



South
Derbyshire
District Council
Community and
Planning Services

South Derbyshire Regulation 22 Consultation Statement



July 2014

South Derbyshire Changing for the better

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

Contents

1.	Introduction	
1.1	Purpose of document	2-4
1.2	Statement of Community Involvement	4-6
1.3	Duty to Co-operate	6-7
1.4	Sustainability Appraisal	7-8
1.5	Local Plan Consultations	8
1.6	Consultation Methods	8-11
2.	Pre Submission Local Plan Consultation	
2.1	Introduction	11
2.2	Who was invited to be involved at this stage and how	11-14
2.3	What were the main issues raised	15-37
3.	Issues and Ideas	
3.1	Introduction	37
3.2	Who was invited to be involved at this stage and how	37-39
3.3	What were the main issues raised	39-40
3.4	How, where necessary, these issues were addressed	40-41
4.	Issues and Alternative Options	
4.1	Introduction	41
4.2	Who was invited to be involved at this stage and how	41-44
4.3	What were the main issues raised	44-47
4.4	How, where necessary, these issues were addressed	47-50
5.	Your Neighbourhood Talk to Us	
5.1	Introduction	50
5.2	Who was invited to be involved at this stage and how	51-54
5.3	What were the main issues raised	54-55
5.4	How, where necessary, these issues were addressed	55-56
6.	Options for Housing Growth	
6.1	Introduction	56
6.2	Who was invited to be involved at this stage and how	56-60
6.3	What were the main issues raised	60-61
6.4	How, where necessary, these issues were addressed	62-63
7.	Preferred Growth Strategy	
7.1	Introduction	63
7.2	Who was invited to be involved at this stage and how	63-67
7.3	What were the main issues raised	67-69
7.4	How, where necessary, these issues were addressed	69-70
8.	Draft Local Plan Part 1	
8.1	Introduction	70-71
8.2	Who was invited to be involved at this stage and how	71-75
8.3	What were the main issues raised and where necessary, these issues were addressed	75-131
	List of appendices	132-142

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

1. Introduction

1.2 Purpose of Document

This Consultation Statement sets out how South Derbyshire District Council has undertaken community consultation and stakeholder involvement in preparation of the submission Local Plan Part 1 (formally known as the Local Development Framework Core Strategy).

The National Planning Policy Framework (NPPF) paragraph 155 sets out the Government's principles for community engagement; "Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made". This replaces previous guidance contained in Planning Policy Statement 12 (PPS12).

This Consultation Statement has been produced to fulfil the requirements of the Town and County Planning (Local Planning) (England) Regulations 2012. It forms the statement defined at regulation 22(c) comprising, a statement setting out:

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

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

- '18. – (1) A local planning authority must –
- (a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and
 - (b) Invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.
- (2) The bodies or persons referred to in paragraph (1) are –

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

(a) Such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;

(b) such of the general consultation bodies as the local planning authority consider appropriate; and

(c) such residents or other persons carrying on business in the local planning authority area from which the local planning authority consider it appropriate to invite representations

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

Regulation 20 relates to the representations regarding the Pre Submission Local Plan consultation. Regulation 20 states:

(1) Any person may make representations to a local planning authority about a local plan which the local planning authority propose to submit to the Secretary of State.

(2) Any such representations must be received by the local planning authority by the date specified in the statement of the representations procedure.

(3) Nothing in this regulation applies to representations taken to have been made as mentioned in section 24(7) of the Act.

When work commenced on the Local Plan, the relevant regulations were those produced in 2004 followed by updates in 2008 and 2009. These regulations were then replaced entirely by those published in April 2012 in the Town and Country Planning (Local Planning) (England) Regulations 2012. Work produced under the previous regulations is still valid, however the specific regulation (including number) may have changed.

Prior to the submission of the Local Plan Part 1, seven consultations have taken place:

- Issues and Ideas (January 2009)
- Issues and Alternative Options (January 2010)
- Your Neighbourhood Talk to Us (February 2011)
- Options for Housing Growth (July 2011)
- Preferred Growth Strategy (October 2012)
- Draft Local Plan Part 1 (November 2013)
- Pre Submission Local Plan Part 1 (March 2014)

During March and April 2014 South Derbyshire published its Pre-Submission Local Plan Part 1 for consultation. This sought representation on the soundness and legal compliance of the Pre Submission Local Plan and accompanying documents, in order to meet the Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The second chapter of this document sets out details of how representations were sought at this stage, who

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

was engaged in the process, how many representations were received and the main issues raised by the representations submitted.

Chapter's three to seven of this document describes how consultations under regulation 18 were undertaken, outlines who was consulted and how, presents a summary of the main issues raised and explains how they have shaped the Local Plan Part 1. Chapter's three to seven were previously published in South Derbyshire's Draft Consultation Statement in March 2014.

In terms of who was invited to make representations under regulation 18 and 20 consultations, all parties registered on the Local Plan consultation database were informed of the consultations (at each stage). The database has grown substantially since the beginning of the Local Plan preparation process, and as of 21/07/2014 over 3000 consultees are represented. Appendix G2 lists some of the organisations, including main statutory bodies that have been consulted.

It should be noted that this document does not attempt to include every individual comment but does identify the main issues raised. This document endeavours to summarise all the issues raised but reference should also be made to the summary of representations. Full details can be found [here](#).

1.2 Statement of Community Involvement

In March 2006, the Council adopted its Statement of Community Involvement (SCI), which sets out how the community and other stakeholders will be engaged in the preparation of the Local Plan and in development management matters.

The Town and Country Planning (Local Development) (England) (Amended) Regulations 2008 altered the stages of production of a development plan document (removing regulation 26 of the Preferred Options stage). Under the current legislation there are two stages where the document should be subject to consultation: regulation 18, where issues and policy options are explored and regulation 19, the formal consultation on a Pre-Submission Local Plan Part 1.

The Council's SCI was produced before the pre-2008 regulations, however its content is still considered to be consistent with the 2008 requirements. The Council has undertaken more consultation than is required under Regulation 18 due to planning system reforms. This has ensured that the public and stakeholders have had the opportunity to fully engage in the preparation of the Local Plan.

The SCI proposes possible methods of consultation involvement and indicates the approach which will be used to involve the community in the preparation of the Local Plan. It also includes the approaches that may be used if it is believed to be beneficial and/or the resources are available. The Council has employed a range of consultation methods, which are considered to be consistent with the SCI.

The following table is an extract from the SCI, setting out the approaches the District Council will use to involve the community in the preparation of the Local Plan and accompanying documents (✓). It also indicates the additional

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

approaches that may be used where it is believed that they would be beneficial and/or resources are available (P).

Method	Core & general policies			Development Plan Documents (e.g. area action plan)			Supplementary Planning documents	
	1	2	3	1	2	3	1	2
Making documents available for review at Council Offices and libraries	-	✓ *	✓ *	-	✓ *	✓ *	-	✓ *
Newsletter or leaflet available at local venues, e.g. supermarkets, surgeries	✓ *	P	P	✓ *	-	-	✓ *	-
Information sent to existing network of organisations and their newsletters	✓ *	P	P	✓ *	P	✓ *	✓ *	P
Press releases/articles in press	✓ *	✓ *	✓ *	✓ *	P	✓ *	✓ *	P
Exhibition/display in local area(s)	-	P	-	-	✓ *	-	-	P
Information and documents on website	✓ *	✓ *	✓ *	✓ *	✓ *	✓ *	✓ *	✓ *
Questionnaire survey	✓ *	-	-	✓ *	-	-	P	-
Public meeting/surgery	-	✓ *	P	-	✓ *	P	-	✓ *
Focus group with representatives of specific issue area	P	-	-	P	-	-	✓	P
Workshop with representatives of range of issues or interest areas	P	✓	-	P	-	-	✓ *	P
Participative planning activities	-	P	-	P	-	-	-	-
Community liaison group	P	P	P	P	P	P	P	P

Each consultation was undertaken in accordance with the methods stated within the SCI and in some instances these requirements have been exceeded.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

With regards to making newsletters and leaflets available at local venues e.g. supermarkets and surgeries, during the Issues and Ideas consultation stage, an attempt was made to distribute materials to local supermarkets. However, this was unsuccessful as supermarkets were only willing to accept material from charities. Consultation documents were made available at South Derbyshire libraries during each consultation stage.

With regards to the Pre Submission Local Plan Part 1 consultation, the District Council undertook public meetings and formalised workshop events in the form of consultation/drop in events. Due to the stage of the consultation (regulation 19) a traditional workshop style event was not considered appropriate. Furthermore it was considered that undertaking a traditional public meeting, which are normally held for a specific short period of time, could affect the number of consultees who attend the events and get involved.

Drop in events were held throughout the District and were designed to be as flexible as possible, so that members of the public could turn up at any time during the event, and allowed consultees to read material on the consultation and discuss the Pre Submission Local Plan with officers on a one to one basis. (See information of the Pre Submission Local Plan for further information).

1.3 Duty to Co-operate

Section 110 of the Localism Act 2011 introduced a 'Duty to Co-operate'. Local Authorities are required to work with neighbouring authorities and other prescribed bodies in preparing Development Plan Documents. Local Authorities must "engage constructively, actively and on an on-going basis" during the preparation of Local Plans when they relate to strategic matters. Strategic matters are defined as development including infrastructure that "would have a significant impact on at least two planning areas".

The District Council must work with neighbouring authorities, Derbyshire County Council and the following organisations:

- The Environment Agency
- The Historic Buildings and Monuments Commission for England (known as English Heritage)
- Natural England
- The Civil Aviation Authority
- The Homes and Communities Agencies
- Primary Care Trust
- The Office of Rail Regulations
- Integrated Transport Authorities
- Highways Agency

Partnership working has been a key element in the preparation of South Derbyshire's Local Plan Part 1 and the authority has worked closely with other local authorities within the Derby Housing Market Area (HMA). The Derby HMA covers the authorities of South Derbyshire, Amber Valley and Derby City in conjunction with Derbyshire County Council. Due to the functional relationship across the Derby HMA, particularly regarding housing markets and travel to work patterns, aligned working on the respective Local Plans was agreed. It was

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

considered that preparing separate but aligned Local Plans would enable the authorities to achieve consistency.

To facilitate close working relations across the Derby HMA, the following groups have been established:

- Derby HMA Joint Advisory Board, which comprises committee chairs/portfolio holders and chief executives from each Local Authority. The Joint Advisory Board meets on a quarterly basis and it's role is to advise on spatial planning and implementation matters of mutual concern within the Derby HMA. The Joint Advisory Board makes representations to the relevant Local Authorities in the HMA but has no executive powers.
- Coordination Group: Senior planning officers from South Derbyshire, Amber Valley and Derby City attend meetings, usually held fortnightly. Coordination Group discusses the progress of the Local Plans and makes decisions regarding the development of the Local Plans, including consultations and the production of a joint evidence base, to help ensure that the HMA local plans are aligned and progressing.

Along with the above, the HMA authorities have worked jointly to create a robust evidence base. Specific research and studies have been carried out, including:

- Strategic Housing Market Assessments, 2013
- Education Position Statement
- Transport Position Statement, 2012
- Housing Requirement Study, 2012
- Derby Urban Area – Traffic Impact Assessment Report, 2012
- Green Belt Study, 2012
- Gypsy and traveller accommodation assessment, 2008
- Derby HMA Strategic site options study final report, 2010
- Derby HMA Employment Land Review: Forecasts Update, 2013

Further information on the HMA joint evidence base can be found [here](#).

Throughout the preparation of the Local Plan the Council has also consulted its neighbouring authorities outside the Derby HMA, including East Staffordshire and North West Leicestershire. As a minimum, consultation letters have been sent to neighbouring Authorities at each stage of the consultation process and, as appropriate, cross-boundary officer meetings between South Derbyshire and neighbouring authorities have taken place.

A separate document setting out in detail how the Council has discharged its responsibility under the Duty to Cooperate is set out in the Duty to Cooperate Compliance Statement.

1.4 Sustainability Appraisal

South Derbyshire's Sustainability Appraisal has played an integral role in shaping the Local Plan. The Sustainability Appraisal has assisted in identifying sustainable options, taking into account the likely social, environmental and economic effects of implementing different strategic options. The Sustainability Appraisal has also been subject to public consultation. Information regarding

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

these consultations and the responses received can be found within the Sustainability Appraisal.

1.5 Local Plan consultation stages

A number of consultations have been carried out as part of the Local Plan process. The following table summarises the key stages of the development of the Local Plan Part 1.

Stage in Local Plan Part 1	Consultation Period
Issues and Ideas	January 2009 - 3 April 2009
Issues and Alternative Options	29 January 2010 - 31 May 2010
Your Neighbourhood: Talk to us	8 February 2011 – 3 May 2011
Options for Housing Growth	12 July 2011 - 30 September 2011
Preferred Growth Strategy	8 October - 21 December 2012
Draft Local Plan Part 1	27 th September – 15 th November 2013
Pre Submission Local Plan Part 1	10th March – 22nd April 2014

Consultation has been on-going since the start of the Local Plan preparation process and has not been restricted to these seven periods. During and following the consultations, stakeholders, developers, landowners and infrastructure providers have had input into the Plan. Consultation methods have included workshops, presentations, and individual meetings. In addition, consultation documents have continued to be available to view on the Council's website. (Further information on this consultation method used can be found below).

1.6 Consultation Methods

The District Council has used a broad range of methods to consult and engage with stakeholders and the public. The table below provides a summary of the methods used at each stage.

	Issues and Ideas	Issues and Alternative Options	Your Neighbourhood: Talk to Us	Options for Housing Growth	Preferred Growth Strategy	Draft Local Plan Part 1	Pre Submission Local Plan Part 1
Letters or emails to all individuals and organisations on the LDF consultation database	✓ *	✓ *	✓ *	✓ *	✓ *	✓ *	✓
Letters or emails to South Derbyshire District Councils	✓ *	✓ *	✓ *	✓ *	✓ *	✓ *	✓

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

Councillors and MP.							
Letter to Parish Councils	✓ *	✓ *	✓ *	✓ *	✓ *	✓ *	✓
Consultation documents available to review at Council Offices	✓	✓ *	✓ *	✓	✓ *	✓ *	✓
Consultation document available to review online.	✓ *	✓ *	✓ *	✓ *	✓ *	✓ *	✓
Banner advertising the consultations on South Derbyshire District Council's website homepage.		✓ *	✓ *	✓ *	✓ *	✓ *	✓
Hotlink to consultation information from South Derbyshire's District Council website homepage		✓ *	✓ *	✓ *	✓ *	✓ *	✓
Information displayed on the screen in South Derbyshire District Council reception.		✓ *			✓ *	✓ *	✓
Information displayed on the PC screens in South Derbyshire District Council reception.		✓ *					✓
Press Releases	✓ *	✓ *	✓ *	✓ *	✓ *	✓ *	✓
Newspaper articles		✓ *	✓ *	✓ *	✓ *	✓ *	
Tweets		✓ *	✓ *	✓ *	✓ *	✓ *	✓
Drop in		✓ *	✓ *	✓ *	✓ *	✓ *	✓

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

events/public exhibitions with officers in attendance							
Presentations or information given out at Area Forums		✓ *	✓ *	✓ *	✓ *		✓
Letters to all parents of pupils at all Primary Schools within South Derbyshire			✓ *	✓ *			
Letters to all parents of pupils at all Secondary Schools within South Derbyshire			✓ *				
Video uploaded onto You Tube					✓ *		
Questionnaires	✓ *	✓ *	✓ *	✓ *	✓ *	✓ *	✓
Member workshop/training	✓ *	✓ *	✓ *	✓ *	✓ *		
Stakeholder events		✓ *		✓ *	✓ *	✓ *	
Leaflets at Connexions office		✓ *					
Distribution of posters		✓ *	✓ *	✓ *	✓ *	✓ *	✓
Flyers at the Festival of Leisure				✓ *			
Radio Interviews		✓ *		✓ *		✓ *	
Use of QR Code on summary leaflets and notice boards					✓ *		
Short URL Code to webpage on the consultation			✓ *	✓ *	✓ *	✓ *	✓
Local Plan Blog					✓ *	✓ *	
Public meetings	✓ *	✓ *					
Consultation information	✓ *	✓ *	✓ *	✓ *	✓ *	✓ *	✓

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

given to all South Derbyshire libraries							
Information given to presented to the Local Strategic Partnership	✓ *	✓ *	✓ *	✓ *	✓ *		

Further information regarding each consultation stage is set out later in this document and is supported by a comprehensive set of appendices.

2 Regulation 19 Consultation: Pre Submission Local Plan Part 1

2.1 Introduction

The purpose of the consultation was to meet Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The consultation gave consultees a chance to comment on the soundness and legal compliance of the Plan.

The Pre Submission Local Plan Part 1 and accompanying documents were consulted upon between 10th March – 22nd April 2014.

The consultation documents can be found [here](#).

2.2 Who was invited to be involved at this stage and how?

Different methods of public consultation were used to maximise community and stakeholder engagement in the process. These included:

- a. All organisations and individuals including: statutory stakeholders, interest groups, developers, agents and other individuals included on the LDF consultation database were sent (by letter or email (where provided)) a copy of the Statement of Representations Procedure, which informed the consultees of the consultation, how to find further information and how to make representations. In total 1,171 **emails** and 1,728 **letters** were sent (Appendix H1).

All South Derbyshire's Parish Councils were sent a paper copy of the Pre Submission Local Plan Part 1, Sustainability Appraisal, Sustainability Appraisal Non-Technical Summary, Sustainability Appraisal Technical Appendices, Infrastructure Delivery Plan, and Draft Consultation Statement.

As with the Draft Local Plan Part 1, South Derbyshire Councillors did not receive a hard copy of the consultation documents. This was due to the provision of hand-held electronic devices, which enable Councillors to view documents online.

- b. **Posters** were distributed to all Parish Councils and libraries (Appendix H2)

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

- c. Posters, reference copies of the Pre Submission Local Plan Part 1 and accompanying documents together with summary leaflets and response forms to take away, were distributed to all South Derbyshire's **Libraries** (excluding Swadlincote library which was closed for renovation at the time) and the following Libraries outside of the District: Burton upon Trent, Derby City Centre, Blagreaves, Mickleover and Sinfin.
- d. Paper **reference copies** of the Pre Submission Local Plan Part 1 and accompanying documents, summary leaflets and response forms, were made available at the District Council's Main Reception.
- e. During the consultation period, the Pre Submission Local Plan Part 1 consultation was advertised as part of a rolling presentation on **screens** in the Council Office's **Main Reception** (Appendix H3).
- f. A **banner** advertising the Pre Submission Local Plan consultation was uploaded on the home page of the District Council's website, during the consultation period. A **hotlink** on this banner connected directly to the Pre Submission Local Plan Part 1 webpage, which provided further information on the consultation and contained the consultation documents and response forms to download (Appendix H4).
- g. **Response forms** were produced soliciting responses to the soundness and legal compliance of the documents. These were available at all drop in events, all South Derbyshire Libraries (and the other libraries listed above), the District Council's Main Reception and were available to download from the District Council's website. Consultees could also register and submit comments online (Appendix H5).
- h. Drop in events were publicised on the **District Council's website** and the consultation documents and response form was available to view online or download.
- i. Six **drop in events** were held, in various locations, with the aim of reaching all sections of the community, Planning Officers were at the events to talk through the consultation and answer questions from members of the public and stakeholders.

The exhibitions/workshop included information panels explaining the purpose of the consultation, the proposed scale of housing and employment growth, maps showing the Council's proposed housing and employment allocations, and descriptions of the Sustainability Appraisal (and accompanying documents), Infrastructure Delivery Plan and Draft Consultation Statement. Reference copies of the Pre Submission Local Plan and accompanying documents were on display, along with copies of a summary leaflet and response forms, which consultees could take away (H6).

The drop in events took place at the following venues:

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

Venue	Date	Time
Old Post Centre, High Street, Newhall, DE11 0HX	17 th March 2014	2.30pm - 7.30pm
All Saints Heritage Centre, Shardlow Road, Aston on Trent, DE72 2DH	19 th March 2014	2.30pm - 7.30pm
Hilton Village Hall, Peacroft Lane, Hilton, DE65 5GH	26 th March 2014	3.30pm - 7.45pm
Repton Village Hall, Askew Grove, Repton , DE65 6GR	28 th March 2014	2.30pm - 7.30pm
Rosliston Village Hall, Main Street, Rosliston, DE12 8JW	4 th April 2014	2.30pm - 7.30pm
Church Rooms, adjacent to St George and St Mary's Church, Church Street, Church Gresley	8 th April 2014	2.30pm - 7.30pm

- j. Details on the number of attendees at each event can be found at Appendix G1.
- k. The District Council issued a **press release** advertising the drop in events (H7).
- l. A short **URL code** was created for the District Council's webpage, which set out information on the consultation.
- m. The drop in events were advertised on **SDDC Twitter Page** (H8).

2.3 Number of representations made under regulation 20 and a summary of the main issues raised.

There were 636 comments received on the Pre Submission Local Plan Part 1 consultation, made by 127 respondents.

The number of comments made in relation to each policy is as follows:

Policy	Count	Policy	Count
S1	47	H21	2
S2	4	E1	6
S3	4	E2	2
S4	49	E3	2
S5	7	E4	2
S6	2	E5	6
S7	3	E6	5
S8	8	SD1	2
H1	26	SD2	4
H2	7	SD3	4
H3	8	SD4	1
H4	17	SD5	0
H5	3	SD6	3
H6	2	BNE1	6

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

H7	8		BNE2	3
H8	3		BNE3	4
H9	6		BNE4	5
H10	141		INF1	9
H11	12		INF2	8
H12	2		INF3	9
H13	6		INF4	7
H14	4		INF5	0
H15	10		INF6	3
H16	3		INF7	3
H17	2		INF8	4
H18	6		INF9	3
H19	6		INF10	4
H20	13			

In some instances a consultee did not mention a specific policy, however did reference a specific chapter, paragraph number, appendix, the proposals map or the Sustainability Appraisal. The number of people who responded as such can be seen in the table below. Those who referred to a specific paragraph number or table have been included within the number of comments who referred to a specific chapter (under the relevant chapter).

