendix 2 identifies this land parcel.  The land identified in Appendix 2 along Staker Ln is part of a larger commercial farming unit operated by the Partners. The area of land identified in red is proposed within the draft masterplan to be allocated for housing. This is supported by the Chesshire Partnership.  The area of land identified in blue (Appendix 2) is proposed within the draft masterplan to be allocated as country park land/green wedge, which is not supported by the Chesshire Partnership. This area forms part of a commercial farming unit adjacent to the A38 and is in cut along this section. It is therefore expected that landscape/visual sensitivities are least prevalent in this area of the wider allocation.  This area of land also includes existing industrial units in relation to the agricultural holding, and it would therefore be appropriate for further development to take place in this parcel of land. We query the appropriateness of a country park being situated adjacent to A38 dual carriageway.  The masterplan proposes that this land would be bordered by Staker Lane, and an area allocated for housing to the west, the A38 and further allocated land beyond to the east. The emerging context of this land, therefore, is one of built development, and its allocation for countryside would isolate the area within the context of built development. Furthermore, the area is located a significant distance away from the allocation’s southern edge, which is proposed to act as screening to the wider landscape.  In our view, this context places the land within the main developed area of the allocation and is suitable for development.  The Chesshire Partnership would welcome the opportunity to discuss with the Council, the approach to the master planning process for these land parcels and the wider site. | Noted.  The allocation has been amended to include the land not previously identified within the allocation adjacent to the A38 Findern junction.  The Council has commissioned an independent Design Review to consider the site as a whole. When the findings of the Design Review have been published the Council will consider the implications for individual parts for the site. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243538 | Pegasus Group On behalf of L&Q Estates in relation to Land at Staker Lane, Mickl | Pegasus Group |  | Policy STRA 2: Land South of Mickleover 2.9. Firstly, our Client is supportive of the sites inclusion as a strategic allocation within the draft Local Plan. The site offers an excellent opportunity to deliver sustainable development at the edge of the City, meeting the housing needs of South Derbyshire and Derby City.  2.10. There are however concerns with the details of the proposed allocation and the draft masterplan that has been included within the draft local plan.  2.11. In order to ensure the allocation policy allows for the viable, timely and appropriate provision of homes, our clients raise the following comments.  2.12. For ease of reading, Policy STRA 2 is included below and responses have been provided at relevant points. The Strategic Allocation identified as Land South of Mickleover will be expected to deliver the following requirements and be in accordance with other Local Plan Policies: A) Development Requirements i) Approximately 2500 new homes Master planning exercises have considered the elements required as part of the draft allocation policy, including the 5-10ha of employment generating land, the provision of a retirement village and Gypsy and Traveller pitches.  Paragraph 5.17 of the pre-amble to the policy states that the indicative layout on the plan is to guide the development of the site, the indicative layout plan identifies significant areas of green infrastructure within the Clients land interests and throughout the wider draft allocation, without any clear justification. It is not considered realistic that the proposed masterplan will deliver 2,500 homes once these extensive areas of green infrastructure are taken into account.  The proposed masterplan fails to take full account of the on-site constraints and this combined with the proposed provision of significant green infrastructure and the other forms of development to be delivered, means achieving 2,500 dwellings on site would require a very high dwelling per hectare figure which would be out of character with this location at the edge of the City.  The masterplan referred to in the draft policy is not based on the necessary technical evidence needed to support the draft policy and there is concern, therefore, that without this evidence, the plan could be found unsound.  ii) Approximately 5-10ha of employment generating land iii) Explore the provision of a retirement village within the scheme There is no objection in principle to the provision of a Retirement Village within the scheme, however, it does not appear that there has been a viability assessment undertaken. Viability constraints need to be understood in relation to C2/C3 and the relationship with the requirement for affordable housing and other contributions as this could affect the delivery of the wider site. iv) The provision of Gypsy and Traveller pitches in line with Policy H21 The provision of Gypsy and Traveller sites within sustainable urban extensions is not supported, this is not the most appropriate way to meet the needs of this community. It is suggested that a criteria based policy is included in the Part 1 Plan to enable sites to come forward through the plan period. v) Vehicular access to serve the sites shall be developed appropriately, the Principle accesses to the sites shall be from: a. Principle site – Access to the off the A38 roundabout b. East of the A38 – Access to be off Rykneld Road  B) B Social infrastructure / services for the development i) Provision of appropriate scale community facilities; ii) Delivery of healthcare infrastructure sufficient to meet need, either on site or off site through contributions. These contributions towards healthcare facilities will be commensurate with the scale of the development, and in accordance with INF1 and the Planning Obligations SPD iii) Delivery of primary and secondary education sufficient to meet need, either on site or off site through contributions. These contributions towards primary and secondary education, schools and facilities will be commensurate with the scale of the development, and in accordance with INF1 and the Planning Obligations SPD. This will include; a) The provision of a three form entry primary school with nursery; and b) Financial Contributions towards secondary education; iv) Provision of a local retail centre commensurate with the size of the development to provide for the day to say needs of the development and surrounding area  C) Green Infrastructure. A network of interconnected Green Infrastructure which as a minimum shall include the following: i) The provision of a wide green buffer around the pastures hospital estate and along the boundary of the A38; ii) The provision of a Country Park, to be located within the site to the north, west and in part of the land immediately to the south of the pastures hospital estate; iii) The green infrastructure network should allow active travel connections though and across the site to points of interest and recreation; iv) High quality continuous pedestrian and cycle routes shall be provided within the site and links between the site and Burnaston village, and development within Derby City; v) Built development within the Green Infrastructure locations shall be restricted to that ancillary to and necessary to support green infrastructure (such as grounds maintenance huts, small changing rooms etc); The provision of Green Infrastructure throughout the wider draft allocation and our client’s land interests at Staker Lane is supported. However, the requirements should be justified and reviewed as necessary. As referenced above in the preamble to the draft policy, Paragraph 5.17 states that the indicative layout on the plan is to guide the development of the site.  The indicative layout plan identifies the provision of green infrastructure corridors of some 100m wide, adjacent to the western boundary of the site with the golf course. This extent of buffer is unjustified and it is concerning to see such wide green infrastructure corridors where they are not required and difficult to see why such a large separation distance is required given the existing built form located to the west of the clients land interest.  A Landscape and Visual Constraints and Opportunities Report was produced and submitted to the Council during the Call for Sites consultation in 2020. It is considered that the site can accommodate a sensitively designed residential scheme with only limited landscape and visual impact, at a localised level, that can be reduced through effective mitigation. The retention of existing trees and hedgerows within the site and a small buffer to the A511 to the north and existing built form to the west is considered to be sufficient to mitigate any local landscape harm. The provision of a 100m buffer to the existing built form to the west is considered to be excessive and unnecessary and is not considered to be necessary to deliver an appropriate green corridor. The provision of the green infrastructure requirements shown on the draft masterplan is leading concerns regarding the quantum of development and the ability to achieve the 2,500 homes stated within the draft allocation policy.  The submitted Masterplan for our Client’s land at Staker Lane shows a significantly reduced buffer along the western boundary, the buffer still however amounts to a minimum of 25m wide, a substantial buffer, expanding in some areas to be wider. This buffer is considered appropriate to provide for a green landscaped corridor with pedestrian and cycle connections to the wider site allocation and Mickleover to the north. This evidenced buffer significantly increases the developable area of the site and the delivery of housing to meet the required need.  The masterplan for our Client’s land interest shows the provision of approximately 345 dwellings within the SDDC area, with significant and appropriate quantum of green infrastructure. The proposal relates well to the existing built form and would avoid an isolated island of residential development. It is considered that the green infrastructure requirements within the masterplan are reduced to ensure that a suitable and sufficient quantum of development can be delivered in accordance with Part A of the draft policy.  Furthermore, it is considered that the reference to ‘Green Wedges’ is removed from the draft masterplan within the policy, this is not a policy designation within South Derbyshire and should be removed as such. D) Mitigation i) Appropriate sound attenuation/noise mitigation for both dwellings and recreation/ habitats from the A38 and A516; ii) On site biodiversity net gain in line with national legislation and protection and management of key biodiversity assets such as trees and hedgerows;  Biodiversity Net Gain legislation is contained within the environment Act 2021. This is a duplication of national legislation and it is not considered necessary to include it within the draft policy. Notwithstanding this, national legislation allows for biodiversity net gain to be delivered off-site with a preference first for on-site delivery, requiring strictly an on-site provision is considered to be unreasonable and unjustified.  Further clarification may be required in relation to trees and hedgerows, not all trees and hedgerows are good quality that require retention. iii) Appropriate flood risk management in accordance with policy SD2 across the site and ensure that all more vulnerable development is located wholly within flood zone 1; iv) SUDS will be provided in accordance with Policy SD3; v) A layout and form of development that respects the landscape character, as well as the character significance and setting of heritage assets, including Grade II Church at Pastures Hospitals and Grade II Winter Garden at Pastures Hospital; vi) Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of more sustainable transport modes; in accordance with policy F2; vii) Ensure that the development is well connected to frequent public transport to Derby centre as well as other key designations, and that bus stops and routes are provided through the site to allow for convenient boarding; E) No dwelling /phase of development shall be occupied until: i) The necessary Green Infrastructure including open space, active travel provision, connectivity, community facilities including education and health provision, public transport provision, hard infrastructure including access points and highway improvements where required is provided to service that dwelling/ phase. This is to enable new residents to access the full suite of services and facilities to support the delivery of housing in a safe and convenient manner without relying on the private car;  This criteria is not appropriate for a strategic policy where the purpose is to set out a high-level strategy in accordance with the NPPF (paragraphs 20 – 23). The evidence base does not include a Viability Assessment that assesses the potential impact such a requirement could have upon the viability of the scheme and is unjustified as a result. In addition to potentially impacting viability, our clients consider this will impact delivery of the strategic allocation and ultimately the delivery of the Local Plan as a whole.  It is suggested this criterion is amended to request the submission and agreement of a phasing plan which will ensure key infrastructure is delivered in a timely manner.  F) The development shall be provided in broad conformity with the plan below with the details to be confirmed in a Development Framework Document which shall be informed by a Design Review process.  The principles of a Development Framework Document, informed by a Design Review is supported and will provide certainty regarding the delivery of the draft allocation. | Noted.  The Council has commissioned an independent Design Review to consider the site as a whole. When the findings of the Design Review have been published the Council will consider the implications for individual parts for the site.  Notwithstanding this, the principal of providing high quality green infrastructure is an important aspect of the overall aspiration for the site. The Council has also produced a Heritage Impact Assessment for the site which considers the importance of the heritage assets and their settings and will inform how development of the site as a whole takes place.  Infrastructure requirements will be considered under question 7. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243194 | Pegasus on behalf of Richborough - Kings Newton Melbourne Estates Limited | Pegasus Group |  | Chapter 5 Strategic Allocations 2.41. Whilst providing homes for local people within the district and responding to the local housing need, the two strategic allocations at Infinity Garden Village (Policy STRA1) and Land South of Mickleover (Policy STRA2) also contribute significantly to meeting Derby City’s unmet housing need.  2.42. Paragraph 11a of the NPPF states that all plans should ‘meet the development needs of their area’. Our client considers that the allocation of additional, smaller, sites for residential development, which responds to the additional housing need of the district only, is required to ensure the Local Plan is compliant with the NPPF and its soundness tests.  2.43. As set out throughout these representations, it is imperative that more specific deliverable and developable sites are included within the development strategy to ensure that there is adequate flexibility to account for any delay in delivery and to genuinely respond to the need of the South Derbyshire district | Noted.  Please see response to question 3. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242100 | RPS on helaf of Bellway and Clowes (Thulston Fields) | RPS on helaf of Bellway and Clowes (Thulston Fields) |  | STRA2: Land south of Mickleover RPS consider the SHELAA assessment of the Land south of Mickleover has a number of suitability criteria issues that are fundamental to resolve. Namely, with regards to highway access which County Highways have identified the site is constrained in respect of the criteria. The Council state this is considered to be achievable without justification for as to how.  Additionally, material assets (such as public transport, pedestrian and cycle links, highways safety and highways access) and matters relating to utility provision at STRA2 indicate apparent constraints to development without an understanding of the mitigation to be delivered. The Council do not set out what the required mitigation may entail.  The Council has stated its intention for the new strategic sites that have been identified. This appears to be the sum total of information and evidence that has informed the identification and selection of these locations as potential new settlements up to this point. Significant uncertainty remains given the lack of progress in developing an appropriate evidence base for the sites, therefore substantial doubts remain as to the suitability or deliverability of these potential locations as being able to deliver the new strategic sites particularly in the short-term. Consequently, a significant measure of caution must therefore be applied to any of the outputs from the SA process at this stage, until the vacuum in the evidence base to support these new settlement locations is prepared and made available to the public. The Plan does not contain any flexibility should larger sites not come forward. If a flexibility allowance is required then additional sites would need to be allocated in order to allow for this.  Given these uncertainties, the plan must make allowances for other demonstrably deliverable sites to come forward early in the plan period, and additional allocations should therefore be considered. Sites such as the land at Thulston Fields, represent an opportunity to deliver much needed homes early in the plan period. The Council should be proactively considering incorporating more sustainable sites to truly safeguard delivery should the strategic sites or windfall sites identified be delayed / not be forthcoming. | Noted.  Infrastructure requirements are considered in question 7.  Please see response to question 3. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242854 | Stantec on behalf of Caddick Land in relation to Land North of Ashby Road, Woodv | Santec on behalf of Caddick Land in relation to Land North of Ashby Road, Woodville | No |  | Noted. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243556 | Stantec on behalf of Parker Strategic Land South of Mickleover | Stantec on behalf of Parker Strategic Land South of Mickleover |  | 3 Mickleover South Draft Allocation STRA2 3.1.1 As the Principal Promoter, PSL welcomes South Derbyshire District Council’s recognition of the opportunities for land south of Mickleover to create an exemplary new neighbourhood that delivers new homes but also crucially new community facilities and high-quality environmental benefits as part of a sustainable development that connects to the wider Derby conurbation.  3.1.2 PSL supports the principal of such a strategic allocation and is committed to working collaboratively with landowners and the Council through the Design Review process, to ensure a comprehensive approach to the delivery of strategic growth in this location is achieved, shaping spatial principles and distribution, and guiding the site wide infrastructure plan and wider masterplan to a position where it can be presented to the Local Plan Inspector.  3.1.3 The following review of draft Policy STRA2 is underpinned by supporting material and Topic Papers focused on: • Site Opportunity Review; • Transport; • Landscape & Ecology; • Flood Risk & Drainage; • Heritage; and • Sustainability Appraisal (SA).  3.1.4 The accompanying Site Opportunity Review (at Appendix B) provides a design review and comparative analysis between the draft allocation and the PSL proposed masterplan for the Site with the benefit of technical evidence.  3.8.8 Advice Note 3 in its step by step suggestions advises to consider ‘maximising enhancements’ and thereafter sets out means to avoid harm. Whilst we do not consider this to be an exhaustive list, Advice Note 3 includes considerations for Local Planning Authorities to maximise enhancements such as: • Increasing understanding through research and recording; • Repair/regeneration of heritage assets; • Removal from Heritage at Risk Register; and • Better revealing of significance of assets e.g. through introduction of new viewpoints and access routes, use of appropriate materials, public realm improvements, shop front design.  3.8.9 Place-shaping lies at the core of approaches to managing heritage assets through the plan-making process. Both Advice Notes 1 and 3 alongside the NPPF set out the importance of setting out a positive strategy for heritage assets that affords them protection through enabling them to make a positive contribution to the character and distinctiveness of places in which they can be enjoyed. The ability for a development to help repair and sustain heritage assets, putting them to active viable uses that realise their social, economic and environmental potential, forms a key part of this approach. Due to their proximity to and relationship with the draft allocation, the assets centred on the former Pastures Hospital promote opportunities to achieve this approach.  3.8.10 NPPF Paragraph 212 states that: Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.  3.8.11 Historic England Guidance Notes 1 and 3, alongside the Historic England Good Practice Note GPA 3: The Setting of Heritage Assets, recognise the need to ensure high-quality delivery through appropriate mechanisms, controls and monitoring controls, including site-based policies and design principles where necessary.  3.8.12 An analysis of the proposed indicative layout toward draft allocation STRA2 and the PSL Preferred Masterplan is provided within the Heritage Topic Paper (Appendix F). However, in summary following a review of both layouts we consider that: • The overall sensitivity of the historic environment to the development of the draft allocation is low. • There are opportunities to actively integrate heritage assets into the future development of the Site, maximising the role they can actively play in place-shaping whilst mitigating or avoiding harmful impacts upon them. • Critically, and drawing on the framework of law, national and local planning policy and industry best practice guidance, there are opportunities to avoid and mitigate harm to heritage assets, such as through visual screening, but also promote and celebrate their significance through the plan-making process, ensuring they play an active role in future communities. Opportunities to better promote the heritage values of assets associated with Pastures Hospital are lost within the STRA2 allocation, restricting the value they will bring to future communities. • Comparison of the masterplan and STRA2 allocation shows that engaging with the constraints and opportunities posed by heritage assets does not have a strong relationship with the extent of the developable area, but rather in the nature by which heritage assets are engaged with, particularly in the spatial distribution of uses and open space. • The greater the visual and physical connectivity the development has with the landmark former Pastures Hospital campus, the better the development outcomes will likely be for the historic environment. In this respect, amongst others, the masterplan offers significant advantages for place-shaping over the STRA2 allocation.  3.8.13 Based on the work undertaken to date, including the updated Baseline Heritage And Archaeological Technical Assessment prepared by Marrons (November 2024; Appendix G) the PSL Preferred Masterplan is considered to respect and appropriately respond to the heritage assets identified therein.  3.8.14 PSL is committed to working collaboratively through the Design Review process to ensure a comprehensive approach to the delivery of strategic growth in this location. This will include further consideration with landowners, South Derbyshire District Council, and Derby City Council to look for opportunities to enhance or better reveal or enhance the significance of existing heritage assets | Noted. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243648 | Tensi Properties Ltd | Tensi Properties Ltd |  | 2.4. The two new allocations at Infinity Garden Village and Land South of Mickleover are likely to require a longer-term vision extending beyond 2039. This could have serious implications for both the delivery or necessary development.  3.1. Tesni has concerns around the focus and over-reliance on large allocation such as Infinity Garden Village (STRAT1) and Land South of Mickleover (STRA2), which could create an over-concentration of development located to the north of the borough and directly adjacent to the city of Derby. 3.2. This approach neglects smaller settlements and more rural parts of the district, which could benefit from proportionate growth to support local economies, services and infrastructure. As alluded to previously, over-reliance on large sites such as these could lead to delays in housing delivery due to their complexity. Therefore, a diversity in the proposed strategy around allocations is likely to be more sustainable for the wider area. 3.3. Even though it is acknowledged that the borough and the local housing market has a strong relationship with this conurbation. The strategy of focusing development towards Derby risks exacerbating disparities within wider South Derbyshire, leaving smaller communities without adequate investment or development in order to sustain their viability. | Noted.  Please see response to question 3. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242865 | Turley on behalf of Hallam Land | Turley on behalf of Hallam Land | No | Policy S4 “Housing Strategy” sets out that housing will be delivered through two new housing led strategic sites, comprising at least 13,347 dwellings, completions on “saved” allocated sites providing 285 dwellings and a “minimum” of 851 dwellings on windfall development sites.  Firstly, it is considered that a substantial proportion of housing delivery is being directed towards strategic sites. Although in principle, this may be considered an appropriate approach there shouldn’t be an overreliance on strategic sites given the significant infrastructure required and lead in time for this to be delivered. The Plan Review should be identifying sites that can provide homes quickly and early in the plan period, particularly given the acute HMA and national need. This is considered to be a more sustainable approach. Further detail is provided in our submitted representations (December 2024). | Noted.  Please see response to question 3. |  |  |  |  |  |  |  |  |  |  |  |  |
| **Members of the public** | | | | | |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242301 | Adam James |  | No | Being a Heatherton Village resident, this new development you wish to push forward - I completely reject.  This is going to put a massive strain on the local infrastructure.  Even now at school times Rykneld Road is hellish and you want to make this worst. Trying to drive to work from Heatherton Village to Mickleover during the schools run now is bumper to bumper and the traffic comes off the A38 to cut in via Stalker Lane to Mickleover this is without a new housing development.  The thought of gypsy sites being dotted in. No no no I have lived near one in Glasgow and the crime rate jumped in the local area, we had quad bikes on the roads and pavements. Where is the common sense…..  This development will also require the local hospital, who already cannot cope with the current residents let alone another massive development.  Overall I completely object to this development plan. Go back to the drawing board go and build near Burton on Trent. Rolleston on Dove. | Noted.  Infrastructure requirements will be considered under Question 7.  Comments relating to the other strategic sites will be considered under the relevant questions 5a,5c ,6 & 8.  Note: The Drakelow Power Station site is for employment use only and is not being allocated for residential development.  Derby’s unmet need and the Duty to Cooperate is addressed in question 4. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1236474 | Alan Dixon |  | No | As answer 1  Question 1: Do not agree with the proposal for housing south of Mickleover Already enough new housing near Mickleover Ward/City boundary. There is plenty of land available elsewhere in South Derbyshire, and should be nearer Swadlincote because of the 40 percent of social housing |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241993 | Alan Mercer Jones |  | Yes |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1244420 | Alan Parker |  |  | ...whilst I cannot comment specifically on X or Y on various planning rules and regulations I believe I can constructively comment from the standpoint of a Local Resident with children and grandchildren plus I have worked in a wide range of industries (Retail Banking, Corporate Banking, Farming, Domiciliary Care and Technology) albeit from a Finance perspective. Whilst I acknowledge you have a difficult job and balancing act to perform. Drawing on knowledge and experiences I am OBJECTING whole heartedly to the STRA 2 Plan Land South of Mickleover from so many aspects that are currently affec?ng local communities already. There is so much wrong and needs to be put right BEFORE more development and expansion is even contemplated let alone sanctioned. I have chosen not to comment specifically on STRA 1 & STRA 3. However, my comments can be extrapolated into these areas quite easily. The list is long. Road Infrastructure - I will not go into great detail on the poor conditions / pot holes etc but the roads in “so called” 3rd world countries are generally in a far better condition…..I have driven on them - as I do here. The A38 (improvement plan) Markeaton / Little Eaton which was first suggested (my guess) a decade or so ago has simply “ran aground”. Basically, the road infrastructure is already at breaking point. Let alone if another 2500 houses are built another say 3000 to 5000 cars will be on the roads. Plus associated traffic e.g. delivery vans etc. Let alone the poten?al impact of nearby 1&3 of your proposals. This excludes the recent approvals granted at New House Farm and the increased impact of Cotchett Village which is almost complete. Examples of personal experiences - most days you will find and hopefully wholeheartedly agree. Severe Congestion A38 Kingsway / Markeaton / Little Eaton roundabouts - chronic Severe Congestion A50 Sudbury /Uttoxeter / Toyota roundabouts - chronic Both directions leading to and from their respective Motorway Junctions. And yes chronic Try to get into Burton on Trent from A38 again chronic Try to get into Derby near the Derby Royal Hospital absolute gridlock again chronic Two specific examples:- At around 10.40 a.m. on 29/11/24. The car park at Tesco Mickleover was FULL again not in your area being in Derby City but adjacent. At around 11.50 a.m. on 2/12/24. The car park on The Parade was heaving. The road was gridlocked. The Mickleover Villager was stuck because from both ways cars were trying to get into the car park plus one siting in the entrance / exit. Only one car was trying to reverse out of a spot. More locally in Swadlincote I really cannot constructively comment other than the Clock Roundabout is not good. Ok, you might not agree as my main examples are not specifically in South Derbyshire but your proposal is ADJACENT. It will only make the grave situation worse for everyone. Flooding of the road network. I can name three specific “REGULAR” instances (could easily name more) Road leading into Twyford Road connecting Repton from Willington Road - Staker Lane All three I have managed to navigate through but only JUST. THE BUILDING OF MORE HOUSING STOCK WILL ONLY INCREASE THE RISK OF FLOODING. If I read your map on the flyer I picked up at the Hotel, correctly - No narrative merely a symbol indicating vehicle access from Staker Lane into the proposed development this is “an accident waiting to happen”. Staker Lane which is a “Rat Run” already needs to be remodelled in its entirety making it much wider and in places straighter. Plus the junction with The Hollow / Haven Baulk Lane needs significant infrastructure upgrading. Let alone the Historic Flooding - this needs to be stopped. Schools through to Health Care The existing facilities are stretched and at capacity, if not beyond - I will not go into the “Political” aspects of NHS waiting list / time. >From personal experiences:- GP Appointments - the worst example it took 50 yes FIFTY calls to get through to the Surgery. I was then told I couldn’t have an appointment because all slots had already “gone”. No, I couldn’t book one for the future. I WAS TOLD I NEEDED TO ARRIVE IN PERSON AT 8.00 am TO JOIN THE QUEUE. Following a referral from the Opticians in May, this year, my wife is still waiting for the Hospital to contact her for her 1st Appointment. Only last week we spoke to the Optician and she told us there was nothing she could do. Our granddaughter goes to Nursery and yes they too live in SDDC area. The Nursery is at full capacity. They cannot build an extension and as a favour I asked if they could take our granddaughter just for a few hours on a day we look atier her. No sorry we cannot. So, whilst we tried she had to accompany me to my Orthotics appointment and our top up vaccinations which wasn’t ideal. Last December (2023) she came down with a water infection. I needed to get some medical treatment for her. I took her to a walk in clinic. We sat waiting for over 3 hours just to get an initial assessment. Day Schools It is slightly unfair to comment here because this is both in a nearby County and from friends who are teachers / head teachers and teaching assistants. “We need more classrooms to accommodate students having to make to with portacabins” I should add they cover 3 schools and it’s the same message. I’m not referring to John Port in Etwall these are slightly further away. Again, not in SDDC area a Planning Application for the erection of up to 1,350 homes, includes a two-form entry primary school, as well as potential for a local centre, public house, wine bar and hot food takeaway. This clearly demonstrates the need for Schools. I must add the Application has not been passed yet and it is meeting with STRONG Objections from the local community and indeed Sport England. See below for justification of these numbers. 1350 houses will equate to 675 children at the 2.5 average. Split evenly over the 16 years including Nursery means 42 children per year group which is 12 more than the legal maximum. Hence, they are opting for a two form entry primary school. Whilst the proposal here includes “a Three Form Primary School and a Nursery plus Financial Contributions towards Secondary Education”. My conclusion is 2500 homes (with their 3000 - 5000 cars) will generate a significant number of children. Let’s say on the low side 1250 children split evenly over 16 years. That’s 78 children per year group. >From Nursery through to leaving school to either the Job Market or further education. 4 My estimate of 1250 children is supported by Gov.uk - Accredited Official Statistics Chapter 1 Profile of Households & Dwellings published 28/11/24. They have found :- Households with mortgages 2.7 people Private Renters 2.3 people Mean Average 2.5 people per household Hence, a minimum of 1250 children This proposal although mathematically meets the legal requirements in my considered opinion it leaves no room for error / expansion and I believe it is woefully inadequate in this aspect of Education provisions. This area is at breaking point already and simply cannot cope with any potential overspill from the forecast 1250 children however which way you dress it up. Especially as their birth rate per school year will not be an even spread. Proposals state:- “Delivery of Healthcare Infrastructure either onsite or offsite through Contributions” In particular, I would like to draw your atiention to well known statistics concerning the ratio of:- Patients to GP’s The BMA Analysis of NHS General Practice Workforce Data as of October 2024 reveals a single GP has 2271 “Patients” Based on just the averages used above 2500 houses x 2.5 per household would mean extra 6250 people would be living and needing to see the Doctor in what is already # stretched area. Accordingly, just to cover this a GP Surgery onsite with 3 GP’s plus support staff would be required on an ongoing basis. NOT JUST A ONE OFF CONTRIBUTION. The BMA confirmed on 29/11/24 that there is a # shortage of GP’s in England. In 2019 the Conservative Government set a target of 6000 additional GP’s by 2024…..only 3749 extra GP’s have been registered and that number includes Trainees and Locums. It should not come as a surprise according to the GMC it takes 5-6 years to qualify as a GP. Again, I draw on personal experiences from a close friend. He is a IFA (Naturally Client Confidentiality was kept) in the last 3 months to half way through November (when I was told) 6 experienced GP’s / Consultants with their families have leti the UK. The deal they have is mind blowing. Free Accommodation, Free Education for their Children and a Tax Free salary to boot and it was not to the well publicised OZ & NZ destinations. This exodus will only exacerbate the dire situation which is already in crisis. Patients to Dentist’s Similarly, for a Dental Practice (a close friend is an Hygienist in Derbyshire but not SDDC) The ratio of Patient’s in a working Practice with a full time Dentist, Hygienist and Hygiene Assistant. Is just 1300 to 1500 Patients. Accordingly, with a Population of 6250 from this proposed development of 2500 houses a Dental Practice of 5 Dentists, 5 Hygienists and 5 Hygiene Assistants plus support staff will also be needed again on an ongoing basis and NOT JUST A ONE OFF CONTRIBUTION. The BDA in their report of 10/8/22 stated:- “a staggering 9 out of 10 dental practices UK-wide are unable to offer NHS appointments to new adult patients – while 8 in 10 are not accepting new child patients. UK-wide, 25% of practices said they had an open waiting list, and over 1000 said the wait time was a year or longer or were unable to say how long it would be. However, the crisis runs deeper, for as we know many practices have effectively given up the pretence of maintaining these lists given the huge pressures they are under. This is a crisis being felt in every corner of the UK. BBC researchers did not reach any practices accepting new adult NHS patients in over a third of all local authorities.” Again, the time to train to become a Dentist is 5-7 years. Here are two prime examples where your sanctioning of ANY development in the magnitude of your Plan will trigger significant NEGATIVE Health and Educational consequences for both NEW and LONGSTANDING / LONG SUFFERING Residents and without question have a devastating impact on the surrounding rural area. Employment / Jobs I’ll keep the recent Budget implications on Businesses of all sizes out of this objection or indeed the commercial timeframe for growth / expansion. 2500 Houses as a minimum would house 5000 Adults. Given the funds required the odds the owners will be needing to have a mortgage. Whilst some residents may in turn become Private Renters the costs of Mortgage v Rental according to the Mortgage Advice Bureau survey dated 23/8/23. Rental costs are marginally less but not significant. Accordingly, the mortgage or rental and living expenses will probably mean most adults will need employment to finance the household running costs. Let’s be generous §80% will need jobs. Accordingly, some 4000 full time jobs will be needed……oops that potentially means a minimum of 4000 cars not the 3000 referred to above. More cars more congestion. § In the Gov.uk Profile of Households & Dwellings referred to above. It goes on to breakdown the Profile of Households:- 50% Full Time Working 11% Part Time Working 29% Retired 2% Unemployed 1% Education 7% Inactive - long term sick Just where are some 4000 reasonably well paid full time jobs going to come from. Yes, a small percentage could be satisfied through retirement of the existing residents. But with the exponential growth of AI let alone natural automation I really cannot see where these jobs will come from in this Rural area. Using statistics from the Governments own data / publications. Issued by the DIT dated 10/7/2020. 1449 Projects generated 44830 jobs. Using those totalled numbers. That means 129 Projects would be needed to provide 4000 jobs. If you take the statistics for the East Midlands alone… 43 Projects generated 1250 jobs. Extrapolate that for a moment some 137 projects would be needed to provide 4000 jobs. Moving forward the Planning Proposals indicate that 5-10 Hectares would be set aside for employment purposes. I’m old school and need to deal in Acres. So broadly that’s 12 - 25 acres. 6 The Old Bass Brewery land which was used to create Centrum Business Park in Burton on Trent covers some 200 acres, in total. Staffordshire Live on 16/12/21 reported a further development on that site whereby 67 acres would generate 1250 jobs. Using that ratio the 12 - 25 gross acres would generate a maximum of say 466 jobs. However, this number (466) needs to be reduced to form the Net Acreage job v land ratio (Non Productive Land e.g Car Parking ) therefore, the 25 acres would reduce to 20 with a reduction in jobs created to no more than 373 Jobs. Given the future economic growth rate forecasts I still consider my estimate of 300 would be closer to the mark…..see below. I know I’ll be shot down by introducing the following article which demonstrates the need for much more land to job ratio. But here goes. St Paul Minnesota in their City Planning estimated some 250 gross acres (200 net acres) would be needed to generate just 3000 jobs. Jobs are the full spectrum as you would expect in any Commercial Development. This report is dated November 2016 covering the period up to 2040. On this basis the 12 - 25 acres (Neti 20 acres Max) set aside in the proposals will be lucky to provide 300 jobs AT BEST. Just to reiterate I AM TOTALLY AGAINST YOUR PLANS |  |  |  |  |  |  |  |  |  |  |  |  |
| 1240863 | Amardeep Bhopal |  | No | Mickleover has already seen extensive housing development and no improvement to the services or local transport. There is no reason to see any different with this development. We already see congestion on staker lane which will only gett worse if this plan goes ahead. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1233332 | Ameila Hunt |  | No | The land south of mickleover is saturated, is currently green fields and floods. This will be a real issue for people living there.  The traveller site also doesn't need to be near to housing, they just need somewhere big enough for thier community. Not opposed to them being near to the staker lane area but again not in an area that floods as that would be miserable for them. There's plenty of places that don't flood that could be better. Hilton is over saturated and has a very high water table but maybe etwall?  The former power station is good land to develop as it needs something doing with it.i don't know enough about that area to comment further  The infinity park looks like a lot of good use of space if it was totally developed and looks a well thought out plan. With the commercial use in the middle being a nice distinction between the areas allowing for areas to maintain their identity. And close to Royce's which is great for thier workers.  Why nothing around findern, Melbourne, ticknall etc, |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241473 | Amy Simes |  | Yes | We support STRA2 which would allow for a suitable expansion to Mickleover. Site reference 159 submitted in the SHELAA should form part of a future allocation considering its position directly next to this site and proximity to the A38 road network. This would allow for a continued natural expansion. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241986 | Andrea Thompson |  | No |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241956 | Andrew Lee |  | No |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1235411 | Andrew Norman |  | No | The former Drakelow Power Station is, I assume, a brownfield site eminently suitable for housing development. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242364 | Andrew Watson |  | No | I am truly dismayed that south Derbyshire are once again trying to piggy back on the already overwhelmed roads, schools and services of Littleover and Mickleover. If you want to build another 2500 homes do it well inside your own patch. We do not want anymore development on green land. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1232852 | Angus Chan |  | No |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1239219 | Anne Heathcote |  | Yes | Living in Barrow upon Trent, I am deeply concerned that the latest version of the plan shows a massive increase in the number of residential buildings that now appear in our parish. We undertook a parish boundary change to ensure that our parish remained a small, rural parish that was self-contained and discrete from the ever-increasing housing that now borders the south of Derby City. This latest plan has a large number of new residential properties in our parish, north of the A50. It would be sensible, in my view, to make the area of the IGV, north of the A50, a separate parish in its own right. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1236247 | Anthony Overton |  | No |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1233824 | AYeomans |  | No | Firstly, Mickleover has already taken its fair share of housing developments close to the city/ward boundary.  Secondly, the proposed plans are not a sustainable development. Mickleover is bursting at the seams: doctors surgeries are at breaking point and residents are unable to get an appointment, ultimately putting the health of residents in extreme danger. There is no plan to build a school on the development and local schools are already struggling to meet the demands of the numbers of the community. The road and infrastructure around Mickleover is at capacity and building a further development will only add to the unsustainable traffic issues in the local area.  It is outrageous that you are proposing that 40% of the dwellings are social housing, yet the local council offices and support required by future residents is 12 miles away in Swadlincote. If there is a requirement for such significant numbers of social housing, these should be built much closer to the offices and the support services.  Additionally, proposing 2500 houses is not a sustainable nor appropriate development in an area already overrun with new build developments and lack of green space. There are other, more suitable areas in South Derbyshire.  Furthermore, SDCC are rushing their plan to local plan process. The Government are currently reviewing national policy and the future of the A38 junction scheme: SDCC should have waited for clarity on both of these. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242342 | B & Y C Gambini |  | No | We have been unable to complete the online objections to the proposed development on Staker Lane. We are therefore putting our objections here for your consideration. Environmentally, Mickleover has been negatively impacted over the past few years with loss of green space due to the construction of housing estates. This impacts on health and well-being due to increased traffic pollution and lack of greenspace. There are many footpaths and green areas for walking and exercising in this area and these will be lost if this development goes ahead. The lack of green space together with an increase in pollution will have negative affect on the health of the residents.  There are schools and nurseries in the vicinity which will have poor air quality surrounding them, due to the increase in traffic.  Farmland will be lost and livelihoods affected. Once farmland is lost it’s gone for good and we lose our countryside forever.  We would question the choice of this development as Staker Lane is prone to flooding during spells of heavy rain and often has to close. The sewage system around the Pastures development cannot currently cope with the excess so it would hardly cope with another 2500 houses, each with at least 4 occupants.  Whilst Mickleover has been overdeveloped there has been no improvement to the infrastructure in and around the area and it simply cannot sustain additional housing, especially as there is ample land available in other areas of South Derbyshire. The residents of this SDDC development will put yet more strain on DCC services yet SDDC will gain from their council tax.  If 40% of the houses is to be social, what is the benefit of housing people 12 miles away from the SDDC offices and the services they provide?  If the development is to accommodate a travellers’ site is there not a more appropriate space within South Derbyshire, giving the travelling community more access to open land rather than cramming them into an already overdeveloped area?  Why has Mickleover been chosen by South Derbyshire for a new housing development?  Enough us enough! Please reconsider this proposal for the sake of the local community. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242303 | Brian Woodings |  | No | I’m writing regarding the proposal for 2500 dwellings, and a travellers site, South of Mickleover, (The Hollow/Staker Lane area). I’ve lived on Station Rd, Mickleover for the past 30 years, and I’ve noticed the massive impact on services, roads, doctors, etc due, to all the recent housing that has been built locally. I’ve been trying for the last three weeks to get an appointment at my doctors and cannot get through, at 8 o’clock when it first opens. This never used to be like this, but it appears all our local doctors are stretched to the limit, and more dwellings in this area will only exasperate the situation. The roads are so busy now, it can take me 10 minutes just to get off my drive. I retired nine years ago, and when I was working, I used to travel back home from the city centre, by coming up Uttoxeter Road, and never met too much traffic until reaching the Royal hospital, but now, if I come back that way at a similar time, the traffic is queuing all the way from the city to Mickleover. And we long await the A38 road junction alterations at Kingsway, Markeaton Park and Little Eaton, which should ease the congestion, but of course the government may shelve these plans until the distant future, in which case building more housing would cause gridlock at certain times of the day. So therefore I beg you not to put more housing up this way until we have more schools, doctors surgery’s and the A38 junctions complete. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242556 | Carl Whysall |  | No | I wish to formally object to the South Derbyshire Draft Local Plan Part 1 Review dated October 2024. My objection relates to the overall approach and methodology used to allocate development land and to Policy STRA2: Land South of Mickleover.  OBJECTION: 1 The Council has failed to follow best practice and advice on consultations:  1) firstly, by not allowing public scrutiny of the overall housing target imposed on the city of Derby, 2) secondly, by not allowing public scrutiny on the ‘artificial’ Housing Market Area created in 2008 to allocate housing between the City and two of but not all three neighbouring local authorities, 3) thirdly, by consulting in a piecemeal, fragmented manner covering small locations / areas, and without all necessary survey work and data collection being completed to enable it, and the communities it serves, to properly assess and evaluate options.  OBJECTION: 2 The proposed housing allocation south of Mickleover continues the trend of large-scale development being imposed on existing settlements, particularly in South Derbyshire. The District has experienced unprecedented growth consistently since 2011; in percentage growth terms, equal to or usually significantly higher than any other district in Derbyshire or the East Midlands. A more considered organic growth pattern in terms of scale and character would allow time for communities to respond and accommodate growth and services to be provided. Again, no public scrutiny of the options for alternative forms of growth have been adequately carried out.  OBJECTION: 3 The proposal will accelerate house building even further with a heavy dependency once again on South Derbyshire to take Derby’s unmet housing requirement. The requirement to take the city’s housing should be proportionate in scale and character to existing communities. South Derbyshire should recognise it has a duty to all existing communities to ensure that growth is capable of blending in socially, environmentally and in a sustainable manner having regard to the need for biodiversity; an organic way, not simply imposed disruptive and rigid targets. South Derbyshire’s housing needs are quite different from those of the City, but that is not recognised in the consultation or the draft Plan.  OBJECTION: 4 The Council has not completed any traffic impact assessment or publicised / consulted with the local communities on traffic management matters and so cannot demonstrate how this traffic will be absorbed or improved. The imposition of significant additional traffic volumes on an already pressured road network must be avoided. No new development should be considered until the completion of a full traffic study to assess the existing capacity, its potential for improvement and a detailed timetable for implementation. The A38 is a Primary Road artery for the country but is asked to take large volumes of locally based traffic. It suffers from considerable, disruptive congestion and delays exacerbated by the rapid rate of growth in the past 15+ years. This comes at a high cost to the nation and local health. Additional development at Mickleover would compound existing, well-known problems.  OBJECTION: 5 The Mickleover proposals require cross city traffic movements to access key employment sites off the A52 / A61 corridors adding to existing City congestion, increasing noise and environmental pollution. stress and more road traffic danger. Moreover, it conflicts with the national objective to be carbon neutral showing a lack of strategic thinking by local authorities. Access from the east and north would be less intrusive and damaging in all respects.  OBJECTION: 6 The Mickleover housing allocation will result in the loss of valuable agricultural land, hedgerows and wildlife habitats. It is well known nationally that wildlife is under very serious decline, primarily due to the actions of mankind and yet we continue the path of destruction. New development should be directed to sites of lower agricultural value, particularly vacant and underused land in accordance with national planning policy. The Council has not identified or consulted on alternatives sites meeting national policy criteria or on lower grade land.  OBJECTION: 7 Development to the south of the city around Mickleover would require surface water to flow in the direction of Eggington a known problem for flooding. Periods of heavy rainfall and the intensity and frequency of storms is occurring more frequently causing severe disruption and damage. Additional surface water runoff from the development around Mickleover will exacerbate an already known problem and current development mitigation schemes are merely delaying difficulties not solving them.  OBJECTION: 8 Taken together the proposals by South Derbyshire District Council are in direct conflict with National Policies to be carbon neutral, to safeguard valuable productive agricultural land enabling the nation to be less dependent upon imports and to respect the need for biodiversity. Local Authorities must find a new and better way to provide balanced communities without this disruptive approach off old.   BACKGROUND: Mickleover cannot take further development, coming on the back of significant large land releases to the west and north. It is already reeling due to the failure to provide the necessary infrastructure to serve the existing and already planned community let alone the large allocation proposed.  This failure to have realistic growth targets and an accurate picture of the Derby’s strategic housing market as the basis for future growth is fraught with difficulties. The inclusion of Erewash and even parts of Staffordshire as contributing to the housing market must be recognised. Between 2011-2021 South Derbyshire experienced a 13.3% increase in population compared to Derby’s 5.1% and 3.2% for Amber Valley. Erewash’s growth was just 0.7%. This percentage rate of growth was far higher than that for the East Midlands and England. Moreover, the unit change in the number of dwellings demonstrates an equally alarming statistic. South Derbyshire’s growth was 17.8% compared to Derby’s 5.1%, 3.8 for Amber Valley, East Midlands 9.4% and England 8.5%. That trend has continued to today and is now set to increase because of the proposed housing proposals.  A significant consideration when planning growth should also reflects travel to work areas (TTWA). An analysis of commuters into and out of Derby demonstrates clearly the close relationship with Erewash settlements. Erewash has a marginally lower commuter statistics but currently is considered by the local authorities to be insufficient to warrant being considered as acceptable to take some of the City’s housing need.  Since 2011, South Derbyshire has consistently taken the majority of Derby City’s housing overflow provision. The current plans propose a continuation of that trend imposing a huge burden on existing communities by way of noise, pollution, increased dangers to pedestrian and cyclist from additional vehicular movements. A greater proportion of housing allocation should be directed to and borne by neighbouring Districts to provide a more balanced and environmentally friendly approach to housing need.  The problems with Derby’s traffic are well known and the A38 has been scheduled for three separate junction improvements. These have failed to materialise and there remains doubt if they will be provided. Imposing new housing in locations dependent on the A38 for access will add to these problems and must not be permitted.  The minor road network is also totally unsuitable to take the scale of development proposed for Mickleover. Staker Lane, Haven Baulk Lane and The Hollow struggle to take the existing traffic flows. Residents and commuters experience frequent delays, noise pollution, poor air conditions and dangers to pedestrians and cyclists. The existing junction off The Hollow and Brierfield Road/Hedingham Way meet at a junior school and is particularly congested at peak times. Likewise, other roads in Mickleover were never designed for such large-scale development especially in the village centre. They have only limited potential for improvement. The alternative route via Littleover is no better passing at least two schools compounding and increasing problems and dangers for school children.  Moving local transport off the A38 corridor should be a priority however, the existing local road infrastructure is itself incapable of significant improvement. To impose growth of this magnitude is at best foolish, at worst ludicrous. Such action will lead to significant increases in vehicular movements, far greater environmental pollution from air borne pollutants and noise plus a serious traffic danger to pedestrians. The Council must put in place alternatives to manage the communities’ movements and address the associated problems that generates.  Global warming, the need to move to a carbon neutral position as soon as possible and the need to become more self-sufficient in food production all point to an urgent need to protect valuable agricultural land and is a national objective. These proposals are in direct conflict with that objective and demand a rethink. Moreover, it is well known that species loss of both plant and wildlife is becoming critical. The Mickleover development proposals would compound that trend and add to the problem that is threatening our own existence. More suitable land for development and alternative scenarios are available and could be brought forward to meet future demand without high quality agricultural land being taken.  In addition to the Eggington problems, surface water is now often seen in fields around Burnaston, Mickleover, Littleover and Findern. The A516 also experiences flooding between Mickleover and Etwall. Likewise, Staker Lane and Grassy Lane can be expected to be under water as rainfall levels increase in a warming climate.  Please rethink your proposals and undertake more meaning consultation and dialogue with these people and communities you serve. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1248297 | Cynthia Allen |  |  | I wish to object to the above planning proposal in your Local Plan because of the reasons below:-  1) Mickleover has been inundated with bolt-on housing developments by SDDC e.g. Wilson/Barratt homes…………………….388 Avant …………………………………………317 Land West of Mickleover………………11000 Station Road end………….……………….700 (Plus another 600 by DCC) Manor Farm (Bloor’s Ladybank Rd)…….200  Added to this Amber Valley Council have added 800 At Langley Country Park with another 600 or more just getting planning permission  WE DO NOT NEED 2500 MORE ENOUGH IS ENOUGH EVERY SQUARE INCH OF THE CITY BOUNDARY IS BEING EXTENDED WITH SOUTH DERBYSHIRE HOUSES MAKING THE CITY COUNCIL UNDER STRAIN WHILE SDDC GET ALL THE COUNCIL TAX  2) GP surgeries are full to bursting with recent ‘new’ clients from these developments and a shortage of GP’s making appointments nearly impossible. Patient to GP ratio is one of the highest in the country!!!  3) Full Schools. The 2000 approximately houses to the West of Mickleover (New House Farm and Manor Farm sites) have just had the promised school denied.  4) The Hollow/Staker Lane roads are too narrow and dangerous as it is without the volume of traffic that would be involved. Mickleover roads are now congested and traffic speeds have increased to dangerous levels, without any improvements. Ladybank Road and Station Roads are like bone shakers, particularly noticeable on the bus! The roads cannot take anymore.  5) Parking is just impossible in Mickleover village, the Market Place, the Parade and Tescos car park are crowded at the quietest times and impossible to find a space to park, it is a real problem and risk of an accident is high. Mickleover has been spoilt by all the cars and crossing the roads is increasingly dangerous, particularly for children and the elderly.  6) Recreational areas in Mickleover are ridiculously small. Only fit for dogs apparently. Nowhere for teenagers to play for free, they are expected to pay for ‘club’ football, cricket, etc. There is nowhere in Mickleover where there is so much as even goalposts where teens can have a friendly kick about. How disgusting is that? One developer who had made provision for a ‘football pitch,’ when questioned admitted it would be a space but no football pitch would be laid.  SHOULD THESE HOMES BE APPROVED ON YOUR PLAN IT WOULD ENDORSE MORE MISERY ON MICKLEOVER RESIDENTS AND WE HAVE HAD MORE THAN OUR SHARE. PLEASE LOOK SOMEWHERE ELSE IN YOUR REGION. WHAT ABOUT ETWALL! YOU HAVE NOT BUILT THOUSANDS OF HOUSES THERE HAVE YOU? THE GYPSY SITE CAN EITHER BE INCORPORATED WITH THE ONE AT HILTON OR CHURCH BROUGHTON. WHY SHOULD MICKLEOVER GET IT? |  |  |  |  |  |  |  |  |  |  |  |  |
| 1238851 | Carolyn McIntosh |  | No | I would like to raise an objection on the following grounds: 1. The infrastructure already in place cannot currently service the needs of the local population. GP practices are overwhelmed, the catchment secondary school already has more pupils than any in Derbyshire. 2. The number of homes being proposed seems excessive and very likely to completely destroy the local scenery especially if as is suspected there are multi storey buildings. 3. The possible inclusion of a traveller site seems inappropriate where in my experience there will be littering and despoiling of local land I strongly object to this development. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242633 | Cathy Morio-Floch |  | No | I am contacting you about the plan to build 2,500 dwellings plus a travellers pitch in Mickleover.  I strongly oppose to those plans for the following reasons:  - there are ample houses that are in need of refurbishment around the city that should be considered instead of building new houses - already with the new estate that is being built between Mickleover and Etwall, the increase of traffic is of concern. Those additional houses would only add to the issue - there is no real plan on how to tackle traffic issues on stacker lane / instead of building small shops, mickleover is in great need of a large supermarket |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242348 | Chloe Garnham |  | No | I am writing to you to share my concerns regarding the proposed plan for 2500 new homes that you have proposed to building at the outer boarder of your jurisdiction. Micklover is already under strain of so many new builds and there have been days where traffic has already built up to add 10 minutes to a simple journey through some of its main roads. Furthermore, 40% of this housing will be social housing. My worry here is not with the form of housing, but moreso the 12 mile distance this leaves people with to reach SDDC building. This would be 25 minutes one way for a person with a car, or an hour and a half and three different busses for someone without. Having been a former resident of swadlincote, I I can't help but feel there would be far more suitable option at a location closer to you and provide much better access to the greater volume local amenities that draw people to the area than further impending the access that the residents of Micklover, Littleover and by extent, Derby have to green space. I would explore you to reconsider due to the impact that this will have on your neighbour county, the president that this is setting, and the needs of the inhabitants of these houses. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1232962 | Chris Munn |  | No | Mickleover has had its fair share of developments. We don’t have the infrastructure to continue with this |  |  |  |  |  |  |  |  |  |  |  |  |
| 1235648 | chris stott |  | Yes |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242108 | Chris Wilson |  | No | This is a sensible use of disused/ brown field land that can bring needed housing without directly impacting on current communities. Roads are already there. Anyone with half a brain would choose disused sites as a priority. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243592 | Christine Allen |  | No | STRA3 number is too large area of natural beauty roadwork poor protection of wildlife.  STRA1 and 2 Numbers too high – housing. Until a new bridge is built over the Trent the roads and network is unsustainable. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242327 | Christopher Prince |  | No | I wish to protest in the strongest terms about the proposed 2,500 houses and a traveller site in the above location. Mickleover has had far more than it's fair share of development and the local infrastructure is now unable to support the existing population. Another development like this will simply put even more strain on all services and roads, blighting the lives of locals. Enough is enough! The development of 2,500 houses and the traveller site is madness and must not be approved under any circumstances. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1236689 | Claire Austin |  | No | Mickleover has already taken more than it's fair share of housing growth near the ward/ city boundary. The proposed development south of Mickleover lacks breathing space and green space buffer for established Derby City communities.  Proposing 2500 more homes as an urban extension to Mickleover is neither sustainable nor appropriate development, especially with ample land available elsewhere in South Derbyshire.  Up to 40% of the housing will be social, yet SDDC civic offices are 12 miles away in Swadlincote. This housing should be closer to those services. There is also no reason to place SDDC gypsy and travellers pitches near derby when suitable land exists in South Derbyshire.  SDDC is rushing the local planning process. The government is reviewing national planning policy and the future of the A38 Derby junction upgrade, therefore SDDC should wait on clarity on both.  The 'Sustainability Assessment ' report, critical for validating housing and gypsy & site traveller choices, wasn't published until after the consultation began, which undermines the process completely. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1232876 | Claire Woodward |  | No | As previously mentioned, the proposed 2,500 dwellings as another urban extension to Mickleover is not sustainable or appropriate development, especially when suitable and abundant land is available elsewhere in South Derbyshire. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1238657 | Clare Wood |  | No | All of these are car-dependent housing estates which will increase carbon emissions, pollution and noise as well as contributing to the decline of biodiversity. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243605 | Clive and Lucille Pope |  | No | Proposed development land adjacent to Staker Lane DE3 0DJ  We are writing to register our objection to South Derbyshire District Councils proposed development of 2500 houses with traveller sites and land flanking Staker Lane South of Mickleover.  In recent years there have been extensive housing developments constructed on land adjacent to Mickleover. These developments have resulted in large increases in traffic placed an increased burden on local services and amenities, turned the area into a sprawling urban conurbation, taken fertile agricultural land, had an adverse effect on the environment and destroy destroyed habitats.  To impose an additional large development on the area is excessive and unreasonable given the lack of infrastructure to support it and the further loss of good quality agricultural land for such developments. More efforts should be made to find and use Brownfield sites of which there must be many given the level of form in industrial activity in South Derbyshire |  |  |  |  |  |  |  |  |  |  |  |  |