Plan element	Count
Chapter 1	3
Chapter 2	0
Chapter 3	10
Chapter 4	1
Chapter 5	42
Chapter 6	2
Chapter 7	3
Chapter 8	3
Chapter 9	9
Appendix 3	7
Objection to all of the plan	7
Sustainability Appraisal	11
Proposals Map	6
Omission Sites.	16

Regulation 22 (c) (v) states that in addition to setting out the number of representations received under regulation 20, the statement should set out a summary of the main issues raised. Not all responses are summarised below, just the main issues. Reference should also be made to consultation responses, which can be found at: <http://www.lfd.consultations.south-derbys.gov.uk/>

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

2.3 What were the main issues raised?

S1: Sustainable Growth Strategy

The main comments received regarding this policy relate to the Derby HMA and South Derbyshire's housing need (number). The majority of consultees consider that South Derbyshire's housing number is too low and the District along with the Derby HMA are not meeting their objectively assessed housing need. Many consultees suggested that the housing requirement for the District would need to be increased to reflect the outcome of objectively assessed housing needs as recommended by the Planning Inspector at Amber Valley's Core Strategy Examination.

South Derbyshire's plan period is another main issue raised by respondents. It is considered by many that the plan period is too short and should be extended to be in line with the requirements of the NPPF.

Some consultees suggest that the policy should be made more specific regarding the distribution of housing growth within the District.

In addition to the above, other issues/amendments were suggested regarding Policy S1, these include the following:

- Two consultees consider that criterion v does not reflect the NPPF. The National Trust suggest that the criterion should state: 'Through this strategy being put in place it is essential that the District's heritage assets, landscape, natural environment and rural character are recognised and conserved in a manner which reflect their importance and historic significance, and enhanced where possible, whilst accepting that some change is necessary to allow for this strategy to be delivered'.
- English Heritage suggests that the final section of criterion v should be deleted ('whilst accepting that some change is necessary to allow for the strategy to be delivered'), as this is suggestive that the environmental dimension is not equal to the other sustainability dimensions and therefore undermines the concept of sustainable development.
- Clarity is required over the definition of sites being allocated within Part 1 and 2 of the Local Plan.
- The policy should be amended to recognise the growth needs of Burton Upon Trent, based upon an assessment of the housing needs in a Housing Market Area which does not exclude this town.
- The details of the housing split between South Derbyshire and Derby City set out in criterion i) would best be set out in Policy S4 Housing Strategy, as Policy S4 deals with other matters relating to housing requirement and split across the HMA.
- Objection to the policy's preference for brownfield land where possible

Some elements of the policy were however supported, these include:

- Criterion iv) Encouraging tourism and leisure.
- The policy confirms that South Derbyshire's objectively assessed housing need will be met, along with providing additional housing, to ensure Derby City's housing needs are also met.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

- The policy's recognition of the need to develop greenfield land to meet the District's housing need.

S2: Presumption in favour of Sustainable Development

Few comments were made which directly relate to this policy. Derbyshire County Council and Turley Associates on behalf of Hallam Land Management support the policy. Barton Under Needwood Parish Council however suggest that the policy should be removed entirely, as the policy is just a reiteration of the National Planning Policy Framework. The Parish Council go on to add that there is no such policy within the Plan to set out the important characteristic that helps to define what sustainable development means for South Derbyshire. The Parish Council suggests that the Local Plan Strategic Objectives could be recast to form new policy.

S3: Environmental Performance

A mixed response was received regarding the policy. Savills on behalf of Taylor Wimpey supports Policy S3 and supports the policy's reference to use 'allowable solutions'. However Nathaniel Lichfield and Partners on behalf of Commercial Estates Group objects to the policy's support of zero carbon standards through off site "allowable solutions" where it cannot be fully met on site. The consultee suggests that the support for allowable solutions is not based on robust viability evidence, is considered to be inappropriate and should be deleted from the policy. In addition the Home Builders Federation states that the policy needs to be viability tested.

S4: Housing Strategy

One of the main issues raised regarding policy S4 is in regard to the District's housing number. It has been suggested the proposed housing number for South Derbyshire to too low (does not meet the District's objectively assessed need) and will need to be increased. Some consultees again mentioned that the policy would need to be amended to reflect the outcome of the further assessment of objectively assessed housing need as requested by the Amber Valley Core Strategy Inspector; the housing number would need to increase, as the plan period should be extended.

In addition the following issues/alterations have been suggested:

- It is inappropriate to leave 600 units to be allocated in a future Development Plan Document.
- The Policy is unclear whether the 450 windfall allowance should be in addition to the allocation of a future 600 dwellings.
- The policy should state the start and end dates for the plan period for clarity.
- No need to produce Local Plan Part 2 as the NPPF states 'Any additional development plan document (DPD) should only be used where clearly justified'.
- Unlikely to be effective in delivering growth as planned and as needed.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

- Provision of 450 dwellings is unplanned and unidentified development and therefore cannot feature as part of planned supply.
- Replace “at least 12,404” with “a minimum of 12,404”
- Replace “around 600” with “a minimum of 600”.
- Less reliance should be made on Part 1 strategic sites and a greater proportion of the housing delivery should be identified from other sources e.g. Part 2 and windfall. The changes will increase the likelihood that the Plan will deliver its objectively assessed housing need.
- The Part 1 should include smaller allocation sites to provide greater flexibility to respond rapidly to changing circumstance. It will also remove unnecessary delay of around 2 years for the completion of the Local Plan Part 2.
- Policy should be amended to recognise the growth needs of Burton upon Trent.

In addition to the above, some elements of the policy are supported, these include:

- The expression of the dwelling requirement as a minimum figure.
- The proposed split of 12,404 dwellings to be delivered on strategic sites and the remaining 600 to be dealt with as non-strategic sites.
- Housing numbers appear to be based on robust and up to date evidence and to provide objectively assessed need for market and affordable housing.
- The words ‘at least’ within the policy.
- The allocation of strategic sites for residential development.

S5: Employment Land Need

The main issue received regarding policy S5 is that the employment requirement for South Derbyshire is too low and should be increased. Pegasus Planning on behalf of Christ Church, Oxford and Chave Planning Ltd on behalf of Adrian Constable, both suggest that the employment land requirements will need to reflect the greater housing requirement as identified by the Amber Valley Local Plan Inspector. Pegasus Planning on behalf of Christ Church, Oxford suggests that the Policy should be amended to plan for 100ha of employment land and Chave Planning Ltd on behalf of Adrian Constable suggests that the Policy should be changed to allow for additional employment growth beyond the edge of Derby, consistent with the level of housing growth planned to meet the objectively assessed need for the area.

Boyer Planning on behalf of Dove Valley Park suggests that the Policy should express the provision of employment land as “a minimum of 53 ha”.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

Derbyshire County Council however states that the Policy's approach to the provision of new employment land is based on sound and robust evidence and is supported.

S6: Sustainable Access

Only two responses were received which directly relate to this policy. The National Trust and Highways Agency both support the Policy.

S7: Retail

Planning and Design Group on behalf of Hallam Land Management supports the Policy's recognition of the benefits of providing retail services within urban extensions. Derbyshire County Council however suggests that the Policy should be amended to include criteria to assess new retail and leisure developments on the edge of and outside Swadlincote town centre, to be consistent with paragraphs 23-27 of the NPPF. In particular the policy should include the sequential and impact tests for retail and leisure developments.

S8: Green Belt

The majority of responses received support the Policy or aspects of policy S8. Derbyshire County Council supports the Policy and states that the Policy is consistent with the findings of the Review of the Derby PUA undertaken in 2012.

English Heritage and The National Trust support the proposed inclusion of land into the Green Belt as it has the potential to help protect the setting of nearby heritage assets.

Erewash Borough Council welcomes the approach taken by the District Council in planning strategically in order to uphold the principle, general extent and permanence of the Nottingham-Derby and Swadlincote-Burton Green Belts. Erewash Borough Council however suggests that wording 'very exceptional circumstances' should be amended to 'very special circumstances' to be consistent with the NPPF.

Knight Frank on behalf of Thulston Fields Farm Partnership however suggest that given the shortage of land available for both housing and education provision, the Council should have used the 2012 Technical Assessment of the Nottingham-Derby Green Belt to justify the release of land from the Green Belt for a secondary school with some residential. The consultees also questions why only one Green Belt anomaly is being resolved within the Part 1, while other anomalies are being left until Part 2.

Nathaniel Lichfield and Partners on behalf of Commercial Estates Group object to the proposed deletion of land within the Green Belt. The consultee suggests that just because two major roads now form a physical feature in the landscape, does not amount to development which removes all contribution of this land to the openness of the Green Belt. It is considered that it is possible to deliver the housing growth required without the use of Green Belt land, through the allocation of sites such as Newhouse Farm, Mickleover.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

H1: Settlement Hierarchy

Some consultees supported policy H1 or specific aspects of it, whilst others suggested alterations. Aspects of the policy which were supported include:

- the inclusion of Hatton, Repton and Etwall as Key Service Villages, the inclusion of Linton as a Local Service Village;
- the priority given to the development of sites within Swadlincote;
- the tiers of the hierarchy and the settlements named within them;
- the overall settlement hierarchy;
- the policy prioritisation of extensions to urban areas of Derby and Burton upon Trent.

One of the main issues raised regarding this Policy is the proposed housing provision across the settlements within the hierarchy. There is concern that giving each category the number of dwellings it could accommodate is too restrictive. In addition a few consultees suggested that the allocation of 200 dwellings to Urban Areas within Part 2 is too low. Another consultee suggests that the allocation of 404 dwellings to Key and Local Service Village is too low, and a further suggests that 600 dwellings should be allocated to Key Service Villages. One consultee suggests that the policy should be amended to refer to a minimum number of dwellings in each of the settlement hierarchy categories.

In addition to the above, a range of alterations/changes to the policy were suggested. These include:

- Overseal should not be allocated as a Key Service Village.
- Change the settlement hierarchy to recognise Melbourne's position as a sustainable settlement ahead of other less sustainable Key Service villages.
- Linton should be upgraded to a Key Service Village.
- A definition and justification should be given to what is meant by small strategic sites.
- The criterion would be more appropriate if settlements were ranked. eg Hilton better placed to accommodate more housing.
- It would be clearer if specific mention to Church Gresley were given, as it forms part of the wider urban area of Swadlincote.
- Query over the inclusion of Burton upon Trent within the urban area element of the hierarchy.
- It would be more appropriate to combine Key and Local Service Villages, allow suitable development dependent upon the particular village characteristics and allow more local needs based on housing for more rural settlements.

H2: Land north of William Nadin Way, Swadlincote

A mixed response was received regarding policy H2; some support specific aspects of the policy and others suggest different amendments to Policy H2.

The Highways Agency welcomes the reference of high quality cycle and pedestrian links from the housing allocation, connecting to existing and proposed networks, and the Coal Authority is pleased to note that their own comments from the Draft Local Plan Part 1 have been taken into account.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

The suggested amendments to the Policy include:

Pegasus Planning on behalf of Harworth Estates (whilst supporting the strategic allocation) suggests that the policy's requirements of provision of recreational community facilities should be changed to 'consideration of appropriate recreational and community facilities'. Furthermore, policy's requirement of an appropriate buffer in agreement with the Council to be placed around the Breach Ley Farm Meadow County Wildlife site should be amended to 'an appropriate mitigation or compensation strategy shall be agreed, to deal with any harm that may be caused to the Breach Ley Farm Meadow County Wildlife Site'.

The National Forest Company suggests that the young planted woodland in the northern parcel of the proposed allocation should be omitted from the allocation.

Finally, DPD on behalf of Grasscroft Homes and Properties Ltd suggests that the boundary of the housing allocation needs to be amended so that the site does not include the Tetron Point Golf Course; the policy should give greater detail to understand what housing will be built where amongst the three separate sites and whether there is to be any phasing and if there is any linked delivery. The consultee suggests that land at Wrekin, Woodland Road, Stanton should be allocated for housing development to provide greater certainty on delivery of approximately 51 dwellings.

H3: Land at Church Street/Bridge Street/Football club site, Church Gresley

Again a mixed response was received regarding this Policy, with some consultees supporting the Policy (Planning Prospects on behalf of Dyson and St Modwen Developments and Planning Prospects on behalf of St Modwen Developments), other supporting specific aspects of the Policy (Highways Agency welcomes the reference of high quality cycle and pedestrian links for the housing, connecting to existing and proposed networks, and the Coal Authority is pleased to note that their comments from the Draft Local Plan Part 1 have been taken into account) and other consultees suggesting amendments to the Policy.

The suggested amendments to the Policy include:

- Sport England suggest that the policy should include a clearer statement requiring the replacement of the current football ground facility with a facility of equivalent or better quality, in a suitable location, in line with paragraph 74 of the NPPF.
- The National Forest Company and The National Forest Charitable Trust request that the policy refers to the Conkers circuit with regards to the high quality cycle and pedestrian links connecting to existing and proposed networks.
- North West Leicestershire District Council object to the lack of certainty of the proposed use of the Bridge Street site and considers that the proposal needs to consider the impact on the amenities of the residents of Albert Village and the need to maintain a buffer/separation between the proposed sites and Albert Village.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

H4: Land at Broomy Farm, Woodville

All responses received from residents in regards to this Policy suggest that H4 should include a landscape buffer to the south side of the site to protect the existing residential properties. Concern was also raised by some residents about the existing traffic levels and accidents along the A415 and A511.

Further amendments to the Policy were also suggested. Derbyshire County Council suggested the Local Plan should be seeking contribution towards the Swadlincote Regeneration Route and that the Policy should make requirements for developer contributions towards the extension of a local primary school.

In addition Pegasus Planning on behalf of Hallam Land Management suggest that clause ii of the policy should be deleted as the design of the road from the A514 to the A511 through the site can be agreed as part of any application and the design of the road will need to take account of the findings of supporting Transport Assessments. Furthermore the consultee suggests that the policy should delete clause ii and amended clause vi to refer to the provision of a landscaped buffer on the northern site boundary.

The Highways Agency and The National Forest Company however support specific aspects of the policy. The Highways Agency welcome the reference of high quality cycle and pedestrian links from each development site, connecting to existing and proposed networks and the National Forest Company supports the Policy requirement to incorporate a significant green buffer to the north east boundary of the site.

H5: Council Depot

Few responses were received regarding this policy.

The Highways Agency and The Coal Authority support specific aspects of the Policy. The Highways Agency welcome the reference of high quality cycle and pedestrian links for each development site, connecting to existing and proposed networks and the Coal Authority are pleased that their comments from the Draft Local Plan Part 1 have been taken into account.

Sport England however states that the proposed site allocation includes a small area of playing field land within the northern part of the site. Due to this it has been suggested that the Policy requires a clearer statement, stating that the playing field land should be safeguarded/replaced in line with paragraph 74 of the NPPF, or the playing field land should be removed from the allocation.

H6: Drakelow Park

Few responses were received in regards to this policy. The Highways Agency welcome the reference of high quality cycle and pedestrian links from each development site, connecting to existing and proposed networks and English Heritage welcome and support criterion v and vi of the policy.

H7: Land at Hilton Depot, Hilton

A mixed response was received regarding this policy.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

Planning Prospects on behalf of St Modwen support the allocation at Hilton, however suggest that the number of dwellings allocated on the site should increase to 485. The consultee also suggests that criterion vii of the policy should be deleted, as it is unclear of Egginton Junction Gravel Pit Country Wildlife Site's relationship to the proposed allocation and the necessity for nature conservation enhancements at the wildlife site.

The Highways Agency welcome the reference of high quality cycle and pedestrian links for the housing allocation, connecting to existing and proposed networks.

However Planning and Design Group on behalf of Hallam Land Management have concerns regarding the proposed allocation, due to the site's lack of Sequential and Exception Test as set out in the NPPF, including the following:

- H7 is located in a high flood risk area
- The Sustainability Appraisal (SA) fails to consider reasonable alternatives in the process that has led to the selection of the site for allocation
- The SA has failed to fully and properly consider the impact of flood risk in the process that has led to selection of the site for allocation

As a result of the above, the consultee considers that the Council has not demonstrated that the Local Plan presents the most appropriate strategy for meeting housing and associated community development needs in Hilton and consideration should be given to alternative site allocations within and around Hilton.

Vincent and Gorbing object to the allocation of H7, in particular the loss of employment land, and suggest that the housing allocation be replaced with land to the north of Derby Road, Hilton.

In addition concern is also raised regarding school provision.

H8: Former Aston Hall Hospital, Aston on Trent

Only three responses were received regarding this Policy. The Highways Agency welcome the reference of high quality cycle and pedestrian links from the housing allocation, connecting to existing and proposed networks and Derbyshire County Council welcomes that the site's relative environmental sensitivity has been taken into account in the Policy.

English Heritage however are concerned that no reference is made within Policy H8 to the need to protect the setting of heritage assets and suggest that a further criterion is added to the Policy to address this.

H9: Land at Longlands, Repton

The majority of responses received either support the Policy (CT Planning on behalf of Maplevale Developments support the proposed allocation; Derbyshire County Council welcomes that the site's relative environmental sensitivity has been taken into account in the Policy) or support specific aspects of the Policy. The Highways Agency welcome the reference of high quality cycle and pedestrian links from the housing allocation, connecting to existing and proposed networks and English Heritage welcome the policy reference to the protection of heritage assets and their settings.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

However WYG Planning and Environment suggest that the extent of the allocation should be amended to provide a larger strategic allocation by incorporating land to the east. Turley Associates on behalf of Hallam Land Management suggest that the land immediately adjacent to the south of the allocation and fronting Mount Pleasant Road should be included within the allocation.

H10: Land south of Willington Road and land south of Sutton Lane, Etwall

The majority of responses received object to the allocation of this site, including 44 consultees who submitted the same representation. Reasons given for the objections include:

- The Sutton Lane site was not consulted upon until the Pre-Submission stage and the Willington Road site was only included at the Draft Plan stage, preventing the local community from being able to participate fully in neighbourhood planning as required by the Localism Act;
- There are reasonable SHLAA alternatives which do not necessitate building on well-established recreational facilities;
- No better or improved village facilities can be offered apart from new cricket facilities, which will not benefit the majority of Etwall residents;
- The need for new cricket facilities has never been considered an essential requirement by village residents;
- The establishment of cemetery space should be explored elsewhere in the District.

Furthermore Chave Planning on behalf of Gainsborough Property suggests that the Policy should be deleted and the 114 dwelling requirement added to the Local plan Part 2.

Changes to the Policy have been requested. Pegasus Planning on behalf of Bloor Homes suggests that the word “require” should be amended to “seek”, and criterion C should be removed, (which requires a green buffer and landscaping along the southern edge of the site).

In addition Barton Willmore on behalf of Taylor Wimpy suggest that land to the south west of Etwall should be included within the Plan for 150 dwellings.

English Heritage however welcomes the policy’s reference to the protection of heritage assets and their settings and The Highways Agency welcome the reference of high quality cycle and pedestrian links from the housing allocation, connecting to existing and proposed networks.

H11: Land north east of Hatton

The majority of responses received regarding this Policy support H11 or aspects of the Policy. The Highways Agency welcome the reference of high quality cycle and pedestrian links for each development site, connecting to existing and proposed networks and English Heritage welcome the policy reference to the protection of heritage assets and their settings.

Severn Trent Water Limited states a sewage pumping station which would be located to the southeast of the proposed urban extension of Hatton is now surplus to their requirements and could be made available to be utilised in order

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

to facilitate bringing forward the proposed urban extension. Severn Trent's site access could be redirected away from the existing residents on Church Avenue and instead enable access to be taken via Derby Road to the north which could then run along the eastern boundary of the proposed urban extension.

Cass Associates supports the proposed extension at Hatton but suggests that the delivery of the 'combined access' is expressed with firmer intent.

Savills on behalf of Taylor Wimpy however suggests a number of amendments to the Policy which can be seen below:

- The location plan for the Policy should be amended to accurately reflect the ownership boundaries of the site. The land controlled by the Salt Box Café in the north west corner of the site should be amended to show a potential location for retail and the area of land between Rye Flatts Lane and Lime Grove should be included in the plan.
- The criteria which seeks to protect heritage assets in the area should be removed from the plan
- The wording of the criteria B iv and B vii should be amended to include viability considerations
- Paragraph 5.53 makes reference to the site's access. Taylor Wimpy considers that the site will be accessed off Derby Road and/or off Station Road via a suitable point of access.
- The Policy should be reworded to state a minimum of 400 dwellings.

H12: Highfields Farm

Two responses were received which directly relate to this Policy, both from the Highways Agency. The Highways Agency welcome the statement 'developer contributions to be made toward improvements to the A50/A515 and A50/A38 junction to safeguard the operation of the Strategic Road Network' within the Policy and welcome the reference of high quality cycle and pedestrian links from the housing allocation, connecting to existing and proposed networks.

H13: Boulton Moor (South East of Derby)

The majority of responses received regarding this Policy suggest alterations to the Policy.

The National Trust and English Heritage suggest that the Policy needs to be reworded to include the opportunity to secure positive improvements to heritage assets, to be in line with the NPPF. The National Trust adds that the criteria xi of the Policy should be reworded to include the provision of high quality pedestrian and cycle routes within the site and links between these and existing and proposed routes and green spaces beyond the site, including in particular Elvaston Park and Garden.

Derbyshire County Council on behalf of County Council Members state that consideration could be given to exploring what opportunities there are for Section 106 monies from the existing/planned housing and other development to be directed towards Elvaston to fund capital improvements, such as recreational facilities.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

Barton Willmore on behalf of the Chamberlain Family and Central Land Holding offer their full support to the allocation of Boulton Moor Phases 1, 2 and 3 and offer their broad support for policy H13. The consultees support aspects of the Policy such as: the Council's proposal to apply a cross boundary approach to the provision of affordable houses; the requirement for financial contributions to be made by developments towards the proposed provision of bus services and Park and Ride, (although the contributions from Boulton Moor to the latter should take account of the land contributions likely to be made by the consultee); and the requirement that the green infrastructure requirements of the site could be partly met through improvements to existing green infrastructure. However some alterations to the Policy have been suggested by the consultees, examples of which can be seen below:

- The development should be referred to as a sustainable urban extension, in preference to a new suburb.
- Cross boundary flood mitigation from fluvial sources is not relevant in this instance; the words 'cross boundary' should be removed from the policy.
- The requirement for a cross boundary approach to preparing a flood risk assessment should be deleted or reworded to require the applicant to consider submitting a cross boundary flood risk assessment.
- The requirement for a small/medium sized supermarket should be deleted.

The Highways Agency however provides a positive comment regarding the Policy. The Highways Agency welcome the statement 'developer contributions to be made toward improvements to the A50/A515 and A50/A38 junction to safeguard the operation of the Strategic Road Network' within the policy. Furthermore, they welcome the reference of high quality cycle and pedestrian links from the housing allocation, connecting to existing and proposed networks.

H14: Chellaston Fields, Chellaston

The Highways Agency welcome the statement 'developer contributions to be made toward improvements to the A50/A515 and A50/A38 junctions to safeguard the operation of the Strategic Road Network' within the Policy and welcome the reference of high quality cycle and pedestrian links from the housing allocation, connecting to existing and proposed networks; English Heritage have concerns that the Policy makes no reference to the need to protect and enhance the setting of heritage assets; and Derbyshire County Council consider that the following wording should be included in the policy: 'developer contributions to be made to primary and secondary school provision on an agreed strategy with the council'.

H15: Wragley Way (South of Derby)

Six consultees (making 9 comments) made comment on this policy, four of which raise concern. Two consultees suggest that the proposal will put extra strain on the existing road system, one of which suggests that the transport modelling work should have been completed by the time of publication of the Pre Submission Local Plan Part 1. One consultee suggests that the road infrastructure at Deep Dale Lane will need to be upgraded to cater for extra traffic and another suggests that the non-preferred sites should be reinstated and allocated for 500 dwellings and that the western segment of H15 bounded by the railway line and A50 could accommodate 500 dwellings, negating the need for the expensive and irrelevant Southern Derby Link Road.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

Planning and Design Group on behalf of Hallam Land Management however supports H15 and states that the Policy can be complied with.

In addition the Highways Agency welcome the statement 'developer contributions to be made toward improvements to the A50/A515 and A50/A38 junction to safeguard the operation of the Strategic Road Network' within the policy, together with criterion iii, and welcome the reference of high quality cycle and pedestrian links from the housing allocation, connecting to existing and proposed networks.

H16: Primula Way, Sunny Hill

Two consultees (raising three comments) made representations directly relating to Policy H16. The Highways Agency welcome the statement 'developer contributions to be made toward improvements to the A50/A515 and A50/A38 junction to safeguard the operation of the Strategic Road Network' within the policy and welcome the reference of high quality cycle and pedestrian links from the development site, connecting to existing and proposed networks.

Derbyshire County Council suggests that the Policy requires certainty and clarity or the improvements to the primary school and suggested that the Policy should include the following: 'Developer Contributions to be made to primary and secondary school provision on an agreed strategy with the Council'.

H17: Holmleigh Way, Chellaston

Only one consultee made direct reference to this policy providing two comments. The Highways Agency welcome the statement 'developer contributions to be made toward improvements to the A50/A515 and A50/A38 junction to safeguard the operation of the Strategic Road Network' within the policy and welcome the reference of high quality cycle and pedestrian links from the housing allocation, connecting to existing and proposed networks.

H18: Hackwood Farm, Mickleover

A mixed response was received regarding Policy H18.

Two consultees support specific aspects of the Policy. The Highways Agency welcome the reference of high quality cycle and pedestrian links for each development site, connecting to existing and proposed networks and English Heritage welcomes the policy's references to the protection of heritage assets and their settings.

Two further consultees oppose the proposed allocation at Hackwood Farm. A resident raises concern about the community's services and infrastructure, transportation needs, and the lack of regard for wildlife issues and flood risk within the Policy. Nathaniel Lichfield and Partners on behalf of Commercial Estates Group raises a number of concerns over the site including:

- There are cross boundary issues which raise doubt as to whether the Derby City part of the site will be allocated for development and whether the South Derbyshire part of the site will be delivered as a result.
- There are number of factors which raise doubt over the deliverability and developability of Hackwood Farm

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

As a result the consultee suggests that the proposed housing allocation should be deleted.

Pegasus Planning Group on behalf of Miller Homes broadly supports the proposed allocation in principle however suggests some alteration to the policy:

- Criteria iv requires the provision of a pedestrian cycle bridge, however reference to the bridge should be deleted as the bridge will be a requirement of Derby City's Local Plan Hackwood Farm Policy.
- Reference to the Greenway being a local wildlife site should be deleted, as no development is proposed in the part of the Greenway within South Derbyshire's boundaries.
- The applicant is committed to construct a one-form entry primary school on Derby City land and provide sufficient land to enable the City Council to expand to a two-form entry school if necessary. The consultee states that as the primary school will more than meet the need generated by the whole Hackwood Farm development, primary education contributions for South Derbyshire's part of the site should not be necessary and this element of the Policy should be deleted.
- Criteria viii seeks a new local centre. The consultee suggests that this should be deleted as policy H18 relates specifically to the South Derbyshire part of the site, and the local centre will be provided within Derby City.

H19: Housing Balance

No main issue was raised in regards to this Policy, but a number of individual comments were made.

The Home Builders Federation stated that the policy needs to be viability tested and is concerned that a degree of uncertainty is caused by reference to Supplementary Planning Documents in the Policy. The consultee suggests that the Council should provide further clarification of its intentions.

Planning and Design Group on behalf of Hallam Land Management suggest that section D of the policy is confusing and the policy should be amended to read 'Viability assessment will have regard to a schemes housing mix'.

Barton Willmore on behalf of Taylor Wimpy support the Council's approach in not prescribing specific proportions of dwelling size within the policy, however suggest that it is important that the SHMA figures are used as a guide and not a precise requirement.

The Planning Bureau Ltd on behalf of McCarthy and Stone are concerned that the Council have missed an opportunity to tackle the issue in shortfall of specialist accommodation for the older population.

H20: Affordable Housing

The majority of consultees raise concern about elements of the policy.

Some consultees welcome the reduction of the Council seeking up to 40% affordable housing on sites over 15 dwellings or 0.5ha to 30%, however suggest that there is no justification of 30% affordable housing from a viability perspective.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

It has been suggested that evidence needs to be provided to demonstrate the requirement of such a figure.

In addition the following concerns and alterations have been suggested:

- The policy should identify the types of affordable housing tenure which are currently available and suitable
- The option for off-site contribution, subject to exceptional justification, should be extended to all sites where affordable housing is required
- Exception sites should reflect locals' needs, not all settlements are the same, with some villages requiring a greater amount of affordable dwellings
- The Plan currently does not make provision for the potential for cross subsidy from an element of market housing, to bring forward additional affordable units
- It is not clear how the affordability housing target would impact on infrastructure delivery and the viability of the Local Plan as a whole
- The policy suggests that the Council will consult with itself; this is confusing and should be amended

H21: Sites for Gypsies and Travellers and for Travelling Showpeople

North West Leicestershire District Council and Derbyshire County Council support that the Policy does not include gypsy and traveller targets but these, along with allocations, will be provided within a Site Allocations Development Plan Document.

E1: Strategic Employment Land Allocations

The majority of responses received regarding this policy either support the Policy or specific aspects of the Policy. William David Limited supports Policy E1C. Derbyshire County Council states that the provision of new employment land is based on sound and robust evidence. The proposed allocations will be more than sufficient to meet the District's future employment land needs, ensure flexibility in the supply of land and that there was an attractive choice of sites. And Barton Willmore on behalf of Goodman Shepherd considers that the updated supporting text to Policy E1 accords with the tests of soundness and considers that the updated supported text to Policy E1 serves to acknowledge that the East Midlands Intermodal Park has the potential to deliver new employment opportunities on a significant scale.

The Highways Agency does not anticipate that the proposed employment growth in Swadlincote, Hilton and Dove Valley Park will have any strategic implications for the A50 route. However it is possible that some localised SRN mitigation may be required for individual proposals, which can be identified through the development management process.

Some alterations to the Policy however have been suggested. Pegasus Planning on behalf of Christ Church suggests that it is necessary to include 30ha of employment land at Sinfin Moor to ensure the Plan is sound. And The National Trust states that the Policy does not make any provision to ensure that there are no detrimental impacts on landscape or the built, historic or natural environment.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

E2: Other Industrial and Business Development

Two comments were received for Policy E2. The National Trust states that improvements to the Policy have been made since the Draft Local Plan Part 1, however the consultee suggests that this should be a general provision that applies to all new industrial and business development, rather than solely developments within or on the edge of urban areas and villages. Of particular concern is criteria ii) 'the expansion of an existing business', as no indication is given as to the scale of expansion that would be acceptable. In addition the consultee suggests that the following criteria should be added to Policy E2: 'Development at strategic employment allocations should be of an appropriate scale in relation to existing built development and should not give rise to undue impacts on the landscape, natural environment or cultural heritage assets'.

E3: Existing Employment Areas

Two opposing responses have been received for this policy. One states that the general approach in the Policy for the protection of existing employment areas is supported and consistent with paragraph 22 of the NPPF. Whereas the other consultee states that: the Policy should be amended to support the release of employment sites in scenarios where there is no demand for employment uses and where it can be demonstrated that a site is no longer needed for employment use; this change would allow the plan to be positively prepared in accordance with the NPPF.

E4: Strategic Location for Sinfin Moor Employment Site Extension

Two responses have been received regarding Policy E5, both of which support the protection/identification of Sinfin Moor as a strategic employment site. One however suggests that to ensure the Plan is sound the site should be included as an employment allocation under Policy E1 for employment development in *use classes B1(b), B1(c), B2 and B8 purposes*.

E5: Safeguarded Employment Sites – Dove Valley Park

Two consultees provided six comments regarding this policy. Dove Valley Park Ltd (DVP Ltd) welcomes the identification of the remaining 28.3ha of land north of the existing committed site for further strategic employment. However DVP Ltd is concerned at the constraint which the policy (as currently worded) would impose on their ability to bring this land forward, and thereby respond positively to the objectives of both the government and the council to stimulate economic growth. DVP Ltd states that the policy seeks to impose an 'exceptional circumstances' test before any proposal to develop the land will be permitted and suggests that this form of sequential testing is impractical for a site which is specifically intended to respond to one off strategic investment opportunities and is incompatible with broader economic growth objectives. DVP suggests that the Policy should be reworded.

The Highways Agency considers that although development at this location will be subject to Policy INF2, it would be helpful if Policy E5 included the need for associated transport issues to be fully considered and addressed if and when development comes forward, including impacts on the A50/A511 junction and public transport accessibility to the site.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

E6: Woodville Regeneration Area

Two consultees generally support the allocation, however suggest that the plan should maintain some flexibility over the precise balance of uses on the site. The exact balance of employment, housing and other uses within the site are still emerging and opportunities for additional public sector funding may affect the use of the site.

The National Forest Charitable Trust suggests that policy should be amended to include the provision of high quality cycle and pedestrian links both within the development and connecting to existing and proposed networks, including links from the Heart of the Forest towards Swadlincote Woodlands.

North West Leicestershire District Council (NWLDC) support the approach taken by the District Council, for the need for joint working with NWLDC, protecting the amenity of NWLDC, and maintaining a separate identify of nearby Albert Village.

Derbyshire County Council however state that the development of the Woodville Regeneration Area is dependent upon the provision of the proposed Swadlincote Regeneration Route and at the current time no evidence has been provided regarding feasibility, deliverability or impact of the scheme over the wider highway network or indeed its environmental impact.

SD1: Amenity and Environmental Quality

The National Trust supports the policy and the National Farmers Union supports paragraph B (iii) of the policy.

SD2: Flood Risk

A mixed response was received regarding this policy. The National Trust gives its general support for the policy and Planning and Design Group on behalf of Hallam Land Management supports the policy, in particular the statement that the Council will apply the sequential approach to flood risk management.

The Home Builders Federation however suggests that the policy needs to be viability tested and the policy has implications for gross to net development land ratios. A further consultee suggests that the flood risk policy negates the current issues of concern regarding the Hackwood Farm proposal and the policy in conjunction with the Hackwood Farm proposals does not take into account concern for the resultant victims of flooding with insurance costs for those properties that would be affected if the proposals were to take place.

SD3: Sustainable Water Supply, Drainage and Sewerage Infrastructure

A mixed response was received regarding this policy. The National Trust generally supports this policy, and NWLDC supports the proposed approach with regard to the River Mease Special Area of Conservation and the continuation of joint working between SDDC, NWLDC and other relevant authorities in addressing this issue.

Whereas the Home Builders Federation states that the Policy needs to be viability tested and has implications for gross to net development land ratios. Planning Design Group on behalf of Hallam Land Management states that the proposed water consumption target set out in section A(ii) of the Policy (110 litres

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

per person per day) is just 14 litres less than the standard required by Building Regulation. Such a small improvement in water consumption above that already achieved through legislation does not justify the intervention by policy in the part of this development process.

SD4: Contaminated Land and Mining Legacy Issues

Only one response was received regarding this policy. The Coal Authority are pleased to note that their suggested text has been added to the policy.

However one consultee states specific to SD6, there is no basis for renewable constructions, i.e. on-shore wind turbines, as the Authority does not have a consulted upon or applicable policy from which to test pre-applications against.

SD5: Minerals Safeguarding

No responses were received regarding this policy.

SD6: Sustainable Energy and Power Generation

The National Trust supports the policy and the National Forest Company strongly support the emphasis in the Policy on sourcing biomass materials from within The National Forest.

BNE1: Design Excellence

A mixed response was received regarding policy BNE1.

English Heritage welcomes the Policy's reference to and recognition of heritage assets and their settings and the National Forest Company supports the Policy. The National Trust generally supports BNE1 however suggests that the Policy should recognise that important historic views exist which do not relate specifically to landscape or townscape, for example a view of a landmark.

Furthermore Overseal Parish Council state that the need for an enforceable design policy is strongly supported.

Derbyshire County Council however suggests that the Policy should be amended to include a requirement for new development to incorporate broadband services (in conjunction with service providers) as part of the design of new development.

Nathanial Lichfield and Partners on behalf of Commercial Estates Group objects to Part ii) of the Policy. The consultee suggests that the requirement is unduly onerous as it is not clear what standard would need to be met in order to achieve high performance, and it is unclear as to what SPD the Council is referring.

BNE2: Heritage Assets

Two responses were received regarding this policy. English Heritage welcomes and supports the contents of Policy BNE2. The National Trust strongly supports the inclusion of a policy relating to heritage asset, however suggests that the current wording is not sufficiently clear that undesignated heritage assets, including archaeological remains and not restricted to the local list, warrant protection as appropriate to their significance. The National Trust suggests that recognition in the policy or supporting text of the economic/tourism/leisure benefits of South Derbyshire heritage assets would also help to ensure that

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

BNE2 meets NPPF requirements. In addition the National Trust suggest that they are supportive of the identification of BNE2 as a strategic policy (par 8.44), however for avoidance of doubt, the National Trust suggest the plan ought to contain a statement confirming the policy and other relevant policies are strategic.

BNE3: Biodiversity

A mixed response was received regarding this policy. Natural England supports the policy and suggests that it provides a strong framework for the protection and enhancement of biodiversity and geodiversity.

The National Trust supports the policy in principle however suggests that policy should be expanded to ensure that there is protection of undesignated sites or features of demonstrable values and also raises concern that point A(i) restricts the consideration of impacts of development 'within or adjacent' to sites and therefore fails to recognise that other development may have impacts.

Furthermore the National Farmers Union suggests that the Policy needs to make clear in its accompanying text that potential wildlife sites will be on a list identified and verified and not just drawn up by development opposition and the Policy should clarify the distances involved in "adjacent to sites".

BNE4: Landscape Character and Local Distinctiveness

The policy is generally supported. The National Trust strongly supports this policy; Natural England states that the policy provides strong guidance for the protection and enhancement of the character and quality of the District landscape; English Heritage welcomes references to and recognition of heritage assets and their settings; and Derbyshire County Council welcome and support the Policy.

However Nathaniel Lichfield and Partners on behalf of Commercial Estates Group object to the policy and considers that additional text should be added before the final sentence of Part B, in order to provide more certainty for developers as to how landscape impact can be mitigated. The consultee suggests that the Policy as currently worded does not suggest solutions which would help achieve sustainable development.

INF1: Infrastructure and Developer Contributions

The majority of responses received suggest changes to the policy however no overriding main issue regarding the policy was received.

Overseal Parish state that the Community Infrastructure Levy can be spent anywhere in the District, even if the relevant development were to be local. The Parish Council suggest that this should be changed so that the community which houses the relevant development achieved some community benefit from it.

The Home Builders Federation suggest that the policy needs to be viability tested and that policies INF1, INF2, INF4, INF 6 and INF9 overlap and as currently worded there is a distinct impression of potential "double dipping" which should be avoided. The Council should reconsider its wording so that developers are not charged twice. In addition the HBF raise concern that a degree of uncertainty is caused by reference to Supplementary Planning Documents (SPD) in this Policy.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

Paragraph 153 of the NPPF states that the Council cannot use SPD to introduce policy or increase development costs.

Nathaniel Lichfield and Partners on behalf of Commercial Estates Group suggest that evidence has not been provided to demonstrate that infrastructure and service requirements can be achieved through the application of S106 Planning Obligations. Furthermore evidence should be provided by the Council to demonstrate that the provision of infrastructure can be provided in accordance with the requirements of the CIL and the Council will need to ensure that there is no overlapping of contributions to infrastructure from S106 agreements and CIL in order to avoid “double charging”.

Knight Frank on behalf of Thulston Fields Partnership state that there is very little regard to the need for additional secondary school plans within the IDP. Page 27 of the IDP only refers to demand at infant and junior level with no acknowledgement of the growing demand of secondary provision in the demand trend assessment. The table on page 38 identifies the need for a new secondary school, but gives no indication of timetable or funding sources. The consultee is concerned to see that despite the recognised importance and significant cost, there is no assessment of how, when or where this will be delivered. The consultee suggests that the Policy needs to respond to the identified infrastructure need and be deliverable; it does not include provision for secondary education which is needed to ensure the delivery of sustainable development.

The National Trust generally support the Policy however are disappointed that the Policy’s supporting text makes no reference to the potential for heritage related works to be covered by this Policy. In addition The National Trust suggest that they are supportive of the identification of INF1 as a strategic policy (para 9.8), however for avoidance of doubt, the National Trust suggest the plan ought to contain a statement confirming that BNE2, INF1 and other relevant policies are ‘strategic policies’ for the purpose of neighbourhood plan conformity.

Derbyshire County Council support the principle of the Policy, however as currently written, details of the infrastructure delivery are deferred to a forthcoming Planning Obligations SPD and CIL. DCC go on to add that to meet the requirements of the NPPF and to provide greater clarity to developers, infrastructure providers and the public regarding deliverability, the Local Plan should include more detail regarding what infrastructure is critical to delivery of the Local Plan and how it will be funded and delivered.

Some comments of support were also received regarding the Policy. For example the Highways Agency stated that they are satisfied with the Infrastructure Delivery Plan and Planning and Design Group on behalf of Hallam Land Management welcome and support the recognition of the need to consider development viability ‘when determining the extent and priority of development contributions’.

INF2: Sustainable Transport

The majority of responses received support this Policy. The Highways Agency welcomes the planning proposals which seek to reduce the need to travel and encourage a model shift through enhancements to the walking and cycling network and improvements to public transport services, and welcomes the requirements for planning applications with significant transport implications to be

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

accompanied by Transport Assessments and Travel Plans. The National Trust provides general support for provision relating to walking and cycling, in particular provision A. Derbyshire County Council welcome and support that changes suggested in their response to the Draft Local Plan Part 1 consultation have been incorporated in the Policy and The National Forest Company supports the encouragement for sustainable transport, particularly paragraph E which refers to the protection of land for railway stations on the National Forest Line at Drakelow and Church Gresley.

In addition Overseal Parish Council support the re-opening of the Burton – Leicester railway line, however suggest that the reduction of car journeys is thought to be unrealistic.

The Home Builders Federation however suggests that the policy should be viability tested and raises concern that Policies INF1, INF2, INF4, INF6 and INF9 overlap and as currently worded there is a distinct impression of potential 'double dipping' which should be avoided. The Home Builders Federation suggest that the Policy should be reworded so that developers are not charged twice.

INF3: Strategic Rail Freight Interchange

The majority of responses received support or support specific aspects of Policy INF3.

The Highways Agency broadly supports the Policy. English Heritage welcome the reference to and recognition of heritage assets and their settings in the Policy. Derbyshire County Council considers it appropriate and justified that the Planning Inspectorate incorporates a criteria based policy for the assessment of any potential SFRI development scheme and considers that the Policy takes account of guidance published by the Department of Transport.

There were however suggested amendments to the Policy. Derbyshire County Council suggested one update - that all rail freight routes past or connecting to the Toyota site have or will be cleared to W10 height by 2015/16.

Barton Willmore on behalf of Goodman Shepherd supports the principle of the policy in respect of the development of a Strategic Rail Freight Interchange in the context of the proposed East Midlands Intermodal Park. However the consultee suggests that the Policy details require further refinement; in particular the lack of site specificity was mentioned by the consultee.

Egginton Parish Council however states that South Derbyshire has failed its duty to cooperate, having failed to indicate how South Derbyshire has engaged with other partners and authorities to develop this Policy. In addition the Policy fails in its duty to produce a policy upon which a planning application can be judged within a strategic context.

INF4: Transport Infrastructure Improvement Scheme

A mixed response was received in regards to this Policy. The Highways Agency supports the Policy. North West Leicestershire District Council supports the approach to avoid any unacceptable impact to North West Leicestershire District and Planning Prospects on behalf of St Modwen Developments and Dyson support the proposed Swadlincote Regeneration Route.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

From the consultees who have suggested changes, there was no one overriding issue. Pegasus Planning on behalf of Christ Church recommends that the Policy be amended to be explicit in protecting the route of the South Derby Integrated Transport Link phases 1 and 2. The Home Builders Federation also suggests that the policy needs to be viability tested. The Home Builders Federation suggests that policies INF1, INF2, INF4, INF6 and INF9 overlap and as currently worded there is a distinct impression of potential 'double dipping' which should be avoided. The consultee suggests that the Council should re-consider its wording so that developers are not charged twice.

INF5: East Midlands Airport

No responses were received which directly relate to this Policy.

INF6: Community Facilities

There was no one main issue received regarding this policy instead individual concerns were raised.