| 1239208 | Clive Schreiber |  | No | 4. The strategic road network, particularly the A38 corridor is seriously deficient in coping with existing traffic. As well as being designated a primary road of national importance, it carries large amounts of local based traffic, compounding traffic and environmental difficulties. Planned improvements have been scheduled for many years but still await final approval and implementation. The three local authorities have not agreed or put in place a road and traffic strategy to enable the free and safe movement of the existing population let alone growth at this magnitude. 5. The local road hierarchy is incapable of taking this level of growth. Existing communities are already at breaking point from growth, experiencing air pollution endangering the community’s health, noise pollution and traffic dangers, especially to children and the elderly from motor vehicles yet no improvements or alternatives to the road hierarchy have been implemented. It is impossible to see how the Nation will achieve zero carbon by 2050 without a significant change of course and greater vision from our local authorities. 6. A simple analysis of the amount of land identified and the numbers of houses proposed for Mickleover would require a development density of between 40/50 dwellings per hectare. This is a level one would normally associate with high level city centres, not within or adjacent to rural communities. This would be intolerable in this location, is ill conceived and a sad reflection on current proposals. 7. There is a mismatch between key employment sites and planned housing. This inevitably requires cross city movements compounding problems of traffic congestion and its associated problems on health, safety and cost. Even future employment locations do not harmonise with the Mickleover housing allocation in terms of both location and timing, and that is critical. 8. The land around Mickleover is experiencing increasing levels of flooding that coincides with the recent housing provision and more frequent heavy rainfall events due to climate change. This has serious implications further downstream where the flooding is already causing damage, inconvenience and disruption to communities. The Mickleover proposal would compound this problem. It is not believed on site flood alleviation methods traditionally favoured and used by developers would resolve this issue. 9. The recent event organised by South Derbyshire District Council to promote the Local Plan Part 1 Review held at Mickleover Court Hotel was an exceptionally poor event and failed entirely as a ‘consultation’ event. There were no alternatives or options for the community to consider. Supporting evidence for the allocation was not available including any traffic studies and assessments, Derby City’s own housing capacity assessment and a viability assessment. It is difficult to understand how housing sites can be identified and promoted to the community without such fundamental data being available to consider. The public is being asked to comment on incomplete and unknown data. 10. Badgers need rehousing, a legal obligation, which has not been considered or addressed. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242374 | D Cooper |  | No | I wish to comment on an object to SDDC‘s local plan with regard to the proposed 2500 homes south of Mickleover for the following reasons:  The question of sustainability in your document is at least suspect and contrary to the 1987 United Nations definition I will remind you ‘meeting the needs of the present without compromising future generations to meet their own need’.  Derby North and West has already had to absorb you his farm Langley country Park and Mikalo country Park which has conveniently met SDDC and Amber Valley building targets on the city boundary and is compromising Mickleover residents now.  Local plan one states ‘addressing traffic congestion’ Visiting the estates I have seen most houses have two cars which has increased traffic congestion and speeding vehicles on station Road and Etwall Road/Ladybank Road another 2500 houses on the city boundary would not address congestion.  A report some years ago said Derby had high levels of pollution. The new existing housing stains have increased air pollution and road safety for residents and have compromised their needs. Emissions would be further increased by building another 2500 homes as proposed in the local plan. Wind primarily comes from the west and air pollution would target existing residents from the new estate. Long queues of traffic already exist at peak times along Havenbulk and Staker Lane with engines running contributing to pollution. Further air pollution is not contributing to sustainability which is mentioned in your environmental objectives ‘minimising waste and air pollution’.   At the consultation event on the 14th of October a member of the planning team stated that shops would be built on the estate as is written in the local plan. When new house farm was planned exactly the same statement was made and no shops exist. Neither have bus routes been established and discussions about a new doctors surgery drag on and on. 2500 residents and their families will have to use the infrastructure in Mickleover Littleover and Derby city which conveniently lets South Derbyshire, taking the community charges, provide nothing. I am sure SDDC would resist boundary changes and resist absorbing the new houses into Derby city as they would lose the revenue.  I was told SDDC have been in talks with Derby city planning about the development as their housing targets can be absorbed into the development. When I questioned Mickleover counsellors they said talks between the two planning authorities had not taken place for some time and it was an aggressive assumption on behalf of SDDC that there was agreement to the LP. LP 1.7 states ‘the need to provide green spaces and the net gain for biodiversity’. Many hedgerows and trees will be lost and replacements will take anything between 20 and 40 years for new trees to absorb the same amount of carbon. Biodiversity will be lost as there are badgers and hares on the fields. I realise there is a housing issue in the country but South Derbyshire has an area of 113 square miles and yet feels it necessary to build on the city boundary which is a convenient way to meet their targets be as far away as possible from its offices and assume little responsibility. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242311 | Dave Goodhead |  | No | I am writing as a concerned resident of Mickleover regarding the proposed development of 2,500 houses near the Mickleover Ward boundary, around Staker Lane. This plan, should it go ahead, will raise serious concerns about the future of our community’s infrastructure, congestion, and overall quality of life. Mickleover has already experienced substantial growth over recent years, placing significant strain on local roads, infrastructure, and public services. Any additional housing would exacerbate these issues. Whenever there is congestion or a closure on the A38 northbound past the Findern roundabout, traffic diverts onto Staker Lane and through Mickleover, creating extensive tailbacks on Station Road. Increased housing will only worsen this situation, which is already a frequent problem. The inclusion of a gypsy and travellers' site within this development raises further concerns. Experience has shown that such sites often come with complex social challenges, creating tensions within established communities. Moreover, it has come to my attention that the land earmarked for this project may be owned by Derby City Council?, who reportedly, were not pre-informed about the South Derbyshire District Council’s proposal to develop this land. This lack of coordination suggests a worrying oversight in planning and communication, potentially signalling a disregard for the well-being of Mickleover residents. I strongly urge you to reconsider this development. It is essential to assess the broader impact on Mickleover and to recognise that our infrastructure is already under considerable strain. Please convey my concerns at you next proposed meeting on this particular housing development subject. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1239256 | David Needham |  | No | I would like to register my objection to the Plan to build 2500 houses on Staker Lane. Mickleover has had its more than their share of housing built in SDDC which borders the DCC boundary. We need a space on our border. The new residents will not be using any of the SDDC facilities but will use Mickleover and Littleover. Do SDDC have more suitable sites or available land to build their quota. The supply of water and waste water will be treated and supplied by STW and not South Staffs Water Company. The roads for this site will not be suitable for the level of traffic from 2500 properties, especially when we do not know if the Govt will authorise the changes planned for the A38. Also why is the social housing and gypsy/traveller's site not being nearer to the centre of South Derbyshire but closer to the outskirts of Mickleover and Littleover. SDDC have pilloryed the west of Mickleover for too long please look to your own area in future. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241955 | David Stockwell |  |  | Secondary schooling places are in short supply around the Mickleover site, the A38 northbound to Kingsway and Markeaton are congested now and will be impassable with extra houses and the are regular floods in this area. These are THREE key reasons the site is not appropriate |  |  |  |  |  |  |  |  |  |  |  |  |
| 1237912 | David Warriner |  | No | There still appears to be insufficient effort to develop Brown field sites in Derby City before allocating higher quality greenfield sites for South Derbyshire development. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1238385 | Deborah Burns |  | No | Please read and register my objections and concerns below regarding this proposal  Mickleover has already taken more than it's fair share of housing growth near the ward/ city boundary. The proposed development south of Mickleover lacks breathing space and green space buffer for established Derby City communities.  Proposing 2500 more homes as an urban extension to Mickleover is neither sustainable nor appropriate development, especially with ample land available elsewhere in South Derbyshire.  Up to 40% of the housing will be social, yet SDDC civic offices are 12 miles away in Swadlincote. This housing should be closer to those services. There is also no reason to place SDDC gypsy and travellers pitches near derby when suitable land exists in south derbyshire.  SDDC is rushing the local plan process. The government is reviewing national planning policy and the future of the A38 Derby junction upgrade. SDDC should wait on clarity on both.  The 'Sustainability Assessment' report, critical for validating housing and gypsy & site traveller choices, wasn't published until after the consultation began, which undermines the process. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241995 | Donna Shacklock |  | No |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242416 | Duncan and Caroline Williams |  | No | I have been a resident in Mickleover for over 20 years and have witnessed a great deal of new homes being built close to the boundary of Mickleover. You will be aware of the two large developments along Radbourne Lane, to the left and right of Station Road. There has also been a large number of houses added to the Heatherton Village development and we have witnessed the increase in stress placed on the Mickleover infrastructure as a result of these developments. I believe that Mickleover has absorbed more than its fair share of new developments and further development close to our boundary would have a negative impact on us. Also, we understand that up to 40% of dwellings (that's 1000 households) will be for social housing and permanent traveller community pitches will be provided on the site. Many of the households living in this accommodation are likely to have a need to access your council run services and, for this reason, it seems ludicrous siting them all so far away from your council offices in Swadlincote. I would be most grateful if you would take my consideration and have some thought for the people of Mickleover and the negative impact it will have on us. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241890 | Edward Stupple |  | No | STRA1 - appears to give greater opportunities for employment in an area of high housing density STRA2 - This is over development of land south of Mickleover on farmland, destroying a green field farmland site not taking into account the impact of recent large developments in the area and food security STRA3 - appears to be good use of a brownfield site |  |  |  |  |  |  |  |  |  |  |  |  |
| 1248312 | Eleanor Munn |  | No | I am opposed to the housing development proposed opposite The Hollow in Mickleover. The Hollow is already an incredibly busy road with traffic at all times of day and particularly at rush hour and school run time, making it incredibly difficult to get vehicles off driveways. Building this development would dramatically increase traffic levels. Having additional traffic will increase pollution on The Hollow and will make it more dangerous for residents to walk around the area, which is particularly worrying given the amount of children in the area and the proximity to Brookfield Primary School.  I’m concerned about school provisions as well, as schools are already over-subscribed and this development will make this problem far worse.  Loss of green space and agricultural land would be awful, compromising not only the aesthetics of the area but would be bad for the environment.  View from existing The Hollow properties will be compromised and most of the properties were originally purchased due to the green spaces around the properties and these would be lost.  Property value of the existing The Hollow properties will be detrimentally affected. Loss of Green Wedge land. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243193 | Elizabeth Fermor |  | No | I would like to object to the proposed new development on land alongside Staker Lane and the surrounding area for the following reasons:  - Mickleover has taken more than its share of new housing over the last few years, with little to no new infrastructure to support it  - Staker Lane is a busy road prone to significant flooding and consequently an increased risk of accidents, particularly with a significant increase in traffic  - traffic on The Hollow is very heavy during rush hour both morning and evening, and often at a standstill. At the other end of the scale, people often use the route as a cut through to the A38 and far exceed the speed limit. Increased road use would exacerbate this issue  - strain on local schools will be significant, likewise medical services, shops and the village centre  - the site itself will likely take years to develop and the disruption and pollution inflicted on our family, particularly the children, will be significant  - there are other sites in and around Derby and Derbyshire (ie Sinfin, Millenium Way development) that are far better equipped to take more housing and the associated increase to traffic and need for more amenities  I appreciate you taking the time to consider my point of view. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1238115 | Fiona Bevington |  | No | The infinity garden village at least has plans for improved transport links. The power station regeneration utilises a brown field site. I struggle to see how the Mickleover plan can be supported by the current road network or local facilities. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242330 | Fiona Brown |  | No | Please read and register my objections and concerns below regarding this proposal.  Mickleover has already taken more than it's fair share of housing growth near the ward/city boundary. The proposed development south of Mickleover lacks breathing space and green space buffer for established Derby City communities  Proposing 2500 more homes as an urban extension to Mickleover is neither sustainable nor appropriate development, especially with ample land available elsewhere in South Derbyshire  Up to 40% of the housing will be social, yet SDDC civic offices are 12 miles away in Swadlincote. This housing should be closer to those services. There is also no reason to place SDDC gypsy and travellers pitches near derby when suitable land exists in south derbyshire  SDDC is rushing the local plan process. The government is reviewing national planning policy and the future of the A38 Derby junction upgrade. SDDC should wait on clarity on both  The 'Sustainability Assessment ' report, critical for validating housing and gypsy & site traveller choices, wasn't published until after the consultation began, which undermines the process |  |  |  |  |  |  |  |  |  |  |  |  |
| 1235132 | Frazer Murphy |  | No | See above, I am not aware of the other two sites |  |  |  |  |  |  |  |  |  |  |  |  |
| 1248313 | Gerry Griffin |  | No | OBJECTION TO SOUTH DERBYSHIRE DISTRICT COUNCIL’S PROPOSALS SET OUT IN ITS PART 1 REVIEW IN PARTICULAR POLICY STRA 2: MICKLEOVER MIXED USE DEVELOPMENT   The consultation recent event organised by South Derbyshire District Council to promote the Local Plan Part 1 Review held at Mickleover Court Hotel offered no alternatives or options for the community to consider and offered only further enburdenment onto an already stretched, increasingly under-resourced community.  There was no supporting evidence for the allocation, nor any traffic studies and assessments nor floodplain impacts or consideration of sustainable drinking water supply. It is difficult to understand how housing sites can be identified and promoted to the community without such fundamental data being available.  An increasingly unfair burden of South Derbyshire, Amber Valley and Derby’s housing provision since 2008 has been made in the Mickleover area. This has already very seriously detrimentally impacted existing communities, with loss of natural open aspect and farmland, increased traffic congestion and delays. Indeed, why consider a gypsy site in a relatively urban, city community?  Building traffic has already caused damage to local roads, without redress. All detrimentally impacting the levels of confidence in the decision-making processes. These actions have a real impact on people’s lives, their health and state of mind.  In addition to Derby and South Derbyshire, further overall housing need should be partially met by Erewash and parts of Staffordshire. Erewash for example, contributes to the city’s workforce at virtually the same levels of daily commuting as from Amber Valley and South Derbyshire Districts, yet takes none of the growth. Indeed, some 6000+ people from Erewash and a further 3000+ travelling in reverse to the Borough daily for employment alone. Amber Valley (in areas well beyond the Mickleover borders) should take a greater proportion of building commitment. Confidence in SDDC proposals is also low, as SDDC have also reneged heavily on their commitment to control existing developments until A38 improvements corridor have taken. Demonstrating that SDDC decisions cannot be trusted to deliver improvements to the communities.  Also, as it borders on Derby City, the proposed development cannot be considered to be democratically driven by the affected community. Local Mickleover, Derby City Councillors have already shown their dissatisfaction at the proposals  The three local authorities bordering Mickleover, where a great deal of housing has been and continues to be built have not agreed or put in place a road and traffic strategy to enable the free and safe movement of the existing population let alone demonstrated an integrated plan to cope with building growth at current magnitudes. Local roads alone cannot take this level of growth and proposals continue to avoid pressing community needs, such as youth services, school provision and other social needs of what is now becoming a sizeable town of people.  Existing communities are already at breaking point, experiencing air pollution endangering the community’s health, noise pollution and traffic dangers, especially to children and the elderly from motor vehicles. Yet no improvements or alternatives to the road hierarchy have been implemented.  Co-ordination between the three authorities to provide best local outcomes and to avoid heavy exploitation from developers is imperative to attaining a vibrant New Town perspective to any new plan that develops and aims to provide the necessary facilities and fulfil local aspirations, without being over exposed by developer’s greed.  It would be hoped that a better co-ordinated approach therefore by the authorities would provide some protection from the attempts by developers to seek to apply for expensive government appeals against properly considered decisions. Something of a failure to date from SDDC on decisions relating to Mickleover. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1235316 | Geoff Lewins |  | No | Mickleover is full. It has had several thousand houses added to its outskirts in recent years without any additional infrastructure. It is not possible to get a doctors appointment, the roads are increasingly busy and parking in the village is all but impossible. Quite apart from exacerbating these problems STRA2 is proposed in an area where 2 already busy roads (staker lane and haven baulk lane/the hollow) merge. There are no local bus stops within easy walking distance so building 2500 extra houses will decant 2-3000 extra cars straight onto those roads. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243600 | Geoffrey Tubey |  | Yes | Again transport links to other infrastructure agreed with planning consent must be achieved. New Walton Bridge would have less than half current cost if built on time. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242119 | George Selby |  | No |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1235279 | Gerald Arthur Bowker |  | No | Re-using brown field for housing, while not ideal is a much better option environmentally than using green belt land. I would hope that STRA3 would have the appropriate and adequate services provided, including schools, doctors surgeries, local shops, bus services etc. I am also assuming that STRA3 is a brown field site - I am going off the description alone. If it is green belt then my answer would be no to that also. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1238342 | Geraldine and Andy Barford |  | No | We are writing to voice our objections to the above proposal.  My husband and I live on Thorndon Close, a cul de sac, near Staker Lane. Since moving to Mickleover over forty years ago, the amount of traffic has rocketed, but the infrastructure, with roads and amenities, has stayed virtually the same. Promises have been made regarding the upgrading of the A38 but nothing actually gets done.  In the last few years there has been a huge number of housing developments all around Mickleover, very few of which fall within the Derby City boundary. SDDC, among others, have given permission for these developments, knowing full well that while they pick up the additional Council Tax revenue, it will be the communities that live within the Derby City boundaries that will have to suffer with the increased traffic, pollution and services being overwhelmed by the new residents, as little provision has been made for their needs.  It is just unthinkable to have another 2,500 homes on Staker Lane, as this area is already a total ‘bottle neck’, especially first thing in the morning and throughout the late afternoon and evening. Mickleover is well and truly over populated now and deserves to have some green spaces available. The situating of the Royal Derby ‘Super hospital’ in Mickleover, has meant additional large numbers of cars travelling into the area, and using the roads in Mickleover as ‘rat runs’, whenever there are hold ups on the A38, which is very often. Enough is enough!  We feel that the whole proposal seems to be moving along at break neck speed, probably because it ticks a lot of target boxes for SDDC, and regardless of the impact and safety on the residents who already live in Mickleover. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242367 | Grace McCullouch |  |  | Housing developers must ensure that their housing developments include the right infrastructure.  Obviously, this needs to include: Schools GP surgeries Sports facilities Healthy food outlets Recreational areas e.g. parks Playgrounds  Of these, sports and recreational infrastructure should be a top priority. For example tennis courts, basketball courts, athletics tracks, football pitches. We have an increasing obesity crisis, problem with severe inactivity and poor lifestyle choices and poor mental health amongst families and children and this has to be addressed with infrastructure provision. The link between infrastructure and lifestyle is well evidenced in public health reports.  The idea is simple. Surrounding people with takeaways, in housing estates where they drive everywhere and have no recreational areas leads to poor health. Surrounding people with recreational areas for exercise and socialisation leads to better health.  Alongside this, it would help to have more greengrocers rather than takeaways. Do developers get to have a say on the type of retail units they allow?  Let's use housing development as an opportunity to boost the health of Mickleover. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241973 | Graham Keith Sanders |  | No | Total lack of foresight !! Infrastructure (Doctors,Shops,Schools,Roads,Utilities) will not cope ! Councils inability to fulfill obligations (Refuse,Drains,Paths,Roads,Trees,Grass cutting) |  |  |  |  |  |  |  |  |  |  |  |  |
| 1238350 | Hannah Butler |  | No | Please read and register my objections and concerns below regarding this proposal  Mickleover has already taken more than it's fair share of housing growth near the ward/ city boundary. The proposed development south of Mickleover lacks breathing space and green space buffer for established Derby City communities  Proposing 2500 more homes as an urban extension to Mickleover is neither sustainable nor appropriate development, especially with ample land available elsewhere in South Derbyshire.  Up to 40% of the housing will be social, yet SDDC civic offices are 12 miles away in Swadlincote. This housing should be closer to those services. There is also no reason to place SDDC gypsy and travellers pitches near derby when suitable land exists in south Derbyshire.  SDDC is rushing the local plan process. The government is reviewing national planning policy and the future of the A38 Derby junction upgrade. SDDC should wait on clarity on both.  The 'Sustainability Assessment ' report, critical for validating housing and gypsy & site traveller choices, wasn't published until after the consultation began, which undermines the process. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1233334 | Harvey Heldreich |  | No | Mickleover has been over developed, Drake low would be the perfect example of redeveloping a brown site and could easily accommodate the housing requirements, the infinity development is just tearing up more green belt, the area is being hammered in that area from chellaston to littleover. Enough is enough. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241873 | Hilary Lomas |  | No | Unsure of other areas but definitely not Mickleover as it has had many new developments in the past few years and most unfair of South Derbyshire to inflict more |  |  |  |  |  |  |  |  |  |  |  |  |
| 1232904 | Holly Robinson |  | No |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1234311 | Ian Fox |  | No | The land South of Mickleover is not capable of support from the existing services. The new dwellings should be stopped and only reconsidered with all new services being implemented for the existing population with additional capacity for any new proposed dwellings in the future. The new additional services should be the go / no go gate for any future proposed dwellings.Sort the existing problem before trying to add to the problem with proposed additional new dwellings. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1240252 | Ian McHugh |  | No | STRA3 (Yes) This is a brownfield site (ie no loss of green)  STRA1 (Yes) This is a well developed plan, with Central Government Infinity approval close to existing employment and with key infrastructure improvements (A50 junction, Secondary School, South Derby Integrated Transport Link, Retail and Medical etc)  STRA2 (No) This represents a loss of green space over brownfield space, whilst also further congesting the surrounding local roads. The plan considers the site in isolation without considering compound effects of the adjoining new and proposed developments at H18, H19 and within DCC.  The local roads in and around this site are already beyond capacity. Without the A38 GSJ upgrade, upgrades to Staker Lane, Station Road, Uttoxeter Road etc, Mickleover will grind to a halt. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1233335 | Ian Molyneux |  | No | Mickleover already has 1000's of new houses (across the back of Ladybank, Hackwood Farm, Station Road etc in last few years). I've just been to the planning meeting at the Mickleover Court Hotel (14th Oct) and the planning officer I spoke to could not give me the number which I thought was not acceptable. The infrastructure simply cannot cope and without doubling the size of the village centre it never will be able to with this proposal. There is one road running through it's centre, very limited parking and no matter how much people are attempted to be persuaded to walk, cycle, use public transport people still drive less than a mile to Tesco's etc. That's just a fact that needs to be built into this and not circumvented by someone who has a theory that adding a walkway or a bus route will make it all OK. From what I can see there are also no plans to improve the access by road into Mickleover with Staker Lane and Haven baulk the only route into the village. It's clear that whoever came up with this plan has not studied the traffic both at school start/finish and rush hour. Staker Lane is always backed up very badly - not to mention the fact it is badly affected by flooding.  Also I understand the new secondary school will be in the South Derbyshire area - John Port and Murray park are already at capacity. can you assure us that they will not be increased further in size. Also getting into a Drs surgery I think you have to be nearly dead to get an appointment (apologies for being dramatic but it feels like that) -again previous assurances have all been rubbish  I cannot believe there are not better places around Derby/Derbyshire that could handle this better than Mickleover (which as I have said has already increased massively over the past few years with the promise of improved services that have not been delivered.  The bottom line is Mickleover cannot cope and this should be stopped now. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1240150 | Ian Turner |  | Yes |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241860 | Innes Mary |  | No | As previously stated |  |  |  |  |  |  |  |  |  |  |  |  |
| 1232861 | Jack O’Connor |  | No | Mickleover is over crowded. Clearly it doesn’t take a genius to know the infrastructure around Mickleover cannot cope with extra houses. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1238248 | Jackie Taylor |  | No | Mickleover has already seen the building of very considerable numbers of new homes in South Derbyshire along the western boundary of Derby.  I live in the southern section of Mickleover which is already affected by the existing developments. Traffic increases, anxiety created by the, recently withdrawn, plan to relocate our local GP surgery to one of the new South Derbyshire estates, and a strain on local resources. All of these effects can only be made worse by the development suggested around Staker Lane and the Merlin Way estate.  It seems to me to be devious, unfair, and designed to avoid taking proper responsibility for development in your council area. Shame on you for trying to avoid the costs of providing services to people who will be paying rates to your council.  I really object to your Local Plan, and I think you should build housing you need around South Derbyshire Villages like Hilton or Etwall, proving a services base for your residents in the northern part of your area. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242318 | Jane Whittingham |  | No | I am extremely concerned to read about your plans to build a further 2,500 homes and traveller site so close to Mickleover, Derby. I live off Ladybank Road and the impact of the recent building programme of over 3,000 homes in the last 3 years has been massive. You have a duty not to underestimate the impact the existing housing developments have had on the existing green spaces. I feel that every time I try to go for a walk, I am negotiating crowds of people all looking for the same as me…. Breathing space. It’s had a massive impact on my mental health and as there have been no new doctor surgeries built, I am unable to get an appointment. How on earth are 2,500 new households going to access already stretched services? Surely South Derbyshire social housing tenants need easy access to South Derbyshire services? Over 12 miles away from your offices is ridiculous and I can’t say how strongly I object to your plan. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1236651 | Jennifer Shaw |  | No | I am writing to object, in the strongest possible terms, to the South Derbyshire proposal to build a further 2,500 houses, on the southern edge of Mickleover.I live on Western Road, in Mickleover, near to Chevin Avenue. Following the building of the New House Farm estate, covering an area of land from Radbourne Lane to Etwall Road, the traffic has increased exponentially, to the extent that Western Road has developed into a main route into the city, whereas previously, it was secondary to the Uttoxeter Road. Unfortunately, this road has had “temporary lights” for the last two years, and as a result, more traffic is using Western Road. Every morning, traffic is stationary outside of my house ,with engines running due to being backed up from the lights on the main road, which in itself is causing pollution.  I understand, and sympathise with families who need homes, and if the planners were also able to devise new ways for the home-owners to get to where they need to go every day, your plan might be acceptable. Two thousand five hundred houses, probably means and extra five thousand cars on the roads in the vicinity of Mickleover, unless a large majority of the people will be working in Swadlincote.  I would urge you to think again about your plan, and to look elsewhere within your jurisdiction for building homes. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242289 | Jenny Wright |  | No | I am a resident of Mickleover and wanted to raise my own concerns about the additional housing plans for the local area. I understand houses need to be built but previous developments have fallen short of promises around amenities.  Mickleover is subsequently under a huge strain with traffic and shops. More importantly, the doctors surgeries are really struggling. Highlighted recently when I tried to make an appointment and couldn't even get through. I had to go to urgent care and this is a result of additional housing without the expansion of local services.  I was unable to attend the consultation but noticed I was able to email my concerns. Would you be able to forward my concerns to the relevant people. Local services need expanding before more housing is added.  Thank you for your time.  If at all possible, please could someone acknowledge this email so I know my points have been raised? |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243552 | Jim Froggatt |  | No | Although not confirmed in the existing plan, development between Infinity Park and the A50 has been proposed for a long time. However, the Sustainability Appraisal says “the site is located on greenfield/Grade 3 agricultural land- which is classed as 'best and most versatile'- and lies partially within a sand and gravel mineral safeguarding zone and a contamination zone. The loss of greenfield land/Grade 2 and 3 agricultural land cannot be mitigated”. This should warrant a re-think. Staker Lane has not been publicly proposed before and is situated between current developments which are already overloading roads and facilities within Derby city. If the current government review of highway projects does allow the A38 junction remodelling to progress, the site should not be developed prior to that project’s completion. If it is cancelled, a new traffic plan for the area needs to be developed before any further housing is built. The site is also greenfield/Grade 3 agricultural land. Drakelow is an expansion of a current development. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241773 | Joanna Ayres |  | No | All of these developments are in danger of creating urban sprawl, loss of green areas, loss of habitat, loss of wildlife and traffic problems. The developments in Mickloever will encourage car use and increase traffic problems. Staker Lane is completely unsuitable for the increased traffic generated by people entering and exiting the housing estate. It is also completely unsuitable and dangerous for pedestrians and cyclists. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241686 | John Moore |  | No | STRA1 : Balanced plan to add to already existing high quality employment and residential area. Infrastructure able to cope with proposed increased demands.  STRA2 : Area is already overdeveloped; limited local employment without external travel; irreversible, high quality, greenfield site; existing infrastructure already stressed.  STRA3 : Necessary re-development of brownfield site; will bring improvements to local communities. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1232940 | Jon Arnott |  | No |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242116 | Jonathan Nutman |  | No | Not convinced that the 'Village' will be anything like a village but more a vast housing estate. Drakelow Power station is previously developed land so I guess that is one way to find land. Mickleover is big enough and unconvinced that existing infrstructure could cope. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241240 | Jonathan Watson |  | No | Mickleover has already taken more than its fair share of housing growth near the Ward/City boundary. The proposed development south of Mickleover lacks ‘breathing space’ / green space buffer for established Derby City communities.  Proposing 2,500 more homes as an urban extension to Mickleover is neither sustainable nor appropriate development, especially with ample land available elsewhere in South Derbyshire.  Up to 40% of the housing will be social, yet SDDC offices are 12 miles away in Swadlincote. This housing should be closer to SDDC services. There's also no reason to place SDDC Gypsy & Traveller pitches near Derby when suitable land exists in South Derbyshire.  SDDC is rushing the local plan process. The government is reviewing national planning policy and the future of the A38 Derby junction upgrade. SDDC should have waited for clarity on both.  The Sustainability Assessment Report, critical for validating housing and traveller site choices, wasn't published until after the consultation began, which undermines the process.  The new plans don't include any form of sustainable transport, e.g. for cycling. Staker lane is already dangerous, any new development must make cycling these areas easier, the best solution being, suitable off-road cycle paths to encourage this sustainable travel.  There is not enough thought given to the needs of a new community, Doctors, shops, schools, dentists etc. They will just become a burden on already stretched services. The track record is not good, lots of things were planned for the Cotchett village site, but none have happened. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243168 | Joy Walsh |  | No | Dear Planners  I wish to object most strongly to the plans outlined in this latest document.  I have been a resident in Mickleover for 37+ years, during that time period there has been extensive building of houses with very little change to the local infrastructure. We still have the same two doctors surgeries, which have reached absolute saturation point. There has only been one new school built. Traffic becomes gridlocked at peak times, with Staker Lane being used as a rat run through to Station Road, Radbourne Lane\* and beyond.  \*Amber Valley have recently started their planned development here, they have ripped out all of the long established hedgerows prematurely, which was sanctuary for birds and other wildlife, and replaced it with wire fencing set well back from where the hedgerow was! Why do developers do this?! If they were truly sympathetic to the views of local people they would have considered that leaving the hedgerow intact would have afforded the householders opposite some relief from the inevitable mud and mess whilst the works went on.  It should be compulsory for the developers to put in place any necessary infrastructure BEFORE other building commences and before their costs escalate and they determine there's insufficient funds left and inevitably renege on their original "commitment".  Another issue I have with these plans is that both South Derbyshire and Amber Valley District Council then leave Derby City Council with the responsibility of service provision, which has a direct effect on our council taxes, paying much more for less reliable services. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1234342 | Julia Bather |  | No |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243170 | Julian Fowkes |  | No | I wish to object to proposals for a large development in Mickleover. As a Parish Councillor within the Parish where these will be sited, I am emotional over these plans.  My Parish council and many other residents will also be submitting objections, so I’ll keep it short and succinct.  • Green belt farmland being used. • The proposal event at the hotel was poor. • No alternatives presented. • The public had no input into which areas of the district should be considered. • Local area and traffic studies were not shown. • Derby City’s local plans were not shown. • South Derbyshire has already taken up shortfalls from the neighbouring councils. • As far I am aware only SDDC and Amber Valley have been asked to take up DC shortfall. • Amber Valley take up is less than SDDC. Should this not be an even split? • East Staffs and Erewash should also have contributed. • Other local developments have been approved based on A38 improvements. • These A38 improvements are still not finalised and maybe cancelled outright. • The sighting of this development is next to the A38 and will be reliant on its efficiency. • The other roads around are already congested at peak times. (Staker Lane Havenbaulk Ave). • One of the exit routes is near a local school: the air pollution, noise pollution and traffic dangers need to be considered. • Does Mickleover’s infrastructure have the ability to take the extra inhabitants? • Given the change in climate conditions has flooding been considered? • It appears the location been chosen specifically for its proximity to DC. • The location uses Mickleover’s infrastructure, but SDDC will collect the council tax. • Primary and Junior schools seem to have been considered but which senior schools will be used? There are three in the area but only one in SDDC. • The land ownership between the existing development and new development is not clear. This needs to be made public. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241728 | Julie Craig |  | No | This area has already been significantly built on in the last two decades with I believe well over 2000 homes, to attempt to double that number without significant physical investment in roads, services, flood defences, senior schools, medical provision is not sustainable and will lead to further congestion in an already congested areas that relies on few A roads. Also current land is farming and I believe this should be maintained. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1234363 | Julie Eason |  | No | Already stated |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242321 | Julie Muller |  | No | In the last few years Mickleover has grown enormously. The area feels increasingly urban, traffic noise is constant, the roads are often congested. Staker Lane and access to the A38 from Mickleover is already clogged at commuter times and school drop off and pick up times without the addition of thousands more cars. A substantial green buffer zone is needed to ensure decent air quality, flood prevention and general quality of life. The shops and Dr.'s surgeries simply cannot absorb the increasing numbers of residents. Please reconsider how this development would be better served in a different area |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242407 | K R Buckeridge |  | No | I wish to object to the proposed development at sticker Lane Mickleover. Mickleover is in Derby not South Derbyshire 2500 extra Homes will be using the utilities paid for by Derby Council tax and did not South Derbyshire. 2500 houses will be an extra 5000 cars using the roads Staker Lane is a narrow winding country lane already potholed being the main access to Mickleover shops, pubs etc and cannot take an extra 5000 cars. The social housing will be too far from South Derbyshire Council offices and is not a suitable location for a gypsy site. Surely there is plenty of more suitable land in South Derbyshire more suitable for such a large development. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1238095 | Karen Bansal |  | No | I am deeply concerned about the planned proposals for 2500 dwellings and travellers site south of Mickleover (The Hollow / Staker Lane).  ▪️ Mickleover has already taken more than its fair share of housing growth close to or on the Ward / City boundary.  ▪️ The proposal south of Mickleover does not provide ‘breathing space’ / green space buffer for established Derby City communities and these new dwellings. It is not sustainable development.  ▪️ Proposing 2,500 dwellings as another urban extension to Mickleover is not sustainable or appropriate development, especially when suitable and abundant land is available elsewhere in South Derbyshire.  ▪️ Up to 40% of the dwellings are to be social housing, yet SDDC offices are 12 miles away in Swadlincote. This housing should be closer to SDDC services. There is no justification for placing SDDC Gypsy & Traveller pitches on the Derby City boundary, suitable land is available in South Derbyshire.  ▪️ SDDC are rushing their local plan process - Government are currently reviewing national planning policy and the future of the A38 junction upgrade scheme. SDDC should have waited for clarity on both.  ▪️ SDDC have also not published their Sustainably Assessment Report. This is one of the most important local plan documents to demonstrate where housing and travellers sites have been considered, ruled out or chosen. This document is fundamental in testing the validity of the local plan process and housing / traveller site selection etc. The consultation should not have been launched without this document available. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1236417 | Kaye Macken |  | No | mickleover has already recently had multiple housing estates built which has impacted on the local infra structure. The local roads get blocked at peak times especially during school pick up and drop off and getting up and down uttoxeter road at peak times is horrendous.Hospital workers are often waiting hours to get out of the carpark due to volume of traffic on the island on Uttoxeter road. The doctors at mickleover are already struggling to cope and it is very difficult to get appointments or to get through on the telephone to them. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242335 | Keith Marklew |  | No | I am writing to express my concerns regarding SDDC proposals for 2500 dwellings on land on the ward/city Boundary.Whilst I appreciate the requirement for a great deal of additional housing in the country I feel that Mickleover has over the past few years has had its fair share of housing growth particularly on its boundary and this is continuing currently. First of all the proposal smacks of nimbyism as SDDC seems to wish to plan development on the edge of their area backing up to Derby limits. SDDC has already built, I believe, at least 2 sites on the DCC boundary by Mickleover. I doubt very much that you are considering a similar size site eg 2500 properties in your area even though I feel sure you could provide one. This is a huge development and will create further problems in what has become a sprawling area. The infrastructure is not there to support this development such as doctors surgeries, Schools, Roads, public transport, loss of green space etc and there is no mention regarding these. I understand that social housing will comprise 43% of the development - surely the distance away from yourselves will not help you support these individuals sufficiently. The roads around this area are extremely busy and are not conducive to the additional strains that would be created by the development. In addition should the A38 development proceed then this would have chaotic implications around the area. This plan does not appear to be well thought through, nor consulted sufficiently. I see it as a quick solution. For these reasons I strongly object to this development. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242626 | Keith Ryan |  | No | Lack of Information & Detail  The recent consultation event held at Mickleover Court Hotel was not a consultation but a presentation of a number of colourful pictures based upon a very limited terms of reference for the ‘Sustainability Appraisal’ submitted by SLR Consulting Ltd. Additionally, the personnel at the event to support and give information on the proposal were not well informed.  Infrastructure  The Executive Summary in the SLR Consulting document available at the Mickleover Hotel states “Development in the SDDC Urban Fringe performs more positively than development in the AVBC Urban Fringe for sustainable transport as there is higher potential for transport infrastructure improvements and more existing routes into Derby.”  This appears to translate into being based upon using and expanding existing infrastructure (viz. Mickleover infrastructure).  Already Mickleover has, in recent years, had six (6) developments surrounding it comprising Manor Farm Fields, Cotchett Village, Bramble Gate, Radbourne Lane, Langley Country Park and Hackwood Grange. These developments bring nearly an additional 3000 houses and, based upon a modest average of 2.5persons per household, approximately 7500 people that are relying upon the support of an already creaking Mickleover infrastructure. The 2021 census showed a population of 14,696 for Mickleover so these developments have the potential of a 50% increase on that figure.  There has been a small contribution to infrastructure development in the form of a 250 pupil Hackwood Primary Academy on the Hackwood Grange development and couple of roundabouts on Radbourne Lane.  Local doctor’s surgeries, dentists, shops and parking are getting overloaded. Also, the busier roads require more pedestrian crossings to ensure the safety of pedestrians. It is difficult to see how the existing infrastructure to support local residents needs can cope with the increases from existing developments let alone a new development of 2500 houses.  In 7.0 Conclusions and Recommendations of SLR document it states “This assessment has assumed that necessary infrastructure will be provided to meet new resident’s needs. The authorities will need to consider whether necessary infrastructure can be delivered …..”  Overall more detail and information is required to show how the Mickleover infrastructure will be developed and financed to accommodate the needs of the existing and planned additional residents..   Traffic Density  Access and Exit points are shown at a sharp bend on the narrow Staker Lane and at the A38 roundabout junction with Staker Lane. Also, the existing Staker Lane is not capable of taking the additional volume of traffic into and out of the planned development. No traffic study information was available and presumably has not yet been done. Traffic flow has increased substantially, and pinch points are appearing at various road junctions around Mickleover.  A Traffic Study needs to be done and presented for consideration that includes taking account of traffic flow impact from other developments, school traffic, pinch points and actions that are to be taken to minimise/eliminate volume and road safety issues. Without this the development does not appear to be safe and viable.   Provision of a Travellers Pitches  There is no indication where this will be situated on the plan or any detail of why it is being considered within a residential housing development. Also, how will any inevitable tensions between residents and Travellers be managed and provision of facilities and general services.   Financing  In Conclusions and Recommendations of SLR document it states “This assessment has assumed that necessary infrastructure will be provided to meet new resident’s needs. The authorities will need to consider whether necessary infrastructure can be delivered …..”  This is a bold statement as local councils are cash-strapped and unable to fund the many areas for which they have responsibility. Even declared offsets and agreed payment commitments by developers/builders when getting approval for a development can be changed/reduced. This has recently been shown where AVBC agreed to a reduction from Hodgkinson Builders on the amount of money related to a development at Cinder Road, Somercotes. It puts major doubts on any required Infrastructure improvements happening. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1240207 | Kevan Sutherns |  | No | Overloading of local facilities in STRA1 & STRA2 which in the case of Mickleover has it's services which were barely coping before recent developments are not inundated as things are.  STRA3 why is it down for what could be industrial when it could possibly be used for housing.  Some of my objections to the proposed developments bordering the boundary of Mickleover and Littleover:  1) There has been too much development in the area already and South Derbyshire has taken more housing development in Derbyshire since 2011 which has overloaded the local infrastructure without any great improvement in facilities, planning may state such things as Doctors surgery and shops to be built in some of these areas but few appear or operate this has lead to Mickleover becoming a hub which it cannot support without itself being developed.  2) Local roads are unable to cope with the existing traffic particularly concerning the A516 and adjacent roads, any additional traffic will have a disastrous effect on journey times.  4) Mickleover and Littleover are heavily congested causing increasing air and noise pollution, danger to pedestrians, cyclists and children and time delays for journeys, parking is now inadequate in both areas and while they are not your responsibility the planning of the new developments is the major cause. A few years ago I could get into Derby or Burton in less than 15 minutes and be parked, I now have to allow 30 and every modification slows the flow of traffic.  5) Any flooding in and around the area will in many cases affect the areas where building development is taking place. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242287 | L Haines |  | No |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242063 | Laura Massey-Pugh |  | No | Enough consideration has not been given to brownfield sites in the city. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1232863 | Lauren Ryan |  | No | Mickleover has had too many developments over recent years and is now a busy and overcrowded place to live |  |  |  |  |  |  |  |  |  |  |  |  |
| 1232988 | Leigh Fearon |  | No | With caution Stra1 maybe ok, but again undue pressure on bypass road.  Stra2 would cause many many issues which won’t be resolved, current builds in the area have caused massive issues which have not been dealt with.  Stra3 aware of massive developments already however much land is repurposed which is correct and should be the first place to look when developing. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1239197 | Linda Isburn |  | No | Mickleover has taken its fair share of housing growth since I moved here in 1997. School places are full. It's virtually impossible to get a doctor's appointment. Roads are chaotic with too much traffic and potholes. This is not suitable for this area and it has to STOP! |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243172 | Lisa Fearn |  | No | I am opposed to the housing development proposed.  The Hollow road is busy at all times, and extremely busy specifically at rush hour and school run time. Having additional traffic will increase pollution on The Hollow for both inhabitants and the children and their parents walking to school. o Increased road traffic on an incredibly busy road during school times and peak times. o Increased pollution due to additional traffic, especially traffic waiting to pull out of the proposed new development and then delaying the traffic on The Hollow. o Walk to school for children will be more dangerous due to increase in traffic, higher pollution levels, more roads to cross. o View from existing The Hollow properties will be compromised. Reason for purchasing properties due to field behind the rear gardens will be lost. o Property value of the existing The Hollow properties will be detrimentally affected. o Loss of Green Wedge land. o Increased traffic, traffic pollution and noise pollution during construction phase of proposed development. o Possibility of damage to existing roads from construction traffic during construction phase of proposed development. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1235572 | Lisa Marie Roberts |  | No | No Sustainability Assessment for housing and the traveller community wasn't published until after the consultation  Mickleover has already taken more than its fair share of housing growth near the ward/city boundary. The proposed development south of Mickleover will impact on the current infrastructure which is already strained with increase traffic and facilities.  Up to 40% of the housing will be social, yet SDDC civic offices are 12 miles away in Swadlincote. This again will impact on travel arrangements.  Green space is already limited due to the housing development in the area. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1235357 | Lorna Hodgetts |  | No | Already massively overpopulated and infrastructure not coping and insufficient for current needs |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242396 | Lorna Watkins |  | No | I’m writing to object to the proposal 2500 dwellings, including gypsy and traveller pitches south of Mickleover as part of SDDC‘s local plan. The number of dwellings 2500 is too large and will swamp Mickleover generally and in particular with Cars and extra traffic with noise and air pollution give us some room to breathe please instead spread the burden by including smaller numbers of houses on the local plan for South Derbyshire villages to accommodate young people locally in their own villages Should they wish rather than forcing them to live in a city with no sense of place and with no sense of community The proposed 2500 dwellings are too far away from Swadlincote and it services to support the social housing on the site Why hasn’t SDDC not made it clear where the gypsy and traveller pictures will be located? The sustainability assessment report wasn’t published until after the consultation began which begins the process as you may well know Finally, we haven’t been given much time to respond to the draft local plan. Is there a sense of an important and significant decision rushed through?  I realise houses have to be built but it is essential they are built in the right place. The suggested area on the plan is the last green wedge that exists as new house farm and Mickleover country Park and Langley country Park Have surrounded the suburb.  Our counsellors are also against the development as they correctly argue that Mickleover has had enough new housing and should still have some open space attached to it.  Congestion on the roads in Mickleover has already drastically increased with long queues forming on main roads and rat roads starting to impending Jon residence. Crossing main roads at peak times is a problem now and more cars would exacerbate this. Most homes have two cars so there would be another 5000 vehicles entering Mickleover to use shops and facilities.  Building on the edge of South Derbyshire may suit the Council’s housing needs, but this at the expense of Mickleover residents. The local plan mentions building affordable houses but Mickleover is the most expensive area in the city to buy property so your statement is false and meaningless. Developers will ask higher prices for the houses and make more profit at the expense of existing members of Mickleover.  The planned Green Park mentioned will not replace the existing wildlife who will have to find new and suitable habitats and the existing mature trees can absorb 22 kg of carbon a year. Any new trees that are planned and survive will take decades to do the same |  |  |  |  |  |  |  |  |  |  |  |  |
| 1232937 | Margery Morgan |  | No | See above regarding what has already happened on the edge of Mickleover. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1233131 | Mariah Senaa |  | No | I do not agree that the following strategic sites should be allocated for development:  STRA1: Infinity Garden Village – No • The scale of this development risks overburdening the local infrastructure and could lead to increased traffic congestion and environmental strain. While there are benefits in terms of job creation and housing, I believe that more consideration is needed to balance development with the preservation of local character and the needs of existing residents.  STRA2: Land south of Mickleover – No • Developing this area could significantly impact the local community, including increased pressure on schools, healthcare services, and roads. Mickleover is already a well-established residential area, and adding more housing could lead to overdevelopment, diminishing the quality of life for existing residents.  STRA3: Former Drakelow Power Station – No • Although the redevelopment of brownfield sites is generally preferable, the proposed scale of development here may overwhelm local infrastructure and lead to environmental concerns. The impact on the surrounding natural areas and communities must be fully assessed, and I believe the proposal requires further review to ensure it meets sustainability goals without excessive negative consequences.  In all cases, the focus should be on sustainable development that does not harm existing communities or strain local infrastructure. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241749 | Mark Hoptroff |  | No |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1238388 | Martin and Pat Cocker |  | No | I wish to register my objections to the proposed development of 2500 houses to the south of Mickleover.  > Over the past ten years hundreds of new houses have been built near to Mickleover. Although most of these developments have been within SDDC boundaries, there has been a massive impact on Mickleover in the City of Derby.  > Doctor’s surgeries are now even more stretched and the village centre and its roads and car parks are always congested. The area just cannot cope with providing these services for another 2500 households.  > The proposed location of the new development is particularly inappropriate. Not only would it occupy the only green space between Mickleover and Littleover, it would also put unsustainable pressure on the roads in the area. Traffic from Staker Lane would have to feed into Havenbaulk Lane or Rykneld Road/Pastures Hill. Both routes are already heavily congested at the morning and evening rush hours. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1232938 | Martin Turner |  | No | Expand Derbys boundary & it would be of no concern to south derbyshire. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242135 | Matt Coxon |  | No | Mickleover has had many developments created over the last few years with more already coming. There is already a development falling under SDC which is on the A516. This is far away from any other SDC facilities so the residents use DCC provided services.  There has been a huge influx of social housing on each development as it is which has bought a steep rise in anti-social behaviour in the local area. A traveller site would bring even more, not necessarily from its occupants but when others come to visit/ stay as witnessed on other places. The huge increase in local traffic is also a concern with routes in and out of Mickleover now becoming already swolen and bottlenecked.  The safety and wellbeing of the people who already occupy this are should be the first priority when planning these new developments. NOT dragging the area down with huge social housing clusters and traveller sites. TERRIBLE IDEA.  This new section of development is also under a different council to Mickleover. This would mean that people from the new estates would be using the Derby City councils facilities such as doctors and the local schools which are already at breaking point.   The other Infinity Garden site does not seem a bad option for a new development. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1233743 | Matt Hunt |  | Yes | Too close to A50, who wants to live next to a major arterty road, with associated pollution and noise. I guarantee none of the councillors will. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1232922 | Maureen Shenton |  | No | Infinity and Drakelow are areas that are not overdeveloped. The Mickleover area is already grossly overdeveloped and struggles to provide services such as GPs and school to those already resident in the area. The roads around Mickleover are already at breaking point with traffic volume and simply cannot cope with more. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242296 | Melissa Deighton |  | No | As a lifelong resident of Mickleover, i now live technically within Southern Derbyshire but still remain part of Mickleover and use the infrastructure around my local area where i can. This has a number of challenges which will be amplified if you decide to pursue your local plan along Staker Lane.  Your proposal will have a negative impact on current residents and, in particular, those who move in to the social housing and travellers site that you are trying to distance yourself from - literally. People need access to support functions like doctors, dentists, council offices, clinics etc. To isolate people away from their local support will have a severely detrimental impact on their health outcomes - placing additional demands on health and LA services. I have already witnessed this for communities living in South Derbyshire who need to take long and expensive bus journeys to get to ‘local’ support services like council offices that are not local to them at all. Often this means they can not access the support they need. What you are trying to do, is pocket section 106 money to spend / save / invest as you want, whilst literally dumping all your problems in Derby - somewhere that is already struggling with its own problems.  If you have ever driven down the ‘rat run’ that is staker lane you would understand the concerns of locals. Its a country road which floods regularly, is too narrow in places and tight and twisty. Any slight change to the balance of the road - the A38 being congested, cyclists going down it, rush hour, school starting or ending, means severe queues along staker lane. There is no footpath along the road and pedestrians often have to trudge along the thick boggy grass. Staker Lane is also the first bit of green space many will see. It provides a natural breathing space between communities. Building such a large development would completely alter this side of Derby.  I have worked for the NHS for 33 years and i am saddened that a local authority would neglect the health and care needs of their intended community in this way. I know the strain both our services are under, and your plan should reflect the long term need to bring people to safe communities that protect their health and social care needs, not a short term strategy to dump people as far away from you as possible. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243655 | Melvyn Day |  | No | The size of the Plan is far too big and will be bigger than both Repton and Willington together. My calculations based on the Census information I could find of Willington being 3277 in 2021 which include those on the Marina. Allowing for extras I have increased that to 3500.  The average of the number of persons in a family being 3.11 Therefore 3500 divided by 3.11 = 1125 households In Repton allowing extra because I could only find the census of 2011, which was 2867, I will increase that also to 3500 which then give the same answer as Willington. Which would be 1125 Added together 2250.  This is a major Increase of accommodation, which will include Houses of all types, Flats, Homes for the elderly, Traveller Camp, and others of which I have not thought. With the many other housing sites built on the border of Derby in this area of Mickleover and Littleover the roads are already noticeably much busier. The road into Derby through Mickleover towards the Hospital and then along the Uttoxeter Road and across the ring road are remarkably busy at times, with long queues at all junctions as they try and make their way into town and around the ring road in both directions. The left turn at the ring road having had more than its own problems, which often find those trying to get out of the Kingsway Industrial and shopping park getting stuck for hours because of the traffic going to the A38 hardly moving. Often the A38 where the A516 meets it can be queuing to this point and sometimes beyond at busy times. The A516 slip road to the hospital is also a queuing area and this also creates more problems around the island outside the hospital.  Haven baulk Lane has Brookfield Primary School at the Mickleover end which has a school crossing point which when or if these houses are given permission by South Derbyshire Council will make this area more dangerous for the children crossing with the obvious extra vehicles using it. At the other end of the Haven baulk lane (Littleover end) we have real problems now with both The Littleover School and the Derby Grammer School creating huge problems at peak times when pupils both enter and leave the schools.  Pasture’s Hill and Rykneld Road has similar problems with traffic which sometimes can queue for over a mile when residents go to work when parents bring children to schools and collect them.  The island at the top of Pastures Hill and Hillsway during school times is so bad causing additional delays. This has been asked about in Meetings with the former MP Amanda Soloway, but no Improvements have been made or even investigated as since the Election we have had a change in our MP.  The Toyota Island at peak times has long queues on all four slip roads but particularly on the slip roads of the A38 North and South and additional traffic could increase the queue’s which may at times make them so long that they might go beyond the slip road which could be a danger.  When we have had closure of the M1 the traffic transfers to the A50 and then to the A38, which quickly causes major problems as when the traffic builds up vehicles with nowhere to go, use Staker lane, Rykneld Road and Pastures Hill and some then go down Havenbaulk lane which causes gridlock in all the areas mentioned above. This has happened several times. We also get the same problem when the A38 gets blocked.  In your documents it says that you must consider the traffic problems that a proposal of this size will cause. We have suffered the problems more often than you would have thought. Before any of this proposal is passed, the problems with traffic should be considered and improvement made. That being the proposed improvements of the A38 which would prevent massive build ups and the new Junction on the A50 near Infinity Park. There should also be improvements to the roads going into the Derby centre both those through Littleover and Mickleover  To expect the people of Littleover, Mickleover and the City of Derby to absorb the problems that a development of this size will create with traffic, Doctors and many other services being required is massive. And I believe the size should be thought about as it is far too big. Those living in the new development will pay their taxes to South Derbyshire, whilst they use the many facilities that Derby can provide at those who live in Derby’s expense,  I think that you should relook at this development because of the information I have given above and either do not go ahead at all or at least rethink drastically the size. My recommendation would be that the most house’s that be built should be five hundred after which you should monitor the affect that it has on the area near to the proposal before adding more.  South Derbyshire planning is taking advantage of the situation that Derby City Council finds itself in having to provide more houses than it can find within the city, and they feel that they must allow building on our borders just to get the numbers down. We the residents then will have to put up with the consequences with no one to listen to our problems. Indeed, this has been going on for many years especially in the Boulton Moor area and the many proposals of the Amber Valley Council.   I believe that this Proposal should by South Derbyshire Council be removed altogether as it seems enough thought of the problems it will cause have not been thought about enough.  You could have picked many other places to put 2500 houses, even if it meant spreading them all over South Derbyshire area without touching our boundaries but instead taking advantage of the silly position that the Government puts Derby in. You and Amber Valley have and are making Derby bigger and bigger and with Derby city seeming to encourage it as the number game is played out, leaving those living in the area to have to put up the mess that will be left.  If you chose to develop on the borders as you have so often it seems to me that you are taking the easy option as your Councillors and MP,s will not have to listen to those complaints of those who this proposal affects the most being those in Mickleover and Littleover, and again taking an easy route.  I do intend to challenge our government to either make our boundaries larger or reduce the number of houses that we must produce. You have an abundance of places to get your numbers, both your council and Amber Valley without becoming parasites attacking our boundaries just because it is easy. I will suggest an area that you can build 2500 houses. I would like you to look at the area between Repton and Newton Solney and including the area towards Bretby. Can you imagine the outcry then.  The only choice that Derby have left to them is High rise and that is unfair to us whilst you plunder our Boundaries.  Even the Park that you suggest is in my mind in the wrong place and is being used to placate those South Derbyshire Residents when it could have been placed close to Havenbaulk Lane to make such an horrendous plan a little more acceptable but then you would not be placating your own residents with such a large proposal. This leads me to believe that any not so nice area’s might be forced onto those living near HavenBaulk Lane.  I would ask if this plan was to go ahead that you also consider the position of the schools , Industrial area and Gipsy Camp so not to create more problems for those near to Havenbaulk Lane as we have awful trouble already at school times with standing traffic causing pollution and parking at all the schools. I would ask you to come and visit me at school arrival and leaving times to see the chaos we face now around the schools and the roads into Derby, the A38, Pastures Hill, and the roads into Derby near to the Hospital and the Mickleover and Littleover centres.  I could go on forever explaining why this proposal should not go ahead and hope you would listen, but I think you will take an easy way out and placate those who vote in South Derbyshire just look at the number of houses that have been built around the edge of Derby. Add them and the ones you are about to add, you could have built a town has big as Swadlincote.  I am sorry to be so blunt at times and if I have repeated myself, this is not an easy proposal to accept by those living within 2 to 3 miles of its position because we know well enough the problems with traffic now as explained earlier. Please before passing this proposal think more about the problems, it will cause.  Finally, may I thank Mr James Norton one of your Planning officers for taking his time to talk to me about the Plan and Planning Rules and helping me to know more about what is happening, which has helped answer so many questions of why . |  |  |  |  |  |  |  |  |  |  |  |  |