The Theatres Trust states the Policy does not include the word cultural nor does the accompanying text and there is no explanation of the term community facilities. The Home Builders Federation suggests that the Policy needs to be viability tested and policies INF1, INF2, INF4, INF6 and INF9 overlap and as currently worded there is a distinct impression of potential 'double dipping' which should be avoided. The consultee suggests that the Council should re-consider its wording so that developers are not charged twice. Additionally Sport England supports the inclusion of policy concerning provision, enhancement and protection of community facilities, however suggests that current wording around protection of facilities should be modified to better align with the NPPF; 'suitable alternative' should be changed to require 'replacement with equivalent or better provision in terms of quantity and quality in a suitable location' and the suggestion in the explanatory text that marketing for 12 months could justify loss should be omitted as such an approach would not be supported by evidence of need and would be contrary to the NPPF.

INF7: Green Infrastructure

The National Trust and Derbyshire County Council both support the Policy. One consultee has raised concern over INF7. Barton Under Needwood Parish Council are disappointed that the Local Plan fails to make reference to the Central Rivers Initiative, does not give an explanation of what the Trent Strategic River and the Trent and Mersey canal corridor is, and does not explain what the Trent Valley vision means.

INF8: The National Forest

The majority of responses received support this Policy. The National Trust, The National Forest Company and the National Forest Charitable Trust supports the Policy (however the National Forest Charitable Trust do suggest that the figure in the commuted sum section of Table 6 on page 148 should increase from £10,000 to £20,000).

The Home Builders Federation however suggests that this Policy needs viability testing and that the policy has implications for gross to net development land ratios.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

INF9: Open Space, Sport and Recreation

There was no one main issue received regarding this Policy instead individual issues were raised by consultees.

For example Overseal Parish Council states that the expansion of leisure services is welcomed, but the failure of the District Council to assist with repairs to the sports changing room is disappointing.

Home Builders Federation suggests that the policy needs viability testing and that policies INF1, INF2, INF4, INF6 and INF9 overlap and as currently worded there is a distinct impression of potential 'double dipping' which should be avoided. The consultee suggests that the Council should re-consider its wording so that developers are not charged twice.

Sport England supports the inclusion of policy concerning provision, enhancement and protection of open space, sport and recreation facilities. The policy correctly emphasises the requirement to plan for facilities and to base decisions in the light of up to date evidence. However it is not clear from the list of evidence base documents within the appendix or the explanatory text to the Policy that there is at present a sufficiently robust evidence base to support successful application of the Policy.

INF10: Tourism Development

The responses received regarding this Policy have some concern over the Policy wording. The National Trust and The National Forest Company both suggest that the Policy is too restrictive on tourist development and the National Forest Charitable Trust and the National Forest Company consider that the policy contradicts Policy INF8 and is too restrictive on tourism development within the National Forest, as most visitors of the National Forest will travel by car.

Furthermore The National Trust and National Forest Company and Chave Planning Ltd on behalf of Mr and Mrs Woodward all consider that the Policy is not consistent with the NPPF.

Proposals Map

No one main issue was raised regarding the proposals map. However alterations to the maps were suggested, these include:

- It would be helpful if the area of H13 to be added to the Nottingham-Derby Greenbelt were shaded green according to the key. Recognising that this area has planning consent, it may be necessary to include a boundary line, however the current shading gives the impression that this piece will accommodate built development.
- The symbol denoting the Historic Park and Garden should be moved a little south and enlarged to more accurately reflect the location and extent of Elvaston Park and its relationship with nearby development sites.
- The exact boundary of Elvaston Park and Garden should be plotted along with the Green Belt boundary
- The proposals maps should be based on an Ordnance Survey Map
- South Derby Integrated Transport Link should be identified as a protected route

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

- Employment site Sinfin Moor is incorrectly referenced as E4 on the Aston Area Proposals Map
- The boundary of the housing site H2 should be amended to fit the approved and under construction golf course boundary.
- The proposed protected station site at Drakelow is not shown on the Southern Villages Area Proposals Map.

Appendix 3

Few responses were received which directly relate to Appendix 3. Individual reasons for either support or opposition were received regarding the appendix, these include:

- There are potential issues regarding the trajectory demonstrating a 5 year housing land supply
- It is not contended that delivery will not occur at all or in accordance with the published trajectory
- Broomy Farm should have a start date as 2014/15 rather than 15/16
- Agreement over the housing trajectory start period for Hackwood Farm
- The trajectory indicated that in year 2014/15 there will be a 100% increase over the highest completions so far, this increase significantly to 2017. It is considered that the trajectory is wholly unrealistic for the next 5 years and should be reconsidered.

3 Consultation on Issues and Ideas (January – 3rd April 2009) (Regulation 18 Consultation)

3.1 Introduction

In January 2009 South Derbyshire District Council published its first consultation document towards its Local Plan – Issues and Ideas. This set out the Council's initial thoughts on the main questions to be addressed in identifying the right options for development within South Derbyshire, such as the District Vision, employment, housing, rural issues, heritage and conservation, to name a few.

Consultation on Issues and Ideas ran from January until the 3rd April 2009. The consultation document and responses received can be found on the Council's website [here](#).

3.2 Who was invited to be involved at this stage and how?

Different methods of public consultation were used to maximise community and stakeholder engagement in the process. These included:

- a. All organisations and individuals on the LDF consultation database being contacted by letter, or email where provided, with an enclosed summary leaflet, which explained the purpose of the consultation, how to find further information and how to make representations. Two different letters were sent: one aimed at statutory consultees and developers and the other at general amenity consultees (Appendix A1 & A2).

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

All South Derbyshire Councillors, Parish Councils and the South Derbyshire MP were sent a hard copy of the Issues and Ideas document and a summary leaflet (appendix A3, A4 & A5). Board members and Local Strategic Partnership member organisations were emailed separately to inform them of the consultation and provide details of where the Issues and Ideas document could be found on South Derbyshire's website (Appendix A6 & A7).

A follow up email was sent to consultees to remind them of the closing date of the consultation (Appendix A8).

- b. A paper **reference copy** of the Issues and Ideas document was made available to view in South Derbyshire District Council's Main Reception along with questionnaires.
- c. **A questionnaire** was produced asking for thoughts on the Issues and Ideas document. This was available to download from the Council's website and consultees were able to submit comments online by registering on the consultation system (Appendix A9).
- d. The Issues and Ideas **webpage** on the Council's website provided information on the consultation, along with an electronic copy of the questionnaire and the Issues and Ideas document.
- e. Reference copies of the Issues and Ideas document, along with questionnaires, were made available to view at all South Derbyshire **libraries**, plus libraries in adjoining areas at Derby Central, Borrowash, Mickleover, Sinfin, Blagreaves Lane, Burton upon Trent and Ashbourne.
- f. At the time of the consultation, speculation about development proposals in Etwall, particularly development at Egginton Common, had given rise to strong local feeling within the area. As a response to this, residents in Egginton, Etwall and surrounding villages were invited to a **public meeting** on the 19 February, 2009 at Etwall, called by South Derbyshire District Council, to hear about future development plans within the area. A PowerPoint presentation was delivered on the role of the Local Development Framework, the Issues and Ideas consultation and how to get involved. The planning application process was also explained. A question and answer session followed. A generic press release was sent promoting the public meeting (Appendix A10) along with a specific press release to the Burton Mail (Appendix A11). Those concerned about development at Etwall also produced posters advertising the public meeting (Appendix A12). Notes from the consultation meeting can be found in Appendix A13. The Burton Mail published a follow up article on the 21 February 2009 (Appendix A14). Within this article an error was reported, which was later redacted in an article published on the 24 February, 2009 (Appendix A15). In addition "This Is Derbyshire" published an article on the 20 February, 2009 regarding the public meeting (Appendix A16).
- g. On 9 January, 2009 a **presentation** was given to the **Local Strategic Partnership** on the Issues and Ideas consultation (Appendix A17).

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

- h. An **LDF workshop** for Elected Members was held on the 17 March 2009 to update South Derbyshire District Council's Members on the process and progress of the LDF, exploring the content of the LDF vision and identifying some key LDF objectives (Appendix A18).
- i. An Elected **Member priorities seminar** was undertaken on 14 July 2009 in which planning officers sought to understand Member's priorities for their ward (Appendix A19).
- j. An article on the consultation was published by the Burton Mail (Appendix A20).
- k. An article was published in the Burton Mail regarding a 'memorandum of understanding' between South Derbyshire and East Staffordshire to the effect that both parties agreed to work closely on development likely to have a large impact on both areas (Appendix A21).

3.3 What were the main issues raised?

942 individual comments were registered from 116 contributors. The main issues raised were as follows:

- The majority of consultees agreed that there was potential to harness renewable, low carbon or locally generated energy in the District and that it was desirable to make provision for renewable energy installations in the District. However the majority of responses received did suggest that there was a threat or potential threat to the landscape character of the District from renewable energy.
- A mixed response was received on whether there were opportunities for the promotion of eco buildings exceeding the design standards set out in national Building Regulations.
- There was a divide between developers and residents on whether the Core Strategy should plan for levels of growth significantly different to those set out in the Regional Spatial Strategy (RSS). In the main residents suggested that the Core Strategy should not plan for levels of growth significantly different to those set out in the RSS or should plan for less, whilst developers suggested that the Core Strategy should plan for growth higher than that provided for by the RSS.
- The majority of the responses suggested that housing development should be located around the Derby Principle Urban Area and Swadlincote and some respondees suggested that the location of housing development should reflect the distribution provided for in the RSS. A mixed response was received on whether, and how much, housing development should occur in rural areas.
- The majority of consultees suggested that a mix of dwellings was needed in South Derbyshire.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

- Regarding particular housing needs arising from specific sections of the population that were considered to be unlikely to be adequately met through general housing provision. Housing for older people was mentioned most by respondents as it was considered that this was unlikely to be met adequately through general housing provision.
- A mixed response was received on whether the appropriate threshold for affordable housing provision should be sites of 15 or more dwellings.
- The majority of consultees suggested that a uniform approach to residential density should not be applied across the District.
- Consultees were asked whether major transport schemes/routes were required in addition to the Woodville - Swadlincote Regeneration Route. A range of schemes/routes were suggested (see Appendix A22)
- Very few respondents commented on the quantity of new employment land to be provided within the District to 2028. However, some locations for employment were suggested by consultees (see Appendix A22).
- The majority of responses supported the continued use of the Green Belt to prevent key settlements from coalescing. Two consultees suggested that a review of the Green Belt should be undertaken and two suggested specific locations for alterations to the boundary.
- Comments were received about specific settlements in the District, including things that residents liked and disliked about their neighbourhoods and suggestions for improvement.

A full summary of representations received can be found at Appendix A22.

3.4 How, where necessary, these issues were addressed

As the Local Plan process was at an early stage, further evidence was required to establish South Derbyshire's policy stance on a number of questions raised.

Further evidence was obtained to establish the potential for renewable and low carbon sources of energy within the HMA.

Further work on the HMA evidence base was undertaken to establish the types of homes needed, in terms of proportion of affordable dwellings needed – and provision for specific groups, including older people and those with disabilities. This evidence was then used to help shape the emerging Local Plan.

Further work was required and undertaken regarding the provision of affordable housing within the district. The evidence collected has informed the affordable housing policy within the Local Plan.

It was decided not to pursue a uniform policy for residential density in the Local Plan as it was considered that an area-based approach would be more beneficial in terms of ensuring appropriate housing delivery and protecting the natural and built environment.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

With regards to improvements to transport schemes/routes, modelling evidence was needed to identify the future performance of the highway network and the potential impacts on the efficient operation of transport infrastructure that would result from allowing development in different locations.

Further work was required to establish the extent of any need for new employment development and the opportunities for new employment allocations in the District. The evidence collected has helped influence provision for employment development in the Local Plan.

Work was also required to establish whether the areas of Green Belt within the District still fulfilled their intended purpose and whether any alterations to the boundaries should be considered.

All the additional work identified above contributed toward the identification of strategic development sites and the formulation of policy and formed the basis of subsequent stages of public consultation, particularly Issues and Alternative Options.

Responses received that referred to specific parts of the District were summarised and incorporated into the Area Profiles and Summary Profiles in the “Your Neighbourhood: Talk to Us” and “issues and Alternative Options” consultation exercises.

4 Consultation on Issues and Alternative Options (29 January 2010 – 28 May 2010) (Regulation 18 Consultation)

4.1 Who was invited to be involved at this stage and how?

In January 2010 the District Council started consultation on its “Issues and Alternative Options” document. Views were sought on:

- key issues to be addressed
- a draft Vision for South Derbyshire and the Derby Housing Market Area
- a number of Strategic Objectives for guiding future change in South Derbyshire and the Derby Housing Market Area
- a number of alternative options for how the District might grow in the future, including potential development locations.

Consultation on Issues and Alternative Options was undertaken concurrently across the Housing Market Area and initially ran until 31 March 2010, but was later extended to 28 May 2010, due to high interest.

4.2 Who was invited to be involved at this stage and how?

Different methods of public consultation were used to maximise community and stakeholder engagement, including:

- a. All organisations and individuals including statutory stakeholders, interest groups, developers and agents and other individuals whose details were on the LDF consultation database, were contacted by letter or email (where provided), with an enclosed or attached summary leaflet, to inform

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

them of the consultation and explain how to find further information and make representations. In total 414 **emails** and 789 **letters** were sent (Appendix B1 and B2).

All South Derbyshire Councillors and Parish Councils were sent a hard copy of the “Issues and Alternative Options” document, a summary leaflet and a questionnaire. A further letter was distributed to the Councillors regarding the public exhibitions (Appendices B3, B4 & B5). South Derbyshire’s MP was also sent a letter and hard copy of the consultation document (Appendix B6).

A further email was sent to those on the LDF database at the start of the consultation period to remind consultees of the current consultation and inform that public exhibitions within the District had been organised (Appendix B7).

A further letter was sent to those on the LDF database on the 26 March 2010 informing consultees of the extended consultation deadline (Appendix B8).

- b. **Posters** advertising the consultation were distributed to all Parish Councils and libraries. Posters were also located on notice boards within Swadlincote Town Centre; Sharpes Pottery Museum and Tourist Information Centre; Sir Nigel Gresley Pub, Swadlincote; Green Bank Leisure Centre; Adult Education Centre; Hilton Village Hall and South Derbyshire District Council offices (Appendix B9).
- c. Reference copies of the full document, summary leaflets and questionnaires to take way were distributed to all South Derbyshire **Libraries**, including mobile libraries, to the Willington and Chellaston post offices and to two mobile libraries. They were also distributed to the following libraries outside the District: Burton upon Trent, Derby Central, Blagreaves Lane (Littleover), Mickleover, Alvaston, Borrowash, Ashbourne and Sinfin.
- d. **Consultation leaflets** and questionnaires were distributed to the Connexions Office within Swadlincote (Appendix B10).
- e. **Reference copies** of the consultation document and questionnaires were made available at South Derbyshire District Council offices.
- f. During the consultation period an advert publicising the consultation was added to a rolling presentation on the tv **screens** within the Council office’s **Main Reception**.
- g. The consultation was advertised on the **publicly accessible computers** in the Main Reception at the Council offices.
- h. A **banner** advertising the Issues and Alternative Options document was uploaded on the South Derbyshire District Council website home page, during the consultation period. A **hotlink** on this banner connected directly to the “Issues and Alternative Options” webpage, which provided further

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

information and contained the main document and questionnaire to download.

- i. **Questionnaires** were produced soliciting views on alternative options. These were available at all drop in events, all South Derbyshire Libraries (and the other venues listed in point “c”, above) the Council office Main Reception and on the Council’s website (appendix B11). Consultees could also register and submit comments online.
- j. Drop-in events were publicised on the **District Council’s website**, along with the consultation document and questionnaire to view online or download.
- k. Five **drop-in events**, were held across the District, with the aim of reaching all sections of the community. Planning officers attended the events to explain the purpose of the consultation and answer any questions.

The drop-in events were held at the following venues:

Venue	Date	Time
Melbourne Leisure Centre, Melbourne	23 February 2010	10am –7pm
Swadlincote Town Hall, Swadlincote	24 February 2010	10am –7pm
Hilton Village Hall, Hilton	4 March 2010	10am – 7pm
Stenson Fields Primary School, Stenson Fields	19 March 2010	3pm – 6pm
Mickleover	31 March 2010	4pm – 8pm

Planning officers also attended five Derby City public meetings at Mickleover, Chellaston, Sinfin, Littleover and Alvaston.

Details on the number of attendees at each event can be found in Appendix G1.

- l. The consultation events were announced three times on **Twitter** during the consultation period.
- m. The Derby HMA local authorities issued a joint **press release** advertising the consultations (Appendix B12) and South Derbyshire District Council issued two further press releases to publicise the Council’s public exhibitions (Appendix B13 & B14).
- n. An **article** regarding the consultation was published online in the Derby Evening Telegraph on the 26 January, 2010 (Appendix B15).
- o. At the request of Woodville Parish Council and Etwall Parish Council, the Development Management and Planning Policy Managers attended a Woodville Parish **Council meeting** on 16 February, 2010 and the Planning Policy Manager attended an Etwall Parish Council meeting on 15

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

March, 2010. The purpose of these engagements was to discuss the consultation and any potential development which could impact upon these locations.

- p. Planning Policy officers attended a **Mickleover Public Meeting** on the 3 March, 2010 and the **Chellaston Residents' AGM** on the 24 March, 2010. The officers explained the purpose of the current consultation and responded to questions.
- q. A presentation was made to the South Derbyshire **Parish Liaison Group** on 17 February, 2010.
- r. A presentation was given to the **Local Strategic Partnership Sustainable Development Group** on 5 March 2010.
- s. A meeting was held on the 28 January 2010 with Planning Policy Officers and the **Local Strategic Partnership Board** to discuss the consultation.
- t. Councillor Heather Wheeler, Leader of the Council at the time, was interviewed on Touch FM on 20 February, 2010. A Derby City Planning Policy Officer was also interviewed on BBC **Radio**.
- u. A **Member workshop** was undertaken on the 16 March, 2010 to inform Elected Members of the purpose and content of the consultation exercise and the on-going Local Plan preparation process.
- v. A **Developers Forum** was held at the Council Offices on 13 July, 2010.
- w. Presentations were given at the following **Area Forums**: Swadlincote (26 January, 2010), Repton (27 January, 2010), Linton (1 February, 2010), Melbourne (2 February, 2010), Melbourne (3 February, 2010) and Newhall (8 February, 2010) (Appendix B16).
- x. The **Community Voluntary Service (CVS)** emailed those on their consultation database to publicise the consultation exercise, including details of public exhibitions.

4.3 What were the main issues the representations raised?

4174 Individual comments were registered from 891 respondees during the consultation. The main issues raised were as follows:

- The consultation provided three housing growth options in South Derbyshire. Option 1: make provision for the Regional Plan 2006-2026 requirements; Option 2: anticipate the review of the Regional Plan and extend the end date of the Core Strategy to 2031; and Option 3: make provision for an amount in excess of the Regional Plan requirement. From the representations received, Option 1 was favoured above the others.
- Three options were provided in regards to how much new employment land should be provided in the Derby HMA. Option 1: provide a total amount of new employment land across the HMA in line with the

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

recommendation of the employment land review; Option 2: provide a total amount of new employment land across the HMA below that recommended in the employment land review and; Option 3: provide a total amount of new employment land across the HMA above that recommended in the employment land review. From the representations received, Option 1 was the most popular.

- Five main spatial options or broad areas for housing growth were suggested around the PUA. The options can be seen below in order of preference:
 - Option 5: Boulton Moor (66 respondees chose this option)
 - Option 4: Chellaston (59 respondees chose this option)
 - Option 3: Sinfin (51 respondees chose this option)
 - Option 1: Mickleover area (51 respondees chose this options)
 - Option 2: Littleover (49 respondees chose this option)All of the options received both positive and negative comments.
- Two options were provided in regards to housing delivery within the PUA: Option 1: multiple locations or Option 2: a single location. Option 1, received the most support by a substantial margin.
- Three options were presented regarding where employment provision could be allocated in the PUA. Option 1: mixed use urban extensions to Derby; Option 2: within Derby and Option 3: within South Derbyshire and Derby. Option 2 was the preferred option followed by Option 3. Option 1 received substantially less support.
- Four options were presented in regard to managing existing and future travel demands and behaviours in the PUA and non-PUA. Option 1: minimum intervention; Option 2: demand management; Option 3: measures to increase use of alternatives to the car and; Option 4: highways based improvements. In the case of the PUA and non-PUA Option 3 was the preferred choice.
- Four options on housing distribution outside the PUA were presented. These are listed in order of preference:
 - Option 4: Swadlincote and redevelopment of a major brownfield development site in the vicinity of the former Drakelow Power Station (144 respondees chose this option)
 - Option 1: Swadlincote Focused Growth (101 respondees chose this option)
 - Option 2: Swadlincote and limited development in named villages (41 respondees chose this option)
 - Option 3: Swadlincote and maximum development in named villages or rural locations where potential development exists (32 respondees chose this option)
- Five options were presented on the direction of growth in Swadlincote and are listed in order of preference:
 - Option 4: A combination of locations (54 respondees chose this option)
 - Option 1: Extensions to the west and south west (24 respondees chose this option)

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

- Option 3: Extensions to the south (10 respondees chose this option)
- Option 2: Extensions to the east (8 respondees chose this option)
- Two options were presented on employment land provision outside the PUA. Option 1: no additional provision and Option 2: increased provision. Both received a similar level of support, with Option 1 receiving slightly more with 47 responses in support to 41.
- Two options were presented on regeneration in Swadlincote and Woodville. Option 1: employment led regeneration and Option 2: mixed use regeneration. Both received a similar level of support with Option 1 receiving slightly more with 32 responses in support to 27.
- Four locations (with an additional option of no sites) were presented on a strategic distribution (logistics) facility. The options are listed in order of preference:
 - Option 3: Drakelow Power Station (56 respondees chose this option)
 - Option 2: Willington Power Station (39 respondees chose this option)
 - Option 5: no sites (35 respondees chose this option)
 - Option 1: A38/A50 area (31 respondees chose this option)
 - Option 4: Sinfin Moor (28 respondees chose this option)
- The majority of consultees agree with the use of Building For Life in guiding design quality.
- With regards to delivering improvements to energy efficiency in developments, three options were presented. Option 1: use building regulations; Option 2: set targets and; Option 3: higher targets on specific sites. Option 2 was the most popular.
- The consultation sought views on whether development should be allowed in the flood plain. Two options were provided: Option 1: no development in the flood plain and Option 2: a special exceptions policy. Option 1 received the majority of support.
- With regards to water supply the consultation asked whether the Core Strategy should require water consumption rates in new homes to be below 125 litres per person per day, set out in building regulation's or whether higher standards should be set. Setting higher standards was the preferred option.
- Two options were presented on how Sustainable Urban Developments (SUD) could be delivered through the Core Strategy. Option 1: business as usual (seek sustainable drainage systems wherever practical in accordance with PPS25 and the East Midlands Regional Plan) and Option 2: higher standards (specification of high environmental standards relating to surface water management). Option 2 was preferred.
- Two options were presented on increasing the provision of affordable housing. Option 1: set a lower thresholds size for qualifying sites and Option 2: increase the provision of affordable housing required on sites

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

which exceed the qualifying site size threshold. Option 1 was the most popular.