| 1244734 | Member of the public (name unknown)) |  |  | The plans for 2500 homes plus gypsy and traveller pitch which he proposed to build up to the boundary of little over/middle over is most inappropriate.  There are not sufficient amenities to accommodate the amount of properties already in place. The roads cannot take any more traffic. Not enough room in the schools and no shops or doctor’s surgeries. The roads are locked down with traffic queues. I think it would be much better were these homes and travellers pitch be placed much closer to the boundary of Swadlincote enabling refuse collection to take place nearer to Swadlincote saving time and money. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243611 | Michael Burns |  | No | I object to the proposed development of 2500 dwellings on the following basis:  1) South Derbyshire Council has approved a significantly higher number of houses than Derby City and Erewash Councils since 2010. The surrounding sites of Hackwood Farm, land at the end of Station Road, land off the A516 close to Mickleover Court Hotel, Heatherton Village and work just started now on Radbourne Lane represent many 1000's of new homes built and being built.  2) The congestion in Mickleover has increased significantly since 2010 when the new housing was started.  3) Staker Lane is in a poor condition and is not wide enough to take the volume of traffic from the housing proposed.  I commute using Staker Lane in a southerly direction and the traffic coming north is often backed up by circa 150 cars between 7:30 and 8:30 am.  4) Mickleover and Littleover are already heavily congested and the inevitable increase in traffic will add to the already polluted atmosphere risking the health of commuters and people living off Staker Lane and the surrounding roads  5) The land is low lying, susceptible to flooding and will increase the risk of sewage discharge already well above government targets. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242418 | Michael Holland |  | No | Specific objections to the STRA 2 : Mickleover Proposals  This section of the document appears to have been conceived as a paper exercise by people who do not know the area and have no interest in, or concern for, the effects of previous planning decisions.  Access to the proposed site from the A38 and The Hollow  Mickleover is already suffering from the delays in implementation the major improvement project on the A38 at Markeaton and Kingsway despite that having been promised when planning permission for existing developments was given. This new proposal envisages the main access to the site coming from the A38 roundabout at Findern. This roundabout already has five access roads and a sixth would lead to considerable safety concerns on a very busy and complex intersection.  The proposed second access to the site from The Hollow would involve travelling along the narrow and twisted Staker Lane or Haven Baulk Lane each leading to an already notorious bottleneck in The Hollow.  Recent housing developments in Mickleover.  In the last few years SDDC has given planning permission for approximately 2,000 new houses on two sites at Hackwood Farm and Newhouse Farm. The current proposal for an additional 2,500 houses would result in a further 3,500 to 4,000 cars. At a conservative estimate of 1.5 cars per household the harmful effects of all these cars, with their multiple journeys, on air pollution, people's health and congestion is all too evident .  GP Practices and other promises.  In spite of the promise made of a new GP practice when the Hackwood planning permission was granted there are still only 2 GP practices in Mickleover to meet the needs of the 1000s of new residents. This means that it is already difficult and frustrating trying to obtain a GP appointment. The outline leaflet for the current proposal contains a vague reference to 'Delivery of Healthcare Infrastructure' , whatever that means, together with other woolly references to secondary education and community facilities.  Loss of good quality farmland  Once again good quality farmland is to be covered in concrete with the ensuing serious consequences for food production, increased flooding risk and exacerbation of the existing problems of sewerage disposal.  Conclusion  This scheme should be abandoned and Mickleover should not be subjected to any more developments of this scale with such serious consequences. Rather SDDC should concentrate on fulfilling the promises and inducements made when previous schemes were approved. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1238860 | Michael Sherrington |  | No | My main concerns and points against the proposal are:  • Mickleover has already taken more than its fair share of housing growth near the Ward/City boundary. The proposed development south of Mickleover lacks “breathing space” /green space buffer for established Derby City communities. • Proposing 2,500 more homes as an urban extension to Mickleover is neither sustainable nor appropriate development, especially with ample land available elsewhere in South Derbyshire • Up to 40% of the housing will be social, yet SDDC civic offices are 12 miles away in Swadlincote. This housing should be closer to those services. There’s also no reason to place SDDC Gypsy & Traveller pitches near Derby when suitable land exists in South Derbyshire • SDDC is rushing the local plan process. The government is reviewing national planning policy and the future of the A38 Derby junction upgrade. SDDC should wait for clarity on both • The “Sustainability Assessment” report, critical for validating housing and gypsy & traveller site choices, wasn’t published until after the consultation began, which undermines the process |  |  |  |  |  |  |  |  |  |  |  |  |
| 1234532 | Michelle Garnham |  | No | Mickleover is over populated for the community resources provided: GPs and schools. Made harder (from experience) as someone who lives on the border of Mickleover but falls in South Derbyshire council. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241601 | Miresh Mistry |  | No | - It seems very unreasonable that the Mickleover strategic site is being considered as a site for housing allocation, when it is miles away from the main population centres of South Derby and miles away from where the decision makers are. This is especially true of the gypsy and traveller sites - which are being proposed miles away from the decision makers. - South Derbyshire has taken a higher percentage of housing in Derbyshire since 2011 and this plan continues that trend. The allocation should be more equally split across the councils in Derbyshire. - Staker Lane where the proposed entrance is being considered is very narrow and congested in rush hour from the north end adding to traffic near the Brookfield school. Adding a housing site would make the traffic unbearable without serious infrastructure upgrades - I challenge the council to observe the traffic there from 8-9am and 3-5pm and you will see the issue. - The housing development will need to consider the local wildlife that lives in the fields and trees including local deer, badgers, hare and bats in particular which cross between the natural reserve and Burnaston visible throughout summer - The entire field where the site is being proposed is often flooded. Adding housing to this site will put pressure on local drainage and lead to unsustainable issues for the housing sites - The 2,500 proposed houses on 1.46km2 of the proposed site seems a stretch and unreasonable - There is no guarantee given that the country park will remain protected from further development or a future master plan - Adding fringe sites like this are not considering the impact to already overloaded local services and infrastructure. Furthermore, there is a massive housing development 1/2 mile away from this proposed site on the north side of the A516, which is already add strain to local traffic, school admission and health services. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1239108 | Mr and Mrs Ginko |  | No | Myself and my wife strongly disagree with the proposed plan for SDDC to build 2500 houses south of Mickleover and Littleover. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1244747 | Mr and Mrs Ward |  | No | Objection letter to planning permission application – STRA2 Land south of Mickleover  We write as a local resident to strongly object to the above planning application for the reasons listed below.   Flooding  As residents of Grassy Lane, we already have concerns about the amount of surface water flooding that comes from the east in heavy rainfall. This will certainly become a lot worse when permeable land is lost through this proposed development.  There are areas of Grassy Lane that flood and are unable to drain during high rainfall because of the difference in land levels.  Over the past few year’s roads have been closed by the police in the areas of Grassy Lane and Dee Lane due to flooding. Making roads unsafe to use and not accessible to residents.   Country park/green wedges and pedestrian cycle routes  As marked on the plan these proposed routes are already bridle paths and are currently used by locals daily. These bridal paths are natural walkways and are in keeping with the local environment not effecting the biodiversity.  If the development proceeds the increased volume on Grassy Lane being used by bicycles, scooters and increased foot traffic this will result in serious injury. This will be due to the lane only being a narrow single track with limited areas for passing traffic.  If Grassy Lane is to be used as the council desires as a cycle path when the users reach the top of the lane they will be met by an extremely busy and dangerous A road. This A road is a 60mph road in which it is often difficult to enter onto in a vehicle never mind a bicycle. This will have no other impact than causing extremely tragic accidents and result in serious injury or death. It would be a catastrophe.  The top of Grassy Lane is also a busy industrial area with a car mechanic garage and multiple businesses with numerous staff accessing their units and places of work. There are often large vehicles delivering and unloading which would result in users having to enter the busy car park to pass by, making this a dangerous area for anyone passing through on a bicycle or scooter.  Grassy lane is currently unadopted by the council and the residents have been carrying out yearly repairs for their own benefit. In the event of an accident on the lane we would be in fear of prosecution.  With the increase of human traffic and dogs on the land bins would have to be installed across the country park. How would these be emptied without the use of Grassy Lane and how often? We are aware of numerous areas in Derbyshire that have overflowing bins that are not collected often enough for the demand in their usage. Adding to this already growing problem will only put more strain on the Council which they already have proven they cannot cope with. This will result in dog faeces littering Grassy Lane and not only will it be disgusting it will cause a great hazard to the wildlife and humans in the area.   The rural area and wildlife  We feel with this development we are sacrificing agricultural land and natural habitats for our wildlife. We currently have healthy wildlife and habitats in the area, including badgers, newts, bats, hares, buzzards to name a few.  Natural habitats will be lost which have existed for many years which traditional vegetation of the countryside are supporting.  In the present climate our nation is struggling to supply the country with its own produce, giving up more farmlands can only have a negative effect.    Road safety  As previously stated, the A516 is an extremely busy road through out all hours. It is used as a rat run from the A38 to the A50 bypass at Hilton. We already experience congestion at the entrance to Grassy Lane and it is used as a slip road entering the fuel station. Traffic pulls into there at the speed of the road and many users do not understand the right of way for the traffic coming up Grassy Lane making it very unsafe for the residents.  Since the installation of the island at the top of the A516 for the other monstrous development a few years ago, traffic now has to slow down for the island which then causes users to increase speed on the straight length of road passing Grassy Lane.  If this development proceeds this road traffic will only become worse ensuring this problem is increased.   The provision of gypsy and traveller pitches  We strongly feel that this is completely unnecessary and there seems to be no real evidence for this being required for no other reason than a box ticking exercise. As a county we have plenty of sites already allocated locally.  For all these reasons and many more we urge the council to refuse this application. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242560 | Mr R E Southworth |  | No | The proposed development site to the land south of Mickleover will have a serious detrimental effect on Mickleover as a whole.  Development site & traffic / environmental issues:  The siting of the development with Staker Lane as the main artery is totally inappropriate. It is merely a winding country lane in poor condition, no hard road edges or pavements. It will be totally inadequate to deal with an additional load of around 4000 vehicles from the new estate.  Staker Lane will require a major upgrade to accommodate the junctions proposed both onto & off the development and the junctions with The Hollow & the A38 & the additional traffic created by the development Staker Lane itself will become a heavily congested "rat run" between Mickleover & the A38 running directly through the centre of the new development, with severe traffic stress points at the intersections of, Staker Lane /The Hollow & The Hollow / Headingham Way junctions.  The current situation with regard to traffic at the junctions of Staker Lane / The Hollow , and The Hollow / Headingham Way are already heavily congested at peak times.  This situation is made significantly worse at the start & finish of "school hours" at the local primary school. In addition to school traffic, cars are now parking on a regular basis between The Hollow / Headingham Way junction & the Kipling Drive turning.  This slows traffic down as cars have to give way to on coming traffic and this then causes more congestion in this area. Overall impact on Mickleover of the additional developments that have already been built  This proposal will have a very detrimental environmental impact on the village, particularly as a result of the additional traffic problems. It will create a huge increase in the number of cars from the development wanting access to the village amenities on a daily basis.  These additional traffic problems will add to the existing situation outlined below:  The environmental impact that will be created by this development cannot be considered on it's own.  It must take into account those developments that have already taken place & the developments already approved & about to be implemented on New House Farm/ Hackwood Farm / Radbourne Lane & Station Road.  All these new developments have already put severe pressure on the village and this will be made significantly worse if more houses are added. Mickleover has already taken a large amount of the Derby City shortfall.   None of the existing new developments have been provided with a bus service, so the only way to access Mickleover amenities and to be able to use existing bus services to continue into Derby or Burton is to travel into Mickleover by car and park.  Access & parking to Mickleover amenities:  Parking is now a severe a problem and with so many cars parked on Vicarage Road all day the access through the road is difficult at times for buses as well as cars.  Parking on Station Road by Boots the Chemist is another area that causes problems very near a road junction and traffic lights.There are two small car parks in front of each parade of shops both are full all day and the one near the post office often has traffic queuing on the road waiting to access a space. This then causes a build up of traffic on the road.  The car park by the library is for users of the library and the community centre users. This car park is often full. Tesco also have a car park for customers and at peak times there is queuing on the road to access the car park.  The traffic level has increased dramatically, parking is extremely difficult, cars are now continually parked on the roadsides all over the village as there is insufficient parking for the volume of traffic now imposed on the area.   GP practices: These are already over subscribed, Promises were made that additional GP facilities would be provided along with the last set of developments. This did not happen and the situation will be made significantly worse with addition of even more residents. We note that the proposal STA2 suggests that the Council will "work with infrastructure providers to ensure health provision will be addressed". This merely echoes the promises given at the previous developments which did not materialise.   Primary School & "local centre": There is a promise that these will be provided, however no commitment is made to ensure that these will be in place in the very early stages of the development. If this is not the case, where will schooling for the children on the new development be accommodated in the local area? |  |  |  |  |  |  |  |  |  |  |  |  |
| 1236663 | Nicholas Reynolds |  | No | My main concerns & points against this proposal are: o Mickleover has already taken more than its fair share of housing growth near the Ward/City boundary. The proposed development south of Mickleover lacks 'breathing space' / green space buffer for established Derby City communities. o Proposing 2,500 more homes as an urban extension to Mickleover is neither sustainable nor appropriate development, especially with ample land available elsewhere in South Derbyshire. o Up to 40% of the housing will be social, yet SDDC civic offices are 12 miles away in Swadlincote. This housing should be closer to those services. There's also no reason to place SDDC Gypsy & Traveller pitches near Derby when suitable land exists in South Derbyshire. o SDDC is rushing the local plan process. The government is reviewing national planning policy and the future of the A38 Derby junction upgrade. SDDC should wait for clarity on both. o The 'Sustainability Assessment' report, critical for validating housing and gypsy & traveller site choices, wasn't published until after the consultation began, which undermines the process. o Mickleover amenities (especially access to the doctors surgeries) has deteriorated dramatically since the building by SDDC and Amber Valley Borough Council in the area. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1234080 | Nick Pope |  | No | Mickleover cannot take this additional strain. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241910 | Nigel Bentley |  | No | I’m only directly concerned with land south of mickleover and comment as follows: - access to / from Staker Lane is limited; it is unreasonable to expect that traffic from this development will automatically choose to travel via the A38 - therefore significant amounts of traffic will be thrown onto an unsuitable road infrastructure (the area bordering Hedingham Way, Brierfield Way and The Hollow already suffers major congestion at school drop off / pickup times; the route thence into Derby is via Uttoxeter Road which again already suffers major congestion at peak times; Staker Lane is, itself, a ‘rat run’ from the A38 whenever there is major congestion on the latter). - public transport is already nonexistent for the established dwellings on the south side of Uttoxeter Road, nor any of the recent developments beyond the village centre, eg, Pastures, New Farm and Hackwood estates. It is unlikely that this will ever change given that the design of modern estates is not conducive to the provision of bus services. - lack of schooling provision; the proposed development only has provision for early years learning and fails to take into account the inability of the two nearest senior schools, Murray Park & John Port, to cater for a significant increase in students. - flood risk: Staker Lane is already prone to flooding due to the local topography - building over the fields will only serve to increase that risk due the amount of run off generated. - unsuitability of land for housing: a large proportion of the land identified for housing will be unavailable / economically unviable for housing due to the presence of overhead power cables. Hypocrisy: a resident of Staker Lane has historically been refused planning permission due to the nature of the area surrounding their property, ie. it would spoil the countryside!!!! Absence of healthcare provision: Mickleover already only has two overstretched GP surgeries - promises of a further practise to support the Hackwood development have failed to materialise. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242391 | Pamela Pym |  | No | I’m writing to object to the proposal 2500 dwellings, including gypsy and traveller pitches south of Mickleover as part of SDDC‘s local plan. The number of dwellings 2500 is too large and will swamp Mickleover generally and in particular with Cars and extra traffic with noise and air pollution give us some room to breathe please instead spread the burden by including smaller numbers of houses on the local plan for South Derbyshire villages to accommodate young people locally in their own villages Should they wish rather than forcing them to live in a city with no sense of place and with no sense of community. The proposed 2500 dwellings are too far away from Swadlincote and it services to support the social housing on the site. Why hasn’t SDDC not made it clear where the gypsy and traveller pictures will be located? The sustainability assessment report wasn’t published until after the consultation began which begins the process as you may well know. Finally, we haven’t been given much time to respond to the draft local plan. Is there a sense of an important and significant decision rushed through? |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242557 | Patrick Kniveton |  | No | I have the following comments on the proposals to build c. 2500 houses on the land South of Mickleover:  1) I am supportive of building more housing to fulfill the demand for new housing and recognise that this is an area that has exhibited significant demand. I'm not convinced that putting such a large number of houses in this single site is viable or sensible.  2) Although in principle this would appear to be a suitable area, I do believe there are significant issues with the proposal. These include: the geography and geology, the access to the proposed site and connection to the existing transport infrastructure, the demand for schools and primary medical care, the effect on existing housing and facilities.  3) Taking these in turn, the site lies at the bottom of the hill and is the focus of ancient water drainage lines; such as the routes to Hell Brook and Doles Brook, tributaries to the Trent. These already cause flooding across parts of the golf course, Staker Lane in particular, and the fields below. There are existing old drains that are still in operation carrying surface water, but are not shown on the Severn Trent plans.There would need to be very significant drainage infrastructure provision to solve existing problems, never mind the new run-off from hard infrastructure. The ground is largely Mercia Mudstone and has a resulting heavy clay soil.  4) The apparent route to the site would be via Staker Lane from Findern junction on the A38. The clue is in the name; it is a minor road that already has suffered from existing house building large lorries using it illegally as a ratrun. It has tailbacks at school and rush hour times to the junction with the Hollow and up to Brookfield School. These are all residential streets and totally inadequate for the traffic that would be generated. The A38 would suffer once more from further traffic to the currently further-delayed and long-overdue Derby junction improvement works. Realistically, the site would need at least two major points of access for traffic for this number of houses. Any belief that "active travel" would reduce this significantly is nonsense.  5) A new school is indicated on the plan, but not its access routes. Any ideas of using the lane down beside the Mickleover Country Park Golf course and social club and football fields would be a major risk to safety. The estate already has a speeding problem and issues with parking when multiple use is made of these facilities. School traffic would lead to major safety risks for the children and residents alike. The site separation must remain intact. Indeed, it would be appropriate to enhance the parking and capacity for these leisure facilities to give an opportunity for social use for all, perhaps with new car park provision the "other side of the fence".  You will be already aware of the inadequate primary medical care provision in Mickleover. There have been over a thousand new houses under construction or planned in the area, but there are still only two doctors' surgeries and both are overloaded. It is essential that new facilities are provided and actually built early on in the construction phase if this proposal goes ahead. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241987 | Patrick Munro |  | No | Because almost certainly they'll follow the same format as the existing developments which over burden the local area. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243225 | Paul and Nicola Pearson |  | No | This mail is a notification of our objection to the planned housing development on green belt land South of Mickleover (Staker lane area).  The current plans do not seem to address the already lack of infrastructure in the area made far worse by the recent and continuing developments at Hackwood farm and the surrounding area , and whilst these fall under Amber Valley responsibility have a direct bearing and impact on the Mickleover area in terms of availability of rotas, schools and other amenities, which this development will make much worse and at rush hour and school times and gridlock Mickleover and the surrounding area.  I am sure there are suitable locations for such developments in the South Derbyshire area closer to the district centre that could and should be utilised and the surrounding areas benefit greater. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243180 | Paul Brindley |  | No | I would like to submit my views against the Draft Local Plan Part 1 development STRA2 Land South of Mickleover page 54 regarding the development off Staker Lane near to the existing Pastures housing estate.  Another housing development will inevitably lead to more traffic and congestion within the local area which has already seen an increase with the numerous developments around the Mickleover area. I am concerned about the impact on local amenities within Mickleover village for available parking and access to local services etc with the increase in population to the area.  Concerns about the impact on the existing drainage and sewage network in place at Pastures Estate being put under greater strain which can result in overwhelming the drains leading to a greater risk of flooding. Flash floods are becoming more and more frequent across the UK.  The area for development is an open space/greenfield site with some areas used for agricultural land which improve air quality, reduce noise and enhance biodiversity. A decline of these areas not only have an environmental impact but also the well-being of the local community. Having access to nature and maintaining green open spaces is important, the improvement to local amenities should include the planting of more trees not the removal of open spaces.  Wildlife and their natural habitats are under pressure in the UK. The greenfield adjacent to the pastures hospital golf course on the North East side contains an abundance of wildlife including birds of prey and badgers and their setts which are protected by law under the Protection of Badgers Act 1992. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241975 | Paul Hopkin |  | No | Those areas will benefit without destrying more green land and putting pressure on over stretched DCC areas |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242307 | Pete Milward |  | No | Regarding the proposed building of 2,500 dwellings plus a (gypsy) site. I would like to know how all of the waste water and rainwater is going to be dealt with. I also believe our local waste treatment works are at full capacity already. The reason people have wanted to move to Mickleover in the past is because it has been regarded as a desirable place to raise their families. With this proposal you are destroying that ideal. This is a step too far. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242315 | Peter Wright |  | No | Dear Councillor’s, As a resident of Mickleover for over six decades I have seen it grow and grow with more and more houses and cars but very little foresight to ensure all other support facilities are balanced with those increases. Modern building practices have given little thought to the expanding ownership of cars and the lack of parking spaces on those properties. Now everywhere you drive the roads and restricted by owner using the roads as their overflow parking facility. In many cases, this is so restricting that emergency vehicles are, should they be required, unable to gain access. The proposal by SDDC for a further 2500 houses South of Mickleover has given little thought to the existing infrastructure of primarily roads: The residents of Mickleover endure numerous occasions each year where a minor problem that occurs on the A38 or A50 and also the M1, drives traffic through Mickleover to avoid major holdup’s. The direct route for the people in Mickleover to access the Findern, Willington, A38, A50 is via The Hollow & Staker Lane. During the traffic problems on the A38, A50 & M1, in addition school start and finishing times both of these roads are grid-locked. Just building houses without consideration of access and implementing additional roads is totally irresponsible and adds to higher levels of pollution and noise to the existing residents of Mickleover. Mickleover is already at breaking point due to lack of facilities including GP Surgeries’. It is therefore totally unacceptable SDDC to hang even more houses onto DCC existing Infrastructure which is NOT SUSTAINABLE. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241989 | R Coxon |  | No | The proposals do not offer additional services such as GP practices or schools to support the new developments. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1238024 | Rachael Emery |  | No | I have previously expressed my concern, but as another example tonight. Staker lane and the road that it joins onto it, The Hollow and Haven Baulk Lane, into Mickleover can’t cope with the traffic as it is, my journey home from work which is usually 7-9 minutes took an hour because of an incident on the A38, which causes everyone to detour which creates a huge amount of congestion. To which if there were additional housing it would be everyday life. Mickleover genuinely cannot take any more heavy congested traffic.  The proposed development will have a significant negative impact. Not only will it increase traffic congestion, but it will also remove more green space than it preserves. This poses a serious threat to the local wildlife, such as the buzzards that currently use the area to search for food. These birds won't be able to adapt to the minimal green space that will remain. I usually see them sat on posts in the morning along Staker Lane. That would certainly not happen if this went ahead.  As a level 3 Forest School Leader, I'm deeply concerned about the environmental impact this project will have, not just on wildlife but on our next generation of children. I’m part of a nursery group that teaches children about our green space. How are parents supposed to support that kind of environmental development when the available green space is shrinking? The town I grew up in and hope to raise my own children in is losing the green spaces that are crucial for children to learn from nature.  The increased density of housing and resulting traffic will only worsen air pollution in the area. Mickleover's amenities are already strained, and cramming more people in without improving infrastructure is short-sighted. I've always loved this town, but if this development goes through, it will make me fall out of love with Mickleover. The negative impacts are simply too massive to ignore.  I really hope you take the time to read my email and many others who I know feel the same way and really think about the many negative impacts of this!! |  |  |  |  |  |  |  |  |  |  |  |  |
| 1233313 | Rae Louis |  | No | Mickleover has already had its fair share of housing growth close to the city boundary. I understand that there is no sustainability assessment report with regards to this development. I understand that this document is fundamental in testing the validity the local plan process and housing. The consultation should not have launched WITHOUT this document being available! |  |  |  |  |  |  |  |  |  |  |  |  |
| 1240880 | Rebecca Buckley |  | No |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1236005 | Richard Larder |  | No | Mickleover and the immediate surrounding area are overcrowded and the existing infrastructure is under pressure. The site over former industrial sites such as Drakelow and possibly Willington power stations should be considered as potential housing sites. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1235713 | Rob M |  | No | Mickleover is already struggling due to pressure on infrastructure, transport in particular. Traffic on Uttoxeter road, Station road and the surrounding areas is already excessive due to various large developments in the area. We also lack retail businesses and employment opportunities around Mickleover, resulting in Tesco being constantly extremely busy, there are few school places for children and there are no Doctor's surgeries or Dentist's surgeries in Mickleover than can accept further patients. Even noise pollution from the A38 has increased drastically over recent years. Mickleover residents have suffered enough due to recent large housing developments being heaped on us despite many objections. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242376 | Robert Kinross |  | No | If I may take this opportunity to convey my thoughts and experience. Having lived on Mallard Walk Mickleover for almost 25 years and backed onto the fields adjacent to Staker Lane it has been and still is a privilege to have done so. To lose these precious pieces of land including the land bordering Mickleover off The Hollow which extends from the green wedge presently coming from Derby City Council land to development would be I feel a collapse of the local environment along with huge social and economic effects the land presently has an abundance of wildlife if lost Would be a sad loss for many reasons the first being environmental as development would without doubt greatly affect what we have. Hawks Buzzards Owls Woodpeckers Wood pigeons, tree creepers Various finches Hedgehogs Badgers Rabbits Cuckoo’s Foxes Blackbirds Looks Frogs Bats Bees Dragonflies Hornets Large oak trees Numerous hedgerows Signs of Medieval cultivation of fields Loss of the important green wedge coming from Derby city. Loss of farming land presently used by local farmer to produce beef and winter feed for his milking cows when barned. Dog walkers though seeking relief from the anxieties of life and solace enjoy the fields in all seasons Dog trainers Ducks use the pond that develops during wet periods This is an important area of land allowing urban dwellers to feel close to the countryside nature and having access to park like environment. Planting additional trees and the making of walkways pathways would further improve the sense of being close to nature which is rapidly disappearing in this area.  These plots of land are adjacent close to the Pastures golf course aiding in the continuation of the green wedge.  For the housing on this side of Mickleover would not only increase the congestion in the village itself, but also increase the congestion on that side of Mickleover where the infant school is and would necessitate the upgrading of Staker Lane to cope with the increased traffic coming from 2500 Homes. Many homes now have two vehicles somehow have three or even four.  Problem of stray golf balls from golf course if land was to be developed problem of housing near to chicken farm flying infested from time to time smell from chicken farm. Close location to dog kennels will be a noise issue. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242634 | Robin and Jean Goodall |  | No | Weare objecting to the council proposals e.g. Mickleover mixed use developments. The local roads are incapable of taking more traffic, it is difficult enough to negotiate entry onto A516 any time of the day, does anyone actually check to see the volume of traffic 24hrs a day ? Obviously, there are no alternatives to be implemented when extra level of growth takes place. We think traffic monitoring should be carried out before any thought of new houses being built. The surrounding roads already struggle with the volume of traffic it has now. Improvement to the A38 have been scheduled for many years and nothing is sorted and we keep waiting. Where are the sewage and drains and surface runoff water going ? is this a priority or not ? or is it a case of” its not on my doorstep” ? We on Grassy Lane are flooded every time it rains due to inconsiderate infrastructure from water trespass from neighbouring properties, it has been reported and reported and still nothing done about it.  It is a shame good agricultural land is going into green spaces. Surely as the way the world is and the food production that more land for growing food would be more worthwhile?  We would like some answers about Grassy Lane, who gave the ok for an unadopted road to be used as a cycle road bringing motorbikes etc, vans who deliver now use it as a racetrack. There are businesses on Grassy Lane who have been and checked about the planning and are worried everything is going through the back door to get planning permission. There are three farms who use Grassy Lane with entrance to their land and yards. There is entrance to 6 private houses, 6 business units also Burnaston garage and the Gulf Garage all use Grassy Lane. Between us all we maintain the surface of the Lane . On the lane itself we have Barn owls, newts, frogs’ toads birds etc. People have bought these houses hoping to move to a quieter party of the country, expecting some peace and quiet not a through lane. Who is going to adopt the road and maintain it so no claims will taken again t the residents? How will it be policed with large agricultural machines moving up and down the lane ? What about Drs surgeries and shops? More houses mean more people who want to be seen by a Dr. It is already hard enough to be seen by a Dr in Mickleover, if you are that lucky !!  You talk about Gypsy encampments, where is that going to go ? Nobody wants them near them as they wont look after the ground and land and what guarantees do we have that all our properties are going to be safe, as they don’t abide by the law and the Police wont do anything about their behaviour  We are feeling that we are being railroaded into this and that no consideration from the Council is being shown to the local area and people who already live here. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1232946 | Rosemary Whitehouse |  | No |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1236654 | Rosie Everett |  | No | I wish to object to the proposed building of 2500 houses on Staker Lane land. We have lived in Mickleover 40 years during that time 1000’s of houses have been built aswell as 2 new estates in Mackworth which obviously impact our roads and facilities.  The pressure on our roads, ( lanes in most cases) the lack of parking in the village, the pressure on our doctors, schools etc is immense. It is impossible to park therefore shop at the local Tesco Store at busy times especially at the weekends.  The roads around Derby are under great pressure and with the the A38 bypass still in the pipeline, more houses will make the roads around here even more busy and dangerous.  All the extra houses affect the environment, more cars - more pollution, wild life suffers with their natural habitat being taken away.  Staker lane is a LANE a narrow one which floods.  We just don’t have the infrastructure for such a huge development. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1233241 | Russell Licence |  | No | I have responded yes to former drake low. This is an example of a site riff for redevelopment.  Infinity village and Mickleover are pure greenfield sites. You cannot make more land so cherish it and stop developing on virgin soils.  As stated previous, farm land is sparse, farming needs to be encouraged in the UK, we need to be more sustainable. Building in greenfield must be a negative impact against carbon neutral targets.  The road and public transport infrastructure cannot cope now  Roads are in a terrible state now  There are not enough school places for Children now  You cannot get a doctors appointment now |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242130 | Samantha Furniss |  | No |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243612 | Sarah Burns |  | No | I wish to lodge an objection to the proposed development (STRA2 Land South of Mickleover 2500 dwellings) on the following grounds:  -There has already been a huge number of new houses around Mickleover with further new builds in the pipeline. Future building should be more evenly distributed around the area with more in Derby City and Erewash.  -Traffic congestion causes significant problems during the rush hours already and would be worsened.  -Heavy traffic and standing traffic are detrimental to the health of people living locally and more houses would make this situation worse.  -People living in the new village would be car dependent because there would be few or no workplaces within walking distance and this would add to the problems already mentioned.  -The roads in the area are in poor condition and further traffic would worsen the situation.  -New houses built in an area already prone to flooding would worsen this problem.  -Access to Royal Derby Hospital is compromised when the routes out of Mickleover are gridlocked- this could obviously result in adverse outcomes for patients. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242285 | Sarah Dolman |  | No | I am extremely concerned about the proposal for 2500 dwellings to built in the South of Mickleover. I am 36 years old and have lived in Mickleover for the whole of my life. I have always been proud to live here and want to be able to raise my own children here also. However, I have also watched as Mickleover becomes significantly overpopulated over recent years resulting in numerous problems for it's residents including the following:  traffic in and out of Mickleover is very heavy, particularly during peak times. It can verge on being dangerous at times with a lot of people also travelling through to get to Derby City Hospital. The roads are just not designed to meet this demand.  There are not enough GP surgeries to support the current residents in Mickleover. It is virtually impossible to get an appointment at my local GP and I very mindful that there has previously been false promises made by Derbyshire County Council about a GP surgery being built on the Hackwood estate which never transpired.  The local primary schools are significantly over prescribed and schools are being forced to have such large classes it is bound to impact on the quality of learning going on.  Mickleover has had so much housing growth over recent years which it already struggling to accommodate.  One of the positive aspects of living within Mickleover was the amount of greenspace not far away, however this is already being overtaken by housing.  The responsible Local Authority for these residents will be SDDC which is over 12 miles away and any new housing projects should be closer to where they LA are based so they can be properly monitored and supported.  Whilst I appreciate there is currently a housing crisis, I also believe that Mickleover has accommodated more than it's share of new homes. I believe that the current infrastructure of Mickleover needs additional support and it would be unfair to put any more strain on this area.  I hope you will take my concerns into consideration and feel free to contact me if you wish to discuss this further. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241947 | Sarah Glover |  | No | There's not the infrastructure in place, such as adequate road network to deal with increases in traffic. There's also a lack of primary care facilities currently and adding further housing in this area is just going to put extra pressure on the services already in place. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1238852 | Sarah Sherrington |  | No | My main concerns and points against the proposal are:  • Mickleover has already taken more than its fair share of housing growth near the Ward/City boundary. The proposed development south of Mickleover lacks “breathing space” /green space buffer for established Derby City communities. • Proposing 2,500 more homes as an urban extension to Mickleover is neither sustainable nor appropriate development, especially with ample land available elsewhere in South Derbyshire • Up to 40% of the housing will be social, yet SDDC civic offices are 12 miles away in Swadlincote. This housing should be closer to those services. There’s also no reason to place SDDC Gypsy & Traveller pitches near Derby when suitable land exists in South Derbyshire • SDDC is rushing the local plan process. The government is reviewing national planning policy and the future of the A38 Derby junction upgrade. SDDC should wait for clarity on both • The “Sustainability Assessment” report, critical for validating housing and gypsy & traveller site choices, wasn’t published until after the consultation began, which undermines the process |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241985 | Shirley Jackson |  | No | Insufficient local infrastructure |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242319 | SP & WL Stanley-Smith |  | No | As Mickleover residents we would like to express our concerns regarding the proposals for 2,500 dwellings and travellers site: 1. Mickleover has already taken more than its fair share of housing growth close to or on the Ward / City boundary. 2. The proposal does not provide a green space buffer between Derby City communities and these new dwellings. 3. This urban extension to Mickleover is not sustainable or appropriate when there is plenty of land available elsewhere in South Derbyshire. 4. Up to 40% is going to be social housing, these should be sited closer to SDDC services in Swadlincote. 5. There is no justification in placing Gypsy and Traveller pitches on Derby City boundary when there is suitable land available in South Derbyshire. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241058 | Stephen Alcock |  | No | Dear sir, I have been a resident of Howden Close Mickleover for over 25 years. We chose the close for its wonderful views over open countryside, and benefited from regular sightings and visits of many species of animals and birds, including foxes hares, owls, birds of prey, and pheasants. I also chose the area due to the infrastructure i.e. good roads that were not generally congested, great access to Derby city centre, great schools, doctors, dentists and adequate shopping facilities. In recent years we have seen a whole string of housing developments placed around the south /west side of Derby City boundary, which has eroded many of the benefits listed above, and has decimated the local wildlife. Traffic jams at peak times have become a regular event, especially on the A38/A516 major roads, plus the radial roads into the city centre, especially Uttoxeter Road, Burton Road and Ashbourne Road. Virtually every day I witness emergency services vehicles struggling to get through the traffic at peak times, especially around the Royal Derby Hospital, which creates potentially life-threatening delays to ill patients. Noting that many housing developments in the area are not yet completed, there is clearly going to be a lot more traffic that will result once all the current approved plans are delivered. I can only guess that traffic flow predictions are somehow made to assess the combined impact, but for sure things are only going to get worse. The situation is further compromised by the lack of previously planned major road improvements going ahead, plus if/when they do, the resultant construction work will cause mayhem to traffic flow for many months/years to come. Also, although you may plan for high quality pedestrian and cycle routes within the development, the existing roads are not suitable for pedestrians or cyclists to use, and would need major improvement to accommodate such plans. I Noting all the above comments, I also list some specific objections on the following grounds: 1. Impact on Local Infrastructure Mickleover schools, doctors, and dentists are all full. The demand on places is continually growing as a result of the new housing developments in the area, most of which at best, have deferred plans for limited facilities, so very reliant on Derby City facilities. Local shopping is also very difficult, with the only large supermarket (Tesco), often being extremely busy at peak times, creating parking problems, and causing general frustration. Similarly, the adjacent Parade of small shops has very limited parking, which again causes much frustration for local residents trying to pop to the post office, Birds etc. I am fortunate that I live close enough to walk, but there are a lot of elderly residents that that rely on taking their car or get a lift from family members. The surrounding streets are progressively becoming extended parking areas, which again causes frustration to some residents, plus adding to traffic flow issues. How does your assessments of these plans take account of such impacts? Specifically for your development, you need to understand just how much traffic flows from Mickleover down Staker Lane, since this is the obvious route for anybody heading south on A38. Staker Lane is a narrow country road, which is unlit, has several 90-degree bends, and has no footpath. It is also very narrow, and is quite dangerous for cyclists who also use it. It would therefore need widening to take account of increased traffic, plus adding at least a pavement on one side of the road. Furthermore, although the primary access is being proposed off the Finden island, the smaller access off Staker Lane could be very dangerous, especially if placed on the bend near the current Watergo Farm entrance.   2. Environmental Concerns  The proposed development will result in the destruction of greenfield land, which serves as a vital habitat for local wildlife and a natural buffer against pollution. Developing this area will irreparably harm biodiversity and contribute to further urban sprawl. With increasing awareness of the need to preserve green spaces, it is imperative to explore alternatives on brownfield sites before considering such damaging developments. If such land cannot be found, then it should be placed in an area where the impact on the existing infrastructure will be far less, or new adequate infrastructure is built as part of the development.  3. Village Character and Community Impact  The scale of the proposed development, including a traveller site, risks overwhelming the existing local community. While diversity and inclusion are important, there is a need for proper consultation and provision to ensure any development integrates effectively and does not create division or strain on local resources. The rural character of Mickleover, which has previously drawn people to live here, will be irreversibly altered by overdevelopment.  4. Lack of Justification  The National Planning Policy Framework emphasizes the need to prioritize brownfield developments over greenfield. There is insufficient evidence to suggest that this particular site is the only viable option. Given the ongoing housing developments in the area, it is unclear why additional pressure needs to be placed on this location, especially when other, more suitable sites could be considered. In particular, this area would not be suitable for a retirement village for the reasons stated above, and equally not suitable for a traveller site, so close to residential properties.  I would also like to draw your attention to the New House farm development. Firstly, the new island caused many accidents initially due to inadequate lighting and road signs. It also has an unnecessary impact on traffic flow due to east bound traffic heading to Mickleover, being directed to turn right at the island, affecting traffic flow going west. This completely ignores the fact that there is a perfectly acceptable slip road another 400 m down the A516, leading up into Mickleover. Also, x years on, the promised pedestrian crossing at the top of Ladybank Road has never materialised, nor has the walk way lights or a proper pavement down the official pedestrian route into the development off Ladybank Road been added. The apparent and promised steps to try and limit vehicle use into Mickleover has only received token improvements, and I for one, would be very reluctant to walk down there in the dark! It would be worth doing a survey of its use, especially for children going to schools in the area. Noting the almost constant traffic flow down Ladybank Road at peak times, plus increased parking and exclusion zones near schools in the area, it is clear that the majority of children off the development are transported to school in cars, with the resultant increase in traffic flow we had predicted. I hope such lessons have been learned for future developments, and developers are held more accountable for delivering their previous commitments/obligations.  In conclusion, I believe Mickleover has had far more than its fare share of new housing developments placed on its doorsteps, which has eroded the previous benefits of the area, and urge the planning authority to reject this draft proposal due to the negative impact on infrastructure, road safety, the environment, and the character of the local area. Sustainable development requires careful consideration, and this project fails to address the needs and concerns of the existing community.  Thank you for considering my objections.  Yours sincerely,   Mr Stephen Alcock |  |  |  |  |  |  |  |  |  |  |  |  |
| 1232906 | Steve Wilson |  | No | I've worked at Drakelow and know how large the site is with good roads. Unlike the Mickleover site served by minor narrow roads. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1236646 | Steven and Joanna Greenway |  | No | I am writing to strongly object to any further plan or application to increase the amount of housing in and around Mickleover, namely south of the suburb around Staker lane and the A38 Mickleover has already seen a massive expansion on the SDDC border with Derby City and it’s time for the SDDC to look elsewhere in their own council area that can more easily accommodate to proposed 2500 houses and travellers camp. As a resident of Mickleover for over 50 years we have seen the area grow from a moderate sized village to a suburb with a population today of approx 18000 people , the recent growth in houses mainly from SDDC has seen a massive strain on the local infrastructure, eg roads crammed and dangerous, that is Uttoxeter Road , Etwall Road , Station Road , the parade shopping area. GP surgeries haven’t kept pace with population increase. Local law enforcement is mainly conducted by special constables . No NHS dentist facilities the list goes on? Any increase in social housing and an outrageous traveller site being included in your plan would put massive pressure on all the facility’s and services in Mickleover and could very easily lead to a decrease in the quality of life for the existing population? Mickleover has already taken its fair share of housing and your proposed development south of Mickleover lacks any green space buffer and breathing space for our already established community Your proposal of 2500 more homes as an urban extension of Mickleover would make this suburban area into an urban sprawl that is not appropriate or sustainable.  The SDDC plan looks to include up to 40% social housing, but your offices are 12 miles away in Swadlincote therefore social houses should be closer to those services you provide and not 12 miles away, I also don’t see any reason for the SDDC plan to include a gypsy / traveller site , SDDC must have more suitable land already existing in South Derbyshire . I am told that the Sustainability Assessment report which is critical for validating housing and gypsy/ traveller site choices, wasn’t published until after the consultation began, so must undermine the process.  Any consultation process should take place before the government has completed and published their national planning policy that will include the future of the A38 junction upgrade, it seems that the SDDC is rushing the local plan process?  Please can you register my and my partners objection to this plan with the hope and wish you will quickly abandon any further plans in this area. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1232909 | Stuart Orr |  | No | Mickleover cannot take any more housing projects without substantial investments. A bypass linking a38,a50 to a52 for example should be part of if any planning requirements as traffic is a nightmare. There is not enough supermarkets for the area. School capacity is capped out already at most levels of education. Gp surgeries have some of the highest patient per gp in the local area. Public transport links need to be improved so funding for additions routes,buses,trams etc should also be part of any approved planning. Travellers sites do need to exist there is no escaping that but it is amusing that rather than host this closer to your main voter base you select a site on the city boundary. Additionally, sddc will take all the taxes for the homes but without any other changes to the plans, the city will suffer from the use of infrastructure and facilities already bursting at the seams. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242313 | Sue Bushell |  | No | I would like to register my concern about the massive housing development (2500 dwellings) and Gypsy and Traveller site proposed by South Derbyshire District Council (SDDC) for the Staker Lane/ The Hollow area south of Mickleover. I have lived in Mickleover since the mid-1980s. Since then, the area has seen extensive house building around it, particularly over the last ten years. This has put considerable pressure on the local roads, infrastructure and facilities. The roads are far busier than they were, making both walking and driving around much more problematic. The two GP surgeries in Mickleover are already massively over-subscribed and are struggling to cope with the existing patients on their books; getting an appointment or appropriate help is extremely difficult. These and other pressures on the area will only increase if further building such as this goes ahead. Some of the recent building has been within the Derby City Council boundaries, but others have been on the borders. Langley Country Park, off Radbourne Lane, for instance is part of Amber Valley and the latest proposal around Staker Lane comes under South Derbyshire District Council. The impression is that these councils give far less consideration to the impact on the local facilities which don’t happen to be within their areas of responsibility, but which they are clearly taking advantage of and putting a strain on. Promises made by planners and developers about mitigating the impact of new housing have simply been broken in many cases. For instance, the promise of shops and a new GP surgery in the planning application for the Hackwood Farm Estate have come to nothing. In addition, various promises about road improvements have not been met. Apart from the direct impact on local facilities, roads and services (the GP surgeries being of particular concern), the broader impact of the building on green spaces, farm and countryside is of concern. It takes a good deal longer to walk to what might be deemed countryside now that it did when I first moved to the area. There may be a need across the country for more housing, but Mickleover has seen more than its fair share of housing growth already. There is plenty of land available elsewhere in South Derbyshire. Please acknowledge receipt of this e-mail and register my strong objection to this latest Local Plan. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1241682 | Sue Glover |  | No | As above  Question 1 response: I feel that Mickleover has had more than it's fair share of development over the last few years. The infrastructure can not cope with any extra pressure/burdens ie Doctors surgeries, schools, roads, shops, local parking etc. The local roads are a lot busier than they used to be.  Question 2 response: 2,500 dwellings is a hell of a lot to stick on the edge of Mickleover an already burgeoning suburb of Derby. Locally we have had enough.  Question 4 response: Not required in this area. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1233359 | Sukhdev Bangar |  | No | STRA1: The site is suitable location as it has little impact on the surrounding area (minimal traffic impact as area not over congested as no nearby homes)  STRA2: This site is unsuitable for such a large number of homes as not only does it impact the view from the nearby homes it will increase the traffic in and around the A38 which is a regular traffic hot spot. Also the area lacks sufficient NHS Dentists and Doctors. The inclusion of a traveler site is not in keeping with the area and its inclusion feels like a snap decision/thought.  STRA3: The site is suitable location as it has little impact on the surrounding area (minimal traffic impact as area not over congested as no nearby homes). This is also re-purposing of land so will only enhance the area from its previous use |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242421 | Susan J Douglas |  | No | There has been and continues to be significant housing development already in Mickleover, without the possibility of a further 2,500 houses. Continued development is unsustainable.  The roads around Mickleover are not intended for a high volume of traffic; consequently congestion frequently occurs giving rise to increased air pollution and noise.  There is no public transport to the new developments and the bus service that does exist to parts of Mickleover has regularly become unreliable.  Services and facilities for such a large and expanding area that Mickleover has become are already in short supply; for example, there are insufficient doctor and NHS dentist surgeries, banks, shops for everyday essentials.  There still needs to be green space, the benefits of which are well documented. Building on farm and grazing land is not the solution.  Given the foregoing, the plan for this area of 2,500 houses which includes social housing and a traveller site is completely unsuitable. At best the plan is ill-conceived and inappropriate. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242052 | Susan Marshall |  | Yes | As stated in the earlier answers, Derby City should review its needs and to review the HMA. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1238864 | Susan Walker |  | No | Re: the proposed building of 2,500 houses within the Mickleover area • Taking more green space is unacceptable for many reasons • Social housing should be built nearer to the SDDC offices in Swadlincote • What changes will be made to Staker LANE, not a major road but, as the name suggests, a LANE • A badly thought-out plan for further housing  I am totally against this proposal and hope common sense will prevail. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1238041 | Sylvia Burns |  | No | Please read and register my objections and concerns below regarding this proposal  Mickleover has already taken more than it's fair share of housing growth near the ward/city boundary. The proposed development south of Mickleover lacks breathing space and green space buffer for established Derby City communities.  Proposing 2500 more homes as an urban extension to Mickleover is neither sustainable nor appropriate development, especially with ample land available elsewhere in South Derbyshire.  Up to 40% of the housing will be social, yet SDDC civic offices are 12 miles away in Swadlincote. This housing should be closer to those services. There is also no reason to place SDDC gypsy and travellers pitches near derby when suitable land exists in south Derbyshire  SDDC is rushing the local plan process. The government is reviewing national planning policy and the future of the A38 Derby junction upgrade. SDDC should wait on clarity on both.  The 'Sustainability Assessment ' report, critical for validating housing and gypsy & site traveller choices, wasn't published until after the consultation began, which undermines the process. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1232857 | Teri Licence |  | No | Former Brownfield sites are perfect for development. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242138 | Tiran Sahota |  | No | I strongly oppose the proposed Infinity Garden Village development. The area has already had new housing developments in recent years and as someone who lives in this area, I understand the impact that the increased housing has had on our services at the Sinfin District Centre. It's now very difficult to make an appointment to see a doctor at Sinfin Surgery - you have to call at 8am to book an appointment for that day and often the appointments have been taken by the time you get through to reception. My elderly parents, who also live in this area, usually go to the surgery at 7am and wait in the queue so that they can get an appointment on that day. They tell me that often other unwell patients in the back of the queue are turned away because there are no more appointments left. Also, there is currently a four year wait to be seen by an NHS dentist at this surgery!!! Building 2000 more houses in this area is only going to make this situation worse!! People won't be able to access adequate healthcare and this will reduce people's quality of life. The Sinfin shopping centre is usually busy and there aren't always enough parking spaces in the shopping centre car park. Even if you do build more infrastructure and services in this new proposed development, the volume of traffic will increase in this area and there will be more people travelling in the area and to other surrounding areas. This will increase pollution which will have a detrimental impact on people's health - I suffer from Asthma and pollution triggers my Asthma symptoms. Increasing pollution will lead to significant increase in health problems which will further stretch the health service. Currently the roads are very congested in this area. A recent trip to a nearby supermarket, which should normally take 10-15 minutes in the car, took me approximately 45 minutes due to the sheer volume of traffic on the road! This will get significantly worse if the Infinity Garden Village goes ahead. I understand that there are plans to build a new A50 junction, but again, this will be overwhelmed with traffic leading to more strain on the infrastructure in addition to environmental issues. This land should not be built on as it provides a boundary between the Derby suburbs and the local villages. It's not just the immediate area that will be overwhelmed by these proposals, the surrounding villages will be overwhelmed and impacted by these proposals too.  In terms of the proposed development in Mickleover, I also strongly oppose this. In recent years Mickleover has absorbed a significant number of new houses and this has completely overwhelmed the area. Again, the area is massively congested with traffic and the services are completely overstretched. So much development is such a short time has had a hugely detrimental impact on this area. Please leave what green land is left in this area - we don't want to see our green space concreted over!  I don't oppose building on brown belt land, so I do feel that the former Drakelow Power Station site would be a good place to build, however, the impact on local services should be considered. Any development here shouldn't have a detrimental impact on the environment and the surrounding countryside. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243183 | Tom Fermor |  | No | I would like to object to the proposed new development on land alongside Staker Lane and the surrounding area for the following reasons:  - Mickleover has taken more than its share of new housing over the last few years, with little to no new infrastructure to support it  - Staker Lane is a busy road prone to significant flooding and consequently an increased risk of accidents, particularly with a significant increase in traffic  - traffic on The Hollow is very heavy during rush hour both morning and evening, and often at a standstill. At the other end of the scale, people often use the route as a cut through to the A38 and far exceed the speed limit. Increased road use would exacerbate this issue  - strain on local schools will be significant, likewise medical services, shops and the village centre  - the site itself will likely take years to develop and the disruption and pollution inflicted on our family, particularly the children, will be significant  - there are other sites in and around Derby and Derbyshire (ie Sinfin, Millenium Way development) that are far better equipped to take more housing and the associated increase to traffic and need for more amenities  I appreciate you taking the time to consider my point of view. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242627 | Tony Lockwood |  | No | I would like to object to the proposed development of houses south of Mickleover for the following reasons:  There has been a huge amount of development in the surrounding area in recent years, surely this is plenty for one area and any further development should be in a different area? Local services are stretched to the limit with all the new housing that has already been built, additional housing should be in an alternative area The local infrastructure is already creaking at the seams and is not adequate for more population in the same area 2,500 houses is too many for the space available The proposed green spaces are not big enough for the community now, even without more houses |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242325 | Tracy and Gordon Harrison |  | No | My detailed answers are below. |  |  |  |  |  |  |  |  |  |  |  |  |
| 1242366 | Tracy Fazekas |  | No | I’m raising concerns about the additional 2,500 houses planned on the border of Mickleover Country Park. My points against this proposal are: As resident of Mickleover Country Park it was disappointing to see that there was no green wedge completely round the estate at the bottom of the golf course. The golf course regularly floods so additional housing next to it will be a flood risk as well. Burnaston have been given a green wedge-why haven’t we? I am against any additional traffic through the estate to reach the proposed housing due to the environmental and safety aspects. There will be no green space left to walk-where do you propose we get green space to walk for our wellbeing when the rest of Mickleover has also been housed over? This is not a sustainable urban extension-there is ample land left closer to SDDC civic offices. We are SDDC residents paying significant amounts of council tax to Swadlincote and currently without complaining we get very little additional services. How will the services for all this additional housing be catered for? The addition of housing on the New House Farm estate has always caused pressure on parking, local amenities and traffic on the A38. These houses have no access to GPs. The roundabout is unsafe and looks unsightly. How can 2,500 be supported by SDDC? The sustainability assessment report was not published which undermines the process. How can you add houses before the decision on the A38? Public services and life saving ambulances will not be able to get through to reach patients. Traffic is so bad at peak times. If up to 40% of the housing is social then it should be in the city or town so that residents can use public transport, access support services and job centres rather than being stranded over 10 miles from the SDDC civic offices. Enough is enough! |  |  |  |  |  |  |  |  |  |  |  |  |
| 1243173 | Trevor Yeomans |  |  | 5. Section 5 – Strategic Allocations  5.2.2. Roads of Staker Lane and Havenbaulk Lane meet at The Hollow. The junction of the Hollow and Brierfield Way already suffers grid-lock at rush hour periods and opening/closing times of local schools. This condition will only be made worse by the proposed development south of Mickleover  5.2.3. The map on page 59 shows a thin area of green space, and blue pedestrian/cycle way running south to the A38 opposite a row of existing houses on Burton Road, west of Dobbies Garden Centre. The cycle route seems to be a dead-end but may give access to the north of the A38. If this is a dead-end it seems to serve no purpose. If there is a pedestrian connection at this point it seems to give access only to the north side of the A38. This seems to be of little value, and proximity to the A38 may present high risks for pedestrians.  5.2.4. For reasons of inadequate road infrastructure of Staker Lane I do not support the proposal to extend the development of areas which border on the north edge of the A38.  5.2.5. It is noted that the Findern Island has slip roads to north (Mickleover) east (Littleover) and south (Findern) but does not yet have any slip road to the west. If the development STRA2 goes ahead as planned then it would be reasonable to build a new road which runs from the A38 island at this point, through Burnaston, and on to the A516 |  |  |  |  |  |  |  |  |  |  |  |  |
| 1238893 | William Bushell |  | No | I wish to protest about the proposed SDDC development, at Mickleover (The Hollow)/ Staker Lane. As I understand it, the proposal includes up to 2500 dwellings and a Traveller site.  South Derbyshire is a large area so there are many other options for a development of this sort. You are most likely proposing it in this location as on the face of it, you think it relieves you of the responsibility of providing the sort of supporting infrastructure it requires, but it does not. The infrastructure capacity is simply not there in and around Mickleover.  As to the inclusion of a Travellers site why on earth there? Why in a residential area on the perimeter of a city? That is completely inconsistent with what I would imagine that someone of a travelling frame of mind would be looking for. An outrageously inappropriate addition to a very bad proposal. |  |  |  |  |  |  |  |  |  |  |  |  |

# Qu. 5c: Do you agree that the following strategic sites should be allocated for development? STRA3: Former Drakelow Power Station

|  |  |
| --- | --- |
| Duty to Cooperate Body / Statutory Consultee | 4 |
| National Organisation | 4 |
| Regional Organisation | 1 |
| Parish Council and other Community Group | 9 |
| Councillor | 0 |
| Landowner or Developer | 10 |
| Members of the public | 66 |

| **Response Id** | **Name** | **Organisation** | **Should Former Drakelow Power Station be allocated for development?** | **Comment** | **Council Response** |
| --- | --- | --- | --- | --- | --- |
| **Duty to Cooperate Body / Statutory Consultee** | | | | | |
| 1244753 | Canal and River Trust |  |  | Chapter 5: Strategic Allocations The proposed additional Strategic Allocations at STRA1: Infinity Garden Village, STRA 2: Land South of Mickleover and STRA3: Former Drakelow Power Station do not appear likely to affect the canal network within the district. | Noted. |
| 1242371 | East Staffordshire Borough Council |  | Yes | We support the continuing redevelopment at Drakelow and its associated infrastructure improvements, such as the Walton-on Trent bypass which we would like to see delivered as early as possible within the phasing program. | Noted. The provision of a new Walton on Trent Bypass is a requirement of a Section 106 agreement prepared in association with the planning permission for the redevelopment of the site for mixed use purposes and must be provided prior to the occupation of 785 dwellings on that site. |
| 1243580 | Historic England |  |  | Policy STRA3: Former Drakelow Power Station – identifies in clause C) iii) the need to consider heritage assets and their significance and character. If we can have sight of the heritage evidence base for this site allocation this will be useful to inform our advice and to understand the harm to the significance of heritage assets. On an initial desk based assessment there are a number of heritage assets within the vicinity of the site, that should be considered at the outset. How does the concept plan take account of the significance of heritage assets? Strategic allocations section – we would require sight of Heritage Impact Assessment to understand the harm to the significance of the affected heritage assets, to understand if the principle of development on these sites is acceptable, we would like to understand what specific mitigation strategies can be incorporated and if these can overcome any harm. We would welcome a meeting with the Council to discuss our comments to your Regulation 18 consultation. In particular, we would like to focus on the historic environment policy and the proposed site allocations within the Plan | Agree.  The Council will provide Historic England with Heritage Impact Assessments to detail the significance of heritage assets affected by development which will incorporate mitigation strategies to overcome any harm.  The Council welcomes engagement with Historic England on the emerging Local Plan. |
| 1243643 | Sport England | Sport England |  | Sport England consider all of these strategic site allocation policies as currently drafted to be unsound. Sport England are extremely concerned that the strategic sites appear to have been selected for development with little/no regard to the protection of existing sports facilities. Site allocations STA2 and STA3 may include land that has not been used for pitch sports for over five years. However, this does not indicate that there is a lack of demand for pitch sport. The fact that playing fields have not been used for 5 years or more does not alter their planning status as playing field land. It is Sport England’s view that nothing has altered the lawful use of the sites. The sites could be made good, pitches marked out and brought back into use for sport and this would not require planning permission. Therefore, the sites are still playing field and should be afforded protection under paragraph 103 of the NPPF. It should also be noted that a playing field does not have to be available for community use to fall within the definition of playing field. Neither the DMPO, NPPF or Sport England Policy make any distinction between private and publicly owned or used nor is there a positive obligation (under planning law) for any playing field to be actively used as such. Both policies are applied equally, irrespective of the ownership. A number of playing fields and golf courses can also be found immediately adjacent to the strategic site allocations. However, the policies as currently drafted do not seek any assessment and/or mitigation to ensure that the proposed developments do not have a prejudicial impact on their sporting use (e.g. noise, ball strike, etc), in accordance with paragraph 193 of the NPPF. The occupiers of new residential developments would generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. In this regard and in accordance with paragraph 97 of the NPPF, new developments at all of the strategic sites should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports/Built Facilities Strategy, Playing Pitch Strategy (PPS) or other relevant needs assessment. In partnership with Active Travel England and the Office for health Improvement and Disparities, Active Design guide was produced in 2023. Many Councils have used the guide in developing their vision, strategic objectives and policies on health, sustainable travel and design. It is advised that the strategic site allocation policies seek that emerging masterplans use the guide’s principles in promoting active environments that encourage people to be active through their everyday lives in accordance with paragraph 135 of the NPPF - https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design | Agree.  The Council will ensure that any loss of playing fields will be mitigated through the provision of on-site facilities and/or off-site provision.  The Council will ensure that the strategic allocation policies will seek assessment and/or mitigation to ensure that the proposed developments do not have a prejudicial impact on neighbouring sporting use.  The Council will also ensure that development will contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision will be informed by a robust evidence base such as an up to date Sports/Built Facilities Strategy, Playing Pitch Strategy (PPS) or other relevant needs assessment. |
| **National Organisation** | | | | | |
| 1235628 | British Horse Society |  | Yes | People have to live somewhere, however;  The Council or developer should be paying to improve road safety around both locations and allowing vulnerable road users to be able to move between both locations. The Active travel scheme can be used to achieve this objective. So we need more traffic calming measures, segregation of horse riders and cyclists from cars, controls to restrict lorries , better lighting and more pavements. | Strategic infrastructure requirements are considered in the responses to question 7. |
| 1243542 | Home Builders Federation (HBF) |  |  | HBF do not comment on individual sites, be we would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. HBF does not comment on individual sites, other than to say the Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full. The soundness of strategic and non-strategic site allocations, whether brownfield or greenfield, will be tested in due course at the Local Plan Examination.  It will be important for the new South Derbyshire Plan to be supported by evidence, monitoring and analysis to demonstrate that all the sites in the Plan, remain deliverable, if they are to continue to be relied upon. HBF are aware of potential challenges can impact on the timescales for delivery of the largest sites. Ways to address such ongoing risks could include increasing the housing requirement and/or the buffer applied. The Plan should also recognise that the time taken to bring forward larger allocations, and this underlines the need for a range of site types and sizes to ensure a five-year land supply on adoption, and an effective housing land supply over the plan period. | Please see Council response to comments on Question 4. |
| 1240828 | Barry Thomas | Open Spaces Society | Yes |  | Noted |
| 1243215 | Trent and Dove Housing Association |  | Yes | STRA3 – the site has a close link to Burton on Trent but the use of brownfield sites should be identified to assist in the delivery of housing and employment. | Noted. |
| **Regional Organisation** | | | | | |
| 1242640 | Derbyshire Association of Local Councils |  | No | The Drakelow estate is large and we are aware of recent issues with lack of footpaths and poor drainage causing flooding. Surrounding parish members have raised concerns regarding highway issues and the delayed building of a second Walton Bridge   Mickleover and Infinity Garden proposals appear to have better infrastructure/access to trunk roads | The provision of a new Walton on Trent Bypass is a requirement of the S106 agreement prepared in association with the outline planning permission for the redevelopment of the site for mixed use purposes and must be provided prior to the occupation of 785 dwellings on that site. The approved masterplan for the site and subsequent reserved matters planning permissions include provision for pedestrian and cycle access to, from and within the site, including the development of a multi-user greenway connection to East Staffordshire. The draft Local Plan proposes that this greenway should extend into and through the STRA3 allocation. |
| **Parish Council and other Community Group** | | | | | |
| 1240947 | Barrow Upon Trent Parish Council |  | Yes | Living in Barrow upon Trent, all our residents are deeply concerned that the latest version of the plan shows a massive increase in the number of residential buildings that now appear in our parish. We undertook a parish boundary change to ensure that our parish remained a small, rural parish that was self-contained and discrete from the ever-increasing housing that now borders the south of Derby City. This latest plan has a large number of new residential properties in our parish, north of the A50. It would be sensible, in our view, to make the area of the IGV, north of the A50, a separate parish in its own right. This was a condition on the original application documents " A development of a Stand alone Village", This is not currently going to be the case and needs looking into . | These comments concern proposed allocation STRA1 and have accordingly been responded to under section 5a. |
| 1239943 | Castle Gresley Parish Council | Castle Gresley Parish Council | No | It is unclear where any additional infrastructure and amenities will be introduced within the local plan for the current developments let alone any future builds. There is no detail regarding extra services such as Doctors, Dentists and school places. Educational mainstream places are already at full capacity. A particular concern is that at the Drakelow Development there is a lack of secondary placement support – It appears that only primary education is being incorporated. There is the additional issue of the lack of a new bridge to enable the additional traffic to commute to Burton, the A38 and other arterial roads. Most of which will be diverted through Catton and Walton and Trent. This will not only include domestic vehicles but commercial vehicles as well as the proposes bus service that would be needed for such a large development.  The other developments underway in Castle and Church Gresley will also put a great strain on its local infrastructure. Again, there have been no additional school places included in the plan, nor Doctors, Dentists, Shops or roads to take into account the additional residents and traffic. Officers need to understand that houses cannot be built on sites just because there is land to build them on. They must have the amenities, roads and services to accommodate them. We believe there should be more protection in the policy against excess traffic and traffic noise, light pollution, fumes and inappropriate developments like fast food outlets near schools etc. We are very concerned about the increased amount of traffic and traffic noise in our parish, and the lack of any additional social infrastructure which also appears not to have been added to any of the developments in the local parish. E.G community centres/halls. There have been no extra school spaces provided for Castle Gresley, either primary or High school despite local schools being full and many of the development houses being 2/3/4 bedroomed. We have seen no extra funding of Gresleydale Doctors and local Dentists are non-existent. Yet we are seeing 71 houses appear in Oak Close and 306 houses in Church Gresley approximately half a mile away. | Details of the infrastructure requirements for each of the new strategic policies are included in the respective polices contained within the draft Local Plan document. These will be detailed further in the Infrastructure Delivery Plan. A Design Review is underway in respect of the STRA3 allocation and any matters identified through this process as needing to be addressed though the policy will be taken into account through additions or other adjustments to the policy. The conclusions of subsequent transport and viability studies and the content of the forthcoming infrastructure Delivery Plan will also be taken into account.  In regard to the particular development impacts mentioned, traffic generation is addressed under Policy INF2 and noise, light pollution and fumes under Policy SD1. These development management policies apply to all proposals requiring planning permission including that on the STRA3 allocation.  The question of restricting fast food outlet development in particular locations in the interests of public health has been considered by planning officers, but it has been concluded that national planning policy does not provide support for the introduction of such controls.  Infrastructure provision for the mixed use development at the former Drakelow power station site, currently under construction is to be in accordance with the planning permission and related S106 agreement for that site. These were prepared in consultation with the Local Education Authority, highway authority, health authorities and others and reflect the negotiated requirements of those bodies. A new River Trent crossing in the form of a Walton-on-Trent bypass is required to be provided in advance of the occupation of 785 dwellings on the site.  Comments regarding infrastructure and service provision in relation to new development in Church and Castle Gresley are addressed under the responses to Question 13.  Provision of services and infrastructure in association with significant new housing development is determined with reference to the policy requirements of the Local Plan, established in close consultation with the relevant highways, education, health and other agencies and having regard to all known deficiencies in community facility provision and those which may arise as a consequence of the proposed new development. In determining planning applications, whilst seeking to adhere as closely as possible to the requirements set out in planning policy, account must also be taken of the ever changing strategies and priorities of the various interested agencies and the financial viability of the development, balanced against the long established national drive to accelerate housing delivery. |
| 1242585 | Egginton Parish Council | Egginton Parish Council | Yes | STRA3: Yes, brownfield site and close to Burton on Trent for amenities. | Noted. |
| 1244412 | Etwall Parish Council | Etwall Parish Council | Yes | STRA3: We do not know the area in sufficient detail, however as a brownfield site, development is appropriate. | Noted. |
| 1238750 | Hilton Parish Council | Hilton Parish Council | Yes | For STRA 1 and 2 see above. Drakelow is a large brownfield site and this is probably the best use for it. | Noted |
| 1243158 | Melbourne Civic Society | Melbourne Civic Society | Yes |  | Noted. |
| 1241376 | Rosliston Parish Council | Rosliston Parish Council | No | We note the placement of 2 strategic sites of 4500 houses on the edge of Derby, to build and support Derby Cities unmet need, building logically where there is an infrastructure to support this development. It is also noted that many of the existing sites will already accommodate much of the housing numbers for Derby City. This therefore reinforces and demonstrates the numbers being passed to SDDC should not be further increased. | Noted. |
| 1243603 | SAVE (Save Aston & Weston Village Environment) | SAVE Aston and Weston Residents Group | Yes | As stated in the earlier answers, Derby City should review its needs and to review the HMA | See Council response to comments on Question 4. |
| 1242402 | Weston-on-Trent Parish Council | Weston-on-Trent Parish Council | Yes | Again this is a qualified yes, based on the need for Derby City to review its needs and to review the HMA | See Council response to comments on Question 4. |
| **Landowner or Developer** | | | | | |
| 1242038 | Inspire Design & Development |  | Yes |  | Noted. |
| 1243582 | CBRE Ltd on behalf of Land Project UK (LPUK) |  |  | Question 5 response: LPUK do not object to the principle of strategic sites for development. However, it is vital that the emerging Local Plan caters for development needs now, and in the absence of Planning Decision Notices, it cannot be guaranteed that the sites can be delivered in the short term (0-5 years), and we have concern that the immediate employment needs of the borough are not being efficiently planned for. Furthermore, it is clear from the draft allocations that further technical work is still required to ensure the feasibility of the scale of growth envisaged within the allocations, with reference to the need for the Council to work with infrastructure providers to address issues such as transport, health and school provision. Given the questions we’ve raised around deliverability and timescales of the new allocations, we recommend other sites are also allocated in the emerging Local Plan for employment purposes that are deliverable now and of a small-medium scale | Concerns relate to the overall potential delivery of the site (with particular regards to employment land) which will be considered under Question 3.  Further technical work is to be carried out including design reviews, a transport study and a viability study. |
| 1242112 | Cushman & Wakefield (on behalf of E.ON UK plc) |  | Yes | See comments below  Response to question 8: Policy STRA3: Former Drakelow Power Station E.ON support proposed Policy STRA3 which allocates the former Drakelow Power Station to deliver up to 68ha of employment use within Use Classes E(g), B2 and B8, subject to identified criteria. The policy should refer to Use Class E (g), B2, B8 and ancillary uses (paragraph 5.22) to ensure a comprehensive development. Policy STRA3 confirms at Criteria A Development Requirements that a range of unit sizes shall be provided, including accommodation for small to medium sized enterpises. E.ON support the provision of a range of unit sizes but these should not affect the delivery or function of Site STRA3 Former Drakelow Power Station as a Strategic Employment Allocation to meet the objectives of Policy S5. Energy development will be permitted outside the employment allocation boundary (paragraph 5.22). E.ON support reference to energy uses to assist in the regeneration of previously developed land. The existing Drakelow Nature Reserve will be retained to its current extent along with the creation of a buffer zone (paragraph 5.23). E.ON support retention of the Nature Reserve and have clarified boundaries with a lease agreement to protect current interests. The extent of buffer required should be determined by the masterplan. | Noted. Amend wording to STRA3. |
| 1242592 | Dean Lewis Estates |  | Yes | DLE agree that the identified Strategic Sites STRA1, 2 & 3 should be allocated in the Partial Review | Noted. |
| 1243628 | Define Planning on behalf of Bloor Homes Ltd |  |  | BHL do not object to the allocation of the two housing led urban extensions, and the strategic employment allocation. However, the Council are clearly over-relying on urban extensions in one area to address the unmet needs of Derby City. In doing so, the Council could fail to address other unmet needs where and when they arise. The development of Sustainable Urban Extensions of the scale proposed can take a significant amount of time to begin to deliver homes due to their scale and complexities. This includes the requirements to mitigate impacts and provide necessary facilities and services. Therefore, as set out in the response to question 4, the Council should apply a buffer to the housing requirement and allocation of additional development sites to balance out the delivery of the homes that are needed. The production of a Housing Implementation Strategy, as set out in the Draft Plan, clearly demonstrates that there are significant constraints to delivering much needed homes against the proposed spatial strategy. Significantly, this would defer decisions about the location of new development that could be reasonably made during the current Review. A more flexible approach could also be taken towards other sites coming forward. This could include identifying additional sites in general accordance with the spatial strategy and hierarchy of settlements, such as BHL’s site at Land west of Castle Gresley. This option is identified in the consultation document which acknowledges that a Housing Implementation Strategy is required as “there is always a risk that sites may not come forward as planned during the anticipated timescale”. | In regard to comments concerning the application of a buffer to the housing requirement see Council response to comments on Question 4.  In regard to land at Castle Gresley, see response to Q13. |
| 1243664 | Deloitte LLP on behalf of Church Commissioners for England |  |  | 6.1.1. The Commissioners are supportive of South Derbyshire assisting Derby City in meeting it’s unmet need, as this concurs with NPPF paragraph 26 which states that “joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.” However, when considering the strategy in which this unmet need is intended to be met, the Commissioners do not consider that strategic sites STRA 1, STRA 2 and STRA 3 provide the most sustainable development opportunities. 6.1.2. Firtly, as noted in response to Question 3, updates to the Local Plan Part 1 in isolation poses a risk of disconnect between the strategic and non-strategic elements inclusive of allocations. The Commissioners consider that, despite some work being undertaken to determine the preferred distribution options such as the Derby Housing Market Area Growth Options Study and Sustianability Appraisal, without undertaking a wholsescale update to the Local Plan inclusive of Settlement Hierarchy and non-strategic allocations, the preferred distribution options cannot fully be determined. 6.1.3. In addition to this, paragraph 31 of the NPPF notes that “the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals”. With regards to the Local Plan Part 1 Review’s strategy for meeting Derby City’s unmet need, SDDC conclude that a range of distribution options have been explored through the Derby Housing Market Area Growth Options Study as prepared by AECOM, the Derby Capacity Study as prepared by AECOM, the Employment Land Review and through the HMA-wide Sustainability Appraisal, which have all fed into the conclusion that the best suited strategic sites are within the Urban Extension typology and “meeting the unmet need arising from Derby as close as possible to the City amounts to sustainable development”. 6.1.4. Although this identifies that some work to the evidence base has been undertaken, vital documentation central to the justification for the allocation of strategic sites STRA 1, STRA 2 and STRA 3 such as the Infrastructure Development Plan update, Design Review for updated plan’s strategic allocations, Local Plan Viability Assessment and Housing Implementation Strategy have not been undertaken or completed. Without the completion and subsequent utilisation of these documents in assessing the viability and deliverability of these strategic allocations, the Commissioners consider that the Local Plan Part 1 cannot be considered justified in line with NPPF paragraph 35, and is therefore unsound. As it is currently unclear whether there would be any barriers to the development of these large-scale sites such as the provision of additional large-scale supportive infrastructure, possible complications with multiple ownerships as well as speed of delivery, as mentioned in the Commissioners response to Question 4. 6.1.5. The Commissioners appreciate SDDC’s commitment to providing a Housing Implementation Strategy (HIS) which explains what SDDC would do should there be any barriers to delivering development as proposed in the Plan, and how to respond to Church Commissioners for England | South Derbyshire Local Plan Part 1 Review 10 changing circumstances. However, it is noted that the HIS will be part of the work leading up to the Regulation 19 consultation on this Local Plan Part 1 Review. The Commissioners consider that there needs to be further robust evidence available to firstly ensure that the preferred distribution options presented within the Local Plan is deliverable and achievable to where the mitigation measures within the HIS will not need to be utilised. SDDC should be confident that these large-scale sites are deliverable, or consider alternative and more balanced distribution strategies that respond to differing market areas and support the long term sustainability of the districts existing settlements. 6.2. Alternative Distribution Options 6.2.1. The Commissioners consider that, alternatively to the strategic allocations STRA 1, STRA 2 and STRA 3, a more balanced development distribution approach that spreads some of the housing provision across Key and Local Service Villages, as well as Rural Villages, would provide a more sustainable distribution of Derby City’s unmet need within the district. This distribution option would provide the most flexibility for housing location and subsequent resident choice within the HMA in line with NPPF paragraph 60 which notes that “it is important that a sufficient amount and variety of land can come forward where it is needed” and that it “should be to meet as much of an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community”. In addition, the Commissioners consider that a focus on meeting Derby City’s unmet need within existing settlements will ultimately be more effective as it will favour sites with more certainty with regards to deliverability. Larger-scale sites hold more barriers to delivery, including the provision of additional large-scale supportive infrastructure. In contrast, smaller sites and Rural Development sites are able to achieve a timelier delivery of housing within the plan period and are vital to ensure a sufficient supply of housing within the district. This will be even more important for South Derbyshire when accommodating some of Derby City’s housing need as part of the Derby HMA. As noted previously, the Commissioners note the lack of robust evidence supporting the deliverability of these large-scale sites, and consider that a focus on increasing sustainable development within existing developments would provide a much more effective approach to the delivering the unmet need. 6.2.2. Additionally, large-scale sites tend to bring with them much bigger infrastructure costs and therefore are less likely to meet affordable housing needs, which SDDC should also be ensuring they deliver as part of the additional unmet need of Derby City. The allocation of smaller sites in the specific strategic context of meeting Derby City’s unmet need would provide greater certainty to the provision of affordable housing, aligning with NPPF paragraph 62 which notes that “the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies” inclusive of affordable housing. 6.2.3. SDDC has been led by the Sustainabilty Appraisals at both the HMA and local authority levels, which indicated that it would be most sustainable to deliver unmet housing need arising from Derby City as close as possible to the City; to utilise existing infrastructure and reduce travel distances. The Commissioenrs do not disagree in general with this conclusion, but rather consider that new housing land intended to meet the unmet need should be provisioned towards existing settlements as a priority before directing it towards the creation of news settlement and larger urban extensions, in order to retain and expand upon the vitality of these settlements. The Commissioners note that villages such as Milton and Repton are still wthin close proximity to the Derby City district, and have the opportunity to provide additional sustainable development in the short term further to that which is currently within the adopted Local Plan. Church Commissioners for England | South Derbyshire Local Plan Part 1 Review 10 6.2.4. Sites such as the Commissioners sites, Land south of Milton Road, Repton (SHELAA ref 040), and sites at Land at Ex Common Farm, Milton (SHELAA ref 223) and Land east of Main Street, Milton (SHELAA ref 222) would provide achievable and suitable developments within the next 0-5 years, enabling elements of the unmet housing need arising from Derby City to be built-out quickly. | See Council response to comments on Question 4.  In regard to land at Repton and Milton see also Council response to comments on Q13. |
| 1243217 | Harris Lamb on behalf of Talland Capital Ltd |  |  | Policy STRA3: Former Drakelow Power Station TCL support the identification of the former Drakelow Power Station site as a strategic employment allocation to accommodate 68 hectares of employment land for uses within Classes E(g), B2 and B8. The proximity of TCL’s site to the proposed employment allocation to the former Drakelow Power Station mixed use development would mean that new residential development can be located in proximity to where new jobs and employment are intended to be created. TCL agree that there is merit in co-locating new employment development with proposed and existing residential development as there is an opportunity to reduce travel between the person’s place of work and their residence.  TCL support the continued allocation of Drakelow Park for residential development of up to 2,239 dwellings. The development is now well underway with Phase 1 complete, Phase 2 currently under construction, Phases 3 and 4 having recently secured Reserved Matters approval and the Bridge and Bypass has a resolution to grant. In addition, the proposal for, Bridge and Bypass, a new primary school and GP surgery are well advanced and discussions relating to the employment and extra care facilities are also well advanced as we understand it. The site has been an important allocation for the Council and its delivery will secure a number of new homes to meet housing needs over the plan period, along with associated infrastructure and facilities TCL’s site at Walton Road has the opportunity to benefit and complement the development due to its close proximity. This includes the provision of the new food retail store that would also help serve the residents of Drakelow Park and Stapenhill who would have less distance to travel to access their food shopping needs. | Noted. |
| 1242570 | Nineteen47 on behalf of Hallam Land (land at Blackwell Lane) |  |  | 3.27 The strategic sites identified within the draft Part 1 update may have a role to play in contributing to the South Derbyshire and Derby HMA requirement. However, the appropriate level of development to be allocated to these sites cannot be appropriately assessed without evidence of the up to date need in the remainder of the District. 3.28 The Interim Sustainability Appraisal 2024 acknowledges a potential negative cumulative effect in landscape and infrastructure terms that may arise from the delivery of such significant sites. It is possible that these impacts could be reduced if an alternative quantum of development was deemed more appropriate within the context of a comprehensive review of available sites across the whole South Derbyshire area, including genuinely alternative sites in other settlements. 3.29 This approach would also support the distribution of employment opportunities across the District, as appose to the likely outmigration of the workforce to Derby resulting from the proposed strategy, to allocate additional strategic sites on the edge of Derby only. 3.30 It is therefore recommended that the appropriate mechanism through which to allocate strategic sites is as part of a comprehensive new Local Plan, to be prepared in accordance with the relevant NPPF at that time. | The Derby and South Derbyshire Employment Land Review identifies an existing quantitative surplus of employment land provision within the District, but the Local Plan nevertheless proposes further allocations to address qualitative needs including for strategic scale and small to medium scale accommodation provision. STRA1, STRA2 and STRA3 employment proposals, together with employment sites identified in the adopted South Derbyshire Local Plan Part 1 and rolled forward in the draft Local Plan Part 1 together provide for new employment provision in both the north and south of the District on a variety of sites. |
| 1242100 | RPS on behalf of Bellway and Clowes (Thulston Fields) |  |  | STRA3: Former Drakelow Power Station RPS considers the assessment of availability of the Former Drakelow Power Station within the SHELAA to be insufficient. The proforma sets out that the site would be available once existing uses have vacated. However, the Council have provided no certainty that engagement has been had with the landowner – with regards to the temporary use of the site – and that phasing and options have been considered to show how the site could become available in the short term and the long term. The Council has stated its intention for the new strategic sites that have been identified. This appears to be the sum total of information and evidence that has informed the identification and selection of these locations as potential new settlements up to this point. Significant uncertainty remains given the lack of progress in developing an appropriate evidence base for the sites, therefore substantial doubts remain as to the suitability or deliverability of these potential locations as being able to deliver the new strategic sites particularly in the short-term. Consequently, a significant measure of caution must therefore be applied to any of the outputs from the SA process at this stage, until the vacuum in the evidence base to support these new settlement locations is prepared and made available to the public. The Plan does not contain any flexibility should larger sites not come forward. If a flexibility allowance is required then additional sites would need to be allocated in order to allow for this. Given these uncertainties, the plan must make allowances for other demonstrably deliverable sites to come forward early in the plan period, and additional allocations should therefore be considered. Sites such as the land at Thulston Fields, represent an opportunity to deliver much needed homes early in the plan period. The Council should be proactively considering incorporating more sustainable sites to truly safeguard delivery should the strategic sites or windfall sites identified be delayed / not be forthcoming. | There has been engagement with the landowner of the former Draklelow power station site and it is understood that employment development can be satisfactorily accommodated, as set out in the STRA3 draft allocation policy.  The Derby and South Derbyshire Employment Land Review identifies an existing quantitative surplus of employment land provision within the District, but the Local Plan nevertheless proposes further allocations to address qualitative needs including for strategic scale and small to medium scale accommodation provision. STRA1, STRA2 and STRA3 employment proposals, together with employment sites identified in the adopted South Derbyshire Local Plan Part 1 and rolled forward in the draft Local Plan Part 1 together provide for new employment provision in both the north and south of the District on a variety of sites.  Employment land monitoring identifies a sufficient quantity of available land for employment development in the District to meet short to medium term needs as set out in the Council’s Authority Monitoring Report.  The Council is undertaking further technical work, including a design review for the site, a transport study and the production of an Infrastructure Delivery Plan.  See also Council response to comments on Question 4. |
| 1242854 | Stantec on behalf of Caddick Land in relation to Land North of Ashby Road, Woodv | Santec on behalf of Caddick Land in relation to Land North of Ashby Road, Woodville | No |  | Noted. |
| **Members of the public** | | | | | |
| 1236474 | Alan Dixon |  | Yes |  | Noted.  Specific comments relating to Infinity Garden Village will be considered under Question 5a and/or 6 and specific comments relating to Mickleover will be considered under Question 5b and/or 7.  It should be noted that the proposed allocation STRA3: Former Drakelow Power Station, is proposed for employment provision not housing. The site has been promoted for employment use and allocation of the site will help meet the qualitative need identified within the Employment Land Review. Policy E1 of the Draft Local Plan Part 1 Review includes a requirement that E1A, E1B, E1C, E1D, E1E, STRA1, STRA2, STRA3 include provision to meet the needs of small and “grow on” business. In terms of the Councils proposed Housing Strategy see Councils responses to Question 3.  As the site is proposed for employment development, provision associated with housing development such as school provision will not be provided on STRA3.  The proposed allocation of STRA3 has been subject to Sustainability Appraisal and has found to be sustainable development.  The provision of a new Walton on Trent Bypass is a requirement of a Section 106 agreement prepared in association with the planning permission for adopted Local Plan allocation H6 and must be provided prior to the occupation of 785 dwellings on that site. The approved masterplan for the site and subsequent reserved matters planning permissions include provision for pedestrian and cycle access to, from and within the site, including the development of a multi-user greenway connection to East Staffordshire. The draft Local Plan Part 1 Review proposes that this greenway should extend into and through the STRA3 allocation.  The District Council will be undertaking Transport Modelling, which will look at the impact of the proposed allocations and any necessary mitigation. This will be in consultation with National Highways.  In terms of public transport provision, Policy STRA3 requires that high quality, frequent and conveniently accessible, public transport services, including connections to Burton-on-Trent and Swadlincote be provided.  The local plan will be supported by an updated Infrastructure Delivery Plan at submission, which (in consultation with service providers) assesses and identifies the infrastructure needed for new development and considers how this will be delivered.  STRA3 does contain a Local Wildlife Site. The Policy requires that key biodiversity and ecological assets including the Drakelow Nature Reserve, Drakelow Wildfowl Reserve Local Wildlife Sites and Tree Preservation Order 122 are safeguarded and protected.  The District Council is working towards submitting the Local Plan Part 1 Review to the Inspector on or before to the 12th March, in line with the transitional arrangements set out within the December 2024 NPPF.  None of the proposed strategic allocations (STRA1, STRA2, STRA3) are on greenbelt land. |
| 1241993 | Alan Mercer Jones |  | Yes |  |
| 1240863 | Amardeep Bhopal |  | Yes |  |
| 1233332 | Ameila Hunt |  | Yes |  |
| 1241986 | Andrea Thompson |  | Yes |  |
| 1241956 | Andrew Lee |  | No |  |
| 1235411 | Andrew Norman |  | Yes | The former Drakelow Power Station is, I assume, a brownfield site eminently suitable for housing development. |
| 1239219 | Anne Heathcote |  | Yes | Living in Barrow upon Trent, I am deeply concerned that the latest version of the plan shows a massive increase in the number of residential buildings that now appear in our parish. We undertook a parish boundary change to ensure that our parish remained a small, rural parish that was self-contained and discrete from the ever-increasing housing that now borders the south of Derby City. This latest plan has a large number of new residential properties in our parish, north of the A50. It would be sensible, in my view, to make the area of the IGV, north of the A50, a separate parish in its own right. |
| 1233824 | AYeomans |  | Yes | Firstly, Mickleover has already taken its fair share of housing developments close to the city/ward boundary.  Secondly, the proposed plans are not a sustainable development. Mickleover is bursting at the seams: doctors surgeries are at breaking point and residents are unable to get an appointment, ultimately putting the health of residents in extreme danger. There is no plan to build a school on the development and local schools are already struggling to meet the demands of the numbers of the community. The road and infrastructure around Mickleover is at capacity and building a further development will only add to the unsustainable traffic issues in the local area.  It is outrageous that you are proposing that 40% of the dwellings are social housing, yet the local council offices and support required by future residents is 12 miles away in Swadlincote. If there is a requirement for such significant numbers of social housing, these should be built much closer to the offices and the support services.  Additionally, proposing 2500 houses is not a sustainable nor appropriate development in an area already overrun with new build developments and lack of green space. There are other, more suitable areas in South Derbyshire.  Furthermore, SDCC are rushing their plan to local plan process. The Government are currently reviewing national policy and the future of the A38 junction scheme: SDCC should have waited for clarity on both of these. |
| 1232962 | Chris Munn |  | No | Mickleover has had its fair share of developments. We don’t have the infrastructure to continue with this |
| 1235648 | chris stott |  | Yes |  |
| 1242108 | Chris Wilson |  | Yes | This is a sensible use of disused/ brown field land that can bring needed housing without directly impacting on current communities. Roads are already there. Anyone with half a brain would choose disused sites as a priority. |
| 1243592 | Christine Allen |  | No | STRA3 number is too large area of natural beauty roadwork poor protection of wildlife.  STRA1 and 2 Numbers too high – housing. Until a new bridge is built over the Trent the roads and network is unsustainable. |
| 1232876 | Claire Woodward |  | Yes | As previously mentioned, the proposed 2,500 dwellings as another urban extension to Mickleover is not sustainable or appropriate development, especially when suitable and abundant land is available elsewhere in South Derbyshire. |
| 1238657 | Clare Wood |  | No | All of these are car-dependent housing estates which will increase carbon emissions, pollution and noise as well as contributing to the decline of biodiversity. |
| 1241955 | David Stockwell |  | Yes & No | Secondary schooling places are in short supply around the Mickleover site, the A38 northbound to Kingsway and Markeaton are congested now and will be impassable with extra houses and the are regular floods in this area. These are THREE key reasons the site is not appropriate |
| 1237912 | David Warriner |  | Yes | There still appears to be insufficient effort to develop Brown field sites in Derby City before allocating higher quality greenfield sites for South Derbyshire development. |
| 1241995 | Donna Shacklock |  | Yes |  |
| 1241890 | Edward Stupple |  | Yes | STRA1 - appears to give greater opportunities for employment in an area of high housing density STRA2 - This is over development of land south of Mickleover on farmland, destroying a green field farmland site not taking into account the impact of recent large developments in the area and food security STRA3 - appears to be good use of a brownfield site |
| 1236731 | Ewan Thompson |  | Yes |  |
| 1238115 | Fiona Bevington |  | Yes | The infinity garden village at least has plans for improved transport links. The power station regeneration utilises a brown field site. I struggle to see how the Mickleover plan can be supported by the current road network or local facilities. |
| 1243600 | Geoffrey Tubey |  | Yes | Again transport links to other infrastructure agreed with planning consent must be achieved. New Walton Bridge would have less than half current cost if built on time. |
| 1242119 | George Selby |  | Yes |  |
| 1235279 | Gerald Arthur Bowker |  | Yes | Re-using brown field for housing, while not ideal is a much better option environmentally than using green belt land. I would hope that STRA3 would have the appropriate and adequate services provided, including schools, doctors surgeries, local shops, bus services etc. I am also assuming that STRA3 is a brown field site - I am going off the description alone. If it is green belt then my answer would be no to that also. |
| 1242367 | Grace McCullouch |  | Yes | Housing developers must ensure that their housing developments include the right infrastructure.  Obviously, this needs to include: Schools GP surgeries Sports facilities Healthy food outlets Recreational areas e.g. parks Playgrounds  Of these, sports and recreational infrastructure should be a top priority. For example tennis courts, basketball courts, athletics tracks, football pitches. We have an increasing obesity crisis, problem with severe inactivity and poor lifestyle choices and poor mental health amongst families and children and this has to be addressed with infrastructure provision. The link between infrastructure and lifestyle is well evidenced in public health reports.  The idea is simple. Surrounding people with takeaways, in housing estates where they drive everywhere and have no recreational areas leads to poor health. Surrounding people with recreational areas for exercise and socialisation leads to better health.  Alongside this, it would help to have more greengrocers rather than takeaways. Do developers get to have a say on the type of retail units they allow?  Let's use housing development as an opportunity to boost the health of Mickleover. |
| 1233334 | Harvey Heldreich |  | Yes | Mickleover has been over developed, Drake low would be the perfect example of redeveloping a brown site and could easily accommodate the housing requirements, the infinity development is just tearing up more green belt, the area is being hammered in that area from chellaston to littleover. Enough is enough. |
| 1232904 | Holly Robinson |  | No |  |
| 1240252 | Ian McHugh |  | Yes | STRA3 (Yes) This is a brownfield site (ie no loss of green)  STRA1 (Yes) This is a well developed plan, with Central Government Infinity approval close to existing employment and with key infrastructure improvements (A50 junction, Secondary School, South Derby Integrated Transport Link, Retail and Medical etc)  STRA2 (No) This represents a loss of green space over brownfield space, whilst also further congesting the surrounding local roads. The plan considers the site in isolation without considering compound effects of the adjoining new and proposed developments at H18, H19 and within DCC.  The local roads in and around this site are already beyond capacity. Without the A38 GSJ upgrade, upgrades to Staker Lane, Station Road, Uttoxeter Road etc, Mickleover will grind to a halt. |
| 1240150 | Ian Turner |  | Yes |  |
| 1241860 | Innes Mary |  | Yes | As previously stated |
| 1232861 | Jack O’Connor |  | No | Mickleover is over crowded. Clearly it doesn’t take a genius to know the infrastructure around Mickleover cannot cope with extra houses. |
| 1243552 | Jim Froggatt |  | Yes | Although not confirmed in the existing plan, development between Infinity Park and the A50 has been proposed for a long time. However, the Sustainability Appraisal says “the site is located on greenfield/Grade 3 agricultural land- which is classed as 'best and most versatile'- and lies partially within a sand and gravel mineral safeguarding zone and a contamination zone. The loss of greenfield land/Grade 2 and 3 agricultural land cannot be mitigated”. This should warrant a re-think. Staker Lane has not been publicly proposed before and is situated between current developments which are already overloading roads and facilities within Derby city. If the current government review of highway projects does allow the A38 junction remodelling to progress, the site should not be developed prior to that project’s completion. If it is cancelled, a new traffic plan for the area needs to be developed before any further housing is built. The site is also greenfield/Grade 3 agricultural land. Drakelow is an expansion of a current development. |
| 1241773 | Joanna Ayres |  | No | All of these developments are in danger of creating urban sprawl, loss of green areas, loss of habitat, loss of wildlife and traffic problems. The developments in Mickloever will encourage car use and increase traffic problems. Staker Lane is completely unsuitable for the increased traffic generated by people entering and exiting the housing estate. It is also completely unsuitable and dangerous for pedestrians and cyclists. |
| 1241686 | John Moore |  | Yes | STRA1 : Balanced plan to add to already existing high quality employment and residential area. Infrastructure able to cope with proposed increased demands.  STRA2 : Area is already overdeveloped; limited local employment without external travel; irreversible, high quality, greenfield site; existing infrastructure already stressed.  STRA3 : Necessary re-development of brownfield site; will bring improvements to local communities. |
| 1242116 | Jonathan Nutman |  | Yes | Not convinced that the 'Village' will be anything like a village but more a vast housing estate. Drakelow Power station is previously developed land so I guess that is one way to find land. Mickleover is big enough and unconvinced that existing infrstructure could cope. |
| 1241240 | Jonathan Watson |  | Yes | Mickleover has already taken more than its fair share of housing growth near the Ward/City boundary. The proposed development south of Mickleover lacks ‘breathing space’ / green space buffer for established Derby City communities.  Proposing 2,500 more homes as an urban extension to Mickleover is neither sustainable nor appropriate development, especially with ample land available elsewhere in South Derbyshire.  Up to 40% of the housing will be social, yet SDDC offices are 12 miles away in Swadlincote. This housing should be closer to SDDC services. There's also no reason to place SDDC Gypsy & Traveller pitches near Derby when suitable land exists in South Derbyshire.  SDDC is rushing the local plan process. The government is reviewing national planning policy and the future of the A38 Derby junction upgrade. SDDC should have waited for clarity on both.  The Sustainability Assessment Report, critical for validating housing and traveller site choices, wasn't published until after the consultation began, which undermines the process.  The new plans don't include any form of sustainable transport, e.g. for cycling. Staker lane is already dangerous, any new development must make cycling these areas easier, the best solution being, suitable off-road cycle paths to encourage this sustainable travel.  There is not enough thought given to the needs of a new community, Doctors, shops, schools, dentists etc. They will just become a burden on already stretched services. The track record is not good, lots of things were planned for the Cotchett village site, but none have happened. |
| 1240207 | Kevan Sutherns |  | No | Overloading of local facilities in STRA1 & STRA2 which in the case of Mickleover has it's services which were barely coping before recent developments are not inundated as things are.  STRA3 why is it down for what could be industrial when it could possibly be used for housing.  Some of my objections to the proposed developments bordering the boundary of Mickleover and Littleover:  1) There has been too much development in the area already and South Derbyshire has taken more housing development in Derbyshire since 2011 which has overloaded the local infrastructure without any great improvement in facilities, planning may state such things as Doctors surgery and shops to be built in some of these areas but few appear or operate this has lead to Mickleover becoming a hub which it cannot support without itself being developed.  2) Local roads are unable to cope with the existing traffic particularly concerning the A516 and adjacent roads, any additional traffic will have a disastrous effect on journey times.  4) Mickleover and Littleover are heavily congested causing increasing air and noise pollution, danger to pedestrians, cyclists and children and time delays for journeys, parking is now inadequate in both areas and while they are not your responsibility the planning of the new developments is the major cause. A few years ago I could get into Derby or Burton in less than 15 minutes and be parked, I now have to allow 30 and every modification slows the flow of traffic.  5) Any flooding in and around the area will in many cases affect the areas where building development is taking place. |
| 1242063 | Laura Massey-Pugh |  | No | Enough consideration has not been given to brownfield sites in the city. |
| 1232988 | Leigh Fearon |  | Yes | With caution Stra1 maybe ok, but again undue pressure on bypass road.  Stra2 would cause many many issues which won’t be resolved, current builds in the area have caused massive issues which have not been dealt with.  Stra3 aware of massive developments already however much land is repurposed which is correct and should be the first place to look when developing. |
| 1235357 | Lorna Hodgetts |  | No | Already massively overpopulated and infrastructure not coping and insufficient for current needs |
| 1241896 | Margaret Holmes |  | Yes | I am not familiar with the first two sites on the list and therefore comment on Drakelow Power Station only. So yes, it seems that the site is in a good position for development assuming all the factors that are likely to have an impact on the existing areas are taken into account - in particular a likely increase in traffic with ensuing congestion. - new bus routes would be welcome to augment the public transport provision onwards (e.g. Walton-on-Trent, Rosliston, Coton-in-the-Elms etc)  Where there is greater opportunity for people to socialise, keep appointments, meet with like minded people then that would be likely to have a positive effect on mental health problems etc especially where the opportunity is given to those who might feel isolated in the less well populated areas. |
| 1232937 | Margery Morgan |  | Yes | See above regarding what has already happened on the edge of Mickleover. |
| 1233131 | Mariah Senaa |  | No | I do not agree that the following strategic sites should be allocated for development:  STRA1: Infinity Garden Village – No • The scale of this development risks overburdening the local infrastructure and could lead to increased traffic congestion and environmental strain. While there are benefits in terms of job creation and housing, I believe that more consideration is needed to balance development with the preservation of local character and the needs of existing residents.  STRA2: Land south of Mickleover – No • Developing this area could significantly impact the local community, including increased pressure on schools, healthcare services, and roads. Mickleover is already a well-established residential area, and adding more housing could lead to overdevelopment, diminishing the quality of life for existing residents.  STRA3: Former Drakelow Power Station – No • Although the redevelopment of brownfield sites is generally preferable, the proposed scale of development here may overwhelm local infrastructure and lead to environmental concerns. The impact on the surrounding natural areas and communities must be fully assessed, and I believe the proposal requires further review to ensure it meets sustainability goals without excessive negative consequences.  In all cases, the focus should be on sustainable development that does not harm existing communities or strain local infrastructure. |
| 1241749 | Mark Hoptroff |  | Yes |  |
| 1232938 | Martin Turner |  | Yes | Expand Derbys boundary & it would be of no concern to south derbyshire. |
| 1242135 | Matt Coxon |  | No | Mickleover has had many developments created over the last few years with more already coming. There is already a development falling under SDC which is on the A516. This is far away from any other SDC facilities so the residents use DCC provided services.  There has been a huge influx of social housing on each development as it is which has bought a steep rise in anti-social behaviour in the local area. A traveller site would bring even more, not necessarily from its occupants but when others come to visit/ stay as witnessed on other places. The huge increase in local traffic is also a concern with routes in and out of Mickleover now becoming already swolen and bottlenecked.  The safety and wellbeing of the people who already occupy this are should be the first priority when planning these new developments. NOT dragging the area down with huge social housing clusters and traveller sites. TERRIBLE IDEA.  This new section of development is also under a different council to Mickleover. This would mean that people from the new estates would be using the Derby City councils facilities such as doctors and the local schools which are already at breaking point.  The other Infinity Garden site does not seem a bad option for a new development. |
| 1233743 | Matt Hunt |  | Yes | Too close to A50, who wants to live next to a major arterty road, with associated pollution and noise. I guarantee none of the councillors will. |
| 1232922 | Maureen Shenton |  | Yes | Infinity and Drakelow are areas that are not overdeveloped. The Mickleover area is already grossly overdeveloped and struggles to provide services such as GPs and school to those already resident in the area. The roads around Mickleover are already at breaking point with traffic volume and simply cannot cope with more. |
| 1234532 | Michelle Garnham |  | Yes | Mickleover is over populated for the community resources provided: GPs and schools. Made harder (from experience) as someone who lives on the border of Mickleover but falls in South Derbyshire council. |
| 1238942 | Mr Brian J Harrison |  | Yes & No | Drakelow is a brownfield redevelopment, thus a good use of available land. Infinity Garden Village is part of a wider redevelopment with the proposed business upscaling |
| 1234080 | Nick Pope |  | Yes | Mickleover cannot take this additional strain. |
| 1241910 | Nigel Bentley |  | Yes | I’m only directly concerned with land south of mickleover and comment as follows: - access to / from Staker Lane is limited; it is unreasonable to expect that traffic from this development will automatically choose to travel via the A38 - therefore significant amounts of traffic will be thrown onto an unsuitable road infrastructure (the area bordering Hedingham Way, Brierfield Way and The Hollow already suffers major congestion at school drop off / pickup times; the route thence into Derby is via Uttoxeter Road which again already suffers major congestion at peak times; Staker Lane is, itself, a ‘rat run’ from the A38 whenever there is major congestion on the latter). - public transport is already nonexistent for the established dwellings on the south side of Uttoxeter Road, nor any of the recent developments beyond the village centre, eg, Pastures, New Farm and Hackwood estates. It is unlikely that this will ever change given that the design of modern estates is not conducive to the provision of bus services. - lack of schooling provision; the proposed development only has provision for early years learning and fails to take into account the inability of the two nearest senior schools, Murray Park & John Port, to cater for a significant increase in students. - flood risk: Staker Lane is already prone to flooding due to the local topography - building over the fields will only serve to increase that risk due the amount of run off generated. - unsuitability of land for housing: a large proportion of the land identified for housing will be unavailable / economically unviable for housing due to the presence of overhead power cables. Hypocrisy: a resident of Staker Lane has historically been refused planning permission due to the nature of the area surrounding their property, ie. it would spoil the countryside!!!! Absence of healthcare provision: Mickleover already only has two overstretched GP surgeries - promises of a further practise to support the Hackwood development have failed to materialise. |
| 1241987 | Patrick Munro |  | Yes | Because almost certainly they'll follow the same format as the existing developments which over burden the local area. |
| 1241975 | Paul Hopkin |  | Yes | Those areas will benefit without destrying more green land and putting pressure on over stretched DCC areas |
| 1241989 | R Coxon |  | No | The proposals do not offer additional services such as GP practices or schools to support the new developments. |
| 1236005 | Richard Larder |  | Yes | Mickleover and the immediate surrounding area are overcrowded and the existing infrastructure is under pressure. The site over former industrial sites such as Drakelow and possibly Willington power stations should be considered as potential housing sites. |
| 1235713 | Rob M |  | Yes | Mickleover is already struggling due to pressure on infrastructure, transport in particular. Traffic on Uttoxeter road, Station road and the surrounding areas is already excessive due to various large developments in the area. We also lack retail businesses and employment opportunities around Mickleover, resulting in Tesco being constantly extremely busy, there are few school places for children and there are no Doctor's surgeries or Dentist's surgeries in Mickleover than can accept further patients. Even noise pollution from the A38 has increased drastically over recent years. Mickleover residents have suffered enough due to recent large housing developments being heaped on us despite many objections. |
| 1232946 | Rosemary Whitehouse |  | Yes |  |
| 1233241 | Russell Licence |  | Yes | I have responded yes to former drake low. This is an example of a site riff for redevelopment.  Infinity village and Mickleover are pure greenfield sites. You cannot make more land so cherish it and stop developing on virgin soils.  As stated previous, farm land is sparse, farming needs to be encouraged in the UK, we need to be more sustainable. Building in greenfield must be a negative impact against carbon neutral targets.  The road and public transport infrastructure cannot cope now  Roads are in a terrible state now  There are not enough school places for Children now  You cannot get a doctors appointment now |
| 1241947 | Sarah Glover |  | Yes | There's not the infrastructure in place, such as adequate road network to deal with increases in traffic. There's also a lack of primary care facilities currently and adding further housing in this area is just going to put extra pressure on the services already in place. |
| 1232906 | Steve Wilson |  | Yes | I've worked at Drakelow and know how large the site is with good roads. Unlike the Mickleover site served by minor narrow roads. |
| 1233359 | Sukhdev Bangar |  | Yes | STRA1: The site is suitable location as it has little impact on the surrounding area (minimal traffic impact as area not over congested as no nearby homes)  STRA2: This site is unsuitable for such a large number of homes as not only does it impact the view from the nearby homes it will increase the traffic in and around the A38 which is a regular traffic hot spot. Also the area lacks sufficient NHS Dentists and Doctors. The inclusion of a traveler site is not in keeping with the area and its inclusion feels like a snap decision/thought.  STRA3: The site is suitable location as it has little impact on the surrounding area (minimal traffic impact as area not over congested as no nearby homes). This is also re-purposing of land so will only enhance the area from its previous use |
| 1242052 | Susan Marshall |  | Yes | As stated in the earlier answers, Derby City should review its needs and to review the HMA. |
| 1232857 | Teri Licence |  | Yes | Former Brownfield sites are perfect for development. |
| 1242138 | Tiran Sahota |  | Yes | I strongly oppose the proposed Infinity Garden Village development. The area has already had new housing developments in recent years and as someone who lives in this area, I understand the impact that the increased housing has had on our services at the Sinfin District Centre. It's now very difficult to make an appointment to see a doctor at Sinfin Surgery - you have to call at 8am to book an appointment for that day and often the appointments have been taken by the time you get through to reception. My elderly parents, who also live in this area, usually go to the surgery at 7am and wait in the queue so that they can get an appointment on that day. They tell me that often other unwell patients in the back of the queue are turned away because there are no more appointments left. Also, there is currently a four year wait to be seen by an NHS dentist at this surgery!!! Building 2000 more houses in this area is only going to make this situation worse!! People won't be able to access adequate healthcare and this will reduce people's quality of life. The Sinfin shopping centre is usually busy and there aren't always enough parking spaces in the shopping centre car park. Even if you do build more infrastructure and services in this new proposed development, the volume of traffic will increase in this area and there will be more people travelling in the area and to other surrounding areas. This will increase pollution which will have a detrimental impact on people's health - I suffer from Asthma and pollution triggers my Asthma symptoms. Increasing pollution will lead to significant increase in health problems which will further stretch the health service. Currently the roads are very congested in this area. A recent trip to a nearby supermarket, which should normally take 10-15 minutes in the car, took me approximately 45 minutes due to the sheer volume of traffic on the road! This will get significantly worse if the Infinity Garden Village goes ahead. I understand that there are plans to build a new A50 junction, but again, this will be overwhelmed with traffic leading to more strain on the infrastructure in addition to environmental issues. This land should not be built on as it provides a boundary between the Derby suburbs and the local villages. It's not just the immediate area that will be overwhelmed by these proposals, the surrounding villages will be overwhelmed and impacted by these proposals too.  In terms of the proposed development in Mickleover, I also strongly oppose this. In recent years Mickleover has absorbed a significant number of new houses and this has completely overwhelmed the area. Again, the area is massively congested with traffic and the services are completely overstretched. So much development is such a short time has had a hugely detrimental impact on this area. Please leave what green land is left in this area - we don't want to see our green space concreted over!  I don't oppose building on brown belt land, so I do feel that the former Drakelow Power Station site would be a good place to build, however, the impact on local services should be considered. Any development here shouldn't have a detrimental impact on the environment and the surrounding countryside. |
| 1242325 | Tracy and Gordon Harrison |  | Yes | My detailed answers are below. |

# Qu. 6: Irrespective of your answer to Question 5, do you agree with the policy requirements, extent of the site, facilities and infrastructure proposed at STRA1: Infinity Garden Village?