- Two options were presented on housing density. Option 1: set a minimum density and Option 2: an area-based approach. Option 2 was the most popular option by a substantial margin (85 responses in support to 28).
- The consultation sought views on whether there was a need to seek a proportion of Lifetime Homes in advance of the introduction of national standards in the Core Strategy. Three options were presented. Option 1: use building regulations; Option 2: set targets for lifetime homes in advance of statutory building regulations; and Option 3: set higher targets for lifetime homes on specific strategic/exemplar sites. Option 1 was preferred.
- Two options were presented on the extent to which non-retail uses should be resisted in the central shopping street in Swadlincote; Option 1: priority to A1 uses and Option 2: mixed use approach. Option 2 was preferred.
- With regards to how infrastructure should be funded, four options were presented. Option 1: wider developer contributions; Option 2: S106 contributions; Option 3: introduce levy and Option 4: introduce levy and S106. Options 1 and 2 were the preferred choices.

A full summary of representations received for this consultation can be found in Appendix B17.

4.4 How these issues were addressed along with South Derbyshire's Vision and Objectives

The consultation also provided a vision and strategic objectives for the Derby HMA. These were not carried forward into subsequent consultations as it was considered that having separate visions and strategic objectives for the Derby HMA and South Derbyshire was confusing and unnecessary.

Regarding housing provision, due to the Government's decision to abolish Regional Spatial Strategies and the revocation of the East Midlands RSS in 2013, resulting in Local Authorities setting housing provision to their administrative area, it was necessary to consult on the District's housing provision in more depth and produce further evidence to establish the Derby HMA and South Derbyshire housing requirements over the plan period.

1. The three options in regard to how much employment land should be provided in the Derby HMA were based around the employment land provision identified in the Derby Housing Market Area Employment Land Review, published in 2008. However, due to the passage of time and the review of the Derby HMA and District housing requirement, it was necessary to update the employment land forecasts. The Derby HMA Employment Land Review: Forecasts Update, 2013 provided evidence on the level of employment provision needed for the Derby HMA and the

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

three constituent local authority areas from 2008-2028 and helped inform later stages of the plan preparation process.

In regard to broad spatial options for housing growth in the Derby Principle Urban Area (PUA) and non-PUA, a range of options were provided. The Boulton Moor Area was the most popular choice for the PUA and a combination of locations was the most popular choice for the directions of growth in Swadlincote. All options, however, received a degree of support. Further evidence was obtained in regards to locations for housing growth and was used to help finalise the housing sites within the Draft Local Plan and Pre- Submission Local Plan.

Multiple locations for housing delivery in the PUA have been carried forward into the Preferred Growth Strategy, Draft Local Plan and Pre-Submission Local Plan.

Regarding managing existing and future travel demands and behaviour, both within and outside the PUA, Option 3 (measures to increase use of alternatives to the car) was the most popular. The transport evidence suggests that such measures alone would not be sufficient to effectively mitigate the anticipated transport impacts of proposed development. Based on modelling undertaken to date, it has been concluded that to support the scale of growth proposed, transport mitigation measures should comprise a combination of new public transport services, the creation of new walking and cycling routes, demand management measures and new highway infrastructure.

The Draft Local Plan and Pre Submission Local Plan intends to bring forward the land at Occupation Lane Woodville for employment-led regeneration supported by the delivery of the Woodville to Swadlincote Regeneration Route.

The consultation presented four potential locations (and an option for no sites) for the development of a strategic distribution facility. No sites for such a facility have been allocated within the Draft Local Plan or Pre Submission Local Plan, even though this was only the fourth least popular option. Prior to March 2010 applications for rail freight interchanges would have been submitted to and determined by the District Council. However, following this date applications for infrastructure projects of regional or national significance were required to be submitted directly to the Planning Inspectorate and determined by the Secretary of State. As a result of this change, and coupled with the fact that some of the sites previously identified are no longer available for this type of development, the Council considered that this type of development could be most effectively addressed through the use of a criteria-based policy. Such a policy could help ensure that where proposals come forward, developers will have certainty as to the Council's minimum planning requirements.

Policy BNL1 Design Excellence in the Draft Local Plan and Pre-Submission Local Plan emphasises the importance of good design within development. Building For Life is not specifically mentioned within the policy however is alluded to by stating "All proposals for major development shall perform highly when assessed against current best practice and standards for design, sustainability and place making". Further design guidance which incorporates Building For Life is likely to be set out in a later Supplementary Planning Document.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

The use of Building Regulations along with national standards to deliver improvements to energy efficiency in new development, was the approach carried forward in the Draft Local Plan. However within Pre Submission Local Plan Policy SD1 and SD2 (of the Draft Local Plan) have been amalgamated and amended. Amendments have been made to these policies to reflect the Government's preferred mechanism to deliver zero carbon building and more sustainable developments through building regulations and a 'nationally described standards set' which will deal with issues such as accessibility, space, domestic security, water efficiency and energy subject to viability. The Council will keep this policy under review as the outcome of the governments Housing Standards Review becomes known.

Option 2: a Special Exceptions policy, was carried forward into Draft Local Plan and Pre Submission Local Plan, despite Option 1 being the preferred option by consultees. It was considered that the social and economic benefits of allowing limited growth could, in some cases, outweigh the negative impacts in respect of health and wellbeing and objectives to reduce flood risk and climate change impacts. By incorporating Option 2, the Council will be able to be more flexible in delivering growth in areas of identified flood risk where there are clear benefits in doing so.

In regards to water supply the consultation asked whether the Core Strategy should require water consumption rates in new homes to be restricted to below 125 litres per person per day, as set out in Building Regulations, or whether higher standards should be set. Setting higher standards was carried forward into a Draft Local Plan policy. However within the Pre Submission Local Plan policy wording has been amended to reflect the Governments Housing Standard Review consultation.

The Authority has incorporated a "business as usual" approach to how Sustainable Urban Drainage could be delivered through the Local Plan, despite the option to set higher standards being preferred by consultees. Since the Council undertook the "Issues and Alternative Options" consultation, the Government has introduced the Flood and Water Management Act. Schedule 3 of this Act is likely to be implemented in 2014 (although its implementation has been delayed several times to date) and will require developers to integrate SUDS into new developments - including small scale schemes. National requirements will be implemented within the plan period and, over time, will provide a level of protection to the District's watercourses, which in respect of onsite flood risk, will be comparable with any enhanced policy put in place for South Derbyshire. It is therefore considered that there is no longer a need to pursue improved SUDS provision through the Local Plan. Instead the Authority will seek to work with developers and the County Council, as Lead Local Flood Authority and SUDS Approval body, to implement proposed changes effectively.

The most popular option regarding affordable housing was Option 1: increasing the provision of affordable dwellings by setting a lower size threshold for qualifying sites. This option was not carried forward into the Draft Local Plan or Pre Submission Local Plan as it was considered to be unlikely to be viable in the current economic climate. Small sites that have come forward in the recent past have been reviewed and of these, many are on previously developed land within existing urban areas (i.e. Swadlincote or the villages). By setting a low threshold

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

the Authority could potentially undermine the reuse of small previously developed sites which often have abnormal costs associated with demolition or remediation. Failure to secure the reuse of such sites could have detrimental impacts on surrounding communities and would undermine Government objectives to reuse brownfield sites ahead of greenfield locations. Option 2: “increase the provision of affordable housing required on sites which exceed the qualifying site size threshold”, supported by a criteria-based policy to allow affordable housing exceptions sites, has been carried forward into the Draft Local Plan and Pre-Submission Local Plan.

The Draft Local Plan and Pre-Submission Local Plan reflect an area-based approach to housing density.

On Lifetime Homes, the Council incorporated Option 3 (high targets on specific sites) in the Draft Local, despite Option 1 (use building requirements for the provision of lifetimes) being preferred by most respondents. However from the Pre Submission Local Plan this was removed as Lifetime Homes will be addressed through Building Regulations. The Housing Standards Review confirmed that this approach was consistent with Government policy.

The Issues and Alternative Options consultation included options for town centre and retailing and the Pre Submission Local Plan contains a strategic policy on retail, which amongst other requirements supports the role of Swadlincote Town Centre. The Local Plan Part 2 will contain further retail policies

With regard to the means by which infrastructure should be funded, Option 4 (introduce Community Infrastructure Levy and negotiate Section 106 contributions) is the District’s preference, subject to viability testing. This was not the most popular option chosen by respondents, however changes are due to legislation in England and Wales that will stop Councils pooling contributions from more than five sites, which could potentially hamper the delivery of larger infrastructure items through S106.

5 “Your Neighbourhood: Talk to Us” Consultation (8th February -3rd May 2011) (Regulation 18 Consultation)

5.1 Introduction

During 2011 the Coalition Government was beginning to make major changes to the planning system through the proposed Localism Act and the National Planning Policy Framework. The HMA Local Authorities therefore decided to proceed in a way which better supported localism. South Derbyshire District Council decided to divide the District up into 11 areas and put together a profile for each area. During 8 February to 3 May, 2011 these Area Profiles were published for consultation. The consultations sought members of the public and stakeholder’s views on the whether they agreed with the Council’s understanding of the issues facing each area.

The Area Profiles and summary leaflet can be found [here](#) and consultee responses can be found [here](#).

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

5.2 Who was invited to be involved at this stage and how?

Different methods of public consultation were used to maximise community and stakeholder engagement in the process.

The consultation methods used included the following:

- a. All organisations and individuals including statutory stakeholders, interest groups, developers, and agents and other individuals whose details were included on the LDF database were contacted by **letter** or **email** (where provided) to inform them of the upcoming consultation, where to find documentation on “Your Neighbourhood: Talk to Us”, and how to get involved. An enclosed sheet/attached document provided details of the dates, times and venues of the drop-in events; whilst a map on the reverse helped consultees identify which neighbourhood area they lived within, or closest to. In total approximately 2000 letters and emails were sent (Appendix C1 & C2).

An individual letter was sent to South Derbyshire’s MP informing her of the upcoming consultation and South Derbyshire Councillors were emailed a copy of the letter sent to consultees included on the LDF database (Appendix C3 & C4). All South Derbyshire Parish Councils were sent hard copies of the Area Profile document, a summary leaflet, poster, an Area Profile map and technical appendices for the relevant neighbourhood area (Appendix C5).

Following the conclusion of the drop-in events, a follow up email was sent to inform consultees that the consultation events had now ended, however comments were still welcome until the 3th May 2011 (Appendix C6).

- b. Each **primary school** and **secondary school pupil** within the District received a letter (7,363 and 7,552 letters respectively) to inform parents of the upcoming consultation, indicating where to find the Area Profile documents and how to get involved (Appendix C7).
- c. **Flyers** advertising the consultation were distributed at all **Area Forums**. Area Forums were held on the 25 January, 2010 (Repton), 26 January, 2010 (Linton), 31 January, 2010 (Etwell), 1 February 2010 (Swadlincote), 1 February 2010 (Newhall and the 7 February 2010 (Melbourne) (Appendix C8).
- d. **Posters** were distributed to all Parish Councils, all South Derbyshire libraries, Derby City libraries, post offices and the Hatton Centre. A generic poster was created providing details on all the consultation events along with specific posters targeted to the 11 profile areas. These posters publicised the nearest consultation event (or, where relevant, two events) to the area in which the poster would be displayed (Appendix C9, C10, C11).
- e. A **banner** advertising “Your Neighbourhood: Talk To Us” was located on the South Derbyshire District Council’s website homepage during the consultation period. A **hotlink** on this banner lead directly to the “Your

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

Neighbourhoods: Talk to Us” page, which provided further information on the consultation, Area Profiles and a questionnaire to download.

- f. Area Profiles documents, specific to each of the 11 profile areas, were produced. Reference copies of these, summary leaflets, Area Profile maps and technical appendices were available to view at South Derbyshire, Derby City, Burton-on-Trent and Ashbourne **libraries**.
- g. A paper **reference copy** of the “Your Neighbourhood: Talk To Us” documents was made available to view in South Derbyshire District Council’s Main Reception along with questionnaires.
- h. A **questionnaire** was produced which asked consultees whether they agreed with the District’s understanding of the issues facing their neighbourhood and what they thought their neighbourhood needs were, be it more affordable housing, new play areas or better community facilities etc. A copy of the questionnaire was distributed to all Parish Councils and was available at all South Derbyshire & Derby City (Mickleover, Sinfin, Chellaston, Alvaston, Derby Central, and Blagreaves) libraries. Details of consultation events and a digital version of the questionnaire were made available to download from the Council’s website (Appendix C12). Consultees were also offered the opportunity to submit representations through the Council’s on-line consultation system.
- i. **Drop-in events**, which numbered 13 in total, were held in various locations within South Derbyshire, with the aim of reaching as many different sections of the community as possible. The events included information panels explaining the purpose of the consultations and what was being sought in terms of feedback from the public and stakeholders. Reference copies of the Area Profiles and Conservation Area character statements were on display along with a map showing the areas’ main services and other points of interest. Attendees were invited to stick post-it notes on maps, with comments about their areas. A summary leaflet and questionnaire were also made available to take away. A Powerpoint presentation specific to the area being consulted upon was displayed at each event (Appendix C13 & C14).

Planning officers attended the drop-in events to explain the purpose of the consultation and answer attendees’ questions.

The drop-in events took place at the following venues:

Community Area	Venue	Date	Time
Willington and Findern area	Findern Village Hall, Castle Hill, Findern	8 February, 2011, Tuesday	3.30pm – 7.30pm
Repton area	Repton Village Hall, Askew Grove, Repton	10 February, 2011, Thursday	2.30pm – 7.30pm
Melbourne area	Bill Shone Leisure Centre, Melbourne	15 February, 2011, Tuesday	3pm – 7.30pm

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

Hilton and north west area	Hilton Village Hall, Peacroft Lane, Hilton	22 February, 2011, Tuesday	3pm – 7.30pm
Stenson area	Stenson Field Primary School, Stenson Fields	24 February, 2011, Thursday	3pm – 7.30pm
Etwall area	Frank Wickham Hall, Portland Street, Etwall	2 March, 2011, Wednesday	3pm - 7.30pm
Etwall area	Mickleover Country Park Social Club, Merlin Way, Mickleover	4 March, 2011, Friday	3pm – 7.30pm
Hatton area	Hatton Centre, Station Road, Hatton	9 March, 2011, Wednesday	3pm – 7.30pm
Swadlincote area	Old Post Centre, High Street, Newhall	11 March, 2011, Friday	3pm - 7.30pm
Swadlincote area	Swadlincote Town Hall, The Delph, Swadlincote, DE11 9DA	15 March, 2011, Tuesday	3pm – 7.30pm
Southern Villages area	Rosliston Village Hall, Main Street, Rosliston	17 March, 2011, Thursday	3.30pm – 7.30pm
Aston area	All Saints' Heritage Centre, Shardlow Road, Aston on Trent	22 March, 2011, Tuesday	3pm – 7.30pm
Woodville area	Woodville Youth Centre, Moira Road, Woodville	23 March, 2011, Wednesday	3pm – 7.20pm

Attendee numbers for each event can be found in Appendix G1.

- j. Each consultation event was usually announced on **Twitter** on the day (Appendix C15).
- k. Details of the drop in events were advertised in the **Community Voluntary Service (CVS) newsletter**. CVS staff attended four consultation drop-in events (Findern, Hilton, Stenson and Swadlincote) to promote their services.
- l. The “Your Neighbourhood: Talk To Us” page on Council’s **website** provided a map of South Derbyshire showing the profile areas. Each profile area has its own webpage containing an Area Profile document, summary leaflet, technical appendix and profile map. The consultation questionnaire was also made available to download and the drop-in events were advertised.
- m. Two **press releases** were published (31 January 2011, 24 February 2011) promoting the drop in events. A specific press release was sent to the Melbourne Village Voice (April 2011) (Appendix C16, C17 & C18).
- n. An **article** explaining Localism, the Big Society and publicising the next round of consultation was published on the 6 February 2011 on the Burton Mail community page (Appendix C19). For the January edition of the Derbyshire First newspaper, an article was published on behalf of the Derby HMA authorities advertising the consultation (Appendix C20).

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

- o. The “Say No to Mickleover Sprawl” website publicised the Mickleover drop-in event (Appendix C21).
- p. On 26 January, 2011 an HMA-wide training event was held for Elected Members at Pride Park, Derby. The event covered changes to the plan-making context, an indicative work programme for the Local Plan and community engagement (Appendix C22, C23 & C24).
- q. On 14 April, 2011 discussions were held with the Local Strategic Partnership Sustainable Development Group regarding the consultation.
- r. In February, 2012 a Parish Liaison meeting was held to update Parishes on Core Strategy progress (Appendix C25).
- s. Attended the Values and Attributes group in April 2011 to update them on the Core Strategy progress (Appendix C26)
- t. A **short URL code** was created for the District Council's webpage, which contained information on the consultation.
- u. All comments received were made available to view on the Council website after the end of the consultation period.

5.3 What were the main issues raised by respondents?

958 Individual comments were registered from 98 contributors during the consultation. The main issues raised were as follows:

- Across the District, respondents were relatively consistent in terms of the key things that they liked about their neighbourhood and what they would like to see preserved. Across the District residents valued the open and rural character of South Derbyshire's landscape, the character of villages; village life and the sense of community. Areas such as Repton and Melbourne were treasured for their historic character. In addition, access to services, facilities and the road network were mentioned by numerous residents.
- The aspects of South Derbyshire that respondents would like to see improved were more spatially varied. However issues raised in relation to large parts of the District included car parking provision, improvements to/additional footpaths and cycle links, improvements to existing local community facilities including recreational facilities and, predominantly in the rural areas, improvements to public transport. There was an aspiration for the provision of affordable housing in some parts of the District including the Etwall, Repton, Woodville, Willington and Findern and the Aston areas.
- Consultees were asked whether there was sufficient provision for leisure activities within their neighbourhood. There was a mixed response, some residents suggesting that there is enough to do and others identifying a need for additional or improved provision.. This mixed response applied to

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

all the areas, with the exception of Hilton which received two responses to this question, both of which expressed satisfaction with the current range of provision. Appendix C27 provides further information on the responses to this question.

- Suggested improvements to local sport and leisure facilities, were specific to each profile area in questions. These can be found in appendix C27. It was however There was a widespread view that further sports activities/clubs were needed for children/teenagers.
- In response to the question ‘what type of sport and leisure facility do you like?’ a wide range of activities were stated. Most frequently mentioned among these was walking, which received 37 comments, followed by swimming, with 33 comments. The third most popular was cycling, with 20 comments, followed by tennis (10 comments); yoga (seven comments), badminton (six comments); football (five comments); gym (five comments); cricket (three comments) and gardening (three comments). Appendix C27 provides a table showing how many respondees from the 11 areas within South Derbyshire stated they liked each of the main sports/activities.
- Respondees gave reasons as to why they did not take part in sport and leisure activities. The main reasons given include age(10 comments); high costs (9 comments); time availability of activities/leisure facilities (4 comments); childcare responsibilities (4 comments); limited public transport (4 comments); distance (3 comments); lack of facilities (4 comments) and limited time/other commitments (4 comments). However, 34 responses indicated that nothing stopped them taking part in sport and leisure activities. Appendix C27 provides a table showing how many respondees from the 11 areas within South Derbyshire stated which factor restricts them from taking part in sport and leisure activities.
- Across the 11 neighbourhood areas a range of community facilities and services were identified as being in need of improvement. Across large parts of the District these included improvements to bus services, medical services and local shops. Suggested improvements to community facilities or services within the 11 areas can be found in appendix C27.

A full summary of representations received for each Profile Area can be found in Appendix C27.

5.3 How, where necessary, these issues were addressed

The consultation provided the District Council with a broad understanding of the issues facing each of the 11 profile areas and these were taken into consideration when determining housing and employment allocations.

The premise of the 11 areas of the District was incorporated into the Draft Local Plan. Area based chapters were created which provided an overview of the area in question, objectives for the area over the plan period, and policy for the area to help achieve the objectives. The policy within the area based chapters included:

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

the amount and location of strategic housing and employment development; any opportunities to enhance the environment and leisure, recreation and tourism; any alterations to the greenbelt and; improvement to transport within the area over the plan period.

In producing the Pre-Submission Local Plan Part 1, it was considered that the Planning for Places section comprising the 11 area based chapters, would sit more logically in the Local Plan Part 2, rather than the Part 1. The Local Plan Part 2 will include non-strategic sites to meet comparatively smaller scale development needs and will propose any detailed amendments to settlements and Green Belt boundaries, which could be dealt with on an area basis more easily than could strategic considerations.

6 Consultation on Options for Housing Growth (12 July – 30 September 2011) (Regulation 18 Consultation)

6.1 Introduction

During 2011 the Localism Act was being proposed and it was expected that the regional targets setting out the amount of new homes to be built within the East Midlands Regional Plan were to be abolished. The Council therefore needed to consider afresh how much development should take place in the Derby Housing Market Area up to 2028 and where it should be located. In July 2011 the Council published 'Options for Housing Growth' to consult on this matter. The consultation was carried out from the 12 July 2011 to 30 September 2011.

The Options for Housing Growth document can be found on the Council's website [here](#) and consultee responses can be found [here](#).

6.2 Who was invited to be involved at this stage and how?

Different methods of public consultation were used to maximise community and stakeholder engagement in the process.

The consultation methods used included the following:

- a. All organisations and individuals, including statutory stakeholders, interest groups, developers and agents on the LDF consultation database were contacted by letter or email (where provided) to inform consultees of the consultation, where to find the Options for Housing Growth document and how to get involved. A copy of a poster was enclosed/attached, together with information regarding the dates, times and venues of the upcoming drop in events. In total 1,069 **letters** and 779 **emails** were sent (appendix D1 & D2).