|  |  |
| --- | --- |
| Duty to Cooperate Body / Statutory Consultee | 5 |
| National Organisation | 2 |
| Regional Organisation | 2 |
| Parish Council and other Community Group | 8 |
| Councillor | 0 |
| Landowner or Developer | 11 |
| Members of the public | 70 |

| **Response Id** | **Name** | **Organisation** | **Do you agree with the policy requirements, extent of the site, facilities and infrastructure proposed at STRA 1: Infinity Garden Village?** | **Comment** | **Council Response** |
| --- | --- | --- | --- | --- | --- |
| **Duty to Cooperate Body / Statutory Consultee** | | | | | |
| 1242409 | National Highways |  |  | STRA1: Infinity Garden Village Mixed Use Allocation  The site is estimated to have the potential to accommodate 2,000 dwellings, with 70 hectares of employment land, along with a community and education facility. Primary vehicle accesses will be provided via a new junction on the A50 and junctions via Infinity Park Way.  Based on the highway network layout and its proximity to the SRN, it is likely that a large portion of development traffic from the site would route onto the A50, which is the nearest SRN. National Highways have been working closely with the developers of the site allocation to facilitate the delivery of the new junction on the A50 and are currently consulting on the assessments required to determine the need for wider mitigation on the SRN.  National Highways would welcome the inclusion of policy wording in respect of the potential requirement for off-site highways mitigation (in addition to the new junction). | Agreed. Amend the wording of Policy STRA1 part A (v). |
| 1243623 | Derbyshire County Council |  |  | Since it was first proposed, Derbyshire County Council has been supportive of the delivery of the existing Infinity Garden Village site due to the considerable housing and employment growth that it provides. The County Council has worked jointly with Derby City Council and South Derbyshire District Council and with the site promoters and developers to deliver the scheme, particularly the necessary infrastructure to deliver the development growth. This has included the proposed provision of a new junction on the A50 and link road to serve the site, new primary school and new secondary school.  The proposed new allocation in the Draft Plan for an eastward extension to the existing Infinity Garden Village site, is a logical and sustainable urban extension that has the potential to maximise the benefits of the existing key strategic infrastructure that is planned for the existing Garden Village site as set out above. The new allocation also has implications for additional infrastructure, particularly new primary school and secondary school provision to provide for the additional school places necessitated by the 2000 homes propose for the site. In this respect, it is welcomed and supported that the Policy in the Plan (STRA1) and the indicative masterplan both highlight the need for the provision of a two form entry primary school on the site and a new secondary school to serve the education needs of not just the proposed allocation site but the housing proposed on the existing Infinity Garden village site and in the wider area of the A50 corridor to the west and east of the allocation site.  The County Council has been involved in the master-planning of this site and would welcome the opportunity to remain involved, particularly in terms of the details of the primary school site allocation. Given the proximity of the allocation site to Derby City Council’s administrative area, it will be important for South Derbyshire District Council, Derbyshire County Council and Derby City Council to work collaboratively to ensure that the primary and secondary school place provision needs of the site are delivered in a timely and coordinated way.  Relevant to policy STRA1, but also policies INF1 and INF4(A)i; (South Derby Integrated Transport Link phases 1 and 2, and new A50 junction) the County Council is already working in partnership with the District Council and others towards delivery of the proposed A50 junction and its connection to Infinity Park Derby. Whilst enjoying, in principle, access to Levelling Up Fund grant this infrastructure may still require significant developer contributions if it is to be delivered. It would be helpful if specific reference was made in the plan to the District Council’s intention to act as a broker to ensure (through an appropriate mechanism) that proportionate contributions are made. From a sustainable travel point of view the additional text is suggested in italics below:  Policy STRA1: Infinity Garden Village Mixed Use Allocation C Green Infrastructure (ii) The green infrastructure network should allow active travel connections though and across the site to local destinations, *including schools, shops, local services and employment centres* in addition to points of interest and recreation; D Mitigation (vi) Additional comment: *All residential dwellings should be provided with appropriate cycle storage to enable and encourage this mode of travel. This should include both those with and without garages, in line with LTN 1/20.* (vii) Ensure that the development is well connected to frequent public transport to Derby centre as well other key designation and that the bus stops *with real time information* and routes are provided through the site to allow for convenient boarding, *ensuring that the majority of dwellings are no more than 400 metres from a bus route or bus stop*. (viii) High quality continuous pedestrian and segregated cycle routes shall be provided between the site and villages to the south of the A50 and development within Derby City and within and across the site, to key centres key centres including employment and education facilities. This should include enhancement of key cycle routes through the site, *with due regard to the Derbyshire Key Cycle Network (KCN) and Local Cycle Network (LCN) routes.*  Waste Planning Issues Fig 1. Former landfill site known as Sinfin Moor Park Please be aware that the application site lies within 250m of the former landfill site known as ‘Sinfin Moor Park’ (see Fig. 1 above). In accordance with the Building Regulations an assessment of ground gas risks must be performed. Ground gas risks should be assessed in accordance with good practice guidance such as ‘CIRIA C665 Assessing risks posed by hazardous ground gases to buildings, Construction Industry Research and Information Association, 2007’. Where any significant risks are identified there may be a need for specific remedial measures in respect of ground gas. These measures should be designed in accordance with good practice guidance such as ‘BS8485:2015+A1:2019 Code of practice for the design of protective measures for methane and carbon dioxide ground gases for new buildings’. The scope and details of the gas assessment and any necessary remedial measures must be agreed with the local authority Contaminated Land Officer as part of the wider geo-environmental assessment of the site.  Site requirements From an Adult Social Care and Health point of view there is support for the potential provision of a retirement village at both the Infinity Garden Village and South of Mickleover developments. The County Council would encourage either housing with support or housing with care provision and would ideally like to see a combination of both, with a mix of market and affordable options.  The County Council broadly agrees with the outlined need for housing for older people in Policy H20 and feel that retirement villages provide an excellent opportunity for either housing with support or housing with care. As Derby City’s capacity will also need to be partly met by South Derbyshire, there is a potentially greater need for housing for older people than indicated.  Plans for the above developments indicate the presence of a local centre; the Adult Social Care and Health team would like to see any housing with care or support development close to this centre, potentially in combination with community facilities such as health centres, libraries or café / restaurant offerings, thus promoting integration with the wider community.  Currently, there is little in the way of provision (housing with support, housing with care, residential or nursing care) in the vicinity of the proposed strategic developments, so the County Council considers these would be ideal locations of older people’s accommodation.  Equally the Council considers that the strategic developments of 2046 dwellings at Drakelow Park and 1944 dwellings at Wragley Way would also be suitable for the development of older people’s accommodation | In regard to seeking developer contributions toward the delivery of transport infrastructure, amend the wording of Policy STRA1 part A(v).  Changes to the wording of Policy STRA1 C and D are proposed, in response to comments from the County Council.  Comments regarding the Sinfin Moor Park landfill site and adult social care and health noted. These will be taken into account as part of the design review. |
| 1243643 | Sport England |  |  | Sport England consider this strategic site allocation policy as currently drafted to be unsound. The site allocation appears to include Lowes Lane Clay Shooting Ground and is therefore afforded protection under paragraph 103 and 193 of the National Planning Policy Framework (NPPF). With regards to paragraph 103 of the NPPF, Sport England are unaware of any information that demonstrates that this sporting facility is surplus to requirements in relation to criterion (a) nor are aware of any information that demonstrates that the existing facility will be replaced in relation to criterion (c). Furthermore, if the facility is to be retained, no information has been provided in relation to paragraph 193 of the NPPF that would ensure that the new development would not prejudice its use (e.g. noise, as well as any health and safety requirements). As such, the policy, supporting text and diagram should be redrafted to provide the necessary clarification and justification with regards to paragraph 103 and 193 of the NPPF. The occupiers of new residential development would generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. In this regard, new development should contribute towards meeting the demand that it generates through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports/Built Facilities Strategy, Playing Pitch Strategy (PPS) or other relevant needs assessment. Section 8 of the NPPF also advises that any new sports facility needs arising as a result of new development should be met. Therefore, the Council’s emerging Built Facilities Strategy and Playing Pitch Strategy for South Derbyshire should identify any shortfalls in existing sports provision and should identify how an increase in the demand in an area would generate additional/new demand for sports provision. Sport England’s Sports Facility Calculator and the Playing Pitch Calculator should be used to help determine the necessary sporting provision required, which could include the proposed education facilities. This work should inform the emerging planning policy for a development proposal at this site in accordance with paragraph 97 of the NPPF. Sport England request that the emerging strategic site allocation policy is redrafted and redrawn to take into consideration the above matters. | Comments in regard to the established shooting range noted.  Comments in regard to the need to account for any deficiencies in established sporting provision and any additional demand that may accrue as a result of the development of the site will be taken into account as part of the evidence base that will underpin the STRA1 allocation.  It is proposed that the policy text be changed to address the above matters. |
| 1242867 | Natural England |  | Yes | Natural England welcomes paragraph C which sets out the provisions for Green Infrastructure across the site. We encourage Green Infrastructure to be designed so that it is connected throughout the site and into the wider locality for the maximum benefit of people and biodiversity. Green links to the Sinfin Moor Local Nature Reserve and surrounding areas would also be of benefit. The policy should also consider how the requirements for Biodiversity Net Gain will be achieved on-site at the earliest stages of the masterplan preparation. It should set out the habitats within the site to be protected or enhanced, opportunities for new habitat creation or improvements in connectivity and whether any off-site provision is likely to be necessary. | Although Sinfin Moor Nature Reserve lies within Derby City, away from the City boundary, it nevertheless forms part of the wider Infinity Garden Village designation and the District Council will work with the City Council in seeking to ensure that the location can be accessed via green links from development to take place within the STRA1 allocation in South Derbyshire. This together with the means by which Biodiversity Net Gain will be achieved will be considered as part of the design review process for the site and any changes made to Policy STRA1 as appropriate. |
| 1242629 | Derby City Council |  |  | Proposed Strategic Housing Allocation - Land at Chellaston IGV This area has generally been discussed and supported in principle by the Council as an appropriate location for further growth as part of the Infinity Garden Village and South Derby Growth Zone area. As such this general location is largely supported for further housing growth. The location will have good access to employment uses and to the wider strategic road network with the retention of the SDITL link road within successive developments.  As with the Mickleover site, we would welcome the opportunity to engage in more detailed master planning of this area given its close relationship with the city and particularly the residential areas of Chellaston and Sinfin and we would make similar comments about the need for the development to be self-sustaining and for infrastructure to be provided in a timely manner.  This location is also affected by Green Wedges in the city with the same purpose of penetration of open land into the city. Master planning will need to carefully consider how the wedges are affected.  The integration of a secondary school, primary school, district centre and the employment will reduce the need to travel beyond the boundary of the IGV area. Further, the New A50(T) Junction and Link Road will provide access to the area allowing connections to the existing urban area for all modes of transport and ensuring that the optimum route choice is available for car borne trips. It is likely that the cumulative impact of IGV and the housing allocation will have additional impacts on the network above the mitigation that the new A50(T) Junction will provide. It is likely that demand at the A514/A50(T) Bonnie Prince Charlie Junction will increase and consideration should be given to improving the efficiency of this junction.  However, the housing allocation is part of a wider masterplan and we should ensure that a minimum level of public transport service is provided to IGV. Consultation with the County Council and bus operators needs to be undertaken to make sure that there are deliverable public transport options.  There is a good opportunity to provide quality cycling and pedestrian links across the IGV area. As such, consideration should be given to how to maximise connectivity for non-motorised users and how the allocation fits within the wider masterplan for the area. For example, consideration should be given to whether Sinfin Moor Lane is surfaced and lit to be better integrated into what will become an urbanised area. Further, there are also other off road and shared cycle/pedestrian footways that link into radial cycle routes into the city centre, such as Route 6, and countryside routes currently being developed by the County Council. | Noted. A Design Review for the strategic sites is being undertaken which will include consideration of infrastructure provision (including green infrastructure) and design parameters to ensure that the sites will be developed in a sustainable manner with all relevant cross boundary matters given appropriate consideration. This will involve relevant stakeholders, including Derby City Council.  A Transport Study is to be jointly commissioned by Derby City Council and South Derbyshire District Council to consider transport impacts and mitigation for the strategic sites, including measures to encourage sustainable travel. Integration with Derby City transport infrastructure and services will be a key consideration. |
| **National Organisation** | | | | | |
| 1235628 | British Horse Society |  | No | The A50 junction 3A will create a great deal of traffic issues around the existing area of Stenson, Sinfin, Barrow and other locations. The canal bridge at Barrow is regularly damaged by heavy vehicles so needs to be protected rather than further overloaded. The infrastructure is inadequate and the risk to vulnerable road users is increased. | A Transport Study is to be jointly commissioned by Derby City Council and South Derbyshire District Council to consider transport impacts and mitigation for the strategic sites. The safety of road users will be a key consideration in the master planning of Infinity Garden Village, including any potential impacts in the surrounding area. |
| 1243542 | Home Builders Federation (HBF) |  |  | HBF do not comment on individual sites, be we would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. HBF does not comment on individual sites, other than to say the Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full. The soundness of strategic and non-strategic site allocations, whether brownfield or greenfield, will be tested in due course at the Local Plan Examination.  HBF are aware of potential challenges can impact on the timescales for delivery of the largest sites. Ways to address such ongoing risks could include increasing the housing requirement and/or the buffer applied. The Plan should also recognise that the time taken to bring forward larger allocations, and this underlines the need for a range of site types and sizes to ensure a five-year land supply on adoption, and an effective housing land supply over the plan period. | Please see Council response to comments on Question 4. |
| **Regional Organisation** | | | | | |
| 1243609 | Derby Sandiacre Canal Trust |  |  | I am submitting comments on behalf of Derby and Sandiacre Trust.  Whilst, I appreciate that this is a Part 1 Local Plan, I would make the following comments.  I would like to see the canal restoration indicated on the plans for the Infinity Garden Village Allocation. It lies at the eastern edge.  The restoration meets several policies in the plan, namely with regard to sustainable travel (Policy S6 iii and Policy S1 iii and v).  It already has a function as a cycle route, which will be retained in the restoration scheme, both for commuting and more particularly for leisure purposes. Adding the waterway to the route will significantly enhance its value in terms of environment and well being.  Including this restoration as a developer contribution would be appropriate .  Adding the canal as a strategic priority would assist with its connection southwards to the Trent and Mersey Canal. | Amend STRA1 allocation plan to show proposed Derby and Sandiacre canal restoration.  Comments relating to the Derby and Sandiacre Canal restoration will be taken into account as part of the design review for STRA1 and the wording of the policy amended as appropriate. |
| 1242640 | Derbyshire Association of Local Councils |  | Yes |  | Noted. |
| **Parish Council and other Community Group** | | | | | |
| 1244412 | Etwall Parish Council |  |  | The site proposes a secondary school. Development of this, either on this site or alternative in the area, is essential as the John Port Spencer Academy in Etwall is close to or at capacity and current / future pupils from the East of SDDC need to be transferred away. This will be exasperated if the Mickleover development proceeds, particularly as Derby are restricting access to their schools. | Noted. |
| 1240947 | Barrow Upon Trent Parish Council |  | Yes | Subject to the change of parish boundary / creation of the Infinity Garden Village parish. The advent of the new A50 junction at the IGV will create a significant risk for traffic heading south. It will encourage even more increased, and inappropriate sized vehicles to use this lane (Deepdale Lane) alongside the canal with the 90º bend over the canal at Bridge 16. We already experience massive problems of bridge and road damage, and accidents. It is a huge problem that needs addressing before there is unrepairable damage to the bridge of a fatality. | A Transport Study is to be jointly commissioned by Derby City Council and South Derbyshire District Council to consider transport impacts and mitigation for the strategic sites. The safety of road users will be a key consideration in the master planning of Infinity Garden Village, including any potential impacts in the surrounding area. |
| 1241376 | Rosliston Parish Council |  | Yes | We note the placement of 2 strategic sites of 4500 houses on the edge of Derby, to build and support Derby Cities unmet need, building logically where there is an infrastructure to support this development. It is also noted that many of the existing sites will already accommodate much of the housing numbers for Derby City. This therefore reinforces and demonstrates the numbers being passed to SDDC should not be further increased. | Noted. |
| 1242402 | Weston-on-Trent Parish Council |  | Yes | Again, a qualified yes. The plan needs to be clear on what type of residential development is intended. Different types of housing, including social housing should be properly integrated into the site and not segregated. Also in line with the Climate Emergency, new housing should include a very high standard of insulation, solar panels, heat pumps (or at least be heat pump ready) and EV charging points. Higher housing density and good architectural and landscape design are important. SDDC should consider developing a Supplementary Planning Document like the Hull Residential Design Guide, produced by Hull City Council. Public open spaces should be designated as Common Land and all cycle tracks and footpaths should be dedicated as Public Rights of Way | The numbers and types of home to be provided will be determined having regard to a variety of considerations including a design review of the site, housing needs evidence and viability testing.  Policy S3 of the Draft Local Plan Part 1 addresses the environmental performance of new development.  Policy INF2 E (v) addresses provision for electric vehicle charging.  Designations for open space and Public Rights of Way lie beyond the scope of the Local Plan. |
| 1242585 | Egginton Parish Council |  | Yes | Yes. Importantly the strategic site includes the provision of a secondary school that is very necessary for the District. It also has good access to road infrastructure | Noted. |
| 1243158 | Melbourne Civic Society |  | Yes |  | Noted. |
| 1243603 | SAVE (Save Aston & Weston Village Environment) |  | Yes | The plan needs to be clear on what type of residential development is intended. Different types of housing, including social housing should be properly integrated into the site and not segregated. Also in line with the Climate Emergency, new housing should include a very high standard of insulation, solar panels, heat pumps (or at least be heat pump ready) and EV charging points. Higher housing density and good architectural and landscape design are important. Public open spaces should be designated as Common Land and all cycle tracks and footpaths should be dedicated as Public Rights of Way. The Infinity Garden Village development should not extend south of the A50. | The numbers and types of home to be provided will be determined having regard to a variety of considerations including a design review of the site, housing needs evidence and viability testing.  Policy S3 of the Draft Local Plan Part 1 addresses the environmental performance of new development, which is largely governed by Building Regulations.  Policy INF2 E (v) seeks appropriate provision for electric vehicle charging.  Designations for open space and Public Rights of Way lie beyond the scope of the Local Plan, but will be considered in consultation with the relevant authorities. |
| 1238750 | Hilton Parish Council |  | Yes | It could be clearer in requiring the new secondary school to be completed before the occupation any of the dwellings. The previous approach of only providing a new school after all the houses have been completed is disastrous. The piece meal expansion of existing schools in the surrounding areas is bad for the schools and bad for the extra commuting, traffic congestion etc that results. | The Council will seek the timely provision of school places on the STRA1 allocation. Part E i) of the policy indicates that no dwelling/phase of development shall be occupied until the necessary education provision is in place. |
| **Landowner or Developer** | | | | | |
| 1242645 | Emery Planning on behalf of Strategic Land Group Ltd |  |  | 7.1 The plan assumes that the site will deliver 2,000 dwellings and 70 hectares of employment land over the plan period. There is insufficient evidence that the site will deliver this quantum of development by 2039.  7.2 In terms of the proposed lead-in time, large sites such as this typically take much longer before first completions are realised. The Lichfields report: Start to Finish 3 (March 2024) provides a credible and up to-date assessment of build rates and lead-in times for large sites. It identifies that the average lead-in time from validation of the first planning application to the first dwelling being completed on schemes of 2,000 or more dwellings in 6.7 years. In this case, there is no planning application, and an application could be several years away.  7.3 In terms of build rates, it is not clear what assumptions are being applied. The Council needs to adduce evidence of the local delivery record to support its assumptions, as well as what evidence there is that there will be multiple developers / sales outlets on the sites on the edge of Derby | A Design Review is being carried out which will assist in evidencing the overall quantum of homes to be delivered on the STRA1 site.  A trajectory showing yearly delivery from each allocated site during the plan period will be prepared.  Noted. |
| 1242100 | RPS on helaf of Bellway and Clowes (Thulston Fields) |  |  | Until such time as a Whole Plan Viability Assessment has been published RPS reserve the right to comment further on the policy requirements sought for each strategic site. Without such evidence, it is not possible to be confident in the development requirements sought from each strategic site, the social infrastructure / service enhancements and the green infrastructure enhancements. | Noted. |
| 1242408 | Lichfields (on behalf of St Philips Land Ltd) |  |  | St Philips do not wish to provide comments in respect of Question 6 | Noted. |
| 1243582 | CBRE Ltd on behalf of Land Project UK (LPUK) |  |  | Please refer to our response to Question 5.:  LPUK do not object to the principle of strategic sites for development. However, it is vital that the emerging Local Plan caters for development needs now, and in the absence of Planning Decision Notices, it cannot be guaranteed that the sites can be delivered in the short term (0-5 years), and we have concern that the immediate employment needs of the borough are not being efficiently planned for.  Furthermore, it is clear from the draft allocations that further technical work is still required to ensure the feasibility of the scale of growth envisaged within the allocations, with reference to the need for the Council to work with infrastructure providers to address issues such as transport, health and school provision. Given the questions we’ve raised around deliverability and timescales of the new allocations, we recommend other sites are also allocated in the emerging Local Plan for employment purposes that are deliverable now and of a small-medium scale. | Noted.  The Derby and South Derbyshire Employment Land Review identified an overall surplus of employment land in both local authority areas for the plan period. The Council has identified a sufficient quantum of available employment land to meet near term needs as identified through annual monitoring. Land proposed to be allocated for employment development at STRA1 will contribute toward providing an additional source of supply for the plan period. |
| 1243639 | Carden Group |  |  | 5 Policy STRA1: Infinity Garden Village Mixed Use Allocation Our Comments 5.1 As noted by the Council, the housing proposed at this site is critical to addressing Derby City’s unmet housing need. However, Carden has concerns regarding the deliverability of the proposed 2,000 homes at the Infinity Garden Village by the year 2039.  5.2 Currently, no planning application has been submitted for this site. Given the scale of the proposed development, it is unlikely that an application of this magnitude would be submitted prematurely before the site’s allocation status is adopted, due to the significant financial risks involved. The Council anticipates submitting the plan to the Secretary of State in June 2025, as noted in paragraph 4.6. Furthermore, although the Local Development Scheme (LDS) from 2022 is now out of date, it can be anticipated that it will take several months between submission and adoption, suggesting that adoption may occur in early 2026.  5.3 Lichfields’ latest research (Start to Finish, Third Edition, 2024) indicates that for a site of this size (2,000+ homes), the average lead-in time from application submission to the delivery of the first home is 5.1 years. Additionally, Lichfields’ research suggests an average build-out rate of 138 dwellings per annum (dpa) for sites of this scale.  5.4 Assuming the earliest likely application submission date is early 2026, following the expected adoption of the Local Plan Review, and applying the assumptions from Lichfields’ research, it is estimated that only 1,104 homes could be completed by 2039 on this allocation. Therefore nearly 900 homes— or approximately 45% of the proposed total—are potentially unlikely to be delivered within this timeframe, potentially resulting in a significant future shortfall for the Council. Proposed Modifications  5.5 We recommend that the Council provide additional evidence and assurances to demonstrate that the delivery of 2,000 homes at the Infinity Garden Village by 2039 is achievable.  5.6 Alternatively, the Council should revise the proposed housing number for this allocation to reflect a more realistic delivery target by 2039. 5.7 Should the housing figure be revised downward, the Council must identify alternative sites to address the potential shortfall of approximately 900 homes. These sites should ideally be both located near Derby and be capable of accommodating significant growth, this could include areas such as Hilton for example | Noted.  A trajectory showing annual delivery from each of the allocated sites within the plan period will be prepared.  See also responses to Question 9 in respect of Policy S1. |
| 1243664 | Deloitte LLP on behalf of Church Commissioners for England |  |  | 7.1.1. Although the Commissioners do not have specific commentary regarding the extent of the site, facilities and infrastructure proposed at STRA 1: Infinity Garden Village, they stress the need for SDDC to complete the aformetioned supporting technical evidence before progressing with the allocation. The Infrastructure Development Plan update, Design Review for updated plan’s strategic allocations, Local Plan Viability Assessment and Housing Implementation Strategy will all provide necessary information regarding the deliverability of the site, and therefore at present, the Commissioners do not support the allocation insofar as it cannot be proven as justified or effective in line with NPPF paragraph 35. Notably, the outcome of the Infrastructure Development Plan update should look to provide some guidance as to the policy wording of STRA 1, which the Commissioners consider should have been included prior to this consultation.  7.1.2. In addition, regarding the policy requirements of STRA 1, the Commissioners highlight that the Strategic Housing and Economic Land Availability Assessment (‘SHELAA’) notes that the site is understood to be in multiple ownership, and has some developer interest, however reference to this, or a strategy for the build-out of the site in response to this potential barrier to development is not noted within the policy wording. The Commissioners suggest that SDDC should ensure there is a strategy for the site’s delivery within the policy wording, cognisant of the potential constraint of multiple ownership, to aid the delivery of these 2000 additional dwellings | Noted. A specific Infinity Garden Village partnership approach will be taken to unlock land ownership constraints with site promoters. See also responses included under Question 5(a). |
| 1242854 | Stantec on behalf of Caddick Land in relation to Land North of Ashby Road, Woodv |  | No |  | Noted. |
| 1243628 | Define Planning on behalf of Bloor Homes Ltd |  | No | BHL support the Council in setting out at this early stage the expectations for the strategic development allocations, including high level indicative masterplans. The intention for the development to have strong design principles and mitigate its own impacts is appropriate. | Noted. |
| 1242038 | Inspire Design & Development |  | Yes |  | Noted. |
| 1243190 | David Lock Associates on behalf of Hallam Land |  | Yes | Yes, however with reference to item E(i) of the draft Policy there is opportunity for early delivery of certain quantum of development to come forward in advance of key infrastructure (namely the new A50 junction and SDITL) subject to transport assessment at application stage. Please see full Hallam Land representation letter specific to Infinity Garden Village, prepared by David Lock Associates.  STRA1 (Infinity Garden Village allocation) With the land south of Wragley Way already allocated in the currently adopted local plan, Hallam strongly supports the proposed allocation of the wider Infinity Garden Village, creating a joined up vision for this strategic and cross-boundary extension to Derby City of regional socio-economic importance and which better reflects the land previously identified as the ‘South Derby Growth Zone’.  The relationship between Land south of Wragley Way (H15) and the new STRA1 (IGF) policy is slightly unclear when comparing the policy wording against the supporting plans on the following pages. The STRA1 policy wording should clarify that the 2,000 homes it allocates is entirely separate and additional to the 1,850 allocated at Wragley Way. Further, the diagrammatic masterplan at page 54 of the draft Plan should have the spatial demises of H15 and STRA1 policies clearly demarcated. Although the diagram is clearly highly indicative as a masterplan, it should be noted that the local centre and education facilities are the wrong way around in comparison to the illustrative masterplan supporting Hallam’s live outline planning application for Wragley Way – we suggest this is changed in the final policy wording.  The Wragley Way component of IGV is proposing a primary school. Hallam supports the new policy requirement for a secondary school within the STRA1 allocation, and the policy wording should clarify that the secondary school should be of sufficient size to serve the whole IGV.  The alignment of the SDITL as shown on page 54 is broadly consistent with the Hallam masterplans for the Wragley Way allocation and the employment proposal within the STRA1 area, though this must remain labelled as ‘indicative’ allowing for design flexibility. In particular Hallam commends the use of Wragley Way itself as the section of the SDTIL between Arleston Lane and Stenson Road.  Though supportive of the notion in principle, Hallam consider that item E(i) of the policy wording as drafted is overly prohibitive of development and may unnecessarily delay delivery. With particular regard to transport and hard infrastructure it may well be possible that a certain quantum of housing can come forward in advance of the completion of the new A50 junction and complete SDITL road – both of which are likely to be interpreted as ‘necessary’ in reading this part of the policy. Bespoke triggers to restrict the quantum of development to an appropriate level before key infrastructure should be agreed for each part of the IGV at application stage and demonstrated through technical assessment. | Noted.  Transport modelling work will assist in identifying delivery thresholds beyond which critical transport infrastructure will need to be in place.  In regard to the comments regarding the need for clarity in the demarcation of the H15 site within STRA1, the IGV map will be amended to address this.  In regard to the comments regarding the positions of the proposed local centre and primary school within the H15 site as shown on the STRA1 plan, it is agreed that the plan should be changed to show these in the positions identified in the illustrative masterplan supporting Hallam’s live outline planning application for Wragley Way.  The policy correctly identifes the need for a secondary school on the eastern part of the site, the details of which will be subject to further planning with education providers and the relevant landowners.  It is not intended to change part Ei) of the policy as the requirement relates to the hard infrastructure needed to gain access to the individual dwelling/phase rather than to the overall development. |
| 1243184 | Pegasus on behalf of Wilson Bowden Devts and Barrett Redrow | Pegasus on behalf of Wilson Bowden Devts and Barrett Redrow | Yes | A. Development Requirements i) Approximately 2,000 new homes; Master planning exercises thus far have considered the elements identified at paragraph 1.6 of these representations and do not include consideration to the additional requirements identified in the draft allocation policy or other policy requirements including a retirement village, self-build/custom plots, and Gypsy and Traveller pitches. These policy requirements will affect the quantum of residential development that the allocation will be able to achieve. On this basis, our clients suggest this criterion is altered to ‘Up to 2,000 new homes’ to ensure sufficient flexibility is retained and the Site can be delivered in accordance with the Local Plan.  ii) Approximately 70 hectares of employment generating land; The refenced 70 hectares encompasses the land within the existing allocation under Policy E4 of the Local Plan. It is noted that Policy E4 will no longer be required and the land under this policy will be amalgamated into Policy STRA1. This approach is supported.  iii) Explore the provision of a retirement village within the scheme Upon reviewing the evidence base it does not appear that there has been any viability assessment or input into this policy criterion resulting in it being unjustified. The provision of elderly living accommodation is of course supported, but it must be carefully planned, provided in the correct location, and justified by the Council. The Council needs to understand any viability constraints relating to the different use classes (Uses C2/C3) of elderly persons accommodation and the requirements of affordable housing contributions as this could affect the delivery of sites.  The criterion is also unclear in respect of the size of retirement village and how applicants demonstrate that they have ‘explored’ the provision and satisfied the requirement as a result. This criterion is not justified or effective in accordance with the soundness tests of the NPPF (paragraph 35) and it should be removed.  Accordingly, given the need for elderly persons accommodation, the district should seek to identify and allocate specific sites for specialist housing accommodation to ensure that supply can come forward in a timely manner. There may also be a need  for a criteria-based approach to provide flexibility for more sustainable sites outside settlement boundaries to come forward and boost the supply of specialist housing within the district during the whole of the plan period.  iv) The provision of Gypsy and Traveller pitches in line with Policy H21; This criterion is a duplication of the requirements of policy H22 contrary to the NPPF (paragraph 16 f) and should therefore be removed. Our client’s response to policy H22 is set out below.  v) Primary vehicle accesses via a new junction on the A50 and junctions via Infinity Park Way Whilst the primary vehicular access being via a new junction on the A50 and junctions via Infinity Park Way is our client’s intention and ultimate aim, this criterion risks delaying the delivery of homes, employment provision and infrastructure on site should the junction improvements be delayed for reasons beyond our client’s control. Given the spatial strategy of the draft Local Plan relies on the strategic sites delivering in full by 2039, our clients suggest replacing this criterion with a measurable and clear requirement such as the submission of an access strategy and/ or phasing plan to be provided to demonstrate at the application stage how the Site can appropriately come forward in a phased manner, and how there is no reason that a first phase couldn’t come forward before the A50 junction is established, subject to the appropriate assessment and testing.  B. Social infrastructure / services for the development i) Provision of an appropriate scale of retail, healthcare and community facilities to meet the needs of the new community. It is expected with regard to healthcare that this will comprise a refurbished Sinfin Health Centre; Upon reviewing the evidence base it appears an updated Retail Study or a Viability Assessment have not been undertaken by the Council. It is therefore unclear what an ‘appropriate scale of retail’ is for the Site. Our clients seek clarity and justification with regard to this matter or removal of this criterion.  Our clients consider healthcare provision should form a separate criterion. Following direct engagement with the Integrated Care Board (ICB) our clients understand that healthcare provisions for the Site and wider Infinity Garden Village will be via financial contributions to upgrade the existing Sinfin Health Centre or other appropriate medical centres within proximity to the site. To ensure the policy is effective, it is suggested that the following criterion as outlined below and criterion 1) revised to remove reference to healthcare.  ‘Financial contributions towards the Sinfin Health Centre or other local healthcare facilities within proximity to the site in accordance with the advice of the ICB’. ii) Contributions towards primary and secondary education, schools and facilities commensurate with the scale of the development, in accordance with INF1, INF12, and the Planning Obligations SPD. This will include; a) The provision within the of site of a two from entry primary school with nursery, with sufficient land for future expansion; and b) A new secondary school in the eastern part of the site; Our clients seek clarification regarding who the Council intends to construct the school(s). If it is the intention for the County/ a third party to construct the school(s), the policy should be reworded to make clear that the land will be provided for the provision of a school(s) ensuring the policy is clear and unambiguous. The land for future expansion would need to be evidenced and justified in order to be Reg 122 CIL compliant.  Land for a secondary school was identified within Infinity Garden Village as part of Policy INF12 of the Local Plan Part 2. This land was identified for early delivery to meet both the needs of Infinity Garden Village and the wider needs associated with other housing growth on the southern fringe of Derby and the surrounding area. Policy AC18: Wragley Way outlines that “secondary school needs are met through the extension of existing facilities and/or the provision of a new secondary school.” In addition, the Infinity Garden Village Development Framework Document (June 2020) also outlines at paragraph 3.3.9 that “The proposed secondary school on the Lowes Farm site will be delivered by the County Education Authority, funded in part by contributions from various residential development proposals in and around Derby – including housing development within IGV.” Given that the provision of a secondary school is an allocation within the Local Plan Part 2 and details relating to its funding are defined within the Infinity Development Framework Document, it is considered that criterion b) should detail that any contributions are proportionate.  C. Green Infrastructure A network of interconnected Green Infrastructure which as a minimum shall include the following. i) The provision of a green infrastructure network, including protection and enhancement of visual linkages from the eastern and western parts of the site; Our clients seek clarity regarding the definition of ‘green infrastructure’ to ensure the policy is clear and unambiguous. It is suggested that the definition within the Infinity Garden Village Development Framework Document is included within the Local Plan, which outlines the following: “Open areas of planted landscaping, comprising pedestrian and cycle routes through public open spaces, woodland planting, children’s play areas and village greens.” Our clients also seek clarity with reference to what is meant by ‘visual linkages’ and what existing ‘visual linkages’ in the site need protection and enhancing. ii) The green infrastructure network should allow active travel connections though and across the site to points of interest and recreation; iii) Built development within the Green Infrastructure locations shall be restricted to that ancillary to and necessary to support green infrastructure (such as grounds maintenance huts, small changing rooms etc); Following our clients request for clarity in regard to criterion C (i) above, but it is suggested that parking provision should be added to the list of examples set out above to avoid misinterpretation of the policy during the planning application process. iv) The continuation of the green wedges from Derby City; Upon reviewing the evidence base, a Green Wedge Review does not appear to have been undertaken. There are also no Green Wedges identified on the Proposals Map. Green Wedges are defined within the Infinity Garden Village Development Framework Document as “Areas of predominantly open land that penetrate the City from the surrounding countryside, providing separation between different neighbourhoods and land uses.” It is considered that the existing Green Wedges in the administrative boundary of Derby City will still provide the necessary separation between Sinfin/Shelton Lock/Chellaston and Infinity Garden Village. The proposals at Infinity Garden Village will provide integral blue and green infrastructure links to the Green Wedge but it is considered an additional policy requirement to continue the Green Wedges into the site is not justified.  D. Mitigation i) On site biodiversity net gain in line with national legislation and protection and management of key biodiversity assets such as trees and hedgerows; New Biodiversity Net Gain (BNG) legislation contained in the Environment Act 2021 (schedule 7A) was introduced in February 2024. The aim of the legislation is for all planning permissions granted in England to deliver at least 10% BNG. This criterion is an unnecessary duplication of national legislation and should therefore be removed in accordance with the NPPF. Further, the BNG legislation allows for BNG provision offsite and therefore the requirement to only deliver BNG onsite is not justified. With regard to key biodiversity assets, the wording of the policy is unclear. Not all trees and hedgerows will be key biodiversity assets, and the wording should be amended to facilitate the removal of low value trees and hedgerows where necessary and to facilitate sustainable development. ii) Appropriate flood risk management in accordance with policy SD2 across the site and ensure that all more vulnerable development is located wholly within flood zone 1; iii) SUDS will be provided in accordance with Policy SD3; Criteria ii and iii are duplications of the requirements of Policies SD2 and SD3 and should therefore be removed, in accordance with the NPPF. iv) A layout and form of development that respects the landscape character, as well as the character significance and setting of heritage assets; Our clients are unaware of any heritage assets on site and seek clarity regarding the specific heritage assets this criterion seeks to protect. v) A layout and form that reduces the impact of gas pipeline protected areas; with the siting of residential development; Our clients confirm that the HSE’s land use methodology guidance will be followed at the master-planning stage to ensure development is located a sufficient distance away from any gas pipeline protected areas. It is not considered that there is an impact to be reduced in this regard and the policy wording is therefore unclear. vi) Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of more sustainable transport modes; in accordance with policy F2;  vii) Ensure that the development is well connected to frequent public transport to Derby centre as well other key designation and that the bus stops and routes are provided through the site to allow for convenient boarding;  The wording of criterion D (vii) should be amended to ensure flexibility is retained to respond to technological advancements over the plan period. On demand bus services are becoming more popular and therefore the criterion should be refined to refer to bus routes and services as opposed to bus stops.  viii) High quality continuous pedestrian and cycle routes shall be provided between the site and villages to the south of the A50 and development within Derby City and within and across the site, to key centres including employment and education facilities providing segregated links where practical. This should include enhancement of key cycle routes through the site;  The requirement to provide ‘continuous’ pedestrian and cycle routes to ‘villages to the south of the A50’ is not justified or reasonable, and it is likely not to be practical or viable to accommodate such ‘continuous’ links and therefore requests this criterion is amended so that Active Travel links will be provided within the site and existing Active Travel links enhanced where appropriate.  E. No dwelling/ phase of development shall be occupied until: i) The necessary Green Infrastructure including open space, active travel provision, connectivity, community facilities including education and health provision, public transport provision, hard infrastructure including access points and highway improvements where required is provided to service that dwelling/ phase. This is to enable new residents to access the full suite of services and facilities to support the delivery of housing in a safe and convenient manner without relying on the private car.  This criterion is not appropriate for a strategic policy where the purpose is to set out a high-level strategy in accordance with the NPPF (paragraphs 20 – 23). The evidence base does not include a Viability Assessment that assesses the potential impact such a requirement could have upon the viability of the scheme and is unjustified as a result. In addition to potentially impacting viability, our clients consider this will impact delivery of the strategic allocation and ultimately the delivery of the Local Plan as a whole.  It is suggested this criterion is amended to request the submission and agreement of a phasing plan which will ensure key infrastructure is delivered in a timely manner.  F. The development shall be provided in broad conformity with the plan below which shall be informed by a Design Review process reflecting the status of the site as a garden village which will also evaluate how the site can accommodate need for self-build plots, supported living accommodation (use class c3) housing with care (use class C3) and care beds (use class C2). This will contribute to a future update of the development framework document.  The wording of this criterion regarding the Design Review process should be refined. The Design Review process is not there to provide feedback on principles/uses to be accommodated. The purpose of the Design Review process is to advise on design only and any reference within the policy should ensure this is clear. An update to the Development Framework Document is unnecessary and is likely to delay the planning application process. A Design Review process and the submission and agreement of a Design Code are appropriate measures.  2.29. In relation to the proposals map, for clarity, it should be made explicit that the purple dotted line relates to Policy STRA1 only.  2.30. The Planning Practice Guidance (PPG) (Paragraph: 002 Reference ID: 10-002-20190509) outlines that “The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.”  2.31. Taking note of the PPG, our clients support the allocation of Infinity Garden Village, but it is suggested that the policy requirements are refined once further evidence has been undertaken to justify the relevant requirements and then a Viability Assessment undertaken which particularly evaluates the policy requirements of the strategic allocations so that these sites and the Local Plan as a whole are deliverable. The requirement for significant infrastructure provision including financial and land contributions that, when combined, could risk rendering the sites and Local Plan to be undeliverable.  3. Conclusion 3.1. Our clients are supportive of the allocation of the Site which provides the opportunity to bring forward a unique mixed used sustainable community with a plethora of benefits that will support the delivery of: • Up to 2,000 new homes (including affordable homes) of varying tenures and sizes to respond to local need and demand, • Up to 47ha of employment land, • Critical contributions to the provision of a new South Derby Integrated Transport Link and A50 Link Road, • A 2 Form Entry Primary School, • A Local Centre with community and retail facilities and services, • A range of green and blue infrastructure improvements including community orchards/allotments and play areas for all ages, • Excellent walking and cycling routes into the city, and, • Public transport links including frequent bus links connecting to other employment areas including the city centre and Infinity Park.  3.2. That being said, the policy obligations associated with the strategic allocation require careful consideration in respect to the deliverability and viability of the site and indeed the Local Plan as a whole. A delicate balance is required to ensure our clients and other developers are able to deliver new homes, services, facilities and infrastructure whilst the Council deliver the required quantum of accommodation and other requirements.  3.3. These representations have set out how a pragmatic approach to policies and their requirements could result in the successful and timely delivery of new homes across the district with our clients’ site making a significant contribution to the district’s housing needs and supporting the Council’s Vision.  3.4. Our clients are committed to working with the Council as the Local Plan progresses and are willing to meet with representatives of the Council to discuss the content of these representations. | The quantum of new homes to be provided will be better understood following the design review which will be used to inform any changes to the policy.  The plan will be subject to a viability study, which will include consideration of requirements for older peoples living accommodation. The Local Plan Part 1 review is concerned with strategic scale development. Specific sites for accommodation for people with disabilities and older people would be expected be non-strategic in scale and can thus be considered as part of a review of the policies of the Local Plan Part 2.  The policy requirement in regard to the provision of a retirement village will be considered as part of the design review and plan-wide viability study.  In terms of part iv of the Policy it is not considered that the policy requirements need to be removed.  See Council response to Question 9, Chapter 6: Housing, Policy H22.  In regard to access arrangements a Transport Study is being prepared which will identify that potential transport impacts of development and any mitigation that may be required. This will help to inform any necessary changes to policy requirements.  The design review a plan viability study will assist in clarifying policy requirements in regard to retail provision.  Green wedges are intended to extend from the Derby urban area into the open countryside. For this to be achieved within Infinity Garden Village provision will need to be made to extend Derby’s green wedges through any new development. The design review will assist in identifying how this should be achieved.  The design review will assist In regard to the identifying and protecting visual linkages.  In regard to protection of biodiversity assets, Part D (i) of the policy refers to ‘key’ assets, thus indicating that the policy does not necessarily refer to all trees and hedgerows within the site. The design review will assist in this regard.  The inclusion of the reference to SD2 and SD3 within the policy is simply intended to assist the reader in navigating the Local Plan and it is not intended to change the policy in this regard.  The presence of heritage assets within the vicinity of the site will be considered as part of the design review, the findings of which will inform any necessary changes to the policy.  In regard to part D(v) it is agreed that the policy can be reworded for clarification, as follows:  “v) A layout and form that reduces *~~the~~ any* impact of gas pipeline protected areas; with the siting of residential development;”  It is considered that in order to maximise accessibility to and from the site by sustainable means a strategic scale development of the type proposed should be well served by regular public transport services and ought to provide sufficient critical mass, in terms of potential patronage, to achieve this. It is therefore not proposed to change the policy in this regard.  It is not proposed to change Part B(i) in regard to healthcare provision or B(ii) as the current wording is considered to provide sufficient flexibility. The viability study will take account of such provision and any policy changes can be made as necessary.  In regard to part (viii) of the policy the Council’s Cycle Network Supplementary Planning Document identifies the Key and Local cycle networks for the district. The Council wishes to ensure that new development contributes to the delivery of this network through both on and off site provision, where appropriate. In regard to STRA1, the Council would like to see the delivery of Local Cycle Network connections to existing and proposed links within the Key Cycle Network and to Derby’s existing and proposed cycle network to provide sustainable access to recreational routes in the countryside and to employment, shopping, education, leisure, health and other facilities. The policy wording can accordingly be changed.  The viability and transport studies will help to inform any necessary changes to the policy in regard to the phasing of the development.  In regard to Part F, the design review will advise on how the various uses sought within the development can be most suitably accommodated. Any need to make changes to the Development Framework Document will be informed by the findings of the design review. It is not therefore proposed to change the wording.  The Proposals Map can be amended to make clear that the policy relates to the STRA1 allocation only.  It is confirmed that the term green infrastructure will include children’s play areas, but not car parking facilities. These matters can be given further consideration through the design review and any changes to policy wording made as necessary.  It is not intended to change the reference to part D(i) concerning Biodiversity Net Gain. This matter can be considered in association with the design review and any changes to policy wording made as necessary.  It is not intended that the reference to SUDS should be removed from the policy, which is simply intended to assist the reader in understanding the diverse range of matters to be taken into consideration. |
| 1248316 | Heatons on behalf of Tarmac Trading | Heatons on behalf of Tarmac Trading |  | In terms of the proposed allocations, we are pleased to see a good buffer between the Infinity Garden Village Allocation (STRA1) and the Swarkstone Quarry allocation, permitted reserves and expansion areas. We would like to reiterate here that the proposed housing allocation, should not be permitted to expand any further south than as set out at present, due to the potential implications on mineral extraction. |  |
| **Members of the public** | | | | | |
| 1241890 | Edward Stupple |  |  | Have not studied this part of the Plan in detail STRA 1 but generally appears to create good employment opportunities | Noted.  At submission the local plan will be supported by an updated Infrastructure Delivery Plan, which (in consultation with service providers) assesses and identifies the infrastructure needed for new development and considers how this will be delivered. Furthermore, Strategic allocations on the edge of Derby will provide the critical mass of development needed to deliver essential infrastructure, such as a new local centre.  In addition Part E of Policy STRA1 requires that no dwelling/phase of dwelling shall be occupied until *“The necessary green infrastructure including open space, active travel provision, connectivity, community facilities including education and health provision, public transport provision, hard infrastructure including access points and highway improvements where required is provided to service that dwelling/phase..”*  The District Council will be undertaking Transport Modelling which will look at the impact of the proposed allocations and any necessary mitigation. This will be in consultation with National Highways.  In terms of public transport provision, Policy STRA1 D vii) seeks to ensure that development is well connected to frequent public transport to Derby City and well as other key designation and that bus stops and routes are provided through the site to allow for convenient boarding. Part E of policy STRA1 (mentioned above) also relates to public transport provision.  Policy STRA1 criteria C seeks to provide a network of interconnect Green Infrastructure and includes a list of the minimum the site shall provide. In addition, the allocation will be expected to provide on-site biodiversity get gain in line with national legalisation and protect and manage key biodiversity assets such as trees and hedgerows (criteria D i of policy STRA1).  In terms of the type and tenure of new dwellings within the District, Policy H21 affordable housing seeks to secure up to 40% affordable housing on sites over 10 dwellings and Policy H20, sets out that housing and mixed-use development should comprise a range of dwelling types broadly apportioned to the table within the Policy.  In terms of site density, the Council has a Design SDP which makes use of appropriate densities, this can include high densities on appropriate sites. In addition, the Council is undertaking a design review process for the new strategic allocations which will explore appropriate densities of strategic allocations.  Regarding flooding, the District Council will be undertaking a Flood Risk Assessment which will form part of the evidence base for the Local Plan. In addition, policy STRA1 requires that appropriate flood risk management in accordance with policy SD2 across the site is provided and that all more vulnerable development is located wholly within flood zone 1.  Part L of the Building Regulations set out requirements for energy efficient standards of new and existing buildings and Part O (Overheating) cover the overheating mitigation requirements for new residential dwellings. The Local Plan Part 1 Review will not repeat the requirements set out in Building Regulations nor go beyond those. However, Policy SD3 does support “developers in bringing forward more sustainable homes and commercial properties by supporting the Government’s drive towards improved housing standards… where specific justification exists for seeking higher standards locally than set out in Building Regulations.”  The designation of public open space as common land and cycle tracks and footpaths being dedication as Public Rights of Ways, is outside of the scope of the Local Plan. However, it should be noted that details of the management of Open Space will be clause within any Section 106 Agreement relating to the development of STRA1.  Policy INF2 E (v) addresses provision for electric vehicle charging.  The alteration of Parish Boundaries is outside of the Local Plan Process.  None of the proposed strategic allocations (STRA1, STRA2, STRA3) are on Green Belt land. |
| 1241896 | Margaret Holmes |  |  | I cannot comment |
| 1242574 | Christian Murray-Leslie |  |  | Need more low cost housing at a great density. |
| 1243552 | Jim Froggatt |  |  | This would be a yes if they were to be enforced. With regard to D (vi) and (vii) and E(i), experience at sites currently being developed does not give any confidence that travel plans will be effective or that public transport will be available at an early date. See Q9 for H13, 18 and 19. In the case of H12, Highfields, buses only began to run through the development from 11 November this year (2024) and this is only an hourly link to Littleover and the Royal Hospital. It remains necessary to walk to Rykneld Road or Heatherton to catch a direct bus to Derby city centre. I understand that a bus service to H14, Chellaston Fields, is only now being finalised, despite the comment that the site has been developed. |
| 1232861 | Jack O’Connor |  | No |  |
| 1232863 | Lauren Ryan |  | No |  |
| 1232876 | Claire Woodward |  | No | Village locations should be protected not engulfed by huge housing developments |
| 1232904 | Holly Robinson |  | No |  |
| 1232906 | Steve Wilson |  | No | Just build them where the people who voted you in want them, familys want to live near their family. |
| 1232937 | Margery Morgan |  | No | Don't know enough about it. |
| 1232938 | Martin Turner |  | No | Poor link up with current services - schools, GPs, public transport etc |
| 1232962 | Chris Munn |  | No |  |
| 1232988 | Leigh Fearon |  | No | Needs to be built within first quarter of any build, no questions asked or affected by funds put to one side for this. Generally it’s felt these figures are misleading and often not used. These also have to stop being carbon copies on each new development to provide character and value. |
| 1233131 | Mariah Senaa |  | No | I do not agree with the policy requirements, extent of the site, facilities, and infrastructure proposed at STRA1: Infinity Garden Village. While the development aims to bring housing and employment opportunities, the scale of the proposal raises significant concerns about its impact on local infrastructure, such as roads, schools, and healthcare services. There is a lack of clarity on how these essential services will be adequately expanded to meet the needs of the additional population without placing undue strain on the existing community. Furthermore, the proposed extent of the site risks overdeveloping the area, potentially leading to environmental degradation, increased traffic, and a loss of green spaces, which are vital for the quality of life for both current and future residents. The policy should focus more on sustainable growth that balances development with the preservation of local character and environmental health. |
| 1233241 | Russell Licence |  | No | I have responded yes to former drake low. This is an example of a site riff for redevelopment.  Infinity village and Mickleover are pure greenfield sites. You cannot make more land so cherish it and stop developing on virgin soils.  As stated previous, farm land is sparse, farming needs to be encouraged in the UK, we need to be more sustainable. Building in greenfield must be a negative impact against carbon neutral targets.  The road and public transport infrastructure cannot cope now  Roads are in a terrible state now  There are not enough school places for Children now  You cannot get a doctors appointment now |
| 1233334 | Harvey Heldreich |  | No | I don't think the infrastructure propasal will cover the needs of the size of the development. |
| 1233743 | Matt Hunt |  | No | Because none of the proposed facilities will ever be built due to backhanders! |
| 1233824 | AYeomans |  | No | Unsustainable development area |
| 1234532 | Michelle Garnham |  | No | No view |
| 1235279 | Gerald Arthur Bowker |  | No | I believe this site is a green belt site and as such I don't believe any development would be suitable. This proposal is not sustainable or appropriate when there is land available elsewhere in South Derbyshire. |
| 1235357 | Lorna Hodgetts |  | No |  |
| 1235411 | Andrew Norman |  | No | Although I have answered No, I do not have sufficient knowledge to comment further. |
| 1235713 | Rob M |  | No | For biodiversity, environmental reasons and others I am against building housing developments on arable land or land which could be used for agriculture. All projections point to food security being increasingly threatened in future, so building on land like this is clearly rash. |
| 1236005 | Richard Larder |  | No | Inadequate infrastructure resources. |
| 1238657 | Clare Wood |  | No | The housing is much the same as the housing that is being built in Mickleover and all around England. These estates are high density concrete jungles with very little consideration given to substantial green spaces and for wildlife habitats. Where nature, green spaces and mitigation have been considered, they are token gestures and tick-box exercises. Wildlife is never prioritised, nor are people. The estates are soulless, and the housing is crammed together with very little space between each home and tiny, postage stamp gardens. It is quantity over quality because the developers want to cram in as much housing as they can to maximise their profits, rather than really and truly considering wildlife, the environment and the quality of lives of the people who will live there. |
| 1240207 | Kevan Sutherns |  | No | STRA1 this is a buffer for the people living between Chellaston, Stenson Fields and the A50, the A50 at this point ( in fact from the M1 to Stoke ) is inadequate for the amount of traffic it carries now and in the future this will only get worse. The inhabitants need the buffer space but not only that anyone moving into the area while causing the loss of this will effectively make the present and projected situations regarding noise traffic etc worse by their own efforts of living there plus they will be adjacent to the road. It is also agricultural land which we need to be around all built up areas, it provides a cushion from being surrounded when people can travel a short way to just pass through some countryside. 2000 houses will be a big impact on this area and the current road infrastructure will be even more overloaded. |
| 1240863 | Amardeep Bhopal |  | No |  |
| 1241682 | Sue Glover |  | No | As above  Question 4 response: Not required in this area. |
| 1241773 | Joanna Ayres |  | No | I think 2000 additional dwellings is too much development for this area, putting too much pressure on the existing infrastructure and causing too much countryside to be lost. |
| 1241860 | Innes Mary |  | No | As previously stated |
| 1241910 | Nigel Bentley |  | No | Nope….. as stated previously, SDDC are seeking to maximise revenue streams whilst ensuring minimal costs for ongoing infrastructure provision and maintenance. |
| 1241947 | Sarah Glover |  | No |  |
| 1241973 | Graham Keith Sanders |  | No | Infrastructure (Doctors,Shops,Schools,Roads,Utilities) will not cope ! Councils inability to fulfill obligations (Refuse,Drains,Paths,Roads,Trees,Grass cutting) |
| 1241985 | Shirley Jackson |  | No |  |
| 1241987 | Patrick Munro |  | No | You don't need any more answers from me. I'm fairly certain my views are quite clear. We've had enough development of the nature we've had over the last 10 years. If you want to develop round Derby, do it properly. Build the schools , shops, facilities, parks, improve the roads. |
| 1241989 | R Coxon |  | No |  |
| 1241995 | Donna Shacklock |  | No |  |
| 1242108 | Chris Wilson |  | No | Far too close to major trunk roads. This would cause massive safety issues for traffic and residents. Rykneld Road and the surrounding area is always jammed now due to the massive building programme near the A38. If there is an accident on the A38 Mickleover becomes gridlocked now. The idea of adding more houses, cars is abhorrent. Does anyone have any common sense in the `planning Department? |
| 1242116 | Jonathan Nutman |  | No | Littler detail given so unable to be convinced of plans |
| 1242119 | George Selby |  | No |  |
| 1242130 | Samantha Furniss |  | No |  |
| 1242138 | Tiran Sahota |  | No | The extent of the site proposed is far too big. The current services at Sinfin District Centre are already massively overstretched - there aren't enough doctors appointments available and people have to wait days/weeks to book an appointment to see a doctor. There is currently a four year waiting list to see an NHS dentist at Sinfin surgery. To build more homes in the area would make this situation even worse and this would be unfair on all residents in this area! This surgery doesn't get any investment - all resources go to the Hollybrook Medical Centre in Littleover, Derby so residents who live in the Sinfin surgery catchment area lose out! Since the Newton Village development was built, there have been other developments in this area and they have added to the demand on the current services.  Even if more infrastructure and services were developed within Infinity Garden Village, it would be a massive change for the surrounding suburbs and villages to have this massive new development nearby. The volume of traffic in the area would massively increase - it's already very congested at busy times. The traffic situation will be made significantly worse with more vehicles on the road in this area. This will also lead to increased pollution which in turn will have a detrimental impact on people's health. What about the impact on the environment? We are always being told to be more environmentally friendly, but concreting over the countryside completely contradicts this. What about the wildlife in this area? Building over these fields will completely destroy habitats. I live very close to this area and during periods of heavy rain I have seen these fields flood - will building on this land lead to more homes being flooded in the area? If there isn't anymore land to absorb the water, will enough be done to prevent flooding in the future? Will any homes built on these fields be covered by insurance if they do flood in the future? We've seen floods in Willington near a new housing development which was built on a floodplain - can you guarantee that residents here won't experience the same? |
| 1242325 | Tracy and Gordon Harrison |  | No | This seems to me at least, an encroachment onto greenfield without a clear plan on brownfield redevelopment. I’ve noted two examples of 25 year old plus brownfield sites that need development now. |
| 1232857 | Teri Licence |  | Yes |  |
| 1232909 | Stuart Orr |  | Yes |  |
| 1232922 | Maureen Shenton |  | Yes | The site is suitable for development and is not already overdeveloped |
| 1232946 | Rosemary Whitehouse |  | Yes |  |
| 1233332 | Ameila Hunt |  | Yes |  |
| 1233359 | Sukhdev Bangar |  | Yes | Suitable strategic location |
| 1234080 | Nick Pope |  | Yes | Takes risk away from Mickleover |
| 1235132 | Frazer Murphy |  | Yes | I agree with this due to reason outlined in my first response, Mickleover can’t contain the increase |
| 1235316 | Geoff Lewins |  | Yes |  |
| 1236474 | Alan Dixon |  | Yes |  |
| 1238115 | Fiona Bevington |  | Yes | For the most part, facilities have been planned. |
| 1238942 | Mr Brian J Harrison |  | Yes | Because the development should be away from Mickleover. |
| 1239219 | Anne Heathcote |  | Yes | Subject to the change of parish boundary / creation of the Infinity Garden Village parish. The advent of the new A50 junction at the IGV will create a significant risk for traffic heading south. It will encourage increased, and inappropriate sized vehicles to use this lane (Deepdale Lane) alongside the canal with the 90º bend over the canal at Bridge 16. We already experience massive problems of bridge and road damage, and accidents. |
| 1240150 | Ian Turner | - | Yes |  |
| 1240252 | Ian McHugh |  | Yes | STRA1 (Yes) is a well developed plan, with Central Government Infinity approval close to existing employment and with key infrastructure improvements (A50 junction, Secondary School, South Derby Integrated Transport Link, Retail and Medical etc) |
| 1241240 | Jonathan Watson |  | Yes |  |
| 1241473 | Amy Simes |  | Yes |  |
| 1241686 | John Moore | John Moore | Yes | Well balanced plan; will bring quality housing and additional social facilities into an area with existing high quality employment and potential for more. |
| 1241955 | David Stockwell |  | Yes |  |
| 1241956 | Andrew Lee |  | Yes |  |
| 1241975 | Paul Hopkin |  | Yes | Its in an appropriate location |
| 1241986 | Andrea Thompson |  | Yes | Better access onto the A50 |
| 1241993 | Alan Mercer Jones |  | Yes |  |
| 1242052 | Susan Marshall |  | Yes | The plan needs to be clear on what type of residential development is intended. Different types of housing, including social housing should be properly integrated into the site and not segregated. Also in line with the Climate Emergency, new housing should include a very high standard of insulation, solar panels, heat pumps (or at least be heat pump ready) and EV charging points. Higher housing density and good architectural and landscape design are important. Public open spaces should be designated as Common Land and all cycle tracks and footpaths should be dedicated as Public Rights of Way. The Infinity Garden Village development should not extend south of the A50. |
| 1242135 | Matt Coxon |  | Yes | This site is not as imposing when compared to the impact of 2 and 3. |
| 1243592 | Christine Allen |  | Yes | Yes, with regard to facilities, but no to extent of sites and infrastructure at STRA1. |
| 1243600 | Geoffrey Tubey |  | Yes | But maintain balance between housing and employment. Make sure infrastructure happens. |

# Qu. 7: Irrespective of your answer to Question 5, do you agree with the policy requirements, extent of the site, facilities and infrastructure proposed at STRA2: Land south of Mickleover?

|  |  |
| --- | --- |
| Qu. Duty to Cooperate Body / Statutory Consultee |  |
| National Organisation |  |
| Regional Organisation |  |
| Parish Council and other Community Group |  |
| Councillor |  |
| Landowner or Developer |  |
| Members of the public |  |

| **Response Id** | **Name** | **Organisation** | **Do you agree with the policy requirements, extent of the site, facilities and infrastructure proposed at STRA 2: Land South of Mickleover?** | **Comment** | **Council Response** |
| --- | --- | --- | --- | --- | --- |
| **Duty to Cooperate Body / Statutory Consultee** | | | | | |
| 1242629 | Derby City Council | Derby City Council |  | Notwithstanding this overall view, we would make the following specific comments on the proposed strategic housing allocations at Mickleover and Chellaston:  Proposed Strategic Housing Allocation - Land South of Mickleover  The proposed allocation in this location abuts the city boundary west of The Hollow and it is important that we understand how any cross-boundary development and connectivity will work. There is development pressure within the city in this location and ideally this cross-boundary location should be master planned in a coordinated manner. This includes consideration of how the city’s Green Wedges extend and flow out into South Derbyshire in this location as well as walking/cycling and GI links work across the city/district boundary.  The Council strongly supports the plans in requiring community facilities and a local centre on the site but we stress that these will need be of a size and nature to support the whole strategic development, again considered and delivered within a longer term vision context, in particular providing an anchor retail store. The policy requirements for on-site community and retail facilities should be in the context of a clear understanding of pressure on existing facilities in the city, particularly at Mickleover District Centre. The development should be self-sustaining in terms of these types of critical infrastructure and the infrastructure should be delivered at the appropriate time. We welcome opportunities to work with your officers on these matters.  We support the concept of allocating land for business uses on site to provide access to sustainable jobs and to provide a mixed-use community. A small secondary school, or site provision for future coordinated growth should be a policy aspiration.  We would raise a query/concern about whether all of the 2,500 dwellings which are identified for the site can be delivered by 2039. If this is not the case then it would further affect the ability of Derby City’s unmet housing need being met within the Plan period.  With the exception of a small parcel off Rykneld Road, the proposed housing allocation is entirely located west of the A38, and south of the A516 with access solely proposed off Staker Lane. In its present form, Staker Lane is already prone to flooding with an unattractive alignment, especially for non-motorised users.  As such, routes to the north to access the A516, and Mickleover will remain attractive to future residents and therefore, if this is the case, it is expected that this allocation will need to provide mitigation as a minimum at the Brierfield Way/The Hollow junction, and the Mickleover Court Hotel roundabout.  As an alternative it is strongly suggested that the retained Staker Lane is downgraded, with a new internal access route, provided for such through traffic. Further, that a route between the A38 and A516 is fundamental to allow access for public transport and provides car borne trips with an optimized route choice, which avoids the congested Mickleover District Centre and surrounding residential streets. The link will provide part of a longer term strategy to connect the emerging HMA housing sites on the west of Derby. This connection will not just be important for motorised vehicles, but it will provide the cycle and pedestrian connections to integrate the urban extensions.  It is here that we should reference the support for the provision of SDITL from Infinity Garden Village through this site and onwards round to access the Brun Lane site in Amber Valley. Perhaps AVBC should at this optimum time (as part of this draft consultation) be pushing for SDDC to allocate housing in the gap in this plan so it will be a true cross boundary housing site between B5020 and A52.  Such coordinated long term strategic provision, joined up planning, is essential to movement and growth, but needs our joint HMA ‘planning without boundaries’ agreement.  The housing allocation is part of a wider masterplan and there needs to be a policy to ensure that a minimum level of public transport service is provided from the outset to create opportunities for modal shift. In particular, early consultation with the County Council and bus operators needs to be undertaken to make sure that there are deliverable public transport options.  In a similar vein, it will be important to improve upon existing facilities for pedestrians and cyclists, which are considered unattractive at present e.g. Staker Lane, Rykneld Road | Noted.  A Design Review for the strategic sites is being undertaken which will include consideration of cross-boundary infrastructure provision (including green infrastructure and the extension of the city’s Green Wedges) and design parameters to ensure that the sites will be developed in a sustainable manner with all relevant cross boundary matters given appropriate consideration. This will involve relevant stakeholders, including Derby City Council.  The Council agrees that the full allocation of homes is not likely to be delivered within the plan period and will include a trajectory detailing the expected delivery.  A Transport Study is to be jointly commissioned by Derby City Council and South Derbyshire District Council to consider transport impacts and mitigation for the strategic sites, including measures to encourage sustainable travel. Integration with Derby City transport infrastructure and services will be a key consideration. |
| 1243623 | Derbyshire County Council | Derbyshire County Council |  | The proposed strategic allocation on land South of Mickleover for 2,500 homes also has significant implications for the need for strategic scale infrastructure that is the responsibility of Derbyshire County Council. The infrastructure needs associated with the site are set out in Policy STRA2 and the associated indicative masterplan.  Highways impacts and need for new highway infrastructure are a key consideration for the County Council on this site as the policy and indicative masterplan indicate the need for the site to be served by a primary new access directly off the A38. The potential highways impacts of the proposed allocation site are also complicated by the proposed A38 Derby Junctions Scheme to the north of the site, which proposes the grade separation of the three main junctions on the A38 through Derby that includes Kingsway junction, Markeaton Junction and Little Eaton Junction.  With regard to the A38 Derby Junctions Scheme, a Development Consent Order (DCO) was previously granted for the scheme by the Secretary of State for Transport in January 2021 but was then subject to a successful legal challenge in the High Court and the DCO was subsequently quashed. Although the DCO was re-submitted by National Highways to the Secretary of State and was subsequently re-granted in August 2023, the decision was then subject to further legal challenge, which has recently also been dismissed in the Court of Appeal.  The A38 Derby Junctions Scheme has very important implications for the delivery of future planned growth across the HMA, particularly within or close to the A38 corridor. Growth in the Adopted Derby City and South Derbyshire Local Plans was very much predicated on the A38 Derby Junctions Scheme being implemented.  The implementation of the A38 Derby Junctions Scheme has important implications for the delivery of the land south of Mickleover strategic housing allocation for 2,500 homes. Further and ongoing collaboration between National Highways, the City and County Highway Authorities and the four HMA planning authorities, will be important to consider the implications of the strategic allocation on the A38 and wider area, particularly when the timescales for implementation and completion of the scheme are confirmed, which could have implications for phasing of the delivery of the allocation.  The proposed strategic allocation will also raise significant implications for the County Council (and Derby City Council) for the need for both primary school and secondary school provision to accommodate the new pupils that will be generated from 2,500 new homes being provided on the site. In this respect, it is welcomed and supported that the policy and associated master plan for the site indicates the need for the delivery of a three-form entry primary school (with nursery) on the site and financial contributions towards secondary education. Given the proximity of the site to Derby City Council’s administrative area, it will be important for South Derbyshire District Council, Derbyshire County Council and Derby City Council to work collaboratively to ensure that the primary and secondary school place provision needs of the site are delivered in a timely and coordinated way. The County Council would welcome the opportunity to be involved in discussions about the masterplan in due course.  From a sustainable travel point of view the additional text is suggested in italics below:  Policy STRA2: Land South of Mickleover C Green Infrastructure (ii) As for STRA1 above, ie: The green infrastructure network should allow active travel connections though and across the site to local destinations*, including schools, shops, local services and employment centres* in addition to points of interest and recreation;  (iv) High quality continuous segregated pedestrian and cycle routes shall be provided within the site and links between the site and Burnaston village, and development within Derby City. *This should include enhancement of key cycle routes through the site, with due regard to the Derbyshire Key Cycle Network (KCN) and Local Cycle Network (LCN) routes where appropriate.*  D Mitigation (vi) & (vii). As for STRA1 above.  Site requirements From an Adult Social Care and Health point of view there is support for the potential provision of a retirement village at both the Infinity Garden Village and South of Mickelover developments. The County Council would encourage either housing with support or housing with care provision and would ideally like to see a combination of both, with a mix of market and affordable options.  The County Council broadly agrees with the outlined need for housing for older people in Policy H20 and feel that retirement villages provide an excellent opportunity for either housing with support or housing with care. As Derby City’s capacity will also need to be partly met by South Derbyshire, there is a potentially greater need for housing for older people than indicated.  Plans for the above developments indicate the presence of a local centre; the Adult Social Care and Health team would like to see any housing with care or support development close to this centre, potentially in combination with community facilities such as health centres, libraries or café / restaurant offerings, thus promoting integration with the wider community.  Currently, there is little in the way of provision (housing with support, housing with care, residential or nursing care) in the vicinity of the proposed strategic developments, so the County Council considers these would be ideal locations of older people’s accommodation.  Equally the Council considers that the strategic developments of 2046 dwellings at Drakelow Park and 1944 dwellings at Wragley Way would also be suitable for the development of older people’s accommodation | Noted/ Agree.  A Transport Study is to be jointly commissioned by Derby City Council and South Derbyshire District Council in consultation with the County Council to consider transport impacts and mitigation for the strategic sites, including measures to encourage sustainable travel. Integration with Derby City transport infrastructure and services will be a key consideration.  South Derbyshire District Council will continue to work collaboratively with National Highways, the City and County Highway Authorities and the four HMA planning authorities, to consider the implications of the strategic allocation on the A38 and wider area.  The proposed additional text will be incorporated into the policy requirements. |
| 1242867 | Natural England | Natural England | Yes | Natural England welcomes paragraph C which sets out the provisions for Green Infrastructure across the site and the requirement for a Country Park. We encourage Green Infrastructure to be designed so that it is connected throughout the site and into the wider locality for the maximum benefit of people and biodiversity. The policy should also consider how the requirements for Biodiversity Net Gain will be achieved on-site at the earliest stages of the masterplan preparation. It should set out the habitats within the site to be protected or enhanced, opportunities for new habitat creation or improvements in connectivity and whether any off-site provision is likely to be necessary. | Noted/Agree.  The Council will include the requirements for how BNG will be achieved on the site. |
| 1243643 | Sport England | Sport England |  | Sport England consider this strategic site allocation policy as currently drafted to be unsound.  The strategic site allocation appears to include playing field land. The 2016 Google aerial imagery shows that this playing field accommodated four rugby union playing pitches and a cricket pitch, together with ancillary facilities. The playing field is in the centre of the strategic site allocation and is accessed via an access road that also serves Mickleover Country Park Football Club and Pastures Golf Club. The playing fields associated with the Mickleover Country Park Football Club and High Grange School, as well as the Pastures Golf Club are outside but adjacent to the strategic site allocation.  All of these sports facilities are afforded protection under paragraph 103 and 193 of the National Planning Policy Framework (NPPF). With regards to paragraph 103 of the NPPF, Sport England are unaware of any information that demonstrates that the playing field to be lost is surplus to requirements in relation to criterion (a) nor are aware of any information that demonstrates that the existing facility will be replaced in relation to criterion (b). Furthermore, if the facility is to be retained, no information has been provided in relation to paragraph 193 of the NPPF that would ensure that the new development would not prejudice its use (e.g. noise, ball strike, etc). This is also the case for the adjacent golf course and playing field associated with the football club and school. As such, the policy, supporting text and diagram should be redrafted and redrawn to provide the necessary clarification and justification with regards to paragraph 103 and 193 of the NPPF.  The occupiers of new residential development would generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. In this regard, new development should contribute towards meeting the demand that it generates through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports/Built Facilities Strategy, Playing Pitch Strategy (PPS) or other relevant needs assessment. Section 8 of the NPPF also advises that any new sports facility needs arising as a result of new development should be met. Therefore, the Council’s emerging Built Facilities Strategy and Playing Pitch Strategy for South Derbyshire should identify any shortfalls in existing sports provision and should identify how an increase in the demand in an area would generate additional/new demand for sports provision. Sport England’s Sports Facility Calculator and the Playing Pitch Calculator should be used to help determine the necessary sporting provision required, which could include the proposed education facilities. This work should inform the emerging planning policy for a development proposal at this site in accordance with paragraph 97 of the NPPF.  Sport England request that the emerging strategic site allocation policy is redrafted and redrawn to take into consideration the above matters. | Noted / Agree.    The Council will ensure that the loss of any playing fields that are not surplus to requirements is mitigated through the appropriate replacement and that new development will not prejudice its use. In addition the Council will ensure that new development will contribute towards meeting the demand it generates through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision will be informed by a robust evidence base such as an up to date Sports/Built Facilities Strategy, Playing Pitch Strategy (PPS) or other relevant needs assessment. |
| 1242409 | National Highways | National Highways |  | STRA 2: Land South of Mickleover  This site has the potential to accommodate 2,500 dwellings and 5-10 hectares of employment development, along with a community and education facility. Vehicular accesses are planned at Staker Lane, off the A38 roundabout (Findern Interchange) and Rykneld Road. To understand the mitigation requirements for the SRN, particularly the Findern Interchange, it would be necessary to first understand the traffic impacts associated with the site through the undertaking of a Transport Assessment. Further, it should be investigated whether this site was included in the development of the A38 Derby Junctions scheme, and if not, assessment to understand the potential impacts and ability for this to be accommodated by the scheme should be carried out.  Pending the outcome of a Transport Assessment, improvements to the A38 Findern Junction may be required and potentially other junctions along the A38 corridor. We welcome that the requirement for off-site mitigation is acknowledged within the policy wording. | Noted.  A Transport Study is to be jointly commissioned by Derby City Council and South Derbyshire District Council in consultation with the County Council to consider transport impacts and mitigation for the strategic sites, including measures to encourage sustainable travel.  South Derbyshire District Council will continue to work collaboratively with National Highways, the City and County Highway Authorities and the four HMA planning authorities, to consider the implications of the strategic allocation on the A38 and wider area. |
| **National Organisation** | | | | | |
| 1243542 | Home Builders Federation (HBF) | Home Builders Federation (HBF) |  | HBF do not comment on individual sites, be we would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. HBF does not comment on individual sites, other than to say the Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full. The soundness of strategic and non-strategic site allocations, whether brownfield or greenfield, will be tested in due course at the Local Plan Examination.  HBF are aware of potential challenges can impact on the timescales for delivery of the largest sites. Ways to address such ongoing risks could include increasing the housing requirement and/or the buffer applied. The Plan should also recognise that the time taken to bring forward larger allocations, and this underlines the need for a range of site types and sizes to ensure a five-year land supply on adoption, and an effective housing land supply over the plan period. | Noted.  Please see Council response to comments on Questions 3 & 4. |
| 1235628 | Simon Richards | British Horse Society | No | The infrastructure is inadequate. Money is required to first address concerns instead of leaving these types of issues to the end of the project.  Response to question 5b  the present state of the infrastructure is inadequate for many more cars leading to increased risks for vulnerable road users. The construction of a new junction off the A50 is particularly troubling as it encourages large volumes of traffic onto country lanes during times of traffic delay on the A50. Staker Lane is an old country lane with no lights or pavement and most of the roads between Infinity Village and Staker Lane are also inadequate.  The Council or developer should be paying to improve road safety around both locations and allowing vulnerable road users to be able to move between both locations. The Active travel scheme can be used to achieve this objective.  So we need more traffic calming measures, segregation of horse riders and cyclists from cars, controls to restrict lorries , better lighting and more pavements. | Noted.  The provision of high quality multi-user routes and green infrastructure requirements through the site are key policy requirements which will be considered further through the Design Review.  Note that the principal access for this site is from the A38 (not A50) and this will be for a new access to the site (rather than onto country lanes) with the intention that this will prevent traffic associated with the new development from needing to use Staker Lane.  A Transport Study is to be jointly commissioned by Derby City Council and South Derbyshire District Council in consultation with the County Council to consider transport impacts and mitigation for the strategic sites, including measures to encourage sustainable travel. |
| **Regional Organisation** | | | | | |
| 1242640 | Derbyshire Association of Local Councils | Derbyshire Association of Local Councils | Yes |  | Noted. |
| **Parish Council and other Community Group** | | | | | |
| 1242563 | Burnaston Parish Council | Burnaston Parish Council | No | Response to question 5b  Burnaston Parish Council wishes to formally object to the South Derbyshire Draft Local Plan Part 1. It objects to the overall approach and methodology used to allocate development land and to Policy STRA2: Land South of Mickleover.  The basis of the parish council objections are as follows:-    TRAFFIC  The principal accesses to the sites are stated to be from  a) Principal site - access to be off the A38 roundabout;  b) East of the A38 - access to be off Rykneld Road;  The parish council is not aware that a traffic impact assessment has been undertaken about the impact and needs of such proposals nor if these access points are the best for the site and for residents, present and future.  The A38 currently has significant daily queues of traffic as people travel into Derby for work and also to the schools along Rykneld Road. The A38 itself being a major road connecting the north and south west, suffers from congestion and delays without the addition of a further point of connection for possibly an extra 10,000+ vehicles movements a day (2500 houses with 2 cars each, making 2 journeys – one to work and one returning home). The road network currently cannot cope – this is recognised by improvement works being scheduled along the A38, and the Local Plan provides no indication as to how the additional volume of traffic will be mitigated.  If successful, the Local Plan would provide additional housing needs for the City, however the employment areas of the City are on the opposite side (Nottingham side), the increase in housing will lead to an increase in traffic crossing the City from their homes to places of employment; the City is already congested and the proposed location of additional homes to service the City will exacerbate this significant problem. In addition, such a large development will increase noise and air pollution for residents from the increase in vehicles; the proposal does not fit with any carbon neutral objectives. It is proposed that housing is allocated to the east of the City, this being closer to employment opportunities which will be a better fit with the travel to work objectives.  Traffic alleviation schemes and travel plans have not been identified, the proposal for the site is to have a major link road with the potential to link to the A516. The link road will create a rat run and the A516 like other routes into Derby, already experiences significant traffic volume and congestion. Cycle routes have been identified but none are safe routes into the employment areas of the City.    ENVIRONMENTAL  On site biodiversity net gain in line with national legislation and protection and management of key biodiversity assets such as trees and hedgerows is on first reading something that could be supported, however the parish council objects to the location as the large housing allocation will result in a loss of agricultural land plus existing habitats for wildlife.  It is well known that biodiversity has generally been devastated nationally over a number of years yet there are already wildlife corridors in place at this proposed site and the existing wildlife will be uprooted and decimated by the development resulting wildlife having to restart from a lower base than it currently is. This restart of nature and wildlife will be difficult as to complete as the total number of houses suggested could take up to 10 years, during which time wildlife will not become established, let alone flourish; the proposal of such a large estate as opposed to organically increasing existing villages, is likely to have a huge detrimental impact upon the environment for more than the decade that building will take place.  It is known that net bio gain can be offset, and there are no guarantees that trees and hedgerows will be protected.      INFRASTRUCTURE  There is a bland statement about provision of appropriate scale community facilities however no context has been provided.    The draft Local Plan makes mention of the delivery of healthcare infrastructure sufficient to meet need, either on site or off site through contributions. These contributions towards healthcare facilities will be commensurate with the scale of the development, and in accordance with INF1 and the Planning Obligations SPD. Healthcare is a vital essential requirement for such a large development, but experience has demonstrated that despite providing funding, the NHS and GP surgeries are not found in the large developments. The parish council supports the need for healthcare to be onsite, to be provided elsewhere would leave the potential large community short of an essential service, would increase travel and traffic movements. Without any firm guarantees/commitments that healthcare facilities are to be provided, the additional large number of residents will place an unmanageable burden upon the existing local GP surgeries which are overstretched by the large developments at Hilton, New House Farm, Hatton and now the new residential 66 bed care home at the former Salt Box Café.    Provision of a local retail centre commensurate with the size of the development to provide for the day to say needs of the development and surrounding area. The parish council enquires if this local retail centre is part of the District Council’s employment provision; if so, then the location of the employment provision is wrong, such a retail centre needs to be more central.    Green Infrastructure. A network of interconnected Green Infrastructure which as a minimum shall include the following:  i)The provision of a wide green buffer around the pastures hospital estate and along the boundary of the A38; greater detail is required.    ii) The provision of a Country Park, to be located within the site to the north, west and in part of the land immediately to the south of the pastures hospital estate and the provision of a Country Park which will aim to achieve Green Flag status.  Further explanation is required from SDDC as to its understanding of what a Country Park is – information sought from the officers at the event held at Mickleover Country Park was vague and officers understanding of what a country park is, was conflicting. Green Flag status in practise equates to having a maintenance plan for a site; whilst it is good to have the site maintained the maintenance of the area is only to be expected and Green Flag status is not necessarily a high standard.  iii) The green infrastructure network should allow active travel connections though and across the site to points of interest and recreation; queries are raised as to what points of interest SDDC is referring to be able to assess if these travel connections are appropriate.  iv) High quality continuous pedestrian and cycle routes shall be provided within the site and links between the site and Burnaston village, and development within Derby City. The proposal is for links between the site and Burnaston Village; there are already public footpaths to link the sites. The parish council is concerned about the proposal for the pedestrian and cycle routes as it is essential to maintaining the character of the village that the buffer between the community of Burnaston village from the large development on the edge of the city is retained. There is currently no obvious link to the village other than via the public footpaths and the creation of pedestrian and cycle routes will lead to the incorporation rather than protection of the village from being subsumed by the expanding estate.  v) Built development within the green infrastructure locations shall be restricted to that ancillary to and necessary to support green infrastructure (such as grounds maintenance huts, small changing rooms etc); the parish council acknowledges green infrastructure is required should the site be allocated.  LOCATION AND WORK WITH DERBY CITY It is stated that SDDC and the developers will work together with Derby City to ensure that development of the site is delivered in a comprehensive manner. The parish council was shocked to learn that SDDC and potential developers have been working together for the last 2 years about the potential for this site with no reference or notice being given to the parish council nor to the community; there is little wonder therefore that the community considers this proposal from SDDC to be a “done deal” when so much discussions have taken place behind closed doors. The parish council also has grave concerns about the level of influence Derby City Council will have over the layout and input of any potential development. The proposed site is within South Derbyshire but is being used to deliver the housing needs for the city; which the parish council understands the city’s need are for rented accommodation and flats; this is different to the needs of the district and the local area which is for family homes and housing suitable for people with limited mobility, eg bungalows. The needs of the city are very different to the needs of the local community and concerns surround as to whether it is the needs of Derby City or the needs of the District Council that will take priority. The housing allocation report from the City Council has, to the parish council’s knowledge, not been made available to cllrs nor made available for public scrutiny; therefore the strategic allocation for the land south of Mickleover is skewed to the needs of the City rather than to the district.  The Strategic Allocation identified as Land South of Mickleover will be expected to deliver the following requirements and be in accordance with other Local Plan Policies including approximately 2500 new homes. This suggested number of homes will be subject to review and change but the principle is one of following a trend of large developments being bolted onto existing settlements, particularly in the north of the district (Hilton, Hatton, New House Farm); organic growth does not appear to be an option that the District Council has considered; if consideration has taken place, the rationale for the creation of large developments has not been explained. The parish council knows the district is one of the fastest growing areas in the country and the speed of growth in this area of the district does not allow for communities to assimilate the large developments that are bolted onto the edge of their communities.  EMPLOYMENT The location of approximately 5-10 ha of employment generating land is tucked away on the edge of the site; it is unclear what the District Council has in mind to be located in this area and therefore the suitability of the location and size cannot be assessed.  EXPLORE THE PROVISION OF A RETIREMENT VILLAGE WITHIN THE SCHEME This suggestion is unacceptable, such a facility would have a significant impact on the facilities and infrastructure of the area; it has the potential to swamp the medical facilities, as identified by the GP comments made relating to the planning application for a residential home at Hatton. The residential home in Hatton was for 66 residents; the creation of a retirement village will have significantly more residents who are likely to have medical needs and without proper medical provisions on site, the provision of a retirement village will add further stress and strains on already overstretched first tier medical provisions in the area and which have been raised above.  TRAVELLER PITCHES in line with Policy H21 The parish council questions the appropriateness of such a site in a large residential area. The draft Local Plan does not make any plans to protect the Green Belt from inappropriate development, the Local Plan does not include any proposals about enforcement being effective, efficient nor how this site will meet inclusivity. The level of demand for such sites has not been identified in the documentation accompanying the draft Local Plan nor how tensions between the various communities will be managed. SDDC has not explained how educational and medical provisions will be allocated to ensure the welfare of travellers when both education and medical provision are already overstretched.  HEALTH CONCERNS The Provision of appropriate scale community facilities as stated in the draft Plan; is a bland statement and no context has been provided.  As mentioned above, the parish council has concerns about adequate healthcare provisions being made available on the site; healthcare is a vital essential requirement for such a large development, but experience has demonstrated that despite providing funding, the NHS and GP surgeries are not found in the large developments. Without any firm guarantees/commitments that healthcare facilities are to be provided, the additional number of residents will place an unmanageable burden upon the existing local GP surgeries which are overstretched by the large developments at Hilton, New House Farm, Hatton and now the new residential 66 bed care home at the former Salt Box Café.  EDUCATION A simple statement is made about the delivery of primary and secondary education sufficient to meet need, either on site or off site through contributions. These contributions towards primary and secondary education, schools and facilities will be commensurate with the scale of the development, and in accordance with INF1 and the Planning Obligations SPD. This will include; a) The provision of a three form entry primary school with nursery; and b) Financial Contributions towards secondary education;  Again, the provision of these educational establishments is a must. Currently primary age children from the New House Farm estate are to be bused to schools in Chelleston; which is unacceptable. Providing contributions to schools which are already large and full is not necessarily in the best interest of the children who attend these schools. Schools and nurseries are sought to be built and ready on completion of the first 100 houses on the site, the current demand for primary and secondary schools from the New House Farm development makes such provision viable. The parish council does not agree that financial contributions towards secondary education is acceptable, a new secondary school would be required for such a large development. This may limit the number of shorter school runs being made; but would likely increase the overall traffic congestion and pollution by bringing people into the area from further afield. Super sized schools will be created by off site contributions.  FLOODING Appropriate flood risk management in accordance with policy SD2 across the site and ensure that all more vulnerable development is located wholly within flood zone 1 and iv) SUDS will be provided in accordance with Policy SD3. The proposed site would require significant attention as this area is known to have surface water flooding issues. During period of heavy rainfall, water flows down from the site to Grassey Lane; these incidents have already been reported to SDDC and are subject to investigations by SDDC. The increase in housing plus the increase in hard standing areas will exacerbate the current problem of surface water flooding. During heavy rainfall, surface water lies on the A38, the A516 and within Burnaston village, the village has been cut off as a result with all the roads in/out of the village being impassable due to flood water; the proposal for such large number of housing grouped into a relatively small area will increase the localised flooding already being experienced. Flood prevention has not been considered as part of the proposal for such large volume of housing in this location.  GENERAL The proposal if adopted, is to meet Derby City Council’s requirements and will accelerate house building in a very small area of the district. This area of the district has seen significant upheaval with the developments at New House Farm and at Hilton. Promises of upgrades to the infrastructure have not come forward. The roads into Derby are already gridlocked and to put further traffic from hosing and employment allocations, will only increase the problems. During construction the upheaval and inconvenience and distress to existing residents will be great; a development of the size proposed is likely to take 10 years to construct; leaving the quality of life for the current residents, blighted.  No evidence has been provided as to what is appropriate sound attenuation/noise mitigation for both dwellings and recreation/ habitats from the A38 and A516.  Mickleover itself currently suffers from significant traffic congestion and from large developments at the top of Station Road, Staker Lane, Haven Baulk Lane and The Hollow have daily tail backs particularly at school drop off, collections and at rush hour and any development around the edge of Mickleover will add to this. No proposal in the draft local Plan is identified to mitigate the congestion let alone to improve the quality of life for existing residents.  The parish council cannot see how the impact of global warming upon the site has been mitigated; the impact of storms and torrential downpours will be significantly increased through the loss of permeable land to absorb rainfall.  The expectations of the site is to cover all requirements of the District Council and much of Derby City Council; these being to meet residential requirements of an aging population through a residential village, to meet the needs of the travelling community via a site, to meet housing needs and employment, but the information as to how these would to be successfully integrated, how they would be achieved, how the quality of life of existing and future residents would be improved has not been provided and experiences (both good and bad) of large developments already built in the north west of the district at New House Farm and Hilton do not appear to have been considered and lessons have not been learnt. | Noted.  A Transport Study is to be jointly commissioned by Derby City Council and South Derbyshire District Council in consultation with the County Council to consider transport impacts and mitigation for the strategic sites, including measures to encourage sustainable travel.  South Derbyshire District Council will continue to work collaboratively with National Highways, the City and County Highway Authorities and the four HMA planning authorities, to consider the implications of the strategic allocation on the A38 and wider area.  The allocation provides for employment development on site to ensure that the development is capable of being self-sustainable. Notwithstanding this, the location of the development with direct access onto the A38 and access to the south via the A50 means that it is highly accessible to locations further afield.  Biodiversity net gain means that the resultant biodiversity is higher than present. Note: arable farming such as that undertaken on the land at present can often have low biodiversity value as a result of chemicals used to protect crops. This will need to be assessed by an ecologist as part of the planning application process. As set out in the policy requirement it is expected that biodiversity net gain is achieved on the site alongside the protection and management of existing trees and hedgerows.  Details of the infrastructure requirements for each of the new strategic policies are included in the respective polices contained within the draft Local Plan document. These will be detailed further in the Infrastructure Delivery Plan.    A Design Review for the strategic sites is being undertaken which will include consideration of infrastructure provision (including the location of the retail centre and green infrastructure) and design parameters to ensure that the sites will be developed in a sustainable manner with all relevant cross boundary matters given appropriate consideration.  Providing good walking and cycling connections through the site into the wider area is considered to be key to ensure the long-term sustainability of settlements, to encourage active lifestyles which promotes health and wellbeing and to reduce the reliance on private motor vehicles.  The mix, type and tenure of any houses provided on a site in South Derbyshire would have to be approved by the District Council and would have to conform to other Local Plan requirements.  Note: a retirement village by its virtue would need to ensure that sufficient and appropriate medical facilities were available for residents on site.  Please see the Gypsy and Traveller Accommodation Assessment which is available on the Councils website.  The Council works in partnership with the County Council as education authority to ensure that adequate provision for schools is delivered.  The specific details of the policy requirements set out in the Local Plan (e.g. noise mitigation and flood risk management) will be delt with at the planning application stage of the planning process. |
| 1242585 | Egginton Parish Council | Egginton Parish Council | No | The PC does not agree because:   1. It is high quality BMV agricultural greenfield land, it should be farmed 2. Traffic – the A38 is over prescribed. Previous developments nearby had restrictions on occupancy due to the impact on the A38 (Highways England). 3. Healthcare provision is currently very stretched. Section 106 for off-site provision would be inappropriate. There is a need for on-site provision should the strategy prevail. 4. No new secondary school is to be provided. John Port School is virtually at capacity. 5. There is no mention of a blue buffer – very necessary as the site borders flood zones at Burnaston, Etwall, Findern. 6. There is a danger of coalescence with the historic village of Burnaston. The green wedge between Burnaston and Mickleover would be massively eroded. 7. It is a ‘kitchen sink’ site, everything being thrown into it including gypsy and traveller sites next to elderly retirement provision along with employment and housing. Does this represent good planning and community design? 8. Unsustainable disruption to wildlife sites – particularly near the Sustrans track. 9. As described previously, the housing numbers accommodated here represent too great an acceptance of Derby City’ unmet housing needs. 10. This is a rural area and the pollution which would ensue (air, light and traffic) would be impossible to overcome.   It is noted that other SHELAA sites around Mickleover are treated separately, further inflating the housing numbers in this location. They should be included within this Policy. | Noted.  The Sustainability Appraisal considers the issue of agricultural land classification as part of the overall assessment of the sustainability of the site for development.  South Derbyshire District Council will continue to work collaboratively with National Highways, the City and County Highway Authorities and the four HMA planning authorities, to consider the implications of the strategic allocation on the A38 and wider area.  The Council works in partnership with the integrated Care Board to ensure that adequate healthcare provision is provided in the area (either on-site or via contributions towards improvements in existing provision).  The Council is working in partnership with the County Council as education authority to ensure sufficient school provision in the area. It is expected that the new secondary school to be provided at the Infinity Garden Village site will provide additional capacity at John Port.  Flood risk will need to be mitigated on site.  The provision of Green Infrastructure on site will prevent the coalescence of Burnaston to the built-up area of Derby.  The Biodiversity Net Gain requirement will ensure that wildlife habitat and biodiversity on the site as a whole is increased.  Please see the response to question 4. |
| 1244412 | Etwall Parish Council | Etwall Parish Council | No | Current developments in this area have had a restriction on occupancy due to the anticipated effect on the A38 in the area (Kingsway and Markeaton Roundabouts). Without the A38 Junction Improvement scheme, how can the A38 be the proposed access point to this site, given the pre-existing concerns around traffic volume in this area.  B ii) There is already a need for further Healthcare Provision for residents of Etwall who currently are served by Healthcare provision in Hilton or Willington. Whilst the INF1 will be referred too this doesn’t take into account the experience of residents, many of whom are frustrated by the current difficulties in getting to see a HCP and the lack of recognition from the Council that this is an issue. The new site needs to delivery infrastructure on site rather than contributions towards off site facilities. This would not only exacerbate the current issue on healthcare provision but again require residents to yet again use vehicular transport.  B iii) b) A large number of secondary pupils from Mickleover and the current “Land South of Mickleover” development attend the John Port Spencer Academy in Etwall. Pupils from this side of Derby cannot actively travel to school due to the lack of safe walking or cycling routes and the high speed of the A516. This school is at capacity with approximately 90% being transported into the village from a wide area. This causes significant traffic congestion in the village at school opening and closing times. The volume of traffic also adds to air pollution as the majority of the 2,500 pupils are transported to the school by cars, coaches or buses. In parts of Etwall, due to the proximity to 3 major A-road (A516, A38 & A50) the air pollution level is already below WHO recommended limits.  There is also a serious parking problem in the village due to teacher and pupil parking. This presents risks to pedestrians in Etwall, particularly at peak times. In 2021 there was a fatal accident due to impaired visibility caused by cars being parked on the roadside outside of the 2 large village schools. Before additional pupils are allocated to JPSA from Mickleover, the proposed secondary school provision in the Infinity Garden Village needs to be operational to remove pupils from the East of South Derbyshire, currently allocated to JPSA.  C iv) • Burnaston is not a Key Service Village, has no facilities or amenities and therefore links should not be provided there  Safe pedestrian and cycle routes into Mickleover and to the nearest Key Service Village to the south should be provided. As well as between Etwall, Hilton and Willington. It is important to provide residents the opportunity to actively travel between facilities and amenities within the local villages. Discouraging vehicular transport and active lifestyles needs to be a priority for any new development proposed.  Other SHELLA sites around Mickleover are treated separately including Newhouse Farm (currently under development) by the new A516 roundabout. These sites should be considered under this policy  Burnaston to the South of the development is a rural village which must be protected from the effect of this development and any future expansion by increasing the protected green infrastructure to and possibly around the village. There needs to be a comprehensive flood management review of the whole area rather than individual development sites. There is poor drainage and flood risk in the surrounding area which needs to be addressed before any further development is allowed to commence.  E i) As noted in question 6, education provision, particularly secondary education must be addressed at an early stage. This development is in the catchment of John Port Spencer Academy which is almost at capacity and has a serious effect on Etwall, including significant adverse traffic conditions at opening and closing times.  We would like to question whether gypsy and traveller sites need to be provided as part of this development. Should these be provided in more suitable locations, not associated or attached to new developments.  The expansion of the Mickleover settlement, particularly focusing on the fields that run either side of the Sustrans Cycle Way is concerning. The Sustrans path and surrounding wooded areas that border the path are a wildlife haven. This is a rich and important ecological site whilst also being an important way for local residents to access open space and countryside. The continued expansion of development along this site should not be accepted due to the disruption to wildlife habitats and the encroachment of green and open space that is so important to public health. Continued development along here also encourages vehicular use as it is not part of current bus routes nor near to facilities or amenities either within Mickleover or Mackworth. | Noted.  South Derbyshire District Council will continue to work collaboratively with National Highways, the City and County Highway Authorities and the four HMA planning authorities, to consider the implications of the strategic allocation on the A38 and wider area.  The Council works in partnership with the Integrated Care Board to ensure that adequate healthcare provision is provided in the area (either on-site or via contributions towards improvements in existing provision).  The Council is working in partnership with the County Council as education authority to ensure sufficient school provision in the area. It is expected that the new secondary school to be provided at the Infinity Garden Village site will provide additional capacity at John Port.  Providing good walking and cycling connections through the site into the wider area is considered to be key to ensure the long-term sustainability of settlements, to encourage active lifestyles which promotes health and wellbeing and to reduce the reliance on private motor vehicles.  Note: Newhouse Farm has planning permission and therefore does not need to be allocated for development in the local plan. The Local Plan provides the framework against which planning applications should be assessed.  A Design Review for the strategic sites is being undertaken which will include consideration of infrastructure provision (including the location of the retail centre and green infrastructure) and design parameters to ensure that the sites will be developed in a sustainable manner with all relevant cross boundary matters given appropriate consideration.  The Biodiversity Net Gain requirement will ensure that wildlife habitat and biodiversity on the site as a whole is increased. |
| 1238750 | Hilton Parish Council | Hilton Parish Council | Yes | But given the size of the expansion of this area as well as the previous developments, a new secondary school should be considered. The thought that John Port in Etwall could be asked to take even more children doesn't bear thinking about. It is already too big and the traffic issues are horrendous. The area could support another secondary school and relieve the pressure on John Port | Noted.  The Council is working in partnership with the County Council as education authority to ensure sufficient school provision in the area. It is expected that the new secondary school to be provided at the Infinity Garden Village site will provide additional capacity at John Port. |
| 1240947 | Barrow Upon Trent Parish Council | Barrow upon Trent Parish Council | Yes |  | Noted. |
| 1241376 | Rosliston Parish Council | Rosliston Parish Council | Yes | We note the placement of 2 strategic sites of 4500 houses on the edge of Derby, to build and support Derby Cities unmet need, building logically where there is an infrastructure to support this development. It is also noted that many of the existing sites will already accommodate much of the housing numbers for Derby City. This therefore reinforces and demonstrates the numbers being passed to SDDC should not be further increased. | Noted.  Please see the response to question 4. |
| 1242402 | Weston-on-Trent Parish Council | Weston-on-Trent Parish Council | Yes |  | Noted. |
| 1243158 | Melbourne Civic Society | Melbourne Civic Society | Yes |  | Noted. |
| 1243603 | SAVE (Save Aston & Weston Village Environment) | SAVE Aston and Weston Residents Group | Yes |  | Noted. |
| **Councillor** | | | | | |
| 1242293 | Lucy Care | Derby City Council Councillor |  | The extent is ok, but not sure about purpose (see above). Looking forward, 2500 is not a viable city community. Highfields is better (6000-8000). Jobs and services need to be included and integrating Mickelover County Park makes sense, not isolating it. A road should be provided from A38/Rykneld Road island to A516 to improve access and relieve congestion. It should be residential (not a bypass) improve access and suitable for buses. Think of this as phase 1, so district centre needs to be west of centre. | Noted.  A Design Review for the strategic sites is being undertaken which will include consideration of infrastructure provision (including the location of the retail centre and green infrastructure) and design parameters to ensure that the sites will be developed in a sustainable manner with all relevant cross boundary matters given appropriate consideration. This will involve relevant stakeholders, including Derby City Council.  A Transport Study is to be jointly commissioned by Derby City Council and South Derbyshire District Council to consider transport impacts and mitigation for the strategic sites, including measures to encourage sustainable travel. Integration with Derby City transport infrastructure and services will be a key consideration. |
| **Landowner or Developer** | | | | | |
| 1242100 | RPS on behalf of Bellway and Clowes (Thulston Fields) | RPS on behalf of Bellway and Clowes (Thulston Fields) |  | Until such time as a Whole Plan Viability Assessment has been published RPS reserve the right to comment further on the policy requirements sought for each strategic site. Without such evidence, it is not possible to be confident in the development requirements sought from each strategic site, the social infrastructure / service enhancements and the green infrastructure enhancements. | Noted. |
| 1242408 | Lichfields (on behalf of St Philips Land Ltd) | Lichfields |  | St Philips do not wish to provide comments in respect of Question 7 | Noted. |
| 1242615 | Carney Sweeney on behalf of Peveril Homes Ltd and Kingsmere Holdings Ltd | Carney Sweeney on behalf of Peveril Homes Ltd and Kingsmere Holdings Ltd |  | In part yes as we agree with the proposed allocation of STRA2: Land South of Mickleover. However, we do have concerns with some aspect of the policy requirements, extent of the site, and facilities and infrastructure forming part of the policy wording and ‘layout’ plan for strategic allocation STRA2, which are set out in turn below.  Policy Requirements  There are aspects of Policy STRA2 which are not currently sufficiently clear, and therefore the policy wording is at risk of not being effective. There are also noted to be a number of ‘infrastructure’ requirements, which we comment on separately below, but overall, the evidence base to justify these infrastructure requirements is unclear.  The opening paragraph of Policy STRA2, and Part F of Policy STRA2, refer to the following phrases, respectively: • “The Strategic Allocation identified as Land South of Mickleover will be expected to deliver the following requirements and be in accordance with other Local Plan Policies:..” • “… The development shall be provided in broad conformity with the plan below with the details to be confirmed in a Development Framework Document which shall be informed by a Design Review process…” [Source: Policy STRA 2 of the Draft Local Plan Part 1 Review consultation document,  There is an inconsistency in wording between the above parts of Policy STRA2. Furthermore, the policy wording fails to take account that, due to the scale of development proposed, the requirements set out in other local plan policies may not be achievable or may differ. The policy wording should therefore be clear as to what degree this strategic allocation would be the subject of other Local Plan policies.  Part A i) of Policy STRA2 refers to development requirements of ‘approximately 2,500 dwellings’. The reference to ‘approximately’ in this context should be amended to ‘minimum’ to accord with the provision of Paragraph 60 of the Framework which states that “To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed...”  The inclusion of the word ‘approximately’ suggests a ‘cap’ on the housing quantum, which does not align with Paragraph 60 of the Framework. The location of strategic allocation STRA2 provides an opportunity to support housing growth in a sustainable location, adjoining Derby City and in a non-Green Belt location and therefore, the ability for the allocation to provide additional homes should be supported.  Part A iv) of Policy STRA2 requires the provision of Gypsy and Traveller pitches in line with Policy H21[sic]. The evidence base to justify the requirement for the provision of Gypsy and Traveller pitches is unclear. Appendix 4 of the draft Local Plan refers to “Gypsies and Travellers Accommodation Assessment (GTAA), 2024”, however this document does not appear to be available on the consultation page nor the Council’s website. We comment further on Policy H22 under Question 9, and these comments should also be taken into account with regards to Policy STR2.  Part A v) of Policy STRA2 identifies specific locations for primary access into the site. It is noted that the Local Plan Transport Modelling is pending as reported in Appendix 4 of the draft Local Plan consultation document. In the absence of this evidence base document, the basis for the proposed primary access points into the site is unclear and therefore, once this document is available, we will look to comment further.  Part C i) of Policy STRA2 makes reference to the provision of a “… wide green buffer…” the reference to ‘wide’ is ambiguous and should be removed.  Part C ii) of Policy STRA2 seeks the inclusion of a Country Park but then looks to stipulate where the Country Park should be located. It is noted that a map with a ‘layout’ has been included within the draft Local Plan for strategic allocation STRA2. The inclusion of such a plan is not effective for the delivery of Policy STRA2. How the site is brought forward to deliver the policy requirements of Policy STRA2 is a matter for consideration through the decision-making process once a subsequent planning application is made for determination. It is not a matter for the plan-making process as the layout of sites can be subject to change. The draft Local Plan should therefore remove any ‘layout’ plan for the proposed strategic allocation. It is further noted that the reference to ‘Country Park’ on the ‘layout’ plan also refers to the term ‘green wedge’. From a review of the references to ‘green wedge’ in the draft Local Plan, this term appears to be used in the context of providing green infrastructure, as opposed to proposing a ‘green wedge’ which is a specific designation. If our understanding is correct, then the reference to ‘green wedge’ should be removed throughout the draft Local Plan document as use of this term is misleading.  Part C iv) of Policy STRA1 seeks the delivery of pedestrian and cycle routes stating as follows: “High quality continuous pedestrian and cycle routes shall be provided within the site and links between the site and Burnaston village, and development within Derby City…”. The reference to 'high quality’ is ambiguous as to what would be regarded as high quality, the wording is unclear and too subjective.  Part D Mitigation of Policy STRA2 is again ambiguous as there is no context to the mitigation measures identified  Part D i) of Policy STRA2 seeks the provision of appropriate sound attenuation/noise mitigation from the A38 and A516. The inclusion of the reference “…both dwellings and recreation/habitats…” is not effective, and neither is it necessary as any sound attenuation/noise mitigation would need to protect any sensitive receptors from noise generating uses.  The wording of Part D v) of Policy STRA2 is not consistent with relevant policy tests set out in the Framework with regards to heritage assets.  With regards to Part E i) of Policy STRA2, securing a phased approach for delivery and ensuring all the specific requirements associated with each phase are provided prior to occupation is a matter that can be dealt with via planning condition as part of any subsequent planning application. Such a requirement should not therefore form the basis of a planning policy.  A further point, we note that the drafted policy wording includes incorrect cross references to policies as follows, which should be corrected for clarity: • Part A iv) of Policy STRA2 refers to Policy H21, which should be Policy H22: Gypsies and Travellers and for Travelling Show people. Please also see our separate comments above regarding this specific policy requirement in the context of Policy STRA2, and our separate comments on Policy H22 under Question 9. • Part D vi) of Policy STRA2 refers to Policy F2, which should be Policy INF2: Sustainable Transport  Extent of the Site  The extent of the site boundary for strategic allocation STRA 2: Land South of Mickleover does not encompass all the land parcels promoted by our client.  The full extent of SHELAA site reference 158 is noted to have not been included as part of the allocation boundary, which is available, as reported in the SHELAA assessment. It is therefore unclear as to why the full extent of site reference 158 has not been included, particularly in the context that the policy wording is seeking to deliver a green infrastructure network along the western extent of the site.  It is noted that the full extent of SHELAA site references 210, 228, and 229 have been included within the extent of the site, which is welcomed.  The following land parcels have also been promoted on behalf of our client but do not form part of strategic allocation STRA2, and should be reconsidered by the authority as these parcels provide an opportunity to bring forward additional land to support the aspirations of the proposed strategic allocation: • SHELAA Site Reference 153 – White Haven (Sekhon) (previously known as ‘Fogg’) • SHELAA Site Reference 154 – Frankling (Liberty Farm) • SHELAA Site Reference 155 – Gould • SHELAA Site Reference 156 – Grey • SHELAA Site Reference 159 – New Range Farm  The omitted land parcels above are all assessed by the authority as being ‘suitable’; ‘available’ and ‘achievable’, and developable between years 6-10 of the plan period. On this basis, we recommend that the Council gives these parcels further consideration for inclusion in the extent of the site boundary for proposed allocation STRA2. These additional parcels will continue to support the creation of an urban extension on a non-Green Belt site situated on the edge of Derby City and therefore their inclusion would not undermine the policy aspirations for strategic allocation STRA2. For completeness, please find enclosed at Appendix B of this Questionnaire a plan showing the extent of all the land parcels which have submitted to the authority for consideration.  Facilities and Infrastructure  Part B of Policy STRA2 is noted to set out ‘social infrastructure/services for the development’, which we comment on as follows:  • Part B i) of Policy STRA2 – This seeks the provision of appropriate scale of community facilities. We have no specific comments on this part of the policy and welcome the flexibility to allow for consideration to be given to providing an ‘appropriate scale’ of community facilities.  • Part B ii) of Policy STRA2– This is noted to seek the delivery of healthcare infrastructure either via onsite or off-site contributions. Whilst this part of the policy makes reference to the contributions being “...commensurate with the scale of development…”, the policy does not consider matters of viability, which should be a matter of consideration. The policy wording should therefore look to provide flexibility to allow for viability to be considered.  We comment separately on Policy INF1 which is referred to in this part of Policy STRA2 under Question 9.  • Part B iii) of Policy STRA2 – This is noted to seek the delivery of primary and secondary education provision either via onsite or off-site contributions. However, it is further noted that a) of Part B iii) makes specific reference to the provision of a three-form entry primary school and nursery. As per our above comments, whilst this part of the policy makes reference to the contributions being “... commensurate with the scale of development…”, the policy does not take into account matters of viability, which should be a matter of consideration. The policy wording should therefore look to provide flexibility to allow for viability to be considered.  We comment separately on Policy INF1 which is referred to in this part of Policy STRA2 under Question 9.  • Part B iv) of Policy STRA2 - Again, we note the reference to provide a local retail centre “…commensurate…” to the size of the development, and this flexibility in this part of the policy wording is welcomed. | Noted / Agree in part  It is not considered that ‘approximately’ suggests a cap on residential provision. The Council does not however think that this should be termed as a minimum figure as there are other elements of infrastructure provision (e.g. Green Infrastructure) which are considered key to ensure the long term future sustainability of the site as a whole and that this should not be jeopardised in order to meet a housing requirement.  The Gypsy and Traveller Accommodation Assessment is available on the Councils website. The Council will review the website to try to make navigating it more straightforward.  A Design Review for the strategic sites is being undertaken which will include consideration of infrastructure provision (including the location of the retail centre and green infrastructure) and design parameters to ensure that the sites will be developed in a sustainable manner with all relevant cross boundary matters given appropriate consideration. This will then inform the conception plan included in the Local Plan. The concept plan should be used to guide a planning application on the site.  The Council notes the objection to the term ‘green wedge’ which is green infrastructure that extends the green wedge from Derby City. The Council will ensure that this is clarified.  The Council will amend the wording ‘high quality’ with reference to the walking and cycling route to ‘safe, functional and attractive’.  The planning policy sets out the expectations for the content of any planning application, considering the site as a whole, and whilst it is agreed that some of these issues could be dealt with via a planning condition it is considered useful for the Council to set out expectations early on in the planning process.  The Council does not consider that the mitigation requirements are ambiguous.  The Hospital Building is currently under consideration by Historic England for Listing. The Council has produced a Heritage Impact Assessment which considers the importance of the heritage assets and their setting. This has been considered as part of the Design Review process and the Council maintains that that the layout and form of development should respond to these heritage assets.  The Council will amend Part A iv) of the policy text to reference the correct Gypsy and Traveller policy (H22 not H21).  The Council will also amend Part D vi) of the policy to reference INF2 (from F2).  The Council will include an additional part of the SHLAA submission 158 to support the provision of a clearly defined boundary maintaining a separation distance to villages and residential properties.  Omission site will be considered under question 13.  Viability will be assessed through a Plan-wide viability assessment which will inform the infrastructure requirements on the site. |
| 1242645 | Emery Planning on behalf of Strategic Land Group Ltd | Emery Planning on behalf of Strategic Land Group Ltd |  | 8.1 The plan assumes that the site will deliver 2,500 dwellings and 5-10 hectares of employment land over the plan period.  8.2 We refer to our comments on lead-in times and build rates for the other strategic allocation (Policy STRA1:Infinity Garden Village Mixed Use Allocation). The same applies to this site. There is insufficient evidence that the site will deliver this quantum of development by 2039 | Noted.  See response to question 3. |