All South Derbyshire's Councillors, Parish Councils and South Derbyshire's MP were informed of the consultation either by letter or email (appendix D3, D4 & D5).

A follow up email was sent to those on the LDF database on the 23 September 2011, reminding consultees of the consultation closing date (appendix D6).

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

- b. Each **primary school pupil** within the District received a letter (7,363 letters in total) to inform parents of the upcoming consultation, where to find the document and how to get involved (appendix D7).
- c. **Posters** advertising the dates and locations of the drop in events were distributed to all Parish Councils and were displayed on notice boards at the Delph and High Street, Swadlincote (appendix D8).
- d. 200 **flyers** advertising the dates and locations of the drop in events were distributed to members of the public at the Festival of Leisure on the 25-26 June 2011 (the flyers were an A5 version of the poster).
- e. Flyers advertising the consultation were distributed at the first three **Area Forums** during the consultation, after this, summary leaflets were circulated. At all Area Forums a statement was read out under 'Chair Announcements' explaining the consultation and to refer to the flyers/leaflets for more information. The Area Forums were held on 5 July 2011 (Linton), 14 July 2011 (Repton), 9 July 2011 (Melbourne), 26 July 2011 (Etwall), 27 July 2011 (Newhall) and 28 July 2011 (Swadlincote).
- f. A reference copy of the main document, posters advertising the drop in events and copies of the questionnaire were distributed to all South Derbyshire **Libraries** and libraries at Sinfin, Blagreaves Lane (Littleover), Mickleover, Chellaston, Alvaston, Derby Central, Burton-on-Trent and Ashbourne.
- g. A paper **reference copy** of the Options for Housing Growth document was available to view in South Derbyshire District Council's main reception along with questionnaires to complete.
- h. A **questionnaire** was produced which asked consultees their thoughts on the amount of housing required within the District and broad locations for housing development. A paper copy of the questionnaire was available at all South Derbyshire Libraries, and consultation events. An electronic copy of the questionnaire was available to download from the Council's website and was available to complete through the online consultation system. The Options for Housing Growth document contained a link to the District's online consultation system (when consultees clicked on the text contained in each question on page 17 of the document, consultees could submit their comments online, once registered) (Appendix D9).
- i. **Drop in events**, which numbered 16 in total, were held in various locations within South Derbyshire with the aim of reaching as many different sections of the community as possible. The exhibitions included information panels explaining: the reason for the consultations, why more housing is needed within South Derbyshire, four possible growth options and potential distributions of future housing growth. Reference copies of the main document were on display along with a coloured A3 summary leaflet and questionnaires, which consultees could take away with them. Planning and other officers representing Council services with an interest in planning policy matters, were at the events to talk through the consultation document and answer any questions from members of the

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

public and other stakeholders (Appendix D10 & D11). A PowerPoint presentation, relevant to the area in which the drop in event was being held, was repeated on loop.

The drop in events took place at the following venues:

Venue	Date	Time
Findern Village Hall, Castle Hill, Findern	12 July 2011, Tuesday	3.30pm – 7.30pm
Frank Wickham Hall, Portland Street, Etwall	13 July 2011, Wednesday	3pm – 7.30pm
Repton Village Hall, Askew Grove, Repton,	14 July 2011, Thursday	2.30pm – 7.00pm
Swadlincote Town Hall, The Delph, Swadlincote,	15 July 2011, Friday	10am – 2.30pm
Mickleover Country Park Social Club, Merlin Way, Mickleover	15 July 2011, Friday	3.30pm – 7.30pm
The Mease Pavilion, off The Mease Hilton	18 July 2011, Monday	6pm – 7.30pm
Bill Shone Leisure Centre, High St, Melbourne	19 July 2011, Tuesday	3pm – 7.30pm
Woodville Youth Centre, Moira Road, Woodville	20 July 2011, Wednesday	3pm – 7.30pm
All Saints' Heritage Centre, Shardlow Road, Aston on Trent	21 July 2011, Thursday	3pm – 7.30pm
Sinfin Moor Social Club, Arleston Lane, Stenson Fields	26 July 2011, Tuesday	3pm – 7.30pm
Rosliston Forestry Centre, Rosliston	27 July 2011, Wednesday	12pm – 5pm
Rosliston and Cauldwell Village Hall, Main Street, Rosliston	27 July 2011, Wednesday	6pm-7.30pm
Hilton Village Hall, Peacroft Lane, Hilton	1 August 2011, Monday	3pm – 7.30pm
Hatton Centre, Station Road, Hatton	3 August 2011, Wednesday	3pm – 7.30pm
Old Post Centre, High Street, Newhall	4 August 2011, Thursday	3pm – 7.30pm
Swadlincote Library, Civic Way, Swadlincote	9 August 2011, Tuesday	3pm – 7pm

Details on the number of attendees at each event can be found in Appendix G1.

- j. Each consultation event was announced on **Twitter** on the same day (Appendix D12).
- k. The Planning Policy Manager undertook a **radio** interview on Touch FM on 25 July 2011, with the aim of informing listeners of the consultation.
- l. Two **press releases** were published (7 July 2011 & 21 July 2011) detailing the consultations and listing the drop in events (appendix D13 & D14).

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

- m. Specific **press releases** written for local magazines were sent in time to advertise the local drop in event(s). The press releases were sent to the following local magazines: Hilton and Dove Valley Life; Repton magazine; Hatton News; Etwall Express; Melbourne Village Voice and Willington magazine (appendix D15, D16, D17, D18, D19 & D20). The Council also posted on mickleoverpeople.co.uk (appendix D21) and Hilton South Derbyshire Village Forum regarding Mickleover and Hilton consultation events.
- n. An **article** explaining and publicising the Options for Housing Growth consultation was published on the 2 July, 2011 on the **Burton Mail community page** (appendix D22).
- o. Details of drop in events were advertised on the **Community Voluntary Service (CVS) blog and newsletter**. CVS staff were invited to attend events, but were unable to do so due to staffing constraints.
- p. Drop in events were publicised on the Derby Housing Market Area website from the 8 July 2011. The additional event at Swadlincote Library was later added to the HMA website (8/07/2011).
- q. On the 21 July 2011 (9.30-11.30am) the Derby HMA local authorities held a consultation event at Pride Park Stadium, Derby. Representatives from the business community and other key stakeholders across the HMA were invited to comment on proposals for taking forward planning and localism. The event included a PowerPoint presentation on the authorities' aligned Core Strategies and provided different scenarios on the amount of new housing required across the HMA and where it should be located. This was followed by a question and answer session (Appendix D24).
- r. Drop in events were publicised on **South Derbyshire District Council website**. Once the additional event at Swadlincote Library was booked, the website was updated to include this addition. The Options for Housing Growth document along with the questionnaire were also made available to view online from the Councils website
- s. Member training was undertaken on the 25 May 2011, which included a presentation on planned The Options for Housing Growth consultation.
- t. A presentation was given to the Sustainable Community Partnership Sustainable Development Group on the 18 July, 2011 regarding this consultation and the Local Plan (Appendix D25).
- u. **Parish Council Training** was undertaken in May 2012. A PowerPoint presentation was given to parish councils on the planning application process, Local Plan progress and remaining preparation stages, the introduction of Localism, the NPPF and the Duty to Cooperate (Appendix D26).
- v. A Derby HMA Housing Requirement Study **stakeholder workshop** was held on the 6th March, 2012 (Appendix D27).

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

- w. A Derby HMA Local Development Framework **newsletter** was published in February, 2012 on the South Derbyshire District Council and Derbyshire County Council webpages. This provided an overview on the Government's localism reforms to the planning system, headline results to the Options for Growth consultation and a timetable for Core Strategy publication (Appendix D28).
- x. A **short URL code** was created for the District Council's webpage, providing information on the Options for Housing Growth consultation.
- y. A **Banner** advertising the consultation was uploaded to South Derbyshire District Council's website from the 12 July, 2011 throughout the 'drop in stage' of the consultation period (Appendix D23). A **hotlink** on this banner took consultees directly to the Options for Housing Growth webpage, which provided further information on the consultation, and contained the main document and questionnaire to download.

6.3 What were the main issues raised?

A total of 734 individual comments were registered from 107 contributors. The main issues raised were as follows:

- There was a clear divide between developers and residents on the amount of housing that should be provided within the District. The majority of local residents preferred the lower level of growth identified in the 'Balanced Migration' scenario, whilst the majority of developers/agents preferred the higher levels of growth identified in Scenario 3 (Regional Plan Targets) and Scenario 4 (Government Projections).
- There was a mixed view as to whether the Regional Spatial Strategy (RSS) or the ONS housing figures should be used. Those favouring the RSS figure stated that it had been subject to background evidence and Examination in Public, although there was concern as to whether the figure was out of date, with some considering that newer Government projections would be more reliable. It was also suggested that the ONS figures complied with the Government's pro-growth agenda, and that adoption of this figure would ensure compliance with emerging policy and legislation.
- Views concerning the distribution of new housing within the Derby HMA were mixed. Option 2 (a greater role for other towns) received the most support, followed by Option 1 (concentrating most development within and adjoining Derby). Option 3 (a greater role for rural settlements) was the third most popular and Option 4 (new settlement) received the least support. Numerous negative comments regarding a new settlement were received.
- There was widespread agreement on the need for redevelopment of brownfield land within Derby City. However there was disagreement between developers and residents as to whether 10,000 new homes could

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

be delivered in Derby City between 2008-2028. Residents were mainly of the opinion that this could be achieved, whereas developers/agents raised concerns as follows: brownfield sites have viability issues owing to additional development costs (for example, contaminated land reclamation); other uses, such as leisure, may be developed on these sites and it was over optimistic to assume that all sites identified through the Strategic Housing Land Availability Assessment could be delivered within the plan period.

- Developers were generally supportive of urban extensions, whilst residents were far less so. A range of locations for urban extensions was suggested, the most popular among these being Mickleover: the north side of the A50 and the south west of the city . The locations with the highest levels of opposition to development were, firstly, Mickleover, followed by the Stenson Fields/Sinfin area. Other locations also received support and opposition and are identified in Appendix D29.
- The majority of responses received did not support the development of land within the Green Wedges or Green Belt, although some opportunities for development in these locations were identified (see Appendix D29).
- There was general support for development within Swadlincote, although there was a degree of opposition. Suggested locations included, Woodville, Cadley Hill and the Church Gresley Industrial Estate.
- There was general support for development within villages as a means of sustaining communities, supporting schools and protecting the viability of local services. Specific villages were suggested for development (see Appendix D29). There was some opposition to village development based on the view that rural areas had already taken enough development; desire to preserve the character of settlements and the view that development in such locations would result in longer car journeys to work.
- The idea of a new settlement was not favoured by the majority of respondees, although specific locations for such development were suggested, including Drakelow Power Station; Hilton; between Hatton and Hilton; west of Swadlincote; between Repton and Swadlincote; adjacent to Littleover and at Findern, to allow the village to re-join with its local school; and, as it was a joint consultation, areas outside South Derbyshire.
- Among suggested key investments in communities, highway improvements were the most popular, followed by leisure and recreational facilities, open space and schools. Specific locations for such provision were suggested (see Appendix D29). This part of the consultation also elicited suggestions as to locations for housing development.

A full summary of representations received from this consultation can be found at Appendix D29.

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

6.4 How, where necessary, these issues were addressed

Owing to the lack of consensus on the appropriate level of housing provision, a Housing Requirements Study was commissioned to determine the extent of need on the basis of robust evidence. It was considered that it would be inappropriate to adopt the figure contained in the soon to be withdrawn Regional Plan, The Housing Requirement Study provided the housing evidence base for the Preferred Growth Strategy consultation stage.

The majority of its housing sites proposed at the Preferred Growth Strategy, Draft Local Plan and Pre Submission consultation stages were, firstly, around the edge of Derby City and, secondly, within Swadlincote. Urban extensions were generally opposed by residents, but supported by developers. The majority of responses favoured a greater role for other towns, followed by the concentration of most development in and adjoining Derby. As Derby City has insufficient opportunities to meet its own needs, a significant proportion of its housing requirement is directed to the edge of the city, within South Derbyshire.

Further work was undertaken after this consultation to identify the “preferred” and “non-preferred” housing sites to be presented in the Preferred Growth Strategy. After the Preferred Growth Strategy consultation, work continued to determine whether the “preferred sites” should be carried forward and to identify whether any “non-preferred” sites were needed.

The Options for Housing Growth consultation, Draft Local Plan and Pre Submission Local Plan propose some development in villages, taking care to allocate sites that will not unduly affect their character.

Boulton Moor Phase 3 was identified as a “preferred site” in the Preferred Growth Strategy and as a proposed allocation in the Draft and Pre Submission versions of the Local Plan. Although the majority of responses to this consultation did not support development within the Green Belt, the available evidence, together with the requirements of the National Planning Policy Framework (NPPF), suggested that land should be identified in this location. The NPPF states that changes to the Green Belt boundary can occur through the preparation or review of the Local Plan and only in exceptional circumstances. The Green Belt Study, 2012 (Technical Assessment of the Derby Principal Urban Area Green Belt Purposes) stated that the A50 and the A6 formed a physical feature in the landscape and that the area now bounded by London Road and the A6 spur was now landlocked and did not contribute to the openness of the Green Belt. It suggested that there was an opportunity to consider whether the Green Belt boundaries in this location could be amended through minor changes and considered that the land to the south west of Thulston appeared to perform a Green Belt role and could therefore be incorporated into it.

Following the Options for Housing Growth consultation, the idea of a new settlement within South Derbyshire was not progressed any further as it was not favoured and no suitable site was put forward..

Further work was undertaken to identify the potential transport impacts of the proposed development and the measures needed to mitigate these. These

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

proposed measures were consulted upon in the Preferred Growth Strategy and the Draft Local Plan.

7 Consultation on Preferred Growth Strategy (October – 21 December 2012) (Regulation 18 Consultation)

7.1 Introduction

The next stage of the process was to produce a Preferred Growth Strategy for South Derbyshire. The document sought to expand on and address issues raised in previous consultations and included:

- a revised spatial vision and spatial objectives for South Derbyshire
- the amount of new housing needed within the District
- the location of “preferred” strategic sites to deliver housing development and those “non-preferred”.
- the location of two potential strategic employment sites
- consideration of a Nottingham – Derby Green Belt safeguarding option.

Consultation on the Preferred Growth Strategy ran from October 2012 until 21 December 2012. The Preferred Growth Strategy document can be found on the Council’s website [here](#) and responses to the consultation can be found [here](#).

7.2 Who was invited to be involved at this stage and how?

Different methods of public consultation were employed to maximise community and stakeholder engagement in the process.

Consultation methods included:

- a. The contacting of all organisations and individuals on the LDF consultation database by **letter** or **email** (where provided), informing them of the consultation, how to find further information and how to make a representation. A black and white copy of a poster was also enclosed/attached, providing details of the dates, times and venues of the upcoming drop-in events (Appendix E1). In total 580 **emails** and 1,364 **letters** were sent.
- b. All South Derbyshire Councillors, Parish Councils, and South Derbyshire’s MP were sent a hard copy of the Preferred Growth Strategy document, a questionnaire and a poster advertising the planned drop-in events across the District (Appendix E2). All Parish Councils were also posted a copy of the Preferred Growth Strategy document (Appendix E3).

Two follow up emails were sent to those with email addresses on the LDF database. The first was sent on the 24 October 2012, with an attached updated poster, which included additional consultation events. The second was sent on the 5 December 2012 informing consultees that the drop in events were coming to an end, but that there was still time to comment (Appendix E4 & E5). A follow up letter was also sent on the 24 October 2012 to Parish Councils with an updated poster, informing them of the additional consultation events (Appendix E6).

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

- c. **Flyers** advertising the dates and locations of the drop-in events were distributed to South Derbyshire Area Forums attendees at the time of the consultation (Appendix E7).
- d. **Posters** with dates and locations of the drop-in events were distributed to all Parish Councils, and all South Derbyshire libraries and libraries at Burton upon Trent and Derby Central (see Appendix E8).
- e. A reference copy of the main document, a poster advertising the drop-in events, copies of the questionnaire and summary leaflets were distributed to all **South Derbyshire Libraries** and libraries at Burton upon Trent and Derby Central.
- f. A paper **reference copy** of the PGS was made available to view in South Derbyshire District Council's Main Reception along with questionnaires to complete.
- g. An advert publicising the Preferred Growth Strategy was added to a rolling presentation on the **screens** within South Derbyshire District Council **Main Reception**, during the consultation period (Appendix E9).
- h. A **banner** advertising the Preferred Growth Strategy was included on the South Derbyshire District Council website homepage during the consultation period. A **hotlink** on this banner directed the viewer to the Preferred Growth Strategy webpage which provided further information on the consultation (Appendix E10).
- i. **Questionnaires** were produced soliciting thoughts on the Preferred Growth Strategy asking about housing sites, housing numbers etc.. These were available at all drop in events and all South Derbyshire Libraries. A copy was posted to all Parish Councils. The questionnaire was also made available to download from the Council's website and complete online, through Survey Monkey, the link to which could be accessed from the Preferred Growth Strategy webpage (Appendix E11).
- m. The Council held 14 **drop-in events** across the District with the aim of reaching all sections of the community. Derby City Officers attended three of these at locations close to the boundary of Derby City (Aston on Trent, Stenson Fields Primary School and Mickleover Country Park). South Derbyshire Officers also attended two consultation events organised by Derby City Council at locations close to the boundary of South Derbyshire (Chellaston Academy and Littleover Methodist Church). This ensured that those residents/consultees within South Derbyshire and Derby City who lived/worked in close proximity to the boundary of the two authorities were informed of both Preferred Growth Strategies and had an opportunity to talk to officers at both authorities.

The exhibitions included information panels explaining the purpose of the consultations, the proposed scale of housing development, maps showing the Council's preferred and non-preferred locations of housing development and potential employment sites (appendix E12). Reference copies of the main document were displayed along with copies of a

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

coloured A3 summary leaflet (appendix E13) and questionnaire, which consultees could take away with them. Planning officers were at the consultation events to talk through the PGS and answer questions.

Letters were not distributed via schools as this approach had not yielded a notable increase in the turnout at drop-in events or the number of representations received.

Once the consultation had begun, feedback from members of the public and local councillors indicated demand for additional consultation events in three locations. These were held at Newhall, Church Gresley and Elvaston and were advertised on the Council website; by email to LDF database consultees and using updated posters which were sent to Parish Councils.

As the additional drop in events were held during the early part of the consultation, allowing sufficient time to advertise the events and for consultees to comment, no time extension for the consultation period was required.

The drop in events took place at the following venues:

Venue	Date	Time
Frank Wickham Hall, Portland Street, Etwall,	15 October 2012, Monday	3pm – 7.30pm
Hilton Village Hall, Peacroft Lane, Hilton	17 October 2012, Wednesday	3pm– 7.30pm
Swadlincote Market, High Street, Swadlincote	19 October 2012, Friday	10am - 2.00pm
Swadlincote Market, High Street, Swadlincote	20 October 2012, Saturday	10am – 2.00pm
Hatton Centre, Station Road, Hatton	22 October 2012, Monday	3.15pm - 7.30pm
All Saints' Heritage Centre, Shardlow Road, Aston on Trent	23 October 2012, Tuesday	3pm – 7.30pm
Littleover Methodist Church (<i>Joint Derby City Event</i>)	1 November 2012, Thursday	3.30pm - 7.30pm
Old Post Centre, High Street, Newhall	5 November 2012, Monday	3pm – 7.30pm
Stenson Fields Primary School, Heather Close, Stenson Fields, Derby	7 November 2012. Wednesday	4pm - 7.30pm
Findern Village Hall, Castle Hill, Findern	9 November 2012, Friday	3pm – 7.30pm
Woodville Youth Centre, Moira Road, Woodville	12 November 2012, Monday	4pm – 7.30pm
Mickleover Country Park Social Club, Merlin Way, Mickleover	14 November 2012, Wednesday	3pm – 7.30pm

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

Melbourne Assembly Rooms	16 November 2012, Friday	3pm- 7.30pm
Church Rooms, adjacent to St George and St Mary's Church, Church Street, Church Gresley	19 November 2012, Monday	3pm – 7.30pm
Chellaston Academy <i>(Joint Derby City Event)</i>	21 November 2012, Wednesday	3.30- 7.30pm
Elvaston Village Hall	6 December, Thursday	3pm- 7.30pm

Details of attendee numbers at each event can be found in Appendix G1.

- n. The summary leaflets and notice boards used at the consultation events incorporated a **QR code**, which when scanned with a smart phone, connected directly to the Council webpage containing information on the Preferred Growth Strategy (PGS). The QR code was used 30 times during the consultation.
- o. The drop-in events were announced on **Twitter** on the day of the consultation and tweets were made throughout the drop-in events to inform on how the events were progressing and to air consultees' views on the PGS and responses from planning officers. During the course of the 16 consultation events, more than 600 tweets covering a diverse range of subjects were sent out, with a quarter retweeted to 34,340 more followers. (Appendix 13 provides a case study of the social media used by Northgate Public Services to promote the Preferred Growth Strategy.)
- p. A **short URL code** was created for the District Council's webpage, which contained information on the Preferred Growth Strategy. This URL code was used 665 times during the consultation.
- q. **Press realises** targeted to specific media outlets were sent to Etwall Express, Hatton News, Hilton Dove Valley Magazine, Melbourne Village Voice, Repton Parish Magazine, the Walton Newsletter, Willington Resource 2012 and Derbyshire First (appendix E15 - 23). Five further press releases were sent to outlets included on the South Derbyshire's press mailing list on the 21 September, 10 October, 12 October and 7 December 2012 (Appendix E24-28).
- r. **Articles** on the Preferred Growth Strategy were published in the Melbourne Village Voice (November 2012), Swadlincote Post (30 November 2012), and Derby Telegraph Online (14 November 2012), all of which can be found at Appendices E29 to E31.
- s. An **HMA stakeholder event** particularly aimed at infrastructure and utility providers, house builders and housing associations was held at Pride Park, Derby on the 17 October, 2012 as a morning and afternoon session. Participants are listed at Appendix E32.

The event was split into two parts. The first of these involved a presentation by a planning policy officer from each HMA local authority on the preferred employment and housing sites within their own area and

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

how these related to the HMA as a whole. Maps showing the preferred housing and employment sites were displayed.

The second part provided stakeholders with the opportunity to discuss the Preferred Growth Strategy with planning officers on a one-to-one basis.