| 1243556 | Stantec on behalf of Parker Strategic Land South of Mickleover | Stantec on behalf of Parker Strategic Land South of Mickleover |  | 3 Mickleover South Draft Allocation STRA2  3.1.1 As the Principal Promoter, PSL welcomes South Derbyshire District Council’s recognition of the opportunities for land south of Mickleover to create an exemplary new neighbourhood that delivers new homes but also crucially new community facilities and high-quality environmental benefits as part of a sustainable development that connects to the wider Derby conurbation.  3.1.2 PSL supports the principal of such a strategic allocation and is committed to working collaboratively with landowners and the Council through the Design Review process, to ensure a comprehensive approach to the delivery of strategic growth in this location is achieved, shaping spatial principles and distribution, and guiding the site wide infrastructure plan and wider masterplan to a position where it can be presented to the Local Plan Inspector.  3.1.3 The following review of draft Policy STRA2 is underpinned by supporting material and Topic Papers focused on: • Site Opportunity Review; • Transport; • Landscape & Ecology; • Flood Risk & Drainage; • Heritage; and • Sustainability Appraisal (SA).  3.1.4 The accompanying Site Opportunity Review (at Appendix B) provides a design review and comparative analysis between the draft allocation and the PSL proposed masterplan for the Site with the benefit of technical evidence.  3.1.5 This Section sets out the Principal Promoter’s response to respective aspects of draft Policy STRA2 and the accompanying indicative layout. This section should be read alongside the Site Opportunity Review at Appendix B.  3.2 Laying out a New Community A Development requirements i) Approximately 2500 new homes; ii) Approximately 5-10 ha of employment generating land; iii) Explore the provision of a retirement village within the scheme iv) The provision of Gypsy and Traveller pitches in line with Policy H21;  Achieving the Homes Needed 3.2.1 The PSL land extends to c. 112 hectares. It is located to the southwest of Derby, immediately south of Mickleover. The A516 (Etwall Road) is situated to the north, with Staker Lane and the A38 running along the southern boundary.  3.2.2 Based upon technical analysis undertaken to date, the land controlled by PSL is assessed to be capable of delivering up to 2,200 new homes as shown at Appendix B, and the wider allocation up to 3,100 whilst reserving land for a secondary school. Should the Local Education Authority determine that a secondary school is not needed, the PSL Preferred Masterplan for land controlled by PSL and other landowners within draft allocation STRA2 can be demonstrated to deliver approximately 3,400 homes for draft allocation Land south of Mickleover.  3.2.3 It is recognised that the emerging Local Plan Part 1 is at the early stages of plan-making and that consultations allow for the opportunity to provide comments to iterate and shape the allocation.  3.2.4 At present, the indicative layout as shown within the Regulation 18 Draft Plan would only achieve c.2,000 homes across the whole STRA2 allocation, at a gentle but efficient urban extension density of 35dph. To achieve the desired 2,500 homes in the areas shown for ‘housing development’ this would require an increased density of 46dph which would represent an increased share of apartment accommodation and an increase in 3 to 4-storey buildings that could result in increased visibility from further afield, and would be wholly out of character compared to the surrounding context.  Other Land Uses – Employment 3.2.5 Proposed Policy STRA2 suggests provision of 5-10 hectares of employment generating land. Whilst this policy requirement could take the form of any type of employment generating land, symbols and locations shown on the indicative layout and assessed within the Derby and South Derbyshire Employment Land Review (October 2023) indicates industrial employment land rather than mixed local employment provision.  3.2.6 Whilst there is no reasonable barrier that would prevent the provision of 5-10 hectares of industrial employment land to be included within the proposed STRA2 policy area, the provision of this will affect the quantum of homes that can be delivered within the ‘Housing development’ extents shown on the indicative layout further down from the 2,000 homes expected, as these will compete for land take within the limited indicated area. PSL considers that there may be more appropriate sites for substantial E(g), B2, B8 land allocations elsewhere, as discussed in our response to proposed Policies S5 and E1 within these representations and as recommended by the Councils’ Employment Land Review (October 2023).  3.2.7 PSL instead proposes the inclusion of flexible local employment provision within vibrant mixed-use Neighbourhood Centres and Local Centres that would be focused on serving the new and surrounding communities in terms of small flexible office or studio-style, workspace accommodation to be included alongside cafes, shops and community hub facilities. Such facilities have a far greater opportunity for internalising movements than more external facing strategic industrial/employment premises. This would also address the Council’s identified need for more small-scale and grow-on space.  3.3 Creating a Movement Network that Works for All Residents A Development requirements v) Vehicular access to serve the sites shall be developed appropriately. The principal accesses to the sites shall be from; a) Principal site – access to be off the A38 roundabout; b) East of the A38 – access to be off Rykneld Road; C Green Infrastructure. A network of interconnected Green Infrastructure which as a minimum shall include the following: iii) The green infrastructure network should allow active travel connections though and across the site to points of interest and recreation; iv) High quality continuous pedestrian and cycle routes shall be provided within the site and links between the site and Burnaston village, and development within Derby City; D Mitigation vi) Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of more sustainable transport modes; in accordance with policy F2; vii) Ensure that the development is well connected to frequent public transport to Derby centre as well as other key designations, and that bus stops and routes are provided through the site to allow for convenient boarding;  Vehicular Access Points – Findern Interchange/ A38 Roundabout 3.3.1 Proposed Policy STRA2 suggests principal vehicle access to be off the A38 roundabout. The Regulation 18 indicative layout for Land South of Mickleover also shows a proposed ‘Local Centre’ in the centre of the layout. With no further principal access points shown or set out within Policy STRA2 it is recognised that the primary vehicular route extends from the A38 roundabout towards the proposed ‘Local Centre’ with secondary and tertiary vehicle routes to spread out into the ‘Housing Development’ area, as shown in the accompanying Site Opportunity Review at Appendix B.  3.3.2 Consequently, principal vehicle flow will be funnelled between the ‘Local Centre’ and the A38 roundabout and the indicative layout is expected to result in vehicle flows similar to a cul-de-sac, albeit at strategic scale.  3.3.3 Interconnectivity is beneficial to both existing and future communities South of Mickleover and the wider area and is recognised by South Derbyshire District Council’s position that emphasises the importance of connectivity within draft Policy STRA2 and the expressed intention to work together to deliver development in a comprehensive manner. Limiting movement opportunities without appropriate mitigation or alternatives, risk pressures on the Strategic Road Network as well as local roads. The PSL preferred masterplan incorporates a proposed link road between the A38 and the A516 within land controlled entirely by PSL, which is considered to be a crucial opportunity for South Mickleover which will: • Prevent existing communities from becoming socially isolated; • Enable existing communities to benefit from new infrastructure as well as infrastructure improvements that can only be realised through strategic growth, particularly as presented by PSL; • Deliver gentle but efficient densities throughout the draft Policy STRA2 boundary area; and • Distribute housing and employment across land which respects important habitats, landscape and the appreciation of heritage assets.  3.3.4 Since news of the draft allocation was made public as part of the Local Plan consultation process, the PSL has met with members representing Etwall Ward, Littleover Ward, Burnaston Parish, the MP for Derby North, and the leader and cabinet member for transport and the environment at Derby City Council. All of these members, including parish councillors, were unanimous in asserting the clear need for a new highway link between the A38 and the Etwall Road. This piece of new infrastructure is considered as essential to ensuring the development of this allocation will not unbearably impact the existing highways network and will create options for new public transport connectivity.  Vehicular Access Points & Active Travel – Staker Lane 3.3.5 The draft indicative layout shows another vehicle access point off Staker Lane. Proposed draft Policy STRA2 does not include or suggest Staker Lane to form part of principal vehicle access to the Site and therefore this is considered to be proposed for secondary vehicle access.  3.3.6 Staker Lane is a semi-rural lane with no footway provision, which connects the A38 roundabout to The Hollow and Haven Baulk Lane. The Hollow benefits from a 2m footway on the eastern side of the carriageway, providing a connection under the A516 towards Brookfield Primary School and local centre. Haven Baulk Lane benefits from one footway on the eastern side and forms another connection from Staker Lane, south-east under the A38 towards Nuffield Health Derby Hospital and surrounding local centre.  3.3.7 Existing semi-rural lanes, notably Staker Lane, are currently well used with Staker Lane having approximately 5,500 two-way vehicle movements per day traveling between the Findern Interchange (A38) and Mickleover. This would be expected to increase in usage if proposed as secondary vehicle access as suggested by the indicative layout.  3.3.8 Staker Lane and nearby residential streets (specifically The Hollow and Haven Baulk Lane) are typically less than 6 meters wide and upon review are determined to be unsuitable to support a secondary access for a development of this scale. If left unmitigated, this could result in undesirable increases in vehicle movement along these lanes to the detriment implementation of a tangible active travel strategy between the Site and Derby City, as well as existing residential properties.  3.3.9 Following an initial review and key desire lines for active travel, as submitted to the previous Regulation 18 Consultation, PSL propose a Sustainable Highways Strategy that would downgrade permitted vehicle movement on Staker Lane to accommodate only active or sustainable travel movements. Assuming the provision of an active travel facility within the highway boundary adjacent to the carriageway could not be provided, the PSL Masterplan envisions Staker Lane’s transformation to encompass either: • One-way operation for vehicles to allow the reallocation of road space for pedestrians and cyclists; OR • Sever Staker Lane (so as not to provide a connection through to the A38) and provide access only to properties. This would allow for the link to be redesignated as a quiet lane prioritising walking and cycling.  Best Practice Advice 3.3.10 PSL has instructed a joint technical team to consider the likely vehicle access arrangements, the merits, best practice and provide these within the accompanying Transport Topic Paper at Appendix C.  3.3.11 In considering the Site and best practice approaches in order to achieve the transport vision for the Site, a well-connected, sustainable on-site community must be created that ensures: • Good internal connectivity between land uses to support internalisation of trips and reducing the need to travel offsite; • Good quality transport infrastructure along on-site movement corridors including enhancements to PROWs; • Good connectivity to key off-site route corridors; and • High quality placemaking.  3.3.12 Major supporting transport infrastructure such as a link road and extensive provision of movement corridors can present a challenge, particularly if required at early stages of development. However, mitigation measures proposed to Staker Lane encouraging Active Travel and the link road between the A516 and the A38 are considered core concepts to an evolving and improving sustainable movement strategy for the Site. PSL consider that the Preferred Masterplan underpinned by technical assessments represents a best practice approach towards delivering a holistic movement strategy. PSL also own all of the land required to deliver the link road.  3.4 Delivering Accessible Public Transport D Mitigation vi) Measures necessary to mitigate the traffic impact of the site, including the use of travel plans to encourage the use of more sustainable transport modes; in accordance with policy F2; vii) Ensure that the development is well connected to frequent public transport to Derby centre as well as other key designations, and that bus stops and routes are provided through the site to allow for convenient boarding;  3.4.1 NPPF Paragraph 108 requires that: Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: a) the potential impacts of development on transport networks can be addressed; b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated; c) opportunities to promote walking, cycling and public transport use are identified and pursued; d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.  3.4.2 Moreover, the emerging NPPF draft consultation emphasises changes to how we plan transport arrangements. Draft NPPF consultation paragraph 112 states that it should be ensured that: a) A vision led approach to promote promoting sustainable transport modes can be – or have been – taken up, given is taken, taking account of the type of development and its location; […] d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision led approach.  3.4.3 The proposed changes within the NPPF draft is indicative of wider industry shifts. The way in which we plan for large scale development is changing towards a “Vision Led Planning” approach, which sets out a preferred vision and then provides the means to work towards this.  Traffic Mitigation 3.4.4 Given the scale of the development, current operation of the strategic and local highway network and forecast trip generation it is considered that off-site capacity improvements or contributions towards wider highways improvements may be required to mitigate the impacts of development in line with the NPPF. This would be considered in detail as part of any planning application.  3.4.5 Vehicular traffic movement via the Strategic Road Network must be particularly considered if only one Principal Access is provided from the Site at the A38 roundabout. Not accounting for Staker Lane, there only remain 2no potential routes toward existing employment and facilities hubs at Derby City, specifically at Mickleover shown as example. As further explained in the Transport Topic Paper (Appendix C), not accounting for Staker Lane, the remaining northbound routes consist of movement along the A38 and alternatively via Findern Lane through Burnaston to connect to the A516. Comparing current Google data between the two routes shows that at peak morning hours a route through Burnaston may be quicker in instances than approaching Mickleover via the A38 untoward Hospital Island.  3.4.6 It is acknowledged that further detailed modelling will be required which also accounts for on-site and off-site mitigation measures and that emerging evidence toward the Draft Local Plan Part 1 will require consideration of all reasonable alternatives, including strategic transport options.  3.4.7 However, if the Site were to be given only one Principal Access from the A38 roundabout it is likely to indirectly result in more road users on the network using Burnaston as a rat run to avoid traffic on the A38. It also misses the opportunity to spread movements from the proposed allocation across the network or efficiently that a cul-de-sac approach which in the long run is unlikely to be acceptable.  3.4.8 Therefore, the Site’s proposed link road providing principal vehicle access and connecting the A38 and the A516 is considered to alleviate potential for indirect increases of vehicle movement through Burnaston and allows opportunity for a ‘traffic in villages’ assessment to be undertaken to sensitively discourage the use of Burnaston for through traffic.  Accessible Public Transport 3.4.9 The draft Policy STRA2’s emphasis on public transport within the allocation boundary is supported. The Vision as shown in the Site Opportunity Review (Appendix B) for land controlled by PSL proposes the Neighbourhood Centre to function as movement hubs that South Derbyshire Local Plan  encourages the use and mix of transport options particularly focusing upon pedestrian, cycle and public transport elements. We strongly believe that facilitating trips by public transport will ensure that the Site is well connected to local and regional centres, and support the transition to a low carbon future.  3.4.10 However, reduced access to the Strategic Road Network (SRN) and the potential impact on both the availability of public transport service provision within Site boundaries is important, as well as on the frequency that could be expected within the ‘Housing development’ area as shown on the indicative layout. The indicative layout suggests one Principal Access from the A38, therefore truly frequent public transport would only be achieved along the linear route from the A38 towards the ‘Local Centre’. A strategic interconnected link road provides a stronger basis to increase frequency of public transport services than a resultant cul-de-sac, albeit strategic scale, road layout as would be required by the indicative layout.  3.4.11 PSL is committed to promoting development that takes into account existing communities and to pursue improvements can benefit both new neighbourhoods and existing residents. Existing Communities at Merlin Way do not have frequent bus services and are limited to 2no bus services (219; 403) that each run twice a day. Neither existing communities at Merlin Way nor Burnaston have access to frequent public transport services. It is considered that strategic level growth supported by a strategic link road between the A38 and A516 on land controlled by PSL and shown in the Site Opportunity Review (Appendix B) provides both the critical mass required and the opportunity to locate access to frequent public transport in locations that are capable of also serving existing communities.  3.4.12 Placing public transport stops in locations, as illustrated within the Site Opportunity Review (Appendix B), that could capture demand from existing communities could also improve the business case for a frequent service and further encourage operators to invest in this area.  3.5 The Needed Community Facilities B Social infrastructure / services for the development i) Provision of appropriate scale community facilities; ii) Delivery of healthcare infrastructure sufficient to meet need, either on site or off site through contributions. These contributions towards healthcare facilities will be commensurate with the scale of the development, and in accordance with INF1 and the Planning Obligations SPD iii) Delivery of primary and secondary education sufficient to meet need, either on site or off site through contributions. These contributions towards primary and secondary education, schools and facilities will be commensurate with the scale of the development, and in accordance with INF1 and the Planning Obligations SPD.  This will include; a) The provision of a three form entry primary school with nursery; and b) Financial Contributions towards secondary education; iv) Provision of a local retail centre commensurate with the size of the development to provide for the day to say needs of the development and surrounding area;  3.5.1 PSL supports South Derbyshire Council’s emphasis within draft Policy STRA2 on social infrastructure and the opportunity for land south of Mickleover to deliver community facilities and benefits appropriate in this location.  3.5.2 As underpinned by Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 and set out within NPPF Paragraph 57: Planning obligations must only be sought where they meet all of the following tests: a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development.  3.5.3 The level of community facilities and benefits of development that can be delivered will be commensurate with the quantum and type of growth that is to be allocated in future. Development of land south of Mickleover will deliver the community facilities in proportion to scale of development that will be allocated within the emerging South Derbyshire Local Plan.  The likely education facility needs and requirements have been considered for a proposed development of circa, 2,500 homes (Education Report, May 2022) which concluded that: • A development of circa 2,500 is forecast to generate in the region of 2.86FE of Primary School pupils; • The Education Report Assessment expected SDDC to seek Primary School requirements either via one standalone 3FE Primary School (630 places) or more likely through two Primary Schools; a 2FE facility (420 places) and a 1FE (210 places) on land that could accommodate 2FE to allow for future expansion if the child yield/demand for places is greater than expected; • A development of circa 2,500 homes does not ever reach the size that would require a new Secondary School on its own (noting no Education Authority would deliver a new Secondary School smaller than 4FE). In light of other Derby-based Secondary Schools, excluding the closest Littleover Community School, all having surplus capacity (as assessed in May 2022), and the planned secondary school at Infinity Garden Village development, which is due to be opened 2026. It is considered particularly unlikely that a new Secondary School would be required in this location. • However, if new Secondary School provision does need to be reserved on this Site, it may be appropriate to earmark a space of circa 8ha to be able to deliver a 6FE Secondary School with Sixth Form and SEN (this is the top end of BB103).  3.5.4 Draft Policy STRA2 considers that development of land south of Mickleover is to include land to accommodate 1no 3FE Primary School and located as shown by the indicative layout on land controlled by PSL as labelled for ‘education facilities’.  3.5.5 As set out within the Education Report, the technical team expected South Derbyshire District Council to pursue the provision of two primary schools. This would be more resilient and adaptive to child yield/ demand for pupil places as well as increase accessibility to education facilities throughout land south of Mickleover, however, land has been reserved for the provision of Primary and Nursery Education.  3.5.6 We note that the previous technical work was for development of 2,500 dwellings rather than the 3,100 to 3,400 now deemed possible through further technical work.  3.5.7 On the basis of draft Policy B(iii(b)) we understand that South Derbyshire District Council is not seeking provision of land to be reserved for a secondary school within the draft allocation boundaries and that contributions towards secondary school education provision elsewhere is South Derbyshire Local Plan provided at the appropriate planning stage. We consider that this decision is made in light of the currently proposed scale of 2,500 homes on the entirety of the draft Policy STRA2 area not amounting to the required scale to justify provision.  3.5.8 However, the PSL Preferred Masterplan accounts for land to be reserved for a Secondary School should this be needed following the completion of further evidence base work.  3.6 Interconnective Green Infrastructure  C Green Infrastructure.  A network of interconnected Green Infrastructure which as a minimum shall include the following: i) The provision of a wide green buffer around the pastures hospital estate and along the boundary of the A38; ii) The provision of a Country Park, to be located within the site to the north, west and in part of the land immediately to the south of the pastures hospital estate; iii) The green infrastructure network should allow active travel connections though and across the site to points of interest and recreation; v) Built development within the Green Infrastructure locations shall be restricted to that ancillary to and necessary to support green infrastructure (such as grounds maintenance huts, small changing rooms etc);  D Mitigation v) A layout and form of development that respects the landscape character, as well as the character significance and setting of heritage assets, including Grade II Church at Pastures Hospitals and Grade II Winter Garden at Pastures Hospital;  3.6.1 A Landscape and Ecology Topic Paper is provided at Appendix D.  3.6.2 To date the following technical work, which have also been submitted at previous plan-making consultations, has been undertaken to inform the optimal draft allocation in respect of Mickleover South (STRA2): • Desktop survey of modern and historic mapping and aerial photography; • Desktop study of relevant published baseline, including Landscape Character Assessments; • Site walkover to understand variations in character across the Site and the availability and current character of views; and • Production of a Landscape and Visual Technical Note (R02a). 3.6.3 The accompanying Site Opportunity Review (Appendix B) provides a visual comparative approach to the consideration of draft Policy STRA2 and the PSL Preferred Allocation.  3.6.4 The accompanying Landscape and Ecology Topic Paper (Appendix D) provides further detail. However, based on technical work undertaken to date, summary technical findings of the visual baseline show that: • Despite its size, the visual envelope of the Site is comparatively limited to its immediate environs and the paths crossing it; • Elevated views are possible from the eastern edge of Burnaston towards the flatter centre and south of the Site, including when descending the footpaths off the ridge; • Views from the A516 are limited by vegetation east of Grassy Lane, although the road influences the western part of the Site; • Views from further north are limited by vegetation along the A516 and those from the cycle route along the former railway line are curtailed by the intervening topography; • Views into the Site are also possible from the properties on Merlin Way, particularly south of Duesbury Court, where filtered views into the south of the Site are possible; and • The smaller fields around the stream in the east of the Site are of higher landscape sensitivity but are more visually enclosed.  3.6.5 The PSL Preferred Masterplan has been prepared taking into account the ‘Derbyshire County Council – The Landscape Character of Derbyshire: Part Four – Using Landscape Character as a Spatial Framework (2013)’ and the landscape character assessment tool for the allocation of land within Derbyshire’s Landscape Character Guidance. Part Four of Derbyshire guidance brings together historic, ecological, and landscape data to identify ‘Areas of Multiple Environmental Sensitivity’ (AMES). It is understood that the collective data from Derbyshire County Council demonstrates that the Site and wider STRA2 proposed allocation is situated in the least sensitive area, as its location falls outside of the ‘Primary Sensitivity’ and ‘Secondary Sensitivity’ categories and is within the least relative tranquil areas excluding main urban areas.  3.6.6 After establishing that the area is of lower historic, ecological and landscape sensitivity, as identified by the Derbyshire County-wide assessment, it is important to acknowledge the Site-Specific Landscape Character.  3.6.7 In relation to landscape character, the Site is well-related to Derby and the settlement edge associated with Merlin Way. To an extent, the Site exhibits a character similar to that described in the Settled Farmlands LCT. The larger and more prairie style fields in the west and north-west of the Site are of lower landscape sensitivity, containing comparably fewer landscape features and being more influenced by adjacent residential and commercial development and the major roads. Although these areas are visually more open from some directions due to less vegetation and more PRoW, the Site is more likely to be seen in the context of the adjacent built uses. The eastern part of the Site comprises a more intact landscape with more landscape features.  3.6.8 The proposals for draft Policy STRA2 to include provision of parkland are welcomed. However, the location to the north of the Site retains areas consisting of primarily arable farmland of lower landscape sensitivity, containing the fewest landscape features and is influenced more heavily by existing built form, fringe uses along Grassy Lane and the main roads. As highlighted in Section 3.5 the indicative layout also locates the Country Park to include land of negligible ecological importance.  3.6.9 The draft allocation indicative layout misses opportunities to provide coherent ecological corridors and integrated connections to greenspace both within, and adjacent to, the proposed allocation Site. The proposed built form in STRA2 indicative masterplan appears isolated and with no immediately evident connection to the existing built form and places green buffers where there appears to be no demonstrable requirement for such, such as east of the Pastures Golf Club, and misses opportunities to connect and increase sports provision. PSL strongly encourage the use of green infrastructure corridors that follow existing features (which also benefits biodiversity) and to build opportunities to connect existing communities with proposed new neighbourhoods via an integrated green and blue infrastructure network and is keen to avoid design that creates large disconnecting spaces.  3.6.10 Both the STRA2 indicative layout and the PSL Preferred Masterplan will position built form in areas that will become visible outside of their respective boundaries. It is considered unlikely that a strategic scale development in this location can be prevented from being visible from all surrounding perspectives.  3.6.11 Based on the STRA2 indicative layout, the allocation will be visible from PRoWs as they descend east from Burnaston, and from the surrounding areas of built form and roads. It will be less visible from Grassy Lane and the A516, from where views are already characterised by residential and commercial built form.  3.6.12 The PSL Preferred Masterplan will be visible from the PRoW as they descend off the higher ground of Burnaston and from the surrounding roads and areas of settlement. It will be visible from Grassy Lane and the A516, where it will be seen in front of and in the context of the existing built form in this area.  3.7 Habitat Improvements and Flood Mitigation where it Counts D Mitigation  ii) On site biodiversity net gain in line with national legislation and protection and management of key biodiversity assets such as trees and hedgerows;  iii) Appropriate flood risk management in accordance with policy SD2 across the site and ensure that all more vulnerable development is located wholly within flood zone 1;  iv) SUDS will be provided in accordance with Policy SD3;  3.7.1 A Landscape and Ecology Topic Paper is provided at Appendix D.  3.7.2 To date the following technical work, which have also been submitted at previous plan-making consultations, has been undertaken to inform the optimal draft allocation in respect of Mickleover South (STRA2):  • Ecology and Nature Technical Note 14575\_R01a\_30112022\_RF\_CW; and  • Biodiversity Net Gain Strategy R04\_05122022\_RF\_CW.  Identifying Opportunities for Habitat Improvements  3.7.3 Following an assessment and understanding of further surveys undertaken and the technical baseline conditions, the Site habitat outcomes are identified as that:  • The majority of the Site comprises arable fields and modified grassland of negligible ecological importance.  • Onsite agricultural buildings, some of which have potential to support roosting bats and nesting birds have limited inherent ecological importance in themselves, and so are also considered to have negligible ecological importance.  • Two areas of woodland are listed on the Priority Habitat Inventory for England (deciduous woodland) and are therefore considered a priority habitat and of at least local ecological importance.  • In addition, a number of potential veteran trees were identified across the Site (to be confirmed via future Arboricultural Surveys at the appropriate plan-making stage). Onsite mature trees are therefore considered to be of at least local and up to county ecological importance.  • Field boundaries are primarily made up of species rich hedgerows with mature trees. All hedgerows consisting predominately (over 80% cover) of at least one woody UK native species are classified as a Habitat of Principle Importance (HoPI). As such, onsite hedgerows are considered to be of local ecological importance, or, have the potential to be restored to local ecological importance through appropriate management.  3.7.4 A number of ponds, wet ditches and watercourses are also present throughout the Site which are of value to biodiversity, some of which are considered to be of up to local ecological importance. Ponds which meet the relevant criteria would also be considered to be a priority habitat.  3.7.5 Application of the ‘Mitigation Hierarchy’ is fundamental to any ecological impact assessment and masterplan design process. The design of any future development should be iterative, and in accordance with policy and best practice guidance, following the Mitigation Hierarchy. As such, the Development should be designed to avoid and retain the most important ecological features to ensure they can be managed in the long-term to enhance their importance for biodiversity. Where this is not possible, new habitats should be proposed to compensate for habitat losses with the aim of maximising the ecological value of the habitats proposed on the Site.  3.7.6 Whilst the majority of the Site is of low ecological importance, The PSL Preferred Masterplan has been developed in following the mitigation hierarchy. Upon a review of the proposed STRA2 indicative layout it is made clear that the draft allocation masterplan does not follow the hierarchy in terms of retaining the features of most ecological importance particularly the brook corridor and other priority habitats such and woodland, hedgerows and trees.  3.7.7 The location of the proposed country park to the north of the Site, retains habitats of lower ecological importance, primarily arable farmland of negligible ecological importance. The location and extents of this Country Park and the resultant locations of built up areas shown on the STRA2 indicative layout could preclude the ability to deliver Biodiversity Net Gains within the Site, due to the losses of important ecological features including watercourse, species rich hedgerows, veteran trees and therefore habitat units.  3.7.8 The PSL Preferred Layout has been developed to respond to technical opportunities and constraints of the Site to deliver the optimal layout. This has evolved from a multi-disciplinary approach and with work between the Landscape Planner, Ecologists and Masterplanner to ensure the proposed development areas were identified based on a green infrastructure led approach. This was taken from first principles with no defined red line boundary to ensure the most suitable areas of potential development within a wider land control were identified.  3.7.9 As further expanded upon within the accompanying Landscape and Ecology Topic Paper (Appendix D) the current PSL masterplan responds appropriately, in line with the mitigation hierarchy and in conformity with local and national planning policy and local ecological priorities, by:  • Focusing built form development in areas of lowest ecological and landscape importance (namely the arable land and areas of improved grassland);  • Retaining and protecting the features of highest ecological and landscape importance notably, potential veteran trees, species rich hedgerows with trees, woodland priority habitats, more diverse grassland areas and watercourses.  • Seeking retention and enhancement of other habitats of ecological and landscape importance namely hedgerows, mature trees, ponds and ditches where possible, within appropriate buffers in multifunctional green infrastructure (which can provide open space, drainage, and landscape benefits);  • Providing opportunities for new habitat creation that is appropriately sited to provide connections into the wider ecological landscape and will provide the highest anticipated levels of enhancement that responds to the existing importance identified above; and  • Providing a Green Infrastructure strategy that has been designed to provide a network of well-connected greenspace, which ensures functional wildlife corridors both through and surrounding the proposed built development.  Flood Mitigation and the Sequential Approach  3.7.10 A Flood Risk and Drainage Topic Paper is provided at Appendix E which considers the baseline conditions in respect of flood risk and drainage.  3.7.11 To date the following technical work, which have also been submitted at previous plan-making consultations, has been undertaken to inform the optimal draft allocation in respect of Mickleover South (STRA2):  • Flood Risk & Drainage Appraisal Technical Note (06460-TN-0001-Rv4);  • Indicative Surface Water Drainage Strategy (06460-WR-A-0500-P4); and  • Indicative Foul Water Drainage Strategy (06460-WR-A-0501-P0).  3.7.12 The Site’s flood risk baselines can be summarised as that:  • There are no Environment Agency Main Rivers located within the Site boundary, with the nearest. Main River located approximately 1.5km east of the Site;  • There are a number of small, but well defined, unnamed, ordinary watercourses and ditches evident within the Site boundary;  • Each watercourse within the Site, will likely require an easement or stand-off of 5m from the top of both banks for maintenance purposes, but more importantly also to preserve the riparian corridor and sustain water dependent habitat;  • Ground conditions indicate that the infiltration of surface water runoff to ground will be highly unlikely within the majority of the Site;  • Flood Map for Planning indicates the Site lies within Flood Zone 1 and outside of the maximum extents of identified potential flooding during the 1% and 0.1% AEP events from any nearby Main Rivers;  3.7.13 In broad consideration, There are no Environment Agency (EA) main rivers located within the Site boundary and there exist areas of Low, Medium and High surface water flood risk are identified within the vicinity of the ordinary watercourses flowing through the area. However, the risk areas are limited to the watercourse corridors only.  3.7.14 We consider the land within PSL control a location for suitable sustainable growth on the boundary of a major urban area that is rare when comparing the relatively limited extents of flood risk area to the scale of the Site. However, whilst these extents may be comparatively limited, the PSL Masterplan accounts for best practice approaches and seeks to apply the Sequential Approach to development as stated in NPPF Paragraph 167 and 168 (December 2023) and as set out within Planning Practice Guidance.  3.7.15 Planning Practice Guidance (PPG) for Flood Risk and Coastal Change states at Paragraph 23 Reference ID: 7-023-20220825:  The approach is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. This means avoiding, so far as possible, development in current and future medium and high flood risk areas considering all sources of flooding including areas at risk of surface water flooding. […]  3.7.16 The main steps to address considerations of flood risk start with assessing and then avoiding flood risk, which start with measures to avoid, control, manage, and then mitigate flood risks so that flood risk is not increased elsewhere. When considering the first measures to avoid risks of flooding on site-basis PPG Paragraph 004 (Reference ID: 7-004-20220825) states that:  Within sites, using site layout to locate the most vulnerable aspects of development in areas of lowest flood risk, unless there are overriding reasons to prefer a different location. In addition, measures to avoid flood risk vertically can then be taken, by locating the most vulnerable uses on upper storeys, and by raising finished floor and/or ground levels, where appropriate and that such techniques are suitably designed. Such measures should also account for residual flood risks from flood risk management infrastructure.  3.7.17 The Proposed Local Plan Part 1 Reg 18 draft Policy SD2 Flood Risk also incorporates the need to consider design and layout solutions to avoid areas at risk of flooding. Whilst risk of flooding is mainly limited to follow the routeing of ordinary watercourses, flood risk technical assessments undertaken to date have informed the PSL Preferred Masterplan to avoid these areas so far as possible and is considered to make efficient use of land with a balance that considers sensitive areas of flood risk, heritage, as well as ecological and landscape value. As demonstrated in Figure 4 within the Flood Risk Topic Paper (Appendix E) it is expected that the proposed location shown on the indicative layout for the 5-10 hectares of employment land would be intersected by existing watercourses. It is not evident how the STRA2 indicative layout has made an allowance for existing watercourses and how consideration has been given to apply the sequential approach within a site from the indicative layout whilst remaining capable of delivering the quantum of much needed homes and the industrial employment land expected within draft Policy STRA2.  3.7.18 However, one must recognise that plan-making is a process and an iterative one at that where not all the answers will be available at the current earliest of stages. The purpose of Regulation 18 consultations is to consult and take into account any representations about what a Local Plan ought to contain. We therefore consider these representations as an opportunity to highlight site-specific outcomes from technical analysis undertaken to date to move to a joint understanding of the Site with South Derbyshire District Council to be taken forward.  3.8 Revealing and Respecting Heritage Assets  C Green Infrastructure. A network of interconnected Green Infrastructure which as a minimum shall include the following:   1. The provision of a wide green buffer around the pastures hospital estate and along the boundary of the A38; 2. The provision of a Country Park, to be located within the site to the north, west and in part of the land immediately to the south of the pastures hospital estate;   D Mitigation  v) A layout and form of development that respects the landscape character, as well as the character significance and setting of heritage assets, including Grade II Church at Pastures Hospitals and Grade II Winter Garden at Pastures Hospital;  3.8.1 A Heritage Topic Paper is provided at Appendix F.  3.8.2 A Baseline Heritage Assessment for PSL Site (Locus Consulting, 2022), which has also been submitted at previous plan-making consultations, has been undertaken to inform the optimal draft allocation in respect of Mickleover South (STRA2).  3.8.3 In light of proposed draft Policy STRA2 a further Updated Baseline Heritage Assessment for Mickleover South Site (Marrons, 2024) has been undertaken and provided at Appendix G.  3.8.4 The accompanying Site Opportunity Review (Appendix B) provides a visual comparative approach to the consideration of draft Policy STRA2 and the PSL Preferred Allocation. Moreover, in light of undertaking a holistic review to the Site an updated technical assessment of the baseline heritage and archaeological features (Appendix F).  3.8.5 The heritage and archaeological site baseline findings continue to include that:  • No designated or known non-designated heritage assets lie within the Site controlled by PSL or the boundaries of the wider draft allocation;  • Ridge and furrow earthworks of medieval and post-medieval date lie within several areas of the Site, showing varying degrees of survival. Desk-based review and a field assessment indicates that they are highly unlikely to be of sufficient archaeological interest to be identified as a scheduled monument, as set out in previously submitted Baseline Heritage Assessment (Locus Consulting, 2022);  • Beyond evidence for rural land use from the medieval period onwards, the proposed allocation also has a low to moderate potential to contain archaeological remains associated with Roman and Iron Age activity of local to regional archaeological interest;  • There is no evidence for archaeological remains of such interest that the principle of the Site’s development cannot be established;  • A total of 25 designated and 1 non-designated heritage assets were identified in a Study Area extending 1km outside the redline boundary of the Site. Of these assets, only six show any sensitivity to the draft allocation; and  • Only the former Pastures Hospital shows an elevated degree of sensitivity to the proposed allocation, with many concerns able to be avoided or mitigated through design. Other heritage assets show a low or very low sensitivity to the proposed allocation.  3.8.6 Historic England guidance incorporating advice in relation to the historic environment and the preparation of local plans, and specifically in the allocation of sites is considered relevant. These include:  a. Historic Environment Good Practice Advice in Planning Note 1: The Historic Environment in Local Plans (2015); and  b. Historic Environment Good Practice Advice in Planning Note 3: The Historic Environment and Site Allocations in Local Plans (2015).  3.8.7 A core foundation is that the process of bringing forward the draft allocation will afford great weight to the conservation of heritage assets, proportionate to their significance. Where possible, harm to them should be avoided or mitigated. Decisions will be underpinned by an evolving evidence-base regarding the significance of heritage assets and the impact the allocation’s development would have upon them.  3.8.8 Advice Note 3 in its step by step suggestions advises to consider ‘maximising enhancements’ and thereafter sets out means to avoid harm. Whilst we do not consider this to be an exhaustive list, Advice Note 3 includes considerations for Local Planning Authorities to maximise enhancements such as:  • Increasing understanding through research and recording;  • Repair/regeneration of heritage assets;  • Removal from Heritage at Risk Register; and  • Better revealing of significance of assets e.g. through introduction of new viewpoints and access routes, use of appropriate materials, public realm improvements, shop front design.  3.8.9 Place-shaping lies at the core of approaches to managing heritage assets through the plan-making process. Both Advice Notes 1 and 3 alongside the NPPF set out the importance of setting out a positive strategy for heritage assets that affords them protection through enabling them to make a positive contribution to the character and distinctiveness of places in which they can be enjoyed. The ability for a development to help repair and sustain heritage assets, putting them to active viable uses that realise their social, economic and environmental potential, forms a key part of this approach. Due to their proximity to and relationship with the draft allocation, the assets centred on the former Pastures Hospital promote opportunities to achieve this approach.  3.8.10 NPPF Paragraph 212 states that:  Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.  3.8.11 Historic England Guidance Notes 1 and 3, alongside the Historic England Good Practice Note GPA 3: The Setting of Heritage Assets, recognise the need to ensure high-quality delivery through appropriate mechanisms, controls and monitoring controls, including site-based policies and design principles where necessary.  3.8.12 An analysis of the proposed indicative layout toward draft allocation STRA2 and the PSL Preferred Masterplan is provided within the Heritage Topic Paper (Appendix F). However, in summary following a review of both layouts we consider that:  • The overall sensitivity of the historic environment to the development of the draft allocation is low.  • There are opportunities to actively integrate heritage assets into the future development of the Site, maximising the role they can actively play in place-shaping whilst mitigating or avoiding harmful impacts upon them.  • Critically, and drawing on the framework of law, national and local planning policy and industry best practice guidance, there are opportunities to avoid and mitigate harm to heritage assets, such as through visual screening, but also promote and celebrate their significance through the plan-making process, ensuring they play an active role in future communities. Opportunities to better promote the heritage values of assets associated with Pastures Hospital are lost within the STRA2 allocation, restricting the value they will bring to future communities.  • Comparison of the masterplan and STRA2 allocation shows that engaging with the constraints and opportunities posed by heritage assets does not have a strong relationship with the extent of the developable area, but rather in the nature by which heritage assets are engaged with, particularly in the spatial distribution of uses and open space.  • The greater the visual and physical connectivity the development has with the landmark former Pastures Hospital campus, the better the development outcomes will likely be for the historic environment. In this respect, amongst others, the masterplan offers significant advantages for place-shaping over the STRA2 allocation.  3.8.13 Based on the work undertaken to date, including the updated Baseline Heritage And Archaeological Technical Assessment prepared by Marrons (November 2024; Appendix G) the PSL Preferred Masterplan is considered to respect and appropriately respond to the heritage assets identified therein.  3.8.14 PSL is committed to working collaboratively through the Design Review process to ensure a comprehensive approach to the delivery of strategic growth in this location. This will include further consideration with landowners, South Derbyshire District Council, and Derby City Council to look for opportunities to enhance or better reveal or enhance the significance of existing heritage assets. | Noted.  The Council notes the additional potential residential capacity. The quantity and location of the publicly accessible open space (comprising a country park) is important to be located where it is most accessible for the new residents but also existing residents at the Pastures Hospital estate and Burnaston village in particular. This can be accommodated as planned in the draft allocation without compromising the delivery of the necessary housing numbers and built development proposals in a way that achieves the high-quality sustainable community that the allocation is seeking to achieve.  The policy requirement for the employment aspect is in the Council’s opinion flexible enough to not be prescriptive about the type of employment required. The Derby and South Derbyshire Employment Land Review identified an overall surplus of employment land in both local authority areas for the plan period. It is expected that the Design Review will inform the location of the employment development but that it is likely to support small and ‘grow on’ units that can take advantage of the proximity to the workforce but also the strategic road network.  A Transport Study is to be jointly commissioned by Derby City Council and South Derbyshire District Council to consider transport impacts and mitigation for the strategic sites, including measures to encourage sustainable travel. Integration with Derby City transport infrastructure and services will be a key consideration.  Notwithstanding this, and in light of comments made from Derby City Council and the support from the landowner to deliver the infrastructure the Council will consider whether a road link through the site to connect the A516 and A38 should be provided.  A Design Review for the strategic sites is being undertaken which will include consideration of infrastructure provision, the location of the different types of development and design parameters to ensure that the sites will be developed in a sustainable manner with all relevant cross boundary matters given appropriate consideration. This will then inform the conception plan included in the Local Plan. The concept plan should be used to guide a planning application on the site.  The Hospital Building is currently under consideration by Historic England for Listing. The Council has produced a Heritage Impact Assessment which considers the importance of the heritage assets and their setting. This has been considered as part of the Design Review process and the Council maintains that that the layout and form of development should respond to these heritage assets.  The quantum of publicly accessible open space is a key benefit of the scheme and how this can best be delivered is a main issue to be considered through the Design Review process. |
| 1243582 | CBRE Ltd on behalf of Land Project UK (LPUK) | CBRE Ltd |  | Please refer to our response to Question 3 and 5. Due to the size of the site as 5-10ha, we also question the validity of the site as a “Strategic Allocation”. | Noted.  See response to question 3 & 4. |
| 1243639 | Carden Group | Carden Group |  | 6.1 Similarly, as with the Infinity Garden Village proposed, Carden has concerns regarding the deliverability of the proposed 2,500 homes at the land south of Mickleover by 2039.  6.2 Again, no planning application has been submitted on the site yet, with the allocation yet to be confirmed by the Local Plan Review which if adopted in early 2026, could result in an application immediately after.  6.3 We note that this site has been promoted and is controlled by L&Q Estates, which is now under the ownership of Urban & Civic. These companies either promote or buy large tracts of land, service the plots, and license them to housebuilders in phases.  6.4Therefore, on this site, they will need to market the land to developers, which involves extensive due diligence, negotiations on price, and contract conditions. These steps often take several months or even years, delaying the handover of land ready for development.  6.5 Therefore, using the same Lichfield assumptions (Start to Finish, Third Edition, 2024), as were used when considering the site at the Infinity Garden Village, plus an additional 12 months for the sites sale to a housebuilder, results in a potential date of 2032 for homes to begin to be delivered on site.  6.6 Again, applying Lichfields average build out rate of 138 dwellings per annum, with a 2032 start date, results in 966 homes being completed by 2039, representing a serious shortfall of over 1,500 homes.  Proposed Modifications 6.7 We therefore again recommend that the Council provide additional evidence and assurances to demonstrate that the delivery of 2,500 homes at Mickleover by 2039 is achievable.  6.8 Alternatively, the Council should revise the proposed housing number for this allocation to reflect a more realistic delivery target by 2039.  6.9 If the housing target is adjusted downward, it is essential for the Council to identify additional sites to address the anticipated shortfall of approximately 1,500 homes. Priority should be given to sites near Derby that are well-suited for growth, such as locations like Hilton, which offer the necessary capacity to accommodate future development. | Noted.  South Derbyshire has a track record of delivering large numbers of dwellings per annum on individual allocations, comfortably exceeding 200 completions per year on sites such as the now complete Highfields Farm development and the former Drakelow Power Station, currently under construction.  The Council will produce a housing trajectory for the site, but it is worth noting that it is not expected that the site will build out in full during the plan period. |
| 1243664 | Deloitte LLP on behalf of Church Commissioners for England | Deloitte LLP on behalf of Church Commissioners for England |  | 8.1.1. Although the Commissioners do not have specific commentary regarding the policy requirements, extent of the site, facilities and infrastructure proposed at STRA 1: Infinity Garden Village, they stress the need for SDDC to complete the aformetioned supporting technical evidence before progressing with the allocation. The Infrastructure Development Plan update, Design Review for updated plan’s strategic allocations, Local Plan Viability Assessment and Housing Implementation Strategy will all provide necessary information regarding the deliverability of the site, and therefore at present, the Commissioners do not support the allocation insofar as it cannot be proven as justified or effective in line with NPPF paragraph 35. | Noted. |
| 1242595 | DTH Services Ltd | DTH Services Ltd | No |  | Noted. |
| 1242854 | Stantec on behalf of Caddick Land in relation to Land North of Ashby Road, Woodv | Santec on behalf of Caddick Land in relation to Land North of Ashby Road, Woodville | No |  | Noted. |
| 1243628 | Define Planning on behalf of Bloor Homes Ltd | Define Planning on behalf of Bloor Homes Ltd | No | BHL support the Council in setting out at this early stage the expectations for the strategic development allocations, including high level indicative masterplans. The intention for the development to have strong design principles and mitigate its own impacts is appropriate. | Noted. |
| 1242038 | Calum Reford | Inspire Design & Development | Yes |  | Noted. |
| 1248322 | Oxalis Planning on behalf of Chesshire Partnership | Oxalis Planning on behalf of Chesshire Partnership |  | We support the proposed allocation of STRA2. The site is located in a sustainable location well-related to the Derby City urban fringe and A38, and offers sustainable transport modes. It can also deliver significant green infrastructure inclusive of a new country park and provides the opportunity for a comprehensive development with the provision of new community facilities.  However, we object to the extent of the proposed allocation site, and to the proposed disposition of land uses shown on the proposed allocation plan. The extent of the proposed allocation should include the remaining land west of the Findern Interchange. In our view, the exclusion of this land makes the allocation unsound as it would compromise the ability to comprehensively plan the development of the area and leave an isolated parcel of land surrounded by a large development allocation.  Inclusion of this isolated land parcel would appropriately round off the allocation site and allow for comprehensive development, particularly of the important location adjacent to the Findern interchange. Furthermore, the inclusion of this additional land would allow for the policy to be amended to increase the deliverability of employment generating land, and to therefore help meet the employment needs of the area (please see our response to the employment needs evidence in section 3 below).  As Agents acting on behalf of the Landowners of this site, we put forward and support the inclusion of this land within the proposed allocation, to offer additional land for comprehensive development that would not result in additional wider impacts of the proposed allocation as a whole. The site area is circa 20 acres.  The plan below in figure 1 (and at Appendix 1) identifies the site referred to that has been excluded from the allocation, and we now put forward for its inclusion within the allocation.  Chesshire Partnership control other land within the proposed STRA2 boundary. They are also concerned about the approach to the disposition of land uses across the site, which does not reflect specific conditions on particular areas of the site and is at this very broad brush. In particular a parcel of land situated between the A38 and Staker Lane is identified to be a country park, and this does not respond appropriately to the circumstance of this land parcel. The Plan found at Appendix 2 identifies this land parcel.  The land identified in Appendix 2 along Staker Ln is part of a larger commercial farming unit operated by the Partners. The area of land identified in red is proposed within the draft masterplan to be allocated for housing. This is supported by the Chesshire Partnership.  The area of land identified in blue (Appendix 2) is proposed within the draft masterplan to be allocated as country park land/green wedge, which is not supported by the Chesshire Partnership. This area forms part of a commercial farming unit adjacent to the A38 and is in cut along this section. It is therefore expected that landscape/visual sensitivities are least prevalent in this area of the wider allocation.  This area of land also includes existing industrial units in relation to the agricultural holding, and it would therefore be appropriate for further development to take place in this parcel of land. We query the appropriateness of a country park being situated adjacent to A38 dual carriageway.  The masterplan proposes that this land would be bordered by Staker Lane, and an area allocated for housing to the west, the A38 and further allocated land beyond to the east. The emerging context of this land, therefore, is one of built development, and its allocation for countryside would isolate the area within the context of built development. Furthermore, the area is located a significant distance away from the allocation’s southern edge, which is proposed to act as screening to the wider landscape.  In our view, this context places the land within the main developed area of the allocation and is suitable for development.  The Chesshire Partnership would welcome the opportunity to discuss with the Council, the approach to the master planning process for these land parcels and the wider site. | Noted.  The allocation has been amended to include the land not previously identified within the allocation adjacent to the A38 Findern junction.  The Council has commissioned an independent Design Review to consider the site as a whole. When the findings of the Design Review have been published the Council will consider the implications for individual parts for the site. |
| **Members of the public** | | | | | |
| 1234363 | Julie Eason |  |  | Already given | Noted.  Please see response to questions 3,4 & 5b in relation to the housing strategy, housing requirements, Derby’s unmet need and the principal of development in this location.  Affordable housing should be located in close proximity to where the need arises (rather than in proximity to the Council Offices). Delivery of affordable housing is more achievable on larger sites due to viability issues, therefore the delivery of affordable houses on strategic sites is expected.  With regards to flooding the Council is not able to ask for betterment for the surrounding area. Any flood risk as a result of the development will be mitigated.  The District Council will be undertaking Transport Modelling which will look at the impact of the proposed allocations and any necessary mitigation. This will be in consultation with National Highways.  At submission the local plan will be supported by an updated Infrastructure Delivery Plan, which (in consultation with service providers) assesses and identifies the infrastructure needed for new development and considers how this will be delivered. Furthermore, Strategic allocations on the edge of Derby will provide the critical mass of development needed to deliver essential infrastructure, such as a new local centre.  The Council works in partnership with the integrated Care Board to ensure that adequate healthcare provision is provided in the area (either on-site or via contributions towards improvements in existing provision).  The Council is working in partnership with the County Council as education authority to ensure sufficient school provision in the area. It is expected that the new secondary school to be provided at the Infinity Garden Village site will provide additional capacity at John Port.  None of the proposed strategic allocations (STRA1, STRA2, STRA3) are on Green Belt land.  In terms of public transport provision, Policy STRA2 D vii) seeks to ensure that development is well connected to frequent public transport to Derby City and well as other key designation and that bus stops and routes are provided through the site to allow for convenient boarding. Part E of policy STRA2 (mentioned above) also relates to public transport provision.  Policy STRA2 criteria C seeks to provide a network of interconnect Green Infrastructure and includes a list of the minimum the site shall provide. In addition, the allocation will be expected to provide on-site biodiversity get gain in line with national legalisation and protect and manage key |
| 1241896 | Margaret Holmes | I do not represent an organisation but own land together with my brother Mr Richard Holmes |  | I cannot comment |
| 1235572 | Lisa Marie Roberts |  | No | No Sustainability Assessment for housing and the traveller community wasn't published until after the consultation  Mickleover has already taken more than its fair share of housing growth near the ward/city boundary. The proposed development south of Mickleover will impact on the current infrastructure which is already strained with increase traffic and facilities.  Up to 40% of the housing will be social, yet SDDC civic offices are 12 miles away in Swadlincote. This again will impact on travel arrangements.  Green space is already limited due to the housing development in the area. |
| 1242574 | Christian Murray-Leslie |  |  | Really doesn't meet what is required of new housing for a climate emergency. |
| 1243173 | Trevor Yeomans |  |  | 5.3. STRA2 - Page 55 – D Mitigation – iv) SUDS 5.3.1. I draw attention to the flood risk at the south side of Burton Road at this point. The road gullies in this area, and the paddock field immediately south of Burton Road seem to carry excess surface water constantly in winter months and suffer flooding during periods of high rainfall. Please refer to separate report of Ground Water and Flooding in Findern Area dated 1 October 2024.  5.3.2. Whilst the Policy does say that SUDS will be provided, it is assumed that this will be only in respect of the developed land, when what is needed is a pre-development assessment of surrounding areas and pre-development construction of ground water control systems |
| 1243592 | Christine Allen |  |  | Again, facilities are good, but extent of the sites and infrastructure is impossible without the structure of a new bridge at Swarkestone or nearby. |
| 1232852 | Angus Chan |  | No | Mickleover has already taken more than its fair share of housing growth close or on the ward / city boundary.  Proposing 2,500 dwellings as another urban extension to Mickleover is not sustainable or appropriate development, especially when suitable and abundant land is available elsewhere in South Derbyshire.  Up to 40% of the dwellings are to be social housing, yet SDDC offices are 12 miles away in Swadlincote. This housing should be closer to SDDC services. There is no justification for placing SDDC Gypsy & Traveller pitches on the Derby City boundary. Suitable land is available in South Derbyshire.  The proposal south of Mickleover does not provide ‘breathing space’ / green space buffer for established Derby City communities and these new dwellings. It is not sustainable development.  SDDC are rushing their local plan process - Government are currently reviewing national planning policy and the future A38 junction upgrade scheme. SDDC should have waited for clarity on both. SDDC have also not published their Sustainably Assessment Report. This is one of the most important local plan documents to demonstrate where housing and travellers sites have been considered, ruled out or chosen. This document is fundamental in testing the validity of the local plan process and housing / traveller site selection etc. The consultation should not have been launched without this document available. |
| 1232857 | Teri Licence |  | No |  |
| 1232861 | Jack O’Connor | Rolls-Royce | No | No Mickleover is over crowded |
| 1232863 | Lauren Ryan |  | No | The provisions will not be met just like always. There is never a new doctors built etc. I do not wish to live near a travellers site and feel unsafe surrounded by them and those needing social housing. I am sorry to say but it brings crime to the area. |
| 1232876 | Claire Woodward |  | No | Mickleover has already had too many houses built without the additional schools and GP infrastructure being increased.  Mickleover is turning into a concrete jungle and is no longer a nice place to live and is being overrun with social housing. |
| 1232904 | Holly Robinson |  | No |  |
| 1232906 | Steve Wilson | Home owner | No | You can't possibly safely think you can build 2,500+ houses ect around this area. You are not bothered about our safely just using it as a easy way of getting your new build % up. |
| 1232909 | Stuart Orr |  | No | Too many houses not enough consideration for the impact. |
| 1232922 | Maureen Shenton |  | No | The area is already overdeveloped and lacks the facilities to cope with a huge influx of housing |
| 1232937 | Margery Morgan |  | No | South Derbyshire is yet again trying to take advantage of facilities in Mickleover without contributing to them. The plan would have a very negative impact on many aspects of life for the residents of Mickleover and destroy yet more greenfield areas. |
| 1232938 | Martin Turner |  | No | Poor link up with current services - schools, GPs, public transport etc |
| 1232940 | Jon Arnott |  | No | 40% social housing is a big issue (just look at Girton Way Mickleover)  Infrastructure needs are hard to measure… but I note the existing new development in Mickleover is currently seeking to continue without the planned infrastructure needs set out in its existing policy |
| 1232946 | Rosemary Whitehouse |  | No |  |
| 1232962 | Chris Munn |  | No |  |
| 1232988 | Leigh Fearon |  | No | Plans already underestimate current developments and issues not addressed. These will only add to issues, having a surgery extension in Sinfin is of no use to those in Mickleover unless you drive.  Build now and hope issues are sorted later for services and road networks is shortsighted and deliberately pushing problems down the road. |
| 1233131 | Mariah Senaa |  | No | I do not agree with the policy requirements, extent of the site, facilities, and infrastructure proposed at STRA2: Land South of Mickleover. The proposed scale of development is concerning, as it could place significant pressure on local infrastructure, particularly roads, schools, and healthcare services, which are already under strain in the area. The extent of the site appears to be too large, leading to potential overdevelopment that could alter the character of Mickleover and its surroundings. Additionally, while the policy mentions infrastructure, it lacks clear commitments on how these will be delivered in a timely manner to meet the demands of the increased population. There is also concern about the potential environmental impact, including the loss of green spaces, which are vital for the community. The policy should focus more on sustainable and balanced growth that does not compromise the quality of life for existing residents. |
| 1233241 | Russell Licence |  | No | I have responded yes to former drake low. This is an example of a site riff for redevelopment.  Infinity village and Mickleover are pure greenfield sites. You cannot make more land so cherish it and stop developing on virgin soils.  As stated previous, farm land is sparse, farming needs to be encouraged in the UK, we need to be more sustainable. Building in greenfield must be a negative impact against carbon neutral targets.  The road and public transport infrastructure cannot cope now  Roads are in a terrible state now  There are not enough school places for Children now  You cannot get a doctors appointment now |
| 1233313 | Rae Louis |  | No | The area is already struggling after recent developments with resources. There is not sufficient infrastructure to cope. Doctors surgeries in the area are already at breaking point. Stalker Lane within the development is a narrow winding country lane that constantly floods and causes chaos. This is not a suitable road for new homes to be adjacent to. |
| 1233332 | Ameila Hunt |  | No | Doesn't have enough infrastructure for the amount of people that would be there |
| 1233334 | Harvey Heldreich |  | No | Mickleover had been over developed, and can no longer support the needs of its residents, the volume of traffic in the area will cause health issues, and will sddc stump up for the excess wear of the roads, no I don't think they will. |
| 1233335 | Ian Molyneux |  | No | People from the site will want to use Mickleover and access it via Staker Lane - it cannot cope (I understand a small Co-op size supermarket is going on site but this only accounts for urgent shopping for most - Tesco's will be the major draw as the closest big super market - via Staker Lane that cannot cope today - nobody walks or catch's the bus unless they have to to do their shopping. Also where do people go to get their haircut, eyes tested, fill the car up (whilst not all will use Mickleover a proportion (probably a high proportion) will. Parking is already heavily restricted and insufficient.  also without repeating myself on schools, dr's, parking general infrastructure etc This plan is complete madness |
| 1233359 | Sukhdev Bangar |  | No | Unsuitable strategic location, significant impact on existing residents. Their has already been a significant housing developments in Mickleover (Hackwood Grange & Cotchett Village) which are still in progress so more home are coming. This is already putting significant pressure on the local facilities and transport infrastructure |
| 1233743 | Matt Hunt |  | No | Because none of the proposed facilities will ever be built due to backhanders! |
| 1233824 | AYeomans |  | No | Firstly, Mickleover has already taken its fair share of housing developments close to the city/ward boundary.  Secondly, the proposed plans are not a sustainable development. Mickleover is bursting at the seams: doctors surgeries are at breaking point and residents are unable to get an appointment, ultimately putting the health of residents in extreme danger. There is no plan to build a school on the development and local schools are already struggling to meet the demands of the numbers of the community. The road and infrastructure around Mickleover is at capacity and building a further development will only add to the unsustainable traffic issues in the local area.  It is outrageous that you are proposing that 40% of the dwellings are social housing, yet the local council offices and support required by future residents is 12 miles away in Swadlincote. If there is a requirement for such significant numbers of social housing, these should be built much closer to the offices and the support services.  Additionally, proposing 2500 houses is not a sustainable nor appropriate development in an area already overrun with new build developments and lack of green space. There are other, more suitable areas in South Derbyshire.  Furthermore, SDCC are rushing their plan to local plan process. The Government are currently reviewing national policy and the future of the A38 junction scheme: SDCC should have waited for clarity on both of these. |
| 1234080 | Nick Pope |  | No | It is an unsustainable prospect! |
| 1234311 | Ian Fox |  | No | The proposal does not support the existing area and is totally not sufficient for existing or any proposed new requirements . |
| 1234342 | Julia Bather |  | No | What infrastructure see 1  Question 1 response: The area around the edge of Mickleover, Etwall and Hilton has been heavily built on over the last 5 years. There has been no investment in improved infrastructure, roads, health centers, secondary school,mobile phone signals etc. The traffic is becoming intolerable, you cannot get a dr appointment, have to call 111, John Port School causes issues in Etwall at school start , finnish times, parking is dangerous, blocking access for Emergency vehicles.  No more new houses in S Derbyshire until, A38 is improved, Swarkestone Bridge is replaced and more Secondary school place where the existing new estats have been build, Dr Surgery built in either Etwall or new estate on outskirts of Mickleover |
| 1234532 | Michelle Garnham |  | No | No infrastructure isn't there |
| 1235132 | Frazer Murphy |  | No | See 1st question response  Question1 response: Mickleover has received so much development in recent years. As an owner of a terrace house with no drive, the increase in population in the area has had a massively negative impact on my ability to park near my own house, on top of this the traffic coming to and from Mickleover is already bad along with the constant road works, without potentially another few thousand cars on the road. it’s not just a just a green space and congestion issue, air quality is a massive concern. On top of this the police rarely patrol around Mickleover as there currently isn’t as much of a need too and also being at one of the furthest points in derby from a station - building an extra 2500 homes on the border, 1000 of which will be social housing will inevitably cause an increase in crime in the area, long story short, local infrastructure cannot handle 2500 homes being built in this proposed area.) |
| 1235279 | Gerald Arthur Bowker |  | No | I believe this site is a green belt site and as such I don't believe any development would be suitable. This proposal is not sustainable or appropriate when there is land available elsewhere in South Derbyshire. |
| 1235316 | Geoff Lewins |  | No | Mickleover is full. It has had several thousand houses added to its outskirts in recent years without any additional infrastructure. It is not possible to get a doctors appointment, the roads are increasingly busy and parking in the village is all but impossible. Quite apart from exacerbating these problems STRA2 is proposed in an area where 2 already busy roads (staker lane and haven baulk lane/the hollow) merge. There are no local bus stops within easy walking distance so building 2500 extra houses will decant 2-3000 extra cars straight onto those roads. |
| 1235357 | Lorna Hodgetts |  | No |  |
| 1235411 | Andrew Norman |  | No | The main reasons are outlined in my answer to Q1.  Response to question 1: Mickleover has already taken more than its fair share of housing growth near the Ward/City boundary. The proposed development south of Mickleover lacks ‘breathing space’ / green space buffer for established Derby City communities.  Proposing 2,500 more homes as an urban extension to Mickleover is neither sustainable nor appropriate development, especially with ample land available elsewhere in South Derbyshire.  Up to 40% of the housing will be social, yet SDDC offices are 12 miles away in Swadlincote. This housing should be closer to SDDC services. There's also no reason to place SDDC Gypsy & Traveller pitches near Derby when suitable land exists in South Derbyshire.  The government is reviewing national planning policy and the future of the A38 Derby junction upgrade. SDDC should wait for clarity on both.  Staker Lane is currently used extensively as a short cut between Mickleover and the A38. It is unsuitable as an access route to a large housing development.  Mickleover already provides most of the public infrastructure for new developments located outside of the Derby City boundary and has its own difficulties particularly with access to healthcare. This proposed development will place a further burden on overstretched infrastructure. |
| 1235713 | Rob M |  | No | Mickleover's existing infrastructures are already staggering due to the pressure put on them by the increases in population created by the numerous recent housing developments built around Mickleover. Mickleover's roads are very busy now, resulting in frequent queues on Station Road and Uttoxeter road, Uttoxeter Road has also been afflicted by traffic jams at times and Mickleover residents are also suffering due to the increase in noise pollution from the A38. Mickleover schools, doctor's surgeries, dentists etc. are all running at capacity, and shops and supermarkets around Mickleover are all extremely busy. Mickleover is also lacking in employment opportunities for people due to the lack of shops and businesses operating in the area. The "sprawl" of housing around Mickleover will also have many detrimental effects on the environment as previously detailed, even taking into account the proposed park and other measures which are clearly inadequate, window dressing at best. |
| 1236005 | Richard Larder | Retired | No | Inadequate infrastructure resources. |
| 1236247 | Anthony Overton |  | No |  |
| 1236417 | Kaye Macken |  | No | The roads will not be able to cope with the extra volume of traffic. The junction at the Hollow and Heddigham way already gets very congested especially at peak times and the road gets blocked due to people parking near that junction when picking up and dropping children at Brookfields school. Local services eg Doctors and schools will be impacted. Mickleover has already been extensively built on and services promised in the past have not been provided. South Derbyshire will be building houses but will be using Derby City council's schools roads etc |
| 1236474 | Alan Dixon |  | No | As answer 1   Question 1: Do not agree with the proposal for housing south of Mickleover Already enough new housing near Mickleover Ward/City boundary. There is plenty of land available elsewhere in South Derbyshire, and should be nearer Swadlincote because of the 40 percent of social housing |
| 1236646 | Steven and Joanna Greenway |  | No |  |
| 1238115 | Fiona Bevington |  | No | Local road networks and facilities (doctors, shops, secondary schools) cannot cope with this. |
| 1238388 | Martin and Pat Cocker |  | No |  |
| 1238657 | Clare Wood |  | No | The housing is much the same as the housing that is being built/has already been built in Mickleover and all around England. These estates are high density concrete jungles with very little consideration given to substantial green spaces and for wildlife habitats. Where nature, green spaces and mitigation have been considered, they are token gestures and tick-box exercises. Wildlife is never prioritised, nor are people. The estates are soulless, and the housing is crammed together with very little space between each home and tiny, postage stamp gardens. It is quantity over quality because the developers want to cram in as much housing as they can to maximise their profits, rather than really and truly considering wildlife, the environment and the quality of lives of the people who will live there. |