- t. The Planning Policy Manager attended the **Chellaston Neighbourhood Forum** to deliver a verbal presentation on the Preferred Growth Strategy, which was followed by a question and answer session.
- u. An event was organised to discuss **Western Power Distribution's** capacity to accommodate the preferred sites across the HMA. Planning officers from each local authority and representatives of Western Power Distribution attended.
- v. During the consultation period the **Local Plan Blog** was updated to provide further information and could be accessed from the Preferred Growth Strategy page on the District Council's website. The Blog included a video of explaining the District's Preferred Growth Strategy, an update on how the consultation events were progressing, a PowerPoint presentation (available to view online or download), an electronic copy of the consultation document to view online, a link to the questionnaire, a table showing the dates and locations of the drop-in events, contact information and pictures from consultation events. Through the Blog the Council was able to respond to stakeholder views, ideas and questions. During the consultation period the Blog was viewed 3,580 times. Appendix E33 provides a copy of the content of the Blog during the consultation period.
- w. A presentation was given to the **Sustainable Community Partnership, Sustainable Development Group** during November 2012 on the PGS (Appendix E34).
- x. **Workshops** for Elected Members were held to provide an update on progress of the LDF and explain the Preferred Growth Strategy.
- y. The video explaining the Preferred Growth Strategy was uploaded onto **You Tube** (Appendix E35).
- z. On 23 November 2012, GL Hearn held a **workshop** to share their draft findings on employment land requirements with a Project Steering Group comprising local authority officers, planning agents and developers.

7.3 What were the main issues raised?

Around 1500 Individual comments were registered from 197 respondents during the consultation. The main issues raised were as follows:

- The Preferred Growth Strategy vision received a mixed response. Further analysis of this is set out at Appendix E36.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

- The proposed scale and distribution among the local authorities were controversial issues. In general the scale of growth proposed for South Derbyshire was considered by local residents to be too high, whereas developers and planning consultants considered that it was too low, both for the HMA and South Derbyshire, and should be increased further. A group of planning consultants and associated clients led by Pegasus Planning jointly produced a critique of the Housing Requirements Study and concluded that an HMA figure of 54,482 dwellings would be more appropriate up to 2028.
- Positive and negative responses were received for all of South Derbyshire's preferred and non-preferred housing sites. The two sites which received the most comments were Wragley Way and Church Street. The main concern for Wragley Way were the scale of development and lack of capacity in existing highway infrastructure, including the country lanes connecting to the south from the site. With regards to Church Street, the main concerns were to do with where the access points to the site would be, the loss of greenfield land and existing drainage problems, which it was feared could be exacerbated. A summary of the responses received for each preferred and non-preferred site can be found at Appendix E36.
- One of the main concerns in relation to housing was school capacity, particularly at secondary schools. Particular concern was raised in relation to sites likely affect John Port Academy, Chellaston Academy and Sinfin Moor Community School.
- The capacity of highway infrastructure, its ability to absorb trips from the proposed housing and employment development and proposed mitigation measures were mentioned by many respondents.
- It was apparent that there was some confusion over the meaning of the Government's policy of 'safeguarding' Green Belt land and what the term meant in regard to safeguarding for developers, rather than safeguarding for continued designation as Green Belt land. However, the additional comments submitted made clear that the land should not be safeguarded for development, but should continue to be protected as Green Belt. The main reasons given included: the need to retain the land for agriculture use, the prevention of urban sprawl, the protection of the character of villages, and the protection of wildlife.

However, some members of the public agreed with safeguarding Green Belt land for development. A mixed response was also received from developers and agents on this matter.

- The allocation of land at Sinfin Moor for employment development was supported by most of those who commented on this site. The protection of land to the north of Dove Valley Business Park, to be released in exceptional circumstances, also received some support. Reasons for this included support for employment generation, the fact that the sites were located adjacent to existing and other proposed employment development, the fact that Dove Valley Business Parks was well

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

connected to the highway network and that the Sinfin Moor site was close to the existing population. Some considered that the proposed A50 junction would be useful to this development.

There was also some opposition to each of these sites. The main reasons were concerns about impacts on highway infrastructure, which would be too great. There was also some concern about the scale of potential development at Dove Valley Business Park, given its rural location.

A full summary of representations received for this consultation can be found at Appendix E36.

7.4 How, where necessary, these issues were addressed

Further work was commissioned from GL Hearn on the HMA housing requirement (Housing Requirement Study). This took into account the most recent Government projections. The additional work produced a slightly higher HMA housing requirement of 35,354, rather than the 33,700 proposed in the Preferred Growth Strategy, but was considered to be based on a robust and sound evidence base. This housing requirement was then distributed across the three HMA local authorities, which increased South Derbyshire's housing requirement to 13,454 from 12,700. These revised figures were carried forward in the Draft Local Plan and Pre-Submission Local Plan.

Additional sites were needed in South Derbyshire to meet the increased housing requirement. Some of these, identified in the Draft Local Plan, were identified in the Preferred Growth Strategy as "non-preferred" sites and had attracted opposition at previous consultation stages, including in response to the Preferred Growth Strategy. It was, however, considered that the chosen sites were the most sustainable among the available alternatives.

In regard to school capacity, further joint working between South Derbyshire, Derby City and the Education Authorities for the City and the County had been undertaken to help determine where additional school capacity or new schools could be suitably located to meet projected needs.

In regard to concerns that road infrastructure would be unable to cope with future employment and housing development, further joint working between South Derbyshire, Derbyshire County Council, Derby City Council and the Highways Agency was initiated to determine likely impacts and potential mitigation solutions through modelling of the suggested development. This on-going work is being used to identify the transport impacts and mitigation measures in the Draft Local Plan and Pre-Submission Local Plan.

The principle, general extent and permanence of Green Belt within South Derbyshire is supported, subject to small scale alterations to reflect existing development on the ground (removal of Boulton Moor Phase 3 site from the Green Belt and the inclusion of a 13ha piece of land to the south west of Thulston) to reflect development which has taken place since the adoption of the South Derbyshire Green Belt in 1983. A Technical Assessment of the Derby Principal Urban Area Green Belt states that construction of the A50 and the A6

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

now forms a physical feature in the landscape and the area now bounded by London Road and A6 spur is landlocked and does not contribute to the openness of the Green belt. The study suggests that there is opportunity to consider whether the Green Belt boundaries in this location could be amended through minor changes. In addition the Pre Submission Local Plan proposed small scale changes to the Green Belt within the Local Plan Part 2, where anomalies had existed since the adoption of the Green Belt and where more appropriate defensible boundaries could be established.

No Green Belt land is proposed to be safeguarded. The NPPF states that the general extent of 'Green Belts across the country is already established' and 'once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan'. The NPPF goes on to add that, where necessary, land can be safeguarded 'between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period'. It is considered that further evidence is required to justify the removal of land to the North of the A50 and west of the A6 spur from the Green Belt.

Within both the Draft Local Plan and Pre-submission Local Plan, land to the north of Dove Valley Business Park is identified for employment development in exceptional circumstances, where the needs of a single large end-user cannot be met on any of the allocated employment sites. The land at Sinfin Moor is safeguarded for employment development in the longer term. This approach will ensure that investment is not diverted away from the proposed Infiniti Park industrial and business site within Derby City, whose successful delivery will be of critical importance to the future of Derby's economy.

The **workshop session** held by GL Hearn to share their draft findings on employment land requirements informed the Derby HMA Employment Land Review Forecasts Update, published in March 2013. The employment land need forecasts it produced formed the basis for the determination of the overall extent of provision for industrial and business development in the Housing Market Area.

8 Consultation of the Draft Local Plan Part 1, Draft Sustainability Appraisal, Draft Consultation Statement, Draft Infrastructure Delivery Plan (27th September – 22nd November 2013)

8.1 Introduction

This consultation sought views on four consultation documents, the Draft Local Plan Part 1, Draft Sustainability Appraisal, Draft Consultation Statement and Draft Infrastructure Delivery Plan.

The Draft Local Plan Part 1 sought to expand upon and address issues raised in the Preferred Growth Strategy (PGS) consultation and included:

- Spatial vision and objectives for South Derbyshire.
- The amount of new housing needed for South Derbyshire and location of strategic sites to deliver housing development.
- The amount of new employment provision required in South Derbyshire and the location of sites to deliver this.
- Development Management Policies.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

The Draft Sustainability Appraisal (SA) had been prepared to accompany the Draft Local Plan Part 1, in accordance with national and European legislation. The SA assessed the environmental, economic and social impacts of the Plan. Planning Authorities are required to consult upon their SA report before the Local Plan submission. It was therefore necessary to add an additional stage of consultation after the PGS and before the Local Plan submission, to adhere to legislation.

The Draft Consultation Statement, outlines the consultation work undertaken at each stage of the Local Plan preparation process and summarises the main issues raised.

The Draft Infrastructure Delivery Plan sets out the infrastructure that is required across the District and identifies the likely funding streams to implement it.

The Draft Local Plan Part 1 consultation ran from the 27th September 2013 until 15th November 2013. Due to short delay in uploading the Draft Consultation Statement onto the Council's website, the consultation for this document was extended until the 22nd November 2013. The consultation documents can be found on the Council's website [here](#) and responses can be found [here](#).

8.2 Who was invited to be involved at this stage and how?

Different methods of public consultation were used to maximise community and stakeholder engagement, including:

- a. All organisations and individuals including; statutory stakeholders, interest groups, developers, agents and other individuals included on the LDF consultation database, were contacted by letter or email (where provided) to inform them of the consultation, how to find further information and how to make representations. In total 1028 **emails** and 1596 **letters** were sent (Appendix F1 and F2).

All South Derbyshire Parish Councils and Meetings were sent a paper copy of the Draft Local Plan Part 1 and Draft Infrastructure Deliver Plan (Appendix F3, F4 and F5). The MP for South Derbyshire was also notified by mail. Paper copies of the Draft Sustainability Appraisal and Draft Consultation Statement were not sent to Parish Councils due to size of the documents, but they were made available to view on the District Council's website.

Unlike previous years, South Derbyshire Councillors did not receive a hard copy of the consultation documents. This was due to the provision of hand held electronic devices which enabled them to view documents online.

An additional email was sent to inform consultees that the deadline to submit comments on the Draft Consultation Statement had been extended from 15th November until 22nd November, due to a delay in uploading this document onto the website (Appendix F6).

- b. **Posters** were distributed to all Parish Councils and libraries (Appendix F7 and 8).

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

- c. Posters, reference copies of the Draft Local Plan Part 1 and Draft Infrastructure Delivery Plan, along with questionnaires to take way, were distributed to all South Derbyshire **Libraries** at: Burton upon Trent, Derby Central, Blagreaves Lane (Littleover), Mickleover, Alvaston, Chellaston, Alvaston, Borrowash, Sinfyn and two mobile libraries.
- d. Paper **reference copies** of the Draft Local Plan Part 1 and Draft Infrastructure Delivery Plan, summary leaflets and questionnaires, were made available at the District Council Main Reception.
- e. During the consultation period, the Draft Local Plan Part 1 was advertised as part of a rolling presentation on **screens in** the Council Office's **Main Reception** (Appendix F9).
- f. A **banner** advertising the Draft Local Plan Part 1 consultation was uploaded on the home page of the District Council's website, during the consultation period. A **hotlink** on this banner connected directly to the Draft Local Plan Part 1 webpage, which provided further information on the consultation and contained the consultation documents and questionnaire to download (Appendix F10).
- g. **Questionnaires** were produced soliciting responses to the consultation documents. These were made available at all drop in events, all South Derbyshire Libraries (and the other libraries listed above), the District Council's Main Reception and to download from the District Council's website. Consultees could also register and submit comments online.

It was brought to the Council's attention on 22nd October 2013, that there was a discrepancy regarding question 4 between the paper questionnaire and the online version. This matter was addressed on 23rd October 2013 when the online questionnaire was replaced. A note on the front cover of the questionnaire explained why. (Appendix F11, F12 & F13)

On 23rd October 2013, 13 consultees had completed the online questionnaire, 11 of whom had submitted comments regarding question 4. On 24th October 2013, each of the 13 consultees was emailed advising of the discrepancy regarding question 4 and asking whether they wished to replace their comments. The altered question was included in the letter (Appendix F14).

- h. Drop-in events were publicised on the **District Council's website** and the consultation documents and questionnaire were made available to view online or download (Appendix F15).
- i. Fourteen **drop in events**, were held in various locations, with the aim of reaching all sections of the community. Planning officers were at the events to talk through the consultation and answer questions from members of the public and stakeholders.

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

The exhibitions included information panels explaining the purpose of the consultation, the proposed scale of housing and employment development, maps showing the Council's preferred locations for housing and employment sites and a brief explanation of the Draft Sustainability Appraisal, Draft Infrastructure Delivery Plan and the Draft Consultation Statement (Appendix F16). Reference copies of the Draft Local Plan Part 1 and Draft Infrastructure Delivery Plan were on display, along with copies of a coloured A3 summary leaflet (appendix F17) and questionnaire, which consultees could take away with them.

The drop in events took place at the following venues:

Venue	Date	Time
Church Rooms, adjacent to St George and St Mary's Church, Church Street, Church Gresley	Tuesday 1 st October	3.30pm - 6.30pm
Elvaston Village Hall	Thursday 3 rd October	3pm – 6pm
Old Post Centre, High Street, Newhall, DE11 0HX	Monday 7 th October	3.30pm – 6.30pm
All Saints Heritage Centre, Shardlow Road, Aston on Trent, DE72 2DH	Tuesday 8 th October	3.30pm - 6.30pm
Hatton Centre, Station Road, Hatton, DE65 5EH	Thursday 10 th October	3pm - 6pm
Repton Village Hall, Askew Grove, Repton , DE65 6GR	Monday 14 th October	3.30pm – 6.30pm
Swadlincote Town Hall, The Delph , Swadlincote	Tuesday 15 th October	3.30pm – 6.30pm
Hilton Village Hall, Peacroft Lane, Hilton, DE65 5GH	Wednesday 16 th October	3.30pm – 6.30pm
Frank Wickham Hall, Portland Street, Etwall, DE65 6JF	Thursday 17 th October	3.30pm – 6.30pm
Melbourne Assembly Rooms, High Street, Melbourne, DE73 8GF	Monday 21 st October	3.30pm - 6.30pm
Findern Village Hall, Castle Hill, Findern, DE65 6AL	Tuesday 22 nd October	3.30pm - 6.30pm
Stenson Fields Primary School, Heather Close, Stenson Fields, Derby, DE24 3BW	Thursday 24 th October	4pm – 7pm

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

Woodville Youth Centre, Moira Road, Woodville, DE11 8DG	Thursday 31 st October	3.30pm - 6.30pm
Mickleover Country Park Social Club, Merlin Way, Mickleover, Derby, DE3 0UJ	Wednesday 6 th November	3.30pm - 6.30pm

- j. Details on the number of attendees at each event can be found at Appendix G1.
- k. The District Council issued two **press releases**, advertising the consultation and drop in events on 26th September 2013 (Appendix F18 & F19).
- l. An article publicising the consultation, including the drop in events, was published on 28th September 2013, in the Burton Mail (Appendix F20).
- m. Flyers advertising the consultation were distributed at all Area Forums (Repton Area Forum 22nd October 2013, Linton Area Forum 24th October 2013, Etwall Area Forum 6th November 2013, Swadlincote Area Forum 12th November 2013, Melbourne Area Forum 13th November 2013 and Newhall Area Forum 14th November 2013 (Appendix F21).
- n. A **short URL code** was created for the District Council's webpage, which set out information on the consultation.
- o. During the consultation period, the **Local Plan Blog** was updated to provide information on the Draft Local Plan consultation. The Blog could be accessed from the Draft Local Plan Part 1 page on the District Council's website. It included a table showing the dates and locations of the drop-in events, contact information, a link to the questionnaire and copies of the exhibition boards used at the public exhibitions (Appendix F22).

The Local Plan Blog was updated on 14th November 2013 to remind readers that the consultation was due to close soon.

During the consultation period, the Blog was viewed 488 times.

- p. Each drop-in event was announced on the day on **Twitter** (Appendix F23).
- q. Infrastructure providers were invited to a **seminar**, held on 24th October 2013, about the Infrastructure Delivery Plan and Community Infrastructure Levy (CIL). Presentations were delivered on the Draft Local Plan, the Infrastructure Delivery Plan and CIL (Appendix F24, F25, F26). A question and answer session followed. The seminar gave infrastructure providers an opportunity to put forward their requirements and identify sources of funding. The feedback from the seminar was used to complete the South Derbyshire Infrastructure Delivery Plan and inform the charging schedule of the proposed Community Infrastructure Levy.

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

- r. As part of the consultation, the Planning Policy Manager was interviewed on the radio.

8.3 What were the main issues raised and how, where necessary these issues were addressed?

A total of 360 consultees responded, raising around 1454 individual comments. All responses are available to view in summary at- <http://www.ldf.consultations.south-derbys.gov.uk/>

This report provides a summary of the responses received and is split into the questions asked in the Draft Local Plan questionnaire. Not every consultee response has been summarised below, however, the main responses received have been grouped together.

Do you agree with the revised Vision for South Derbyshire?

Among the responses, 44 consultees agreed with the Vision, or agreed and made further comment and 22 consultees broadly agreed with the Vision and made further comments. A further 32 consultees disagreed with the Vision.

Whilst the majority of consultees who agreed did not provide reasons, comments received can be summarised as follows:

- There is a fair balance of housing and employment opportunities.
- Housing should be spread across South Derbyshire.
- It is important to maintain the character of villages and rural areas.
- Reference to the wealth of heritage assets within the District and the need for their protection and enhancement is welcomed.
- The Vision supports sustainable growth, renewal and opportunity.

Reasons given for disagreement with the Vision were as follows:

- Concern about the proposed amount of new housing development directed to previously undeveloped land, representing an unacceptable level of irreparable damage to the environment and countryside. The Vision should consider the replacement and redevelopment of ageing properties/housing stock.
- Too much impact on the environment.
- Previously developed sites should be accorded more attention.
- No consideration has been made to the need for additional local amenities with an increased population.
- The proposed developments will not assist in the retention of the historic heritage and distinctive character of South Derbyshire's towns, villages and hamlets.
- The Vision does not refer to achieving an increase in jobs and/or economic development.

Further comments, neither agreeing or disagreeing with the Vision included:

- Further infrastructure and schooling provision is required.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

- More commitment needed to the re-use of vacant land.
- People like to live near open spaces.
- Question whether the answer to the demand for more houses is to simply enlarge existing estates, before all the previously developed sites have been redeveloped.
- Opposition to the use of Green Belt and agriculture land.
- There is an underlying concern that the need for houses is the overriding requirement, with any resulting problems to be justified and resolved later. Unless funding is available upfront for the missing essential infrastructure then simply putting more people into an area will not promote healthy and productive lives.
- Funding will be required.
- The Vision does not reflect the on-going process of infilling in villages, where any land that can be built on is built on.
- Unsure why South Derbyshire have taken on extra requirements from Derby City when Derby has available previously developed land.
- Sport England support the reference to healthy and inclusive communities, but consider that sport facilities should be included in the list of services/facilities that local people should have access to.
- Greater emphasis should be made on the importance of potential sites within the Derby Urban Area.
- The most direct way to support Melbourne's core shopping area is to increase the local customer base.
- What has happened to the concept of planned new "Garden Cities" or "Garden Communities", if preferring to work on a more modest scale?

How, where necessary, these issues were addressed

No amendments to the Vision for South Derbyshire have been made in response to consultee comments as it was considered that the Vision either already addressed them, or that they could be most effectively dealt with through changes to Local Plan policies.

For example:

- The use of brownfield land, bringing disused buildings back into beneficial use and protecting heritage assets, is already addressed in the Vision.
- The Vision does not directly refer to economic development or the generation of jobs. However, it does provide a Vision for South Derbyshire's economy, which refers to growth and a more skilled workforce.
- Infill development within villages is to be addressed in revised Policy H1 in the pre-submission version of the Local Plan.
- The reasons for South Derbyshire providing for part of Derby City's housing requirement are set out in the explanatory text of Policy S3.
- The provision of sports facilities is addressed by Policy I9.
- Infrastructure, such as schooling provision and the provision of facilities and services in association with housing development, is addressed in various Local Plan policies.

With regard to the comment received about Garden Cities, in a previous consultation stage, the question was posed as to whether housing needs should

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

be met through the provision of a new settlement. The idea did not receive significant support and therefore was not carried forward.

No responses are proposed in response to statements where no change is asked for or suggested, such as “will require funding” or “people like to live near open spaces”.

Do you agree with South Derbyshire’s Objectives?

A range of comments was received concerning the Local Plan Objectives. 62 consultees agreed or broadly agreed, whilst 30 disagreed. Few reasons for disagreeing with the objectives were provided, but those made more than once included the following:

- The objectives are somewhat generic and should have a local focus.
- There should be an objective regarding the viability of schemes.
- Objectives should make reference to South Derbyshire’s relationship with Burton on Trent.

Individual comments included the following:

- The objectives are not clear.
- The objectives are “apple pie” statements.
- There should be an objective to secure an increase in jobs.
- There are several objectives that are outside the Councils power to directly influence.
- No consideration has been given to the diminution of local amenities with an increasing local population.
- Would like to see more provision for car-free routes into, and out of, Derby City and its surrounding villages.
- Disappointing that there is no reference to the need to provide for, and seek to enhance, the living conditions of disadvantaged groups.
- Could perhaps add aims for a high standard of education provision and the provision of appropriate sites for gypsies and travellers.
- Objective 4 requires the addition of an environmental element, to ensure appropriate reference to the key elements of a comprehensive approach to sustainable development.
- Concern that proper account is not taken of the likely effects of climate change and global warming.
- The Objectives are strategic for South Derbyshire Council only.
- The Objectives should explicitly recognise the role of the area adjoining the Derby Urban area.
- Disagree with Objective 13, which deals with the co-ordination of growth between South Derbyshire and adjoining areas.

In addition, a number of consultees question the Local Plans strategy/policies (including proposed housing allocations), to implement South Derbyshire objectives and suggest that some could be contrary to South Derbyshire objectives.

See appendix F27 for further details on the responses received regarding South Derbyshire strategic objectives.

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

How, where necessary, these issues were addressed

Only two amendments to the objectives have been made in response to consultee representations.