| 1238851 | Carolyn McIntosh |  | No | 1. The infrastructure already in place cannot currently service the needs of the local population. GP practices are overwhelmed, the catchment secondary school already has more pupils than any in Derbyshire. |
| 1238852 | Sarah Sherrington |  | No | The local roads, infrastructure and services are already extremely strained following recent development in and around Mickleover. Havenbaulk Lane, Staker Lane and The Hollow become virtually gridlocked particularly at school start and finish times and also if the A38 has to be closed for any reason. |
| 1238860 | Michael Sherrington |  | No | The local roads, infrastructure and services are already extremely strained following recent development in and around Mickleover. Havenbaulk Lane, Staker Lane and The Hollow become virtually gridlocked particularly at school start and finish times and also if the A38 has to be closed for any reason. |
| 1238864 | Susan Walker |  | No | • The roads cannot cope with all the extra traffic; they are already gridlocked at peak times • The doctors’ surgeries are beyond capacity already • The schools cannot take the number of children that 2,500 houses would bring • Local amenities are overstretched now |
| 1238893 | William Bushell |  | No | Over the last few years, Mickleover has already seen extensive enlargement through various other developments. These developments have placed an unbearable strain on the local infrastructure, so there should be no further development in the area unless and until that infrastructure has been upgraded to catch-up with the increases in population, traffic etc..  Just to be clear, by infrastructure, I mean local essential public services including hospitals, doctor’s surgeries, dental surgeries, schools, shops, roads, banks, Police, Fire Service, Post Offices, bus services, refuse collection and disposal, recreation areas etc.. It is short-sighted, simplistic and irresponsible for you to propose the sort of development you have in mind, while the situation is as it is. Have you no thoughts for the current residents? If you were doing your planning job properly, you would have. There is much more to planning than simply finding a big enough piece of land.  Some of the previous developments around Mickleover have, in their original plans, included the provision of extensions to infrastructure facilities, but none have delivered. Therefore, even if you were to add some infrastructure developments to your current proposal, I do not believe that you would follow-through and deliver them. That is why I say “enough”. No more developments unless and until the infrastructure is there to accommodate it. |
| 1238942 | Mr Brian J Harrison |  | No | This is the use of green fields with existing flooding and traffic capacity issues. |
| 1239108 | Mr and Mrs Ginko |  | No | The local infrastructure in terms of amenities, roads, schools, etc cannot cope with the existing population as it is now. The additional people associated with 2500 houses will bring the situation to a breaking point that Derby City Council will have to solve with SDDC taking council revenue with contribution to the required infrastructure improvement. |
| 1239872 | Daniel Robertson |  | No | As previously stated this estate will end up being predominantly served by private cars.  The two access points to the estate are already areas of traffic congestion.  Furthermore thes plans are essentially for unimaginative suburban sprawl rather than densification of existing land which already exists in Derby itself. |
| 1240207 | Kevan Sutherns |  | No | STRA2 is agricultural land in use and the addition of 2500 houses to use the facilities of Mickleover and Littleover will have impact, they are already over subscribed and parking is just not available, the lack of infrastructure to support the new developments is telling in that the hub of Mickleover has inadequate parking for the extra numbers using it, add to that there are those who drive from outlying areas to catch the bus into Derby to their work. The villager does not cover the more outlying areas and so they drive then catch the Mickleover which is a part of the Derby City Bus service ( name as appropriate at the time, it can change! ) infrastructure is needed to be up to capacity before the development of housing and other building. |
| 1240252 | Ian McHugh |  | No | STRA2 (No)  The plan doesn't give the full picture, as it doesn't show what development would take place in the DCC area along Rykneld Road, Havenbaulk Lane/Hollow (another 400-500 dwellings?). In addition to the existing new development West of Mickleover & Hackwood Farm and the additional proposed H18 & H19 builds (1320+ dwellings).  We have an unsustainable additional 4320 dwellings in a 2 mile radius  STRA2 DCC 500 STRA2 SDDC 2500 H18 290 H19 1030 Total 4320  The smaller STRA1 & STRA3 developments have had proper infrastructure planned (A50 junction, Walton on Trent Crossing, Primary AND Secondary schools built, South Derby Integrated Link etc,etc)  Conversely, STRA2 has no infrastructure other than a primary school.  This represents an under developed plan in an inappropriate location with no serious consideration for the current impact of the developments since the last Local Plan.  The site cannot be seriously considered until the existing H18, H19 and other developments in a 3 mile radius have been fully completed and the effects known (not modelled).  Where would the existing overloaded Havenbaulk Lane and Staker Lane local & "rat run" traffic be routed?  The site will inevitably create increased localised traffic onto the A38 and A50. These trunk roads are already beyond the designed VPD. Without the A38 "Derby Junctions" GSJ implemented this cannot proceed.  Which school would Secondary School pupils attend ?(John Port is full). |
| 1240863 | Amardeep Bhopal |  | No |  |
| 1240880 | Rebecca Buckley |  | No |  |
| 1241058 | Stephen Alcock |  | No | See comments in question 5.  Response to question 5: I have been a resident of Howden Close Mickleover for over 25 years. We chose the close for its wonderful views over open countryside, and benefited from regular sightings and visits of many species of animals and birds, including foxes hares, owls, birds of prey, and pheasants. I also chose the area due to the infrastructure i.e. good roads that were not generally congested, great access to Derby city centre, great schools, doctors, dentists and adequate shopping facilities.  In recent years we have seen a whole string of housing developments placed around the south /west side of Derby City boundary, which has eroded many of the benefits listed above, and has decimated the local wildlife.  Traffic jams at peak times have become a regular event, especially on the A38/A516 major roads, plus the radial roads into the city centre, especially Uttoxeter Road, Burton Road and Ashbourne Road. Virtually every day I witness emergency services vehicles struggling to get through the traffic at peak times, especially around the Royal Derby Hospital, which creates potentially life-threatening delays to ill patients. Noting that many housing developments in the area are not yet completed, there is clearly going to be a lot more traffic that will result once all the current approved plans are delivered. I can only guess that traffic flow predictions are somehow made to assess the combined impact, but for sure things are only going to get worse. The situation is further compromised by the lack of previously planned major road improvements going ahead, plus if/when they do, the resultant construction work will cause mayhem to traffic flow for many months/years to come. Also, although you may plan for high quality pedestrian and cycle routes within the development, the existing roads are not suitable for pedestrians or cyclists to use, and would need major improvement to accommodate such plans. I Noting all the above comments, I also list some specific objections on the following grounds: 1. Impact on Local Infrastructure Mickleover schools, doctors, and dentists are all full. The demand on places is continually growing as a result of the new housing developments in the area, most of which at best, have deferred plans for limited facilities, so very reliant on Derby City facilities. Local shopping is also very difficult, with the only large supermarket (Tesco), often being extremely busy at peak times, creating parking problems, and causing general frustration. Similarly, the adjacent Parade of small shops has very limited parking, which again causes much frustration for local residents trying to pop to the post office, Birds etc. I am fortunate that I live close enough to walk, but there are a lot of elderly residents that that rely on taking their car or get a lift from family members. The surrounding streets are progressively becoming extended parking areas, which again causes frustration to some residents, plus adding to traffic flow issues. How does your assessments of these plans take account of such impacts? Specifically for your development, you need to understand just how much traffic flows from Mickleover down Staker Lane, since this is the obvious route for anybody heading south on A38. Staker Lane is a narrow country road, which is unlit, has several 90-degree bends, and has no footpath. It is also very narrow, and is quite dangerous for cyclists who also use it. It would therefore need widening to take account of increased traffic, plus adding at least a pavement on one side of the road. Furthermore, although the primary access is being proposed off the Finden island, the smaller access off Staker Lane could be very dangerous, especially if placed on the bend near the current Watergo Farm entrance.   2. Environmental Concerns  The proposed development will result in the destruction of greenfield land, which serves as a vital habitat for local wildlife and a natural buffer against pollution. Developing this area will irreparably harm biodiversity and contribute to further urban sprawl. With increasing awareness of the need to preserve green spaces, it is imperative to explore alternatives on brownfield sites before considering such damaging developments. If such land cannot be found, then it should be placed in an area where the impact on the existing infrastructure will be far less, or new adequate infrastructure is built as part of the development.  3. Village Character and Community Impact  The scale of the proposed development, including a traveller site, risks overwhelming the existing local community. While diversity and inclusion are important, there is a need for proper consultation and provision to ensure any development integrates effectively and does not create division or strain on local resources. The rural character of Mickleover, which has previously drawn people to live here, will be irreversibly altered by overdevelopment.  4. Lack of Justification  The National Planning Policy Framework emphasizes the need to prioritize brownfield developments over greenfield. There is insufficient evidence to suggest that this particular site is the only viable option. Given the ongoing housing developments in the area, it is unclear why additional pressure needs to be placed on this location, especially when other, more suitable sites could be considered. In particular, this area would not be suitable for a retirement village for the reasons stated above, and equally not suitable for a traveller site, so close to residential properties.  I would also like to draw your attention to the New House farm development. Firstly, the new island caused many accidents initially due to inadequate lighting and road signs. It also has an unnecessary impact on traffic flow due to east bound traffic heading to Mickleover, being directed to turn right at the island, affecting traffic flow going west. This completely ignores the fact that there is a perfectly acceptable slip road another 400 m down the A516, leading up into Mickleover. Also, x years on, the promised pedestrian crossing at the top of Ladybank Road has never materialised, nor has the walk way lights or a proper pavement down the official pedestrian route into the development off Ladybank Road been added. The apparent and promised steps to try and limit vehicle use into Mickleover has only received token improvements, and I for one, would be very reluctant to walk down there in the dark! It would be worth doing a survey of its use, especially for children going to schools in the area. Noting the almost constant traffic flow down Ladybank Road at peak times, plus increased parking and exclusion zones near schools in the area, it is clear that the majority of children off the development are transported to school in cars, with the resultant increase in traffic flow we had predicted. I hope such lessons have been learned for future developments, and developers are held more accountable for delivering their previous commitments/obligations.  In conclusion, I believe Mickleover has had far more than its fare share of new housing developments placed on its doorsteps, which has eroded the previous benefits of the area, and urge the planning authority to reject this draft proposal due to the negative impact on infrastructure, road safety, the environment, and the character of the local area. Sustainable development requires careful consideration, and this project fails to address the needs and concerns of the existing community. |
| 1241240 | Jonathan Watson |  | No |  |
| 1241601 | Miresh Mistry |  | No | - the provision of infrastructure does not equate to actual provisions. This has been noted time and time again in recent developments in the area including Cotchett Village where health service provisions or schools have allocated land but services do no then appear straining the local community. - The gyspy and traveller sites are far from the decision makers and unequal distribution throughout Derbyshire - Staker Lane where the proposed entrance is being considered is very narrow and congested in rush hour from the north end adding to traffic near the Brookfield school. Adding a housing site would make the traffic unbearable without serious infrastructure upgrades - I challenge the council to observe the traffic there from 8-9am and 3-5pm and you will see the issue. |
| 1241682 | Sue Glover |  | No | No more building is necessary |
| 1241686 | John Moore | John Moore | No | Proposal is inappropriate for the site; too big; difficult traffic flows; no capacity within local infrastructure; previous recent nearby developments demonstrate the inadequacy of local road junctions and parking facilities; local amenities are centred on Mickleover village and will lead the traffic flow North onto The Hollow via dangerous road junctions with Havenbaulk Lane and Brierfield Way; social housing residents will have to travel long distances to access their local authority offices. Public transport is non-existent. |
| 1241749 | Mark Hoptroff | N/A | No | There needs to be a new road off the A38 to ensure cars can access the area north of the proposed land. Also there needs to be a round-about at the top of Havenbaulk lane as this is the only way to ease the traffic in this area. Derby City did this at the top of station road a few years ago and this work perfectly. |
| 1241773 | Joanna Ayres |  | No | This land already suffers from drainage problems. Staker Lane can flood in heavy rain. It is also completely unsuitable for increased road traffic and dangerous for pedestrians and cyclists. This proposed development would also not be encouraging sustainable travel. There are no frequent bus services which serve this area. People living there will be forced to use their cars. |
| 1241860 | Innes Mary |  | No | As previously stated |
| 1241873 | Hilary Lomas |  | No | Lack of existing infrastructure and none planned before housing started  Gridlock already at rush hour on Havenbaulk Lane Pastures Hill  Roads in poor state due to existing traffic around Mickleover /Littleover  2500 houses will mean possibly 40000 cars as many houses have at least2 cars  Large new developments already surrounding Mickleover which have had to be absorbed.  Existing secondary schools in locality already have large number of pupils 1600 Littleover, 2000 John Port. Too big now!! |
| 1241910 | Nigel Bentley |  | No | See comments already provided. Mickleover has become overburdened with development on its periphery and is faced with a double whammy from the current planning proposals for Amber Valley which will further strain the infrastructure and resources of the Mickleover suburb.  If the A38 junction improvements are approved then this will result in several years of disruption to traffic flowing through the south of Derby and it can be expected that Mickleover will take the brunt of this. Equally, if the improvements due not go ahead then, as previously stated, the local road network will simply not be able to cope with the additional volume of traffic that will result from the draft proposal. |
| 1241947 | Sarah Glover |  | No |  |
| 1241955 | David Stockwell |  | No | Road infrastucture is not good enough along the A38, 2.8 Where there is deprivation in the District, it is often linked to education (No secondary school is planned and yet the current local schools are to capacity) |
| 1241973 | Graham Keith Sanders |  | No | Infrastructure (Doctors,Shops,Schools,Roads,Utilities) will not cope ! Councils inability to fulfill obligations (Refuse,Drains,Paths,Roads,Trees,Grass cutting) |
| 1241975 | Paul Hopkin | None | No | As per my previous answers |
| 1241985 | Shirley Jackson |  | No | Insufficient infrastructure on a massive scale to incorporate 3 to 5k new individuals |
| 1241986 | Andrea Thompson | Local resident | No | No infrastructure Refer to the first question |
| 1241989 | R Coxon |  | No |  |
| 1241995 | Donna Shacklock |  | No |  |
| 1242063 | Laura Massey-Pugh |  | No | Facilities are infrastructure have been promised before and are already lacking. The strategy is flawed. |
| 1242083 | Marian Elizabeth Graves | Homeowner | No | These proposals will not provide an important and positive contribution to this area. SDDC have again taken up the slack for Derby City.  I believe the planning rules designed to create housing connected to public transport routes has has not been considered in these plans, these new homes will reman dependant on car transport. There is no current public transport in the Staker Lane/Havenbaulk Lane/The Hollow areas of Mickleover. All the nearest amenities, shops, GPs, ring-roads and hospitals are accessible by car with no public transport provision. As is all of the Cotchet Village and other planning agreements in the area.  There has been no progress in this area of public transport provision when any new development has been sanctioned in the Mickleover area.  I thought the The National Planning Policy Framework (NPPF), governing planning decisions across England, stated that new developments should be located to prioritise easy use of public transport, or walking and cycling, with sites chosen to help this. I do not believe that these plans for the Mickleover area serve us by increasing carbon monoxide poisoning in to air (more cars on the roads) being taken in by those walking because there is no public transport - observe this Havenbaulk Lane/The Hollow in the mornings and evenings when small children are walked to and from school and older pupils are making their way to Littleover Senior School. Reliance on cars must be abated. The time for the SDDC to act on this, is in the planning process, not "kick the can down the road" for others to pick up, after their input is finished. |
| 1242108 | Chris Wilson |  | No | Again why should south Derbyshire be used for Derby city failings?  Why choose green field land when reusing the power station land or disused brownfield sites are available. It feels like the people and businesses of Mickleover are being punished. |
| 1242116 | Jonathan Nutman | N/A | No | Little detail given so unable to be convinced of plans |
| 1242119 | George Selby |  | No |  |
| 1242130 | Samantha Furniss |  | No | The proposed site not only is home to bats and owls (I know because I can hear them) which are both protected species, it is an area that floods - often and has since I was a child 40 years ago! The slightest touch of heavy rain and Staker Lane is barely passable.  The plan is complete ill-thought out and all homes will be using the infrastructure of Mickleover, which is already at breaking point from South Derbyshire allowing the mass house building at the very border of Derby City. |
| 1242135 | Matt Coxon |  | No | Mickleover has had enough development locally and would not benefit from this dwelling being created. See comments in answer 1 below: -   Mickleover has had many developments created over the last few years with more already coming. There is already a development falling under SDC which is on the A516. This is far away from any other SDC facilities so the residents use DCC provided services.  There has been a huge influx of social housing on each development as it is which has bought a steep rise in anti-social behaviour in the local area. some of the families located into these are from far away and so don't care about the local community or maintaining it. A traveller site would bring even more, not necessarily from its occupants but when others come to visit/ stay as witnessed on other places. The huge increase in local traffic is also a concern with routes in and out of Mickleover now becoming already swolen and bottlenecked.  The safety and wellbeing of the people who already occupy this are should be the first priority when planning these new developments. NOT dragging the area down with huge social housing clusters and traveller sites. TERRIBLE IDEA.  This new section of development is also under a different council to Mickleover. This would mean that people from the new estates would be using the Derby City councils facilities such as doctors and the local schools which are already at breaking point. |
| 1242138 | Tiran Sahota |  | No | There has already been a significant amount of development in this area in recent years and it has completely changed the area. The area is very congested and there is a lack of infrastructure to support all this additional housing. It is unfair to continue building in this area which has already absorbed a large number of new homes. If the building continues, Mickleover will join up with Etwall and there will be no green spaces to create boundaries between suburbs and villages. We need to keep these green spaces to distinguish different areas and help them maintain their own sense of community. |
| 1242287 | L Haines |  | No | I am emailing to register my concern after viewing the proposed plans for housing off Staker Lane in Mickleover . When I first heard about this, I assumed it was a joke as to put houses which are essentially off a small country lane is ridiculous. Staker lane is narrow and winding and gets shut often because of flooding - it is also often heavily congested with the amount of traffic already using it, and to imagine it being the entrance to housing estates is madness. The fields round there flood and I know Pastures estates have had issues in the past too. Some of the housing is directly next to the A38 which is busy 24/7 so the quality of air and noise for those homes would be questionable Mickleover has had more than its share of houses built already in the last few years with developments on Hackwood, Cochett Village, Station Rd and Langley Park all putting a strain on local services and roads.  The green space which is there at the moment needs to stay for environmental reasons - housing here is not necessary - there must be other more suitable sites in South Derbyshire with better road access and facilities. I am hoping these plans do not go ahead |
| 1242289 | Jenny Wright |  | No |  |
| 1242296 | Melissa Deighton |  | No |  |
| 1242301 | Adam James |  | No |  |
| 1242303 | Brian Woodings |  | No |  |
| 1242307 | Pete Milward |  | No |  |
| 1242311 | Dave Goodhead |  | No |  |
| 1242313 | Sue Bushell |  | No |  |
| 1242315 | Peter Wright |  | No |  |
| 1242318 | Jane Whittingham |  | No |  |
| 1242319 | SP & WL Stanley-Smith |  | No |  |
| 1242321 | Julie Muller |  | No |  |
| 1242325 | Tracy and Gordon Harrison |  | No | When we bought a house on the old Pastures Hospital site it was sold as Mickleover Country Park phases 1 and 2 by Redrow homes. Presumably the council knew this? The developed site, in my opinion, has that character of being a unique community in the area of having the best of both worlds, just about rural and still close to amenities. I believe if the proposed development proceeds it will change the nature of that community  There are no shops on the site and just the social club which predates the development. It has no throughfare to anything but the houses, golf club, pitches and social club. This was attractive to us when we moved as we didn’t want the traffic or footfall associated with shops and pubs I find it hard to believe that roads linking the proposed site with Mickleover Country Park (MCP) won’t eventually happen causing unwanted through fare in MCP.  The plan mentions a development of a country park to the North, South and West? How does that fit in to and enhance the existing one that in the plan is called “pastures hospital estate”? I’ve attached our Redrow customer reservation form that quotes the development as “Mickleover Country Park”. Can you please call it that instead of “pastures hospital estate”?  The new development proposes to use Staker Lane as the “main road” to take traffic on and off the site. I found a document (attached) DER/0099 that states;  Access Constraints” – “Access to The Hollow/Staker Lane but the roads are poor for significant traffic volume increases.”  The summary – “It is currently significant impaired by access problems. Although a road runs past the site, the potential traffic generation of development here would have an impact on the local road network.”  It’s very difficult to disagree with that assessment and what improvements have been made/identified to lift from “poor” to what must be good enough? As the summary states, Staker Lane will see a significant increase in traffic from the proposed site. Most homes have at least two cars, even assuming one that’s 2,000 cars accessing, what is, a country lane. It’s difficult to see how Staker Lane would cope in its present form nor how the roads leading off would cope.  The plan states it will encourage the use of local transport, is there any plan for a bus route along Staker Lane and The Hollow?  In all, there will be an added traffic burden onto The Hollow which is already quite busy. Add the noise and exhaust pollution from the traffic which will be to the detriment to the people living there.  I also note that land adjacent to Staker Lane is constrained by the Countryside policy (EV 1) noted on the attached document S/0049 and also as Countryside Stewardship (middle tier) on the MAGIC maps (attached). I couldn’t find any more detail online than that and it’s lacking in the draft local plan. What grants have been made/currently in existence for these areas and what incremental improvements have been gained by them?  The mitigation on page 56 states; “On site biodiversity net gain in line with national legislation and protection and management of key biodiversity assets such as trees and hedgerows”  What is the precise biodiversity net gain after building houses etc that didn’t exist before? Is it saying an incremental increase to wild life will occur after building 2,00 homes etc? It suggests the same wildlife will be there with wildlife that wasn’t before.  It’s stated there will be pitches for Gypsy and Traveller’s. I’ve seen where Gypsy’s and Traveller’s pitch in Derby and I’m sorry to say it never enhances the area. There is very little/non-existent respect for the area and litter is very common with sites are left in a far worse state. If it’s law to provide these pitches then there is little to say, if however, it’s not and you’re asking if I think it’s a good idea and want them on the proposed development then no, I don’t.  How big is the proposed “employment development” at the end of Staker Lane near the A38 island? What type is being encouraged, what effect on traffic will it have (vans, lorries etc?) on Staker Lane, The Hollow etc?  Lastly the effect on existing local social infrastructure. 2,000 homes at say 2.5 per home – 5,000 extra people needing doctors, dentists etc. It always feels the same, a promise of infrastructure (carrot) but not without building more houses (stick) on already compromised services.  Forgive me if I find it hard to believe this will happen before the build as stated on pages 56 & 57, now I’ve re-read this says that you’ll build the houses, sell them but won’t allow anyone to move in? How long will that be sustainable? I don’t believe for a second that someone will buy a house and then just wait. –  “E - No dwelling /phase of development shall be occupied until: i) The necessary Green Infrastructure including open space, active travel provision, connectivity, community facilities including education and health provision, public transport provision, hard infrastructure including access points and highway improvements where required is provided to service that dwelling/ phase.” |
| 1242327 | Christopher Prince |  | No |  |
| 1242330 | Fiona Brown |  | No |  |
| 1242335 | Keith Marklew |  | No |  |
| 1242342 | B & Y C Gambini |  | No |  |
| 1242348 | Chloe Garnham |  | No |  |
| 1242364 | Andrew Watson |  | No |  |
| 1242366 | Tracy Fazekas |  | No |  |
| 1242374 | D Cooper |  | No | Economic objectives of the local plan states ‘by identifying and coordinating the provision of infrastructure’.  The local plan meets the number of school places in relation to the number of houses for primary education however only contributions will be made to secondary provision. Littleover school is always oversubscribed and there is little room to build on site. John Port, one of the biggest schools in the country does not need to expand further where will the secondary pupils attend school if they have to travel further? It will only increase congestion and pollution. |
| 1242376 | Robert Kinross | Resident | No | At present, there is insufficient road infrastructure and local amenities. The A38 improvement is vital to help paid in the prevention of congestion within Mickleover. What percentage of people work from home over half do not and studies have shown that employers prefer hybrid working? Also at weekends the additional 2500 houses proposed for this development will undoubtedly greatly contribute to slow movement of traffic in and around Mickleover causing environmental and economic damage. |
| 1242396 | Lorna Watkins |  | No | My final objection is that South Derbyshire would be building on the back of Derby City’s facilities and providing none apart from a school. A doctor’s surgery is proposed but the Health Trust has to agree to this and there is a shortage of GPs. It is unlikely it could be staffed. |
| 1242407 | K R Buckeridge |  | No |  |
| 1242416 | Duncan and Caroline Williams |  | No |  |
| 1242418 | Michael Holland |  | No |  |
| 1242421 | Susan J Douglas |  | No |  |
| 1242556 | Carl Whysall |  | No |  |
| 1242557 | Patrick Kniveton |  | No |  |
| 1242626 | Keith Ryan |  | No |  |
| 1242627 | Tony Lockwood |  | No |  |
| 1242633 | Cathy Morio-Floch |  | No |  |
| 1242634 | Robin and Jean Goodall |  | No |  |
| 1243168 | Joy Walsh |  | No |  |
| 1243170 | Julian Fowkes |  | No |  |
| 1243180 | Paul Brindley |  | No |  |
| 1243225 | Paul and Nicola Pearson |  | No |  |
| 1243552 | Jim Froggatt |  | No | The small area of land east of the A38 should be considered as a separate site. A (iii) A retirement village would need sufficient new fully-staffed facilities for health, shopping, leisure etc. A (iv) A Gypsy and Travellers’ site would not fit in with the general ambience of Mickleover. B (ii) and (iii). Where would you find available healthcare and secondary education that is not already over-subscribed? D (iii) and (iv) Given that “Watergo Farm” is at the centre of the site, would development affect the drainage of the site significantly? Is “SUDS” suitable for the site? D (vi). Recent and on-going developments have significantly increased traffic on both the Uttoxeter Road and Burton Road corridors in the city. The junctions of both with the Derby Outer Ring Road are already near capacity in peak hours and will be over-capacity once these developments are completed. Residents of this site will be sitting in traffic jams unless they make long car journeys on A38 to distant employment, which is hardly sustainable. Experience suggests that Travel Plans have little effect unless alternative modes are very convenient. D (vii). I can’t visualise a route through the site that would provide a bus service to Derby city centre that was both viable and convenient. |
| 1244734 | Member of the public (name unknown)) |  | No | There are not sufficient amenities to accommodate the amount of properties already in place. The roads cannot take any more traffic. Not enough room in the schools and no shops or doctor’s surgeries. The roads are locked down with traffic queues. |
| 1236731 | Ewan Thompson |  | Yes |  |
| 1239219 | Anne Heathcote |  | Yes |  |
| 1240150 | Ian Turner | - | Yes |  |
| 1241473 | Amy Simes |  | Yes |  |
| 1241890 | Edward Stupple | Retired | Yes | There is no detail on public transport and road infrastructure. Staker Lane used for access to Mickleover is an unsuitable route. It is a busy cut through, narrow and very winding and major road improvements are already required. It is unsuitable for large vehicles both lorries and buses.  Havenbaulk Lane and The Hollow are already very congested with long queues.  Parking in Mickleover village is already at capacity. Tesco car park is the largest and extremely busy, the Community Centre and the spaces in front of the Post Office always full to capacity. Derby is set to expand at an unsustainable rate in the area around Mickleover, The thousands of houses built on the boundary of Mickleover a in recent years have not been provided with the necessary promised road improvements, extra doctors surgeries, dentists, schools provision, shops, bus routes which were promised as part of the previous planning permissions granted. This Draft Local Plan will compromise the existing aleady over-stretched facilities and infrastructure. The traveller and gypsy sites proposed are disconnected from South Derbyshire services (12 miles away!) and community and therefore places over reliance on Derby City services. This is impossible to properly assess because there is no detail provided.  Social and affordable housing should be placed closer to Swadlincote where access to SDDC services will be much more accessible.  This will destroy the natural environment of a green field farming wedge when there are better alternatives that are nearer to the centre of South Derbyshire that could better serve that population more effectively and not destroy future food security. |
| 1241956 | Andrew Lee |  | Yes |  |
| 1241993 | Alan Mercer Jones | Individual | Yes |  |
| 1242052 | Susan Marshall |  | Yes |  |
| 1242367 | Grace McCullouch |  | Yes |  |
| 1243600 | Geoffrey Tubey |  | Yes | See 6 above (Q6: But maintain balance between housing and employment. Make sure infrastructure happens. ) |

# Qu. 8: Irrespective of your answer to Question 5, do you agree with the policy requirements, extent of the site, facilities and infrastructure proposed at STRA3: Former Drakelow Power Station?

|  |  |
| --- | --- |
| Duty to Cooperate Body / Statutory Consultee | 3 |
| National Organisation | 2 |
| Regional Organisation | 2 |
| Parish Council and other Community Group | 9 |
| Councillor | 0 |
| Landowner or Developer | 11 |
| Members of the public | 68 |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Response Id** | **Name** | **Organisation** | **Do you agree with the policy requirements, extent of the site, facilities and infrastructure proposed at STRA 3: Former Drakelow Power Station?** | **Comment** | **Council Response** |
| **Duty to Cooperate Body / Statutory Consultee** | | | | | |
| 1243623 | Derbyshire County Council |  |  | Highways Issues Derbyshire County Council has concerns regarding congestion on the local road network in this area. This is exacerbated by a number of well-established annual events/festivals which creates additional traffic flows on commissioning and decommission. The preamble text to policy STRA3 could include a reference to the need for the completion of the Walton Bypass and the new Trent crossing before further development on the Drakelow site progresses. This would ease the load on the already potentially congested local, rural road network and enable traffic, particularly HGVs to use the new Trent crossing in preference to accessing the site from A38 via A444 Stapenhill and A5121 Burton Upon Trent. Neither Walton Bridge, nor Chetwynd Bridge are suitable for HGV traffic, and both have weight restrictions and have suffered from inappropriate traffic use. Waste Planning Issues Fig. 2 Former landfill site at Burnaston The application site lies on the former footprint of the ‘Gravel Pit, Burnaston’ historic landfill site and within 250m of the ‘Burnaston Ash Lagoon No.4’ former landfill site which lies on the western bank of the river Trent. Please see Fig 2 above. In accordance with the Building Regulations an assessment of ground gas risks must be performed. Ground gas risks should be assessed in accordance with good practice guidance such as ‘CIRIA C665 Assessing risks posed by hazardous ground gases to buildings, Construction Industry Research and Information Association, 2007’. Where any significant risks are identified there may be a need for specific remedial measures in respect of ground gas. These measures should be designed in accordance with good practice guidance such as ‘BS8485:2015+A1:2019 Code of practice for the design of protective measures fo methane and carbon dioxide ground gases for new buildings’. The scope and details of the gas assessment and any necessary remedial measures must be agreed with the local authority Contaminated Land Officer as part of the wider geo-environmental assessment of the site. | Agree. Add new paragraph.  Comments regarding the presence of landfill sites noted. |
| 1243643 | Sport England |  |  | Sport England consider this strategic site allocation policy as currently drafted to be unsound. The strategic site allocation appears to include playing field land. The 2007 Google aerial imagery shows that this playing field accommodated a football pitch and a cricket pitch, together with ancillary facilities. The playing field is to the south of the site allocation near to Loverose Way. The strategic site allocation is also near to Branston Golf and Country Club. Both these sports facilities are afforded protection under paragraph 103 and 193 of the National Planning Policy Framework (NPPF). Sport England are unaware of any information that demonstrates that the playing field to be lost is surplus to requirements in relation to criterion (a) nor are aware of any information that demonstrates that the existing facility will be replaced in relation to criterion (b). Furthermore, if the facility is to be retained, no information has been provided in relation to paragraph 193 of the NPPF that would ensure that the new development would not prejudice its use (e.g. noise, ball strike, etc). This is also the case for the adjacent golf course. As such, the policy, supporting text and diagram should be redrafted and redrawn to provide the necessary clarification and justification with regards to paragraph 103 and 193 of the NPPF. The occupiers of new residential development would generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. In this regard, new development should contribute towards meeting the demand that it generates through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports/Built Facilities Strategy, Playing Pitch Strategy (PPS) or other relevant needs assessment. Section 8 of the NPPF also advises that any new sports facility needs arising as a result of new development should be met. Therefore, the Council’s emerging Built Facilities Strategy and Playing Pitch Strategy for South Derbyshire should identify any shortfalls in existing sports provision and should identify how an increase in the demand in an area would generate additional/new demand for sports provision. Sport England’s Sports Facility Calculator and the Playing Pitch Calculator should be used to help determine the necessary sporting provision required, which could include the proposed education facilities. This work should inform the emerging planning policy for a development proposal at this site in accordance with paragraph 97 of the NPPF. Sport England request that the emerging strategic site allocation policy is redrafted and redrawn to take into consideration the above matters. | The Drakelow facilities will be considered as part of the STRA3 design review.  Agree.  The Council will ensure that any loss of playing fields will be mitigated through the provision of on-site facilities and/or off-site provision.  The Council will ensure that the strategic allocation policies will seek assessment and/or mitigation to ensure that the proposed developments do not have a prejudicial impact on neighbouring sporting use.  The Council will also ensure that development will contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision will be informed by a robust evidence base such as an up to date Sports/Built Facilities Strategy, Playing Pitch Strategy (PPS) or other relevant needs assessment. |
| 1242867 | Natural England |  | Yes | Natural England welcomes paragraph B which sets out the provisions for Green Infrastructure across the site and the safeguarding of surrounding natural habitats. We encourage Green Infrastructure to be designed so that it is connected throughout the site and into the wider locality for the maximum benefit of people and biodiversity. The policy should also consider how the requirements for Biodiversity Net Gain will be achieved on-site at the earliest stages of the masterplan preparation. It should set out the habitats within the site to be protected or enhanced, opportunities for new habitat creation or improvements in connectivity and whether any off-site provision is likely to be necessary. | Noted. These matters will be considered as part of the Design Review. |
| **National Organisation** | | | | | |
| 1243542 | Home Builders Federation (HBF) |  |  | HBF do not comment on individual sites, be we would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. HBF does not comment on individual sites, other than to say the Plan should provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full. The soundness of strategic and non-strategic site allocations, whether brownfield or greenfield, will be tested in due course at the Local Plan Examination.  HBF are aware of potential challenges can impact on the timescales for delivery of the SUEs. Ways to address such ongoing risks could include increasing the housing requirement and/or the buffer applied. The Plan should also recognise that the time taken to bring forward larger allocations, and this underlines the need for a range of site types and sizes to ensure a five-year land supply on adoption, and an effective housing land supply over the plan period. | Noted. Please see Council response to comments under Question 4. |
| 1235628 | British Horse Society |  | Yes | no comment. | Noted. |
| **Regional Organisation** | | | | | |
| 1243652 | Derbyshire Wildlife Trust |  |  | STRA3: Draft Former Drakelow Power Station Allocation  The allocation of land close to the Drakelow Nature Reserve will result in significant loss of semi natural habitats that help to buffer and complement the existing nature reserve making it more resilient and better able to support a wide range of wildlife. Our concern relates mainly to approximately 10 ha of land zoned for industrial use that sits adjacent to the reserve.  Ideally it would be good to try and relocate this area elsewhere within the wider site further from the reserve, but if the land is included then there needs to be an effective buffer to the nature reserve that retains a much habitat as possible. | Noted. These matters can be considered as part of the Design Review and any subsequent adjustments made to policy as necessary. |
| 1242640 | Derbyshire Association of Local Councils |  | Yes | Detailed as above in question 5:  The Drakelow estate is large and we are aware of recent issues with lack of footpaths and poor drainage causing flooding. Surrounding parish members have raised concerns regarding highway issues and the delayed building of a second Walton Bridge | Noted. Please see Council response to comments included under Question 5c. |
| **Parish Council and other Community Group** | | | | | |
| 1239943 | Castle Gresley Parish Council |  | No | Although the proposals may be acceptable, experience has shown with the infrastructure A particular concern is that at the Drakelow Development there is a lack of secondary placement support – It appears that only primary education is being incorporated. There is the additional issue of the lack of a new bridge to enable the additional traffic to commute to Burton, the A38 and other arterial roads. Most of which will be diverted through Catton and Walton and Trent. This will not only include domestic vehicles but commercial vehicles as well as the proposes bus service that would be needed for such a large development. The other developments underway in Castle and Church Gresley will also put a great strain on its local infrastructure. Again, there have been no additional school places included in the plan, nor Doctors, Dentists, Shops or roads to take into account the additional residents and traffic. Officers need to understand that houses cannot be built on sites just because there is land to build them on. They must have the amenities, roads and services to accommodate them. We believe there should be more protection in the policy against excess traffic and traffic noise, light pollution, fumes and inappropriate developments like fast food outlets near schools etc. We are very concerned about the increased amount of traffic and traffic noise in our parish, and the lack of any additional social infrastructure which also appears not to have been added to any of the developments in the local parish. E.G community centres/halls. There have been no extra school spaces provided for Castle Gresley, either primary or High school despite local schools being full and many of the development houses being 2/3/4 bedroomed. We have seen no extra funding of Gresleydale Doctors and local Dentists are non-existent. Yet we are seeing 71 houses appear in Oak Close and 306 houses in Church Gresley approximately half a mile away. | Noted. Please note Council response to comments included under Question 5c. |
| 1241376 | Rosliston Parish Council |  | No | SDDC currently has approximately 5597 houses being built in the area. The current infrastructure in the locality of these developments has not been improved to accommodate them or previous developments and this is already having a massive impact on the local communities. It is unclear where any additional infrastructure and amenities will be introduced within the local plan for the current developments let alone any future builds. There is no detail regarding extra services such as Doctors, Dentists and school places. Educational mainstream places are already at full capacity. A particular concern is that at the Drakelow Development there is a lack of secondary placement support – It appears that only primary education is being incorporated. There is the additional issue of the lack of a new bridge to enable the additional traffic to commute to Burton, the A38 and other arterial roads. This bridge has been planned for many years yet still has no start date. Most of which will be diverted through Catton and Walton and Trent. This will not only include domestic vehicles but commercial vehicles as well as the proposes bus service that would be needed for such a large development. The other developments underway in Castle and Church Gresley will also put a great strain on its local infrastructure. Again, there have been no additional school places included in the plan, nor Doctors, Dentists, Shops or roads to take into account the additional residents and traffic. Officers need to understand that houses cannot be built on sites just because there is land to build them on. They must have the amenities, roads and services to accommodate them. We believe there should be more protection in the policy against excess traffic and traffic noise, light pollution, fumes and inappropriate developments like fast food outlets near schools etc. We are very concerned about the increased amount of traffic and traffic noise in our parish, and the lack of any additional social infrastructure which also appears not to have been added to any of the developments in the local parish. E.G community centres/halls. There have been no extra school spaces provided for Castle Gresley, either primary or High school despite local schools being full and many of the development houses being 2/3/4 bedroomed. We have seen no extra funding of Gresleydale Doctors and local Dentists are non-existent. Yet we are seeing 71 houses appear in Oak Close and 306 houses in Church Gresley approximately half a mile away.  There seems to be a lack of joined up thinking, adding new sites in South Derbyshire, without the infrastructure to support them. Surely the infrastructure should be in place either prior to the homes being built or at the very least the same time. | Requirements for infrastructure, service and amenity provision required in connection with currently permitted development are set out in planning permissions and any associated legal agreements, which are available to view on the Council website.  Infrastructure provision for the mixed use development at the former Drakelow power station site, currently under construction, is to be in accordance with the planning permission and related S106 agreement for that site. These were prepared in consultation with the relevant highway authorities among other relevant bodies and reflect their negotiated requirements. A new River Trent crossing in the form of a Walton-on-Trent bypass is required to be provided in advance of the occupation of 785 dwellings on the site.  Draft STRA3 policy in the emerging Local Plan sets out the Council’s requirements for the development of the site. A design review is in progress, which will identify any need to adjust or add to these requirements, as will subsequent transport and viability assessments and the production of an Infrastructure Delivery Plan.  In regard to the particular development impacts mentioned, traffic generation is addressed under Policy INF2 and noise, light pollution and fumes under Policy SD1. These development management policies apply to all proposals requiring planning permission including that on the STRA3 allocation.  The question of restricting fast food outlet development in particular locations in the interests of public health has been considered by planning officers, but it has been concluded that national planning policy does not provide support for the introduction of such controls.  Provision of services and infrastructure in association with significant new housing development is determined with reference to the policy requirements of the Local Plan, established in close consultation with the relevant highways, education, health and other agencies and having regard to all known deficiencies in community facility provision and those which may arise as a consequence of the proposed new development. In determining planning applications, whilst seeking to adhere as closely as possible to the requirements set out in planning policy, account must also be taken of the ever changing strategies and priorities of the various interested agencies and the financial viability of the development, balanced against the long established national drive to accelerate housing delivery. |
| 1238750 | Hilton Parish Council |  | Yes | Good use of an existing brownfield site provided the traffic issues are properly managed and there is not the usual assumption that the existing road infrastructure will cope. | Noted. |
| 1240947 | Barrow Upon Trent Parish Council |  | Yes |  | Noted. |
| 1242402 | Weston-on-Trent Parish Council |  | Yes |  | Noted. |
| 1242585 | Egginton Parish Council |  | Yes | Yes – agreed, it’s a brownfield site close to Burton on Trent for amenities | Noted. |
| 1243158 | Melbourne Civic Society |  | Yes |  | Noted. |
| 1243603 | SAVE (Save Aston & Weston Village Environment) |  | Yes |  | Noted. |
| 1244412 | Etwall Parish Council |  | Yes | As noted above, we do not know the area in sufficient detail, however as a brownfield site, development is appropriate. | Noted. |
| **Landowner or Developer** | | | | | |
| 1242558 | Avison Young on behalf of National Grid |  | Yes | Proposed development sites crossed or in close proximity to NGET assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below.  Former Drakelow Power Station.  A plan showing details of the site locations and details of NGET assets is attached to this letter. Please note that this plan is illustrative only. Without appropriate acknowledgement of the NGET assets present within the site, these policies should not be considered effective as they cannot be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure.  We propose modifications to the above site allocations and/or policies to include wording to the following effect. We propose that these modifications are applied to each of the aforementioned site allocations affected by NGET assets.  Policy STRA3: Former Drakelow Power Station  The development will include a strategy for responding to the NGET assets present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the development on the assets has been reduced through good design.”  Please see attached information outlining further guidance on development close to NGET assets.  NGET also provides information in relation to its assets at the website below. • https://www.nationalgrid.com/electricity-transmission/network-and?infrastructure/network-route-maps | Agreed. Add new section. |
| 1242100 | RPS on helaf of Bellway and Clowes (Thulston Fields) |  |  | Until such time as a Whole Plan Viability Assessment has been published RPS reserve the right to comment further on the policy requirements sought for each strategic site. Without such evidence, it is not possible to be confident in the development requirements sought from each strategic site, the social infrastructure / service enhancements and the green infrastructure enhancements. | Noted. |
| 1242408 | Lichfields (on behalf of St Philips Land Ltd) |  |  | St Philips do not wish to provide comments in respect of Question 8. | Noted. |
| 1243217 | Harris Lamb on behalf of Talland Capital Ltd |  |  | Policy STRA3: Former Drakelow Power Station TCL support the identification of the former Drakelow Power Station site as a strategic employment allocation to accommodate 68 hectares of employment land for uses within Classes E(g), B2 and B8. The proximity of TCL’s site to the proposed employment allocation to the former Drakelow Power Station mixed use development would mean that new residential development can be located in proximity to where new jobs and employment are intended to be created. TCL agree that there is merit in co-locating new employment development with proposed and existing residential development as there is an opportunity to reduce travel between the person’s place of work and their residence.  Policy H6: Drakelow Park TCL support the continued allocation of Drakelow Park for residential development of up to 2,239 dwellings. The development is now well underway with Phase 1 complete, Phase 2 currently under construction, Phases 3 and 4 having recently secured Reserved Matters approval and the Bridge and Bypass has a resolution to grant. In addition, the proposal for, Bridge and Bypass, a new primary school and GP surgery are well advanced and discussions relating to the employment and extra care facilities are also well advanced as we understand it. The site has been an important allocation for the Council and its delivery will secure a number of new homes to meet housing needs over the plan period, along with associated infrastructure and facilities TCL’s site at Walton Road has the opportunity to benefit and complement the development due to its close proximity. This includes the provision of the new food retail store that would also help serve the residents of Drakelow Park and Stapenhill who would have less distance to travel to access their food shopping needs. | Noted. |
| 1243582 | CBRE Ltd on behalf of Land Project UK (LPUK) |  |  | Please refer to our response to Question 5:  LPUK do not object to the principle of strategic sites for development. However, it is vital that the emerging Local Plan caters for development needs now, and in the absence of Planning Decision Notices, it cannot be guaranteed that the sites can be delivered in the short term (0-5 years), and we have concern that the immediate employment needs of the borough are not being efficiently planned for. Furthermore, it is clear from the draft allocations that further technical work is still required to ensure the feasibility of the scale of growth envisaged within the allocations, with reference to the need for the Council to work with infrastructure providers to address issues such as transport, health and school provision. Given the questions we’ve raised around deliverability and timescales of the new allocations, we recommend other sites are also allocated in the emerging Local Plan for employment purposes that are deliverable now and of a small-medium scale. | Noted.  The Derby and South Derbyshire Employment Land Review identified an overall surplus of employment land in both local authority areas for the plan period. The Council has identified a sufficient quantum of available employment land to meet near term needs as identified through annual monitoring. Land proposed to be allocated for employment development at STRA1 will contribute toward providing an additional source of supply for the plan period. |
| 1243653 | Marrons on behalf of Brackley Properties (Burnaston Cross) |  |  | 3.4.4 Approximately 68ha of employment land is proposed for allocation under Policy STR3 at land at the Former Drakelow Power Station. The ELR considers this site under reference 211 and ranks it “B-,” indicating that the site has some, possibly significant constraints and that these raise questions over deliverability and that it should only be considered as a considerable to meet local employment based needs. The site-specific assessment within the ELR observes the following: • Contamination from previous power station uses poses an issue; • Ecological constraints within the site and nearby; • Access is a constraint, namely the current Bailey Bridge over the River Trent; • Availability of power possible constraint as no connections to current infrastructure; • The site is isolated from the A38 requiring access improvements; and • Even with improved access the scheme may be too distant from the A38 corridor to be attractive to occupiers. 3.4.5 On the Council’s own evidence, all three proposed sites allocated to bring forward employment within the current plan period face fundamental questions about their delivery. The ELR also sets out in its assessments of Drakelow Power Station and the Land South of Mickleover that these sites are only suitable to meet localised employment needs, so it is not clear why they have been chosen for a strategic allocation, when the Draft Plan states that part of the rationale for bringing forward additional employment land above objectively assessed needs is to provide for wider regional and sub-regional business accommodation requirements. | The Derby and South Derbyshire Employment Land Review, Para 9.5 indicates that the STRA3 site could be graded either B- or A- depending on how successfully the site can be linked to the nearby A38 corridor.  Infrastructure provision for the mixed-use development at the former Drakelow power station site, currently under construction, is to be in accordance with the planning permission and related S106 agreement for that site. As part of this a new River Trent crossing in the form of a Walton-on-Trent bypass is required to be provided in advance of the occupation of 785 dwellings on the site. This will greatly enhance highway access between the A38 and STRA3 site.  It should be noted that the Employment Land study states that the site would be well placed to cater to larger scale employment accommodation requirements from Swadlincote. It should be noted that Policy STRA3 requires the inclusion of accommodation for small to medium scale enterprises. The site can therefore play an important role in helping top meet employment needs in the south of the District as well as contributing toward strategic needs. |
| 1243664 | Deloitte LLP on behalf of Church Commissioners for England |  |  | 9.1.1. The Commissioners do not have any particular commentary to make in relation to the policy requirements, extent of the site, facilities and infrastructure proposed at STRA 3: Former Drakelow Power Station. | Noted. |
| 1242854 | Stantec on behalf of Caddick Land in relation to Land North of Ashby Road, Woodv |  | No |  |  |
| 1242038 | Inspire Design & Development |  | Yes |  | Noted. |
| 1242112 | Cushman & Wakefield (on behalf of E.ON UK plc) |  | Yes | Policy STRA3: Former Drakelow Power Station  E.ON support proposed Policy STRA3 which allocates the former Drakelow Power Station to deliver up to 68ha of employment use within Use Classes E(g), B2 and B8, subject to identified criteria.  The policy should refer to Use Class E (g), B2, B8 and ancillary uses (paragraph 5.22) to ensure a comprehensive development.  Policy STRA3 confirms at Criteria A Development Requirements that a range of unit sizes shall be provided, including accommodation for small to medium sized enterpises. E.ON support the provision of a range of unit sizes but these should not affect the delivery or function of Site STRA3 Former Drakelow Power Station as a Strategic Employment Allocation to meet the objectives of Policy S5.  Energy development will be permitted outside the employment allocation boundary (paragraph 5.22). E.ON support reference to energy uses to assist in the regeneration of previously developed land.  Paragraph B notes sites, including STRA3 Former Drakelow Power Station should include provision to meet the needs of small and “grow on” businesses to be secured by planning condition or legal agreement attached to a planning permission.  The existing Drakelow Nature Reserve will be retained to its current extent along with the creation of a buffer zone (paragraph 5.23). E.ON support retention of the Nature Reserve and have clarified boundaries with a lease agreement to protect current interests. The extent of buffer required should be determined by the masterplan. | Noted. See Council response to comments in respect of Question 5c.  The extent of the Drakelow Nature Reserve buffer requirement will initially be considered as part of the STRA3 Design Review. |
| 1243628 | Define Planning on behalf of Bloor Homes Ltd |  | Yes | The policy is broadly appropriate for the delivery of an employment site. Whilst it is understood that this Review is in relation to the current unmet need of Derby City, it is unclear whether the impact of additional, significant employment development has been considered in relation to housing needs. It’s important to support new employment development but also provide the homes needed to provide a ready workforce nearby to promote sustainable working practices. The impact of employment development on housing needs should be considered further, and is imperative as part of the production of a new Plan | Substantial housing growth, in excess of 2000 new homes, is taking place on the adjacent Drakelow Park development, currently under construction, whilst planning permission exists for the development of over 1500 new homes in the Swadlincote urban area over the plan period. New employment provision within the District can help address current net travel to work outward journeys from the District to neighbouring areas. |
| **Members of the public** | | | | | |
| 1232861 | Jack O’Connor |  | No |  | It should be noted that the proposed allocation STRA3: Former Drakelow Power Station, is proposed for employment provision not housing.    Specific comments relating to Infinity Garden Village will be considered under Question 5a and/or 6 and specific comments relating to Mickleover will be considered under Question 5b and/or 7.  The provision of a new Walton on Trent Bypass is a requirement of a Section 106 agreement prepared in association with the planning permission for adopted Local Plan allocation H6 and must be provided prior to the occupation of 785 dwellings on that site. The approved masterplan for the site and subsequent reserved matters planning permissions include provision for pedestrian and cycle access to, from and within the site, including the development of a multi-user greenway connection to East Staffordshire. The draft Local Plan Part 1 Review proposes that this greenway should extend into and through the STRA3 allocation.  The District Council will be undertaking Transport Modelling, which will look at the impact of the proposed allocations and any necessary mitigation. This will be in consultation with National Highways.  Policy STRA3 sets out requirements for infrastructure on the site. In addition, the local plan will be supported by an updated Infrastructure Delivery Plan at submission, which (in consultation with service providers) assesses and identifies the infrastructure needed for new development and considers how this will be delivered. Furthermore, Part D of Policy STRA3 requires that no phase of development shall be occupied until *“The necessary green infrastructure including open space, active travel provision, connectivity, public transport provision, hard infrastructure, including access points and highway improvements where required is provided to service that phase.”*  STRA3 contains a Local Wildlife Site. The Policy requires that key biodiversity and ecological assets including the Drakelow Nature Reserve, Drakelow Wildfowl Reserve Local Wildlife Sites and Tree Preservation Order 122 are safeguarded and protected.  In addition, Policy STRA3 criteria B seeks to provide a network of interconnect Green Infrastructure and includes a list of the minimum green infrastructure the site shall provide.  In terms of the proposed allocations impact on nearby residents, criteria Cvii of policy STRA3 requires that residential amenity and safety on the adjoining Drakelow Park development shall be protected, including in relation to noise, vibration, odour, dust, light pollution and traffic generation in accordance with Policy SD1.  Details such as the materials and design of individual buildings will dealt with at the planning application stage. Furthermore, the Plan should be read as a whole when applications are being determined, including Policy BNE1 which expects all developed to well designed and requires development to respond to their context.  None of the proposed strategic allocations (STRA1, STRA2, STRA3) are on Green Belt land. |
| 1232904 | Holly Robinson |  | No |  |
| 1232906 | Steve Wilson |  | No | It makes sense as I've worked there I know how large the site is along with good roads. |
| 1232962 | Chris Munn |  | No |  |
| 1232988 | Leigh Fearon |  | No | Based on developments around myself in Mickleover, I can only assume other developments have the same issues. |
| 1233131 | Mariah Senaa |  | No | I do not agree with the policy requirements, extent of the site, facilities, and infrastructure proposed at STRA3: Former Drakelow Power Station. Although redeveloping a brownfield site like this can be a positive step, the scale and extent of the proposed development are concerning. The site is substantial, and without clear, detailed plans on how the infrastructure—particularly roads, public transport, and utilities—will be enhanced, there is a risk of overwhelming the local area. Additionally, there are potential environmental concerns, especially related to the impact on nearby green spaces and natural habitats. The proposed infrastructure and facilities may not be sufficient to support the increased population without placing a significant burden on existing services, and there is insufficient clarity on how this will be managed. More emphasis should be placed on ensuring sustainable development, protecting the local environment, and safeguarding the quality of life for both new and existing residents. |
| 1233743 | Matt Hunt |  | No | Because none of the proposed facilities will ever be built due to backhanders! |
| 1234532 | Michelle Garnham |  | No | No opinion |
| 1235357 | Lorna Hodgetts |  | No |  |
| 1238657 | Clare Wood |  | No | The housing is much the same as the housing that is being built in Mickleover and all around England. These estates are high density concrete jungles with very little consideration given to substantial green spaces and for wildlife habitats. Where nature, green spaces and mitigation have been considered, they are token gestures and tick-box exercises. Wildlife is never prioritised, nor are people. The estates are soulless, and the housing is crammed together with very little space between each home and tiny, postage stamp gardens. It is quantity over quality because the developers want to cram in as much housing as they can to maximise their profits, rather than really and truly considering wildlife, the environment and the quality of lives of the people who will live there. |
| 1240207 | Kevan Sutherns |  | No | This is a brown field site and if cleared of pollution could be used for housing so why is it marked for industrial? It could have a good link onto the A38 and allow for those who commute on this road. |
| 1241682 | Sue Glover |  | No |  |
| 1241773 | Joanna Ayres |  | No | This could lead to over development for nearby residential areas, loss of countryside and the loss of valuable habitats for wildlife. |
| 1241973 | Graham Keith Sanders |  | No | Infrastructure (Doctors,Shops,Schools,Roads,Utilities) will not cope ! Councils inability to fulfill obligations (Refuse,Drains,Paths,Roads,Trees,Grass cutting) |
| 1241989 | R Coxon |  | No |  |
| 1242116 | Jonathan Nutman |  | No | Little detail given so unable to be convinced of plans |
| 1242130 | Samantha Furniss |  | No |  |
| 1243592 | Christine Allen |  | No | I can’t imagine social housing will be built here and that is the greatest need. |
| 1232857 | Teri Licence |  | Yes |  |
| 1232876 | Claire Woodward |  | Yes |  |
| 1232909 | Stuart Orr |  | Yes |  |
| 1232922 | Maureen Shenton |  | Yes | Lots of land and not over developed. In an area that can attract new industry and provide jobs |
| 1232937 | Margery Morgan |  | Yes | Brownfield site. |
| 1232938 | Martin Turner |  | Yes | Type of available land that should be built on |
| 1232946 | Rosemary Whitehouse |  | Yes |  |
| 1233241 | Russell Licence |  | Yes | Despite my reservations, regeneration and/or re development of brownfield sites is a positive. It makes use of disused sites and allows allocation of required dwellings. It will enhance the area visually whilst allowing targets to be met |
| 1233332 | Ameila Hunt |  | Yes |  |
| 1233334 | Harvey Heldreich |  | Yes | Drakelow is the perfect example of redevelopment of an old industrial site. |
| 1233359 | Sukhdev Bangar |  | Yes | Suitable strategic location |
| 1233824 | AYeomans |  | Yes | The area has had less housing developments than other areas. |
| 1234080 | Nick Pope |  | Yes | Takes risk away from Mickleover |
| 1235132 | Frazer Murphy |  | Yes | I agree with this due to reason outlined in my first response, Mickleover can’t contain the increase |
| 1235279 | Gerald Arthur Bowker |  | Yes | Provided that this site is not classed as green belt and that the appropriate services including schools, doctors surgeries, local shops and bus services are provided. |
| 1235316 | Geoff Lewins |  | Yes |  |
| 1235411 | Andrew Norman |  | Yes | As per my answer to Q5  Response to question5: The former Drakelow Power Station is, I assume, a brownfield site eminently suitable for housing development. |
| 1235713 | Rob M |  | Yes | While I don't fully agree with this development, it's the least worst option of the three proposed and would have the least detrimental effect on the quality of life of those already living in the area. |
| 1236005 | Richard Larder |  | Yes | Relocation of potential housing away from the already overcrowded area around Mickleover. |
| 1236474 | Alan Dixon |  | Yes |  |
| 1236731 | Ewan Thompson |  | Yes |  |
| 1238115 | Fiona Bevington |  | Yes |  |
| 1238942 | Mr Brian J Harrison |  | Yes | This is a brownfield sie. |
| 1239219 | Anne Heathcote |  | Yes |  |
| 1239872 | Daniel Robertson |  | Yes |  |
| 1240150 | Ian Turner | - | Yes |  |
| 1240252 | Ian McHugh |  | Yes | STRA3 (Yes) is a brownfield site (ie no loss of green), already well underway with infrastructure built/under construction/design costs sunk etc - to reverse these decisions would be too costly |
| 1240863 | Amardeep Bhopal |  | Yes |  |
| 1241240 | Jonathan Watson |  | Yes |  |
| 1241473 | Amy Simes |  | Yes |  |
| 1241686 | John Moore |  | Yes | Brownfield site; needs urgent re-development to bring benefits to the local community; well-balanced plan for the future. |
| 1241860 | Innes Mary |  | Yes | Good use of land |
| 1241890 | Edward Stupple |  | Yes | Have not studied this part of the Plan in detail but generally appears to be good use of a brown field site with great opportunities for employment |
| 1241896 | Margaret Holmes |  | Yes | See above Q5. In working with developers who will most likely have their own interests at heart will the SDDC be confident that the finished product is what is agreed in the plans in terms of materials used, layout adopted and a high quality product therefore achieved? Will the different sized units all be dealt with in the same way? It is heartening to see that the opportunity for walking and cycling are given an importance as is the green space provision. |
| 1241910 | Nigel Bentley |  | Yes |  |
| 1241947 | Sarah Glover |  | Yes |  |
| 1241955 | David Stockwell |  | Yes | Brown field site suitable for development |
| 1241956 | Andrew Lee |  | Yes |  |
| 1241975 | Paul Hopkin |  | Yes |  |
| 1241986 | Andrea Thompson |  | Yes | Doesn't interfere with Mickleover |
| 1241993 | Alan Mercer Jones |  | Yes |  |
| 1241995 | Donna Shacklock |  | Yes | Already a concrete space .. should be used respectfully and within the boundaries of the power station. |
| 1242052 | Susan Marshall |  | Yes |  |
| 1242108 | Chris Wilson |  | Yes | This is the sensible option. |
| 1242119 | George Selby |  | Yes | An appropriate brown site. |
| 1242135 | Matt Coxon |  | Yes | Drakelow would have links to Swadlincote and Woodville present and is not already over subscribed. This would make more sense for SDC. |
| 1242138 | Tiran Sahota |  | Yes | This area is brown belt land so it would be better to develop this area rather than the green belt land. It is important for this land to have adequate infrastructure with minimal impact on the environment and local countryside. |
| 1242325 | Tracy and Gordon Harrison |  | Yes | Brownfield site redevelopment is really the first choice, agree this is probably the best use of the land. |
| 1242367 | Grace McCullouch |  | Yes |  |
| 1243600 | Geoffrey Tubey |  | Yes | See 5, 6 and seven  (Q5: Again transport links to other infrastructure agreed with planning consent must be achieved. New Walton Bridge would have less than half current cost if built on time)  (Q6: But maintain balance between housing and employment. Make sure infrastructure happens. ) |