In response to the consultees comments that the objectives are somewhat generic and should have a local focus, the objectives are strategic for the District and the Council considers that they have an adequate local focus. To ensure that readers are aware that the objectives are strategic, the title has been changed from “Local Plan Objectives” to “Local Plan Strategic Objectives”. In addition, the Local Plan will contain local objectives for the 11 areas of the district in the planning for places chapter, which is to be removed from the Local Plan Part 1 and will now be include in Part 2.

A viability objective has been added in response to consultee comments in this regard.

The Council considers that no other amendments to the objectives are necessary. In some instances, the objectives already cover the aspects which the consultees consider should be included. For example, one consultee states that an objective should be included to secure an increase in jobs. However, an economic objective is already included “To enable, support and promote a robust and diverse economy”. Another consultee suggests that Objective 4 should include an environmental element. However, this is addressed by some of the other objectives.

In other instances, consultees requests for the inclusion of further objectives are considered to be effectively addressed by Local Plan policies and do not need to be included as Strategic Objectives. These include:

- Providing sites for gypsies and travellers. This is addressed in a specific policy.
- Recognition of the role of the area of the District that adjoins the Derby Urban Area. This is addressed by the housing policies.
- The Plan contains policies regarding energy efficiency and sustainable energy.
- The Plan contains a policy promoting housing mix that is suitable and adaptable for use by different groups of people.
- Provision of facilities/services alongside housing development. The housing policies address this.

The Council considers that South Derbyshire’s strategy (including housing allocations) and policies are consistent with the Local Plan objectives.

Do you agree that the following sites should be allocated for housing development?

The response to the suggested housing allocation sites was mixed. The site that generated the highest number of objections, at 126, was Hackwood Farm. Land south of Willington Road, Etwall received the second highest number, with 23, followed closely by Wragley Way, with 20.

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

The following table shows the number of consultees who showed support and objection to the proposed housing allocations.

Site	Yes	No
Boulton Moor Phase 2	3	5
Boulton Moor Phase 3	4	7
Chellaston Fields	3	7
Homleigh Way	4	5
Wragley Way	4	20
Primula Way	2	3
Stenson Fields	3	4
Hackwood Farm	2	126
Church Street	4	8
William Nadin Way	3	0
Broom Farm	3	5
North east Hatton	3	4
Hilton	3	13
Repton	5	8
Etwall	5	23
Aston	5	8
Other comments including Part 2 allocations	38	

See Appendix F27 for further details on the responses received in respect of each proposed housing allocation.

How, where necessary, these issues were addressed

The Council considers that the proposed housing sites are the most suitable for strategic housing development, to achieve the District's strategy for sustainable growth over the plan period. The proposed allocations within the Draft Local Plan Part 1 have therefore been carried forward into the Pre Submission Local Plan Part 1.

Changes made to the housing policies in response to representations are set out later in this document under individual policy headings.

Do you agree with identifying a reserve housing site within the Local Plan? (Which reserve site would you prefer?)

Only a few comments were received on the principle of a reserve site, with most offering either support or objection to individual sites.

The majority of the responses received did not support a reserve site policy within the Local Plan. In total 158 consultees disagreed with doing so, compared to 55 who agreed.

The table below provides details on the number of consultees who submitted representations supporting or objecting to the potential reserve sites.

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

Policy/Site	Yes	No
Reserve Site Policy	55*	158*
Lowes Farm, West Chellaston	12	10
Newhouse Farm, Mickleover	4	126
Woodville Regeneration Site	30	6

*Not all consultees stated whether they agreed or disagreed with a particular reserve site, so the figures for total responses do not match the numbers expressing agreement or disagreement.

For further detail on the responses to this question, see Appendix F27.

How, where necessary, these issues were addressed

Please see comments in relation to Housing Policy H22.

Do you agree with the proposed employment allocations?

The majority of responses expressed agreement with the proposed employment allocations. There were 39 comments in support of all employment allocations and some in support of individual sites. The numbers agreeing and disagreeing in respect of each site are set out in the table below:

Employment Site	Number of consultees who agree	Number of consultees who disagree
Tetron Point (8ha)	2	0
Cadley Hill (8ha)	1	2
Land at Hilton (7ha)	2	3
Drakelow Power Station (12ha)	2	0
Dove Valley Business Park (19ha)	3	3
Extension of Dove Valley Park (exceptions site)	3	3
Extension to the Global Technology Cluster (safeguarded site for employment development)	1	3

The majority of responses did not express reasons for agreeing or disagreeing with all, or particular, employment sites.

Developers have submitted representation in support of particular sites and further comments are made by various respondents. These are referred to under the relevant Employment, Sustainable Development and Infrastructure policy headings, later in this document.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

How, where necessary, these issues were addressed

The Council considers that the proposed employment site allocations are the most suitable for the achievement of South Derbyshire's strategy for sustainable growth over the plan period. The proposed allocations have therefore been carried forward into the Pre-Submission Local Plan Part 1.

Changes made to the employment policies are set out under relevant policy headings later in this document.

Do you have any comments to make regarding the Draft Local Plan Policies?

Responses to consultee comments on individual Draft Local Plan Part 1 are set out below. As mentioned at the beginning of this document, it is not intended to include every individual response received from past consultations, but rather to identify the broad issues raised.

Policy S1: A strategy for Sustainable Growth and Regeneration

Individual comments either supported or sought amendment to specific aspects of the policy.

The aspects of the policy receiving support from more than one consultee include:

- Numerous developers stating support for the inclusion of specific housing sites, such as Repton, Aston, Hackwood Farm, Broomy Farm, Etwall, Hilton, and Hatton.
- Recognition that new infrastructure, such as schools and roads, will be required
- The principle of the strategy for sustainable growth and the acknowledgement that South Derbyshire is well placed to serve the housing needs of Derby City, in addition to its own needs.

Requested amendments to the policy include the following:

- Requests for the inclusion of development in other locations not allocated within the Draft Local Plan, including Overseal, Winshill and Castle Gresley.
- Additional Key Service Villages should be included alongside those currently listed under Policy S2.
- Drakelow Power Station should be referred to as an extension to Burton-on-Trent rather than Swadlincote.
- Make more specific reference to how climate change is being taken into account.
- Ensure that the policy doesn't restrict non-employment development on sites which have been demonstrated to no longer be suitable or attractive for employment uses.
- Include: "encouraging the reuse of previously developed sites" within the second paragraph, as one of the Council's intended means of meeting the economic, social and environmental objectives of the Plan.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

- While increasing woodland cover is important, it is just one aspect of the National Forest strategy and perhaps does not fully reflect the economic, social and environmental opportunities referred to in Objective 10.
- In order for the policy to be consistent with the NPPF, it is essential that it makes reference to environmental enhancement.
- The Plan should include a criteria-based policy consistent with National Planning Policy Framework, paragraph 28. This could be included under Policy S1 or as separate policy within the Employment and the Economy section.
- The majority of developers/planning agents commenting on this policy suggested that the plan period should be extended. Some state that the National Planning Policy Framework indicates that local plans should be drawn up over an appropriate, preferably a 15 year, time scale and the South Derbyshire Local Plan will not achieve this. Suggested plan periods have been provided by some consultees. These are: at till at least 2030, at least 2031, to 2033 and could potentially be extended to 2035.

How, where necessary, these issues were addressed

In regards to comments specifically mentioning locations for housing development, this part of Draft Local Plan Policy S1 does not appear under Pre-Submission Local Plan Part 1 Policy S1, but has been moved to other policies within the Local Plan Part 1.

Policy S1 in the Pre Submission Local Plan continues to recognise the importance of the requirement for new infrastructure and that South Derbyshire is well placed to serve the needs of Derby City in addition to its own needs. To further clarify this, the revised policy within the Pre Submission Local Plan Part 1 shows the split of South Derbyshire's and Derby City's assessed housing needs.

To reflect the National Forest Company concern that the policy just reflects one aspect of the National Forest, the policy has been amended to cover more than just increasing woodland cover. It now supports all the National Forests objectives, which include the increase of woodland cover. In addition, the policy has been amended to include reference to environmental enhancements.

In response to the comment that the policy should make more specific reference to climate change, it has been amended to the need to seek to ensure that new development responds to and addresses environmental and social issues, including the need to tackle climate change.

The policy has also been amended to indicate that housing needs will be met through a mixture of brownfield and greenfield development with brownfield land preferred.

The policy has not been amended to reflect changes requested in regards to employment development, as policies contained within the Local Plan already address these issues. Policy E3 allows for the redevelopment or change of use of existing industrial and business land and allows for other uses in appropriate circumstances and Policy E2 allows for employment development in a set of given circumstances.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

In regards to the plan period, the Derby's Housing Market Area housing requirement evidence base covers the period to 2028. All the Derby HMA plans will adopt this timescale.

Policy S2: Presumption in Favour of Sustainable Development

The majority of responses received support the policy and consider that it is consistent with the National Planning Policy Framework. One requested amendment is for the policy wording within the brackets should be changed to include reference to Development Plan Documents.

Further comments suggest that the policy is unacceptable as any presumption must, in the first instance, be consistent with the local community and its affected residents' preference. They consider that local residents will have little opportunity to object if 'applications accord with the policies'.

How, where necessary, these issues were addressed

The policy is considered to be in accordance with the NPPF. Only one amendment to the policy has been made, which clarifies that the planning applications that accord with policies contained within the Local Plan Parts 1 and 2.

Policy S3: Housing Need

Residents responding to the plan generally considered that South Derbyshire housing requirement is too high, whereas developers and planning agents consider that the housing requirement is too low and the District is not meeting its objectively assessed housing need. Consultees have suggested higher housing requirements for the district, ranging from 14,000 to 19,648 dwellings.

Comments have also been received regarding the allocation of 600 dwellings within the Local Plan Part 2. Some have suggested that more than 600 should be allocated, due to: the potential delivery issues and timings of large sites; the faster delivery of smaller sites and the lack of site delivery around the edge of Derby. In addition it has also been suggested that a large proportion of the 600 dwellings should be allocated in the Part 1, rather than the Part 2, document.

How, where necessary, these issues were addressed

The Council considers that the Local Plan Part 1 identified housing requirement of at least 13,454 is based on a sound and robust evidence base. As previously discussed, following the Preferred Growth Strategy consultation, further work was undertaken by GL Hearn on Derby HMA housing requirement (Housing Requirement Study) to take account of the most recent Government projections. As a result of this, the housing requirement for the Derby HMA and subsequently South Derbyshire was increased. This housing number was incorporated into the Draft Local Plan Part 1 and Pre Submission Local Plan Part 1.

It is considered that that the Districts Strategy to allocate 12,404 dwellings within strategic sites within Part 1 of the Plan, 600 dwellings within Part 2 of the Local Plan and an assumed windfall of 450 dwellings across the plan period is an appropriate strategy for the District. Allocating strategic sites within Part 1 of the

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

Plan and small scale development within Part 2 of the Plan, continues a process which was established with the creation of Local Development Frameworks, where strategic policies were produced within the Core Strategy, which set the framework for the remaining part of the plan. The Councils strategy is consistent with the NPPF.

In addition having a Part 2 of the Local Plan allows 600 dwellings to be allocated on small scale sites across the district, instead of allocating 600 dwellings on a few large scale sites within Part 1 of the Local Plan. By accommodating 600 dwellings on small scale sites across the district (in line with the settlement hierarchy), allows South Derbyshire's settlements to grow sustainably.

Policy S4: Settlement Hierarchy

Some consultees supported the policy or specific aspects of it whilst others suggested alterations. Aspects of the policy which were supported include: Linton and Castle Gresley being defined as a Local Service Villages and Repton, Overseal and Hilton being defined as Key Service Villages; preference given to use of previously developed and underused vacant sites; appropriate sites of a local scale (up to 10 dwellings) being promoted within and adjoining the Local Service Villages; appropriate sites of a range of scales up to and including sites within and adjoining Key Service Villages; any scale development, including strategic, being promoted at the edge of Derby and the recognition for extensions to Burton on Trent and Derby.

No main issues were received in regards to suggested alterations to the settlement hierarchy, instead a range of suggestions were received. These include the following:

- Based on service provision Barrow Upon Trent should not be classed as a Rural Village (it should be further up the settlement hierarchy), Aston Trent should be a Key Service Village, Ticknall should not be defined as a Local Service Village (disputes that the village has adequate services) and a question has been raised over the inclusion of Rosliston as a Key Service Village.
- A definition of cross-subsidy exception sites is required
- Only allowing infill development and conversions of existing buildings within settlement boundaries of Rural Villages and Rural Areas could be counter to proposed policy S2 presumption in favour of sustainable development.
- Local Service Villages and Rural Villages should be joined together and appropriate sites of a local scale (up to 10 dwellings) should be promoted within and adjoining Local Service Villages and Rural Villages
- Development in Swadlincote should not be seen as secondary to extensions to Burton-on-Trent and Derby
- The settlement hierarchy has been configured upon an outdated understanding of sustainability and arbitrary rules and political pressures which attempt to classify the role of settlements.

How, where necessary, these issues were addressed

The Council considers that the settlement hierarchy has been founded on an appropriate evidence base, based on the sustainability of each settlement in

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

regards to its services and facilities. Further work on the settlement hierarchy has been undertaken since the consultation on the Draft Local Plan Part 1. This work alters Aston-on-Trent and Rosliston's location within the hierarchy. Based on the services and facilities with the settlement, Aston-on-Trent is a Key Village and Rosliston is a Local Service Village. Barrow upon Trent remains as a Rural Village and Ticknall remains as a Local Service Village.

In addition, within the Draft Local Plan Part 1 Swadlincote, including Woodville, and extensions to Burton Upon Trent and Derby were referred to under two separate categories: "Extensions to Large Urban Areas" and "Growth Towns". In the Pre- Submission Local Plan the two categories have been merged, as development in Swadlincote is not intended to be viewed as secondary to development in Burton-on-Trent and Derby.

The policy has been amended to allow development of limited infill and conversion of existing buildings and local scale affordable and cross-subsidy sites of up to 12 dwellings within Rural Settlements. However limited infill and conversion of existing buildings will be only be considered acceptable within Rural Areas. It is considered that Rural Settlements cannot sustainably accommodate the growth envisaged for Local Service Villages and Rural Areas cannot sustainably accommodate the growth envisaged in Rural Villages.

The Council has not merged Local Service Villages and Rural Villages as it is considered that that Rural Villages cannot sustainably accommodate the growth envisaged for the Local Service Villages.

Furthermore, even though appropriate sites of a local scale (up to 10 dwellings) being promoted within and adjoining Local Service Villages was supported by consultees, the Council has raised the scale of growth supported for Local Service Villages, now to up to 15 dwellings, and local scale affordable and cross subsidy exceptions sites, now also up to 15 dwellings. This amendment has been made as the Council considers that Local Service Villages can sustainably accommodate slightly higher growth than that proposed within the Draft Local Plan Part 1 settlement hierarchy policy.

Moreover a definition of cross-subsidy housing sites has been included within the Pre- Submission Local Plan Part 1 Glossary.

Policy S5: Green Belt (designated to S8 in the Pre Submission Local Plan)

A few comments in support of amendments to the Green Belt have been received. It has been suggest that the Green Belt alteration/swap is a positive and justified approach and consistent with the findings of the Review of the Derby PUA Green Belt undertaken by Derbyshire County Council, Amber Valley Borough Council, the City of Derby, South Derbyshire District Council and Erewash Borough Council.

It has been suggested by a few consultees that in some locations, circumstances have changed since the adoption of the Green Belt and Green Belt boundaries should be reviewed/amended to take account of this.

In addition a few consultees disagree with the Green Belt swap within Policy S5. One states that it is possible to deliver the housing growth requirement identified

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

for South Derbyshire without the use of Green Belt land and that the Council has not advanced any exceptional circumstances for altering the Green Belt boundary.

How, where necessary, these issues were addressed

The policy has been amended to allow small scale amendments to Green Belt boundaries via the Local Plan Part 2, where anomalies existed since the adoption of the Green Belt.

However the alteration to the Nottingham – Derby Green Belt (as stated within the Policy), is maintained within the Pre-Submission Local Plan. The amendment is based on the findings of the Review of the Derby PUA Green Belt and is consistent with the National Planning Policy Framework.

Policy H1: Land north of William Nadin Way, Swadlincote

Few responses directly related to the content of the policy, but rather to the principle of allocating the site.

Derbyshire County Council supports the policy, but asks that developer contributions be sought toward the Swadlincote Regeneration Route which may provide a long term solution to traffic congestion at the A511/A514 Clock Island junction.

The Environment Agency consider that the policy should be amended to “The Council will require the below listed site specifics and accordance with other Local Plan policies: ...An 8 metre wide corridor free from buildings, structures and other obstructions shall be provided either side of watercourse that runs along the south of the site in order to maintain the integrity of the watercourse and it’s floodplain...”

Natural England welcome the provision in the policy wording that land shall be protected either side of the brook that runs along the south of the site and William Nadin Way. However, they also ask that Breach Leys Farm Meadow County Wildlife Site, which is important for its wet grassland, be protected. Natural England suggest that there should be a buffer zone around this site to protect its nature conservation interest.

The Coal Authority request that the following bullet point should be added to the policy: The presence of coal mining legacy and resulting potential for unstable land will require the submission of a Coal Mining Risk Assessment in support of planning applications.

How, where necessary, these issues were addressed.

In regard to the County Council’s comments relating to transport contributions, it is unclear at this stage whether, and to what extent, the transport impacts of the development of these sites could be mitigated by the implementation of the proposed Woodville to Swadlincote Regeneration Route. It is therefore proposed that no change be made to the policy in this respect and that contributions toward any offsite transport impact mitigation measures be sought in accordance with

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

the findings of a Transport Assessment required to be submitted with a planning application for development of these sites in accordance with emerging Local Plan policy INF2: “Sustainable Transport”.

In response to the Coal Authority’s comments, the requirement of a Coal Mining Risk Assessment to be submitted alongside a planning application has been included within the policy. Furthermore, the policy has been amended to consider the effects of developments on nearby occupiers, which may result in the need for buffers to be put in place.

To address the request that that land should be free from development to either side of the watercourse running through the site, the policy requires an appropriate easement, free of built development, along watercourses on the site.

In addition, the policy now requires the provision of an appropriate buffer around the Breach Ley farm Meadow County Wildlife Site, in response to Natural England’s comments.

Policy H2: Land at Church Street/Bridge Street/Football Club Site, Church Gresley

Few responses related to the content of the policy, but rather to the principle of the site allocation.

It has been suggested that the proposed access points for the Church Street site need to be reconsidered. Traffic flow from the site should be directed away from the current Thorpe Downs Road access and St Georges Primary School, to minimise congestion and potential road safety issues.

Derbyshire County Council supports the policy, but asks that developer contributions be sought toward the Swadlincote Regeneration Route which may provide a long term solution to traffic congestion at the A511/A514 Clock Island junction.

North West Leicestershire District Council are concerned that there is no indication that any buffer/separation will be required between the proposed site and Albert Village.

Sport England consider that although the policy states that ‘consideration needs to be made for the provision of a new football ground’, such provision (of an equivalent or better standard in terms of quality in a suitable location) would need to be clearly determined before Sport England could accept the principle of losing the existing facility, rather than deferring the issue.

The Coal Authority request that the following bullet point be added: “The presence of coal mining legacy and resulting potential for unstable land will require the submission of a Coal Mining Risk Assessment in support of planning applications.”

How, where necessary, these issues were addressed

In response to the Coal Authority’s comments, the requirement for a Coal Mining Risk Assessment to be submitted alongside a planning application has been

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

included within the policy. The policy has also been amended to consider the effect of development on nearby occupiers, which may require the mitigation of visual impact.

In regard to the County Council's comments relating to transport contributions, it is unclear at this stage whether, and to what extent, the transport impacts of the development of these sites could be mitigated by the implementation of the proposed Woodville to Swadlincote Regeneration Route. It is therefore proposed that no change be made to the policy in this respect and that contributions toward any offsite transport impact mitigation measures be sought in accordance with the findings of a Transport Assessment required to be submitted with a planning application for development of these sites in accordance with emerging Local Plan policy INF2: "Sustainable Transport".

The policy has also been altered to include the consideration of the provision of a new football ground of acceptable quality, with contributions achieved where viable.

The access points proposed are the most appropriate for the sites and no change is therefore proposed in this respect.

Policy H3: Land at Broomy Farm, Woodville

Few responses directly relate to the content of the policy. Instead, the majority relate to the principle of allocating the site. However, those that make reference to the policy include:

Derbyshire County Council supports the policy, but asks that developer contributions be sought toward the Swadlincote Regeneration Route which may provide a long term solution to traffic congestion at the A511/A514 Clock Island junction.

National Forest Company is pleased to note that the indicative allocation now extends to the brook and that the allocating policy refers to the need to include a significant green buffer to the north-east boundary of the site, to soften the new urban edge. This expectation could be further reinforced, and delivery of this landscaping ensured, by specifically allocating the position and width of the green buffer on the plan.

Natural England states that the site is "closely sited to the Woodville Disused Railway County Wildlife Site and suggest that a positive opportunity should be taken to extend this site linking it with a green infrastructure corridor through the proposed development".

Pegasus Planning, on behalf of Hallam Land Management supports the policy.

The National Forest Company is concerned that the proposed site has been shown to round off the urban edge, rather than using existing landscape features as a boundary. The proposed site is very visible on the landscape when approaching Swadlincote along the A514, as the land rises. If land is to be allocated in this position, the treatment of its northern boundary needs thought to mitigate any visual impact and consideration should be given to allocating land to existing field boundaries, rather than an arbitrary straight line.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

The Environment Agency does not believe that there is spare capacity at Repton Sewage Pumping Station, which could have implications for site H3.

In addition, one consultee suggests that extensive landscaping should be introduced along the rear property boundaries in Hartshorne and that footpaths/cycle routes could be incorporated, linking the access close to Swadlincote Woodlands along Burton Road, through the development to the access proposed along Woodville Road onto Goseley Estate and extending with additional / improved footpaths / cycleway over the land of Broomy Farm towards Hartshorne Village etc. The consultee also suggests that additional land to the North East should be landscaped.

How, where necessary, these issues were addressed

In response to the Environment Agency's comments, a requirement has been added for a strategy to deal with foul water, associated with site development to be submitted alongside any development proposal. In addition, the policy has been amended to require the proposed landscaping to link into the surrounding green infrastructure, in response to Natural England's comments.

The Council considers that the policy does not need to be prescriptive in allocating the position and width of the green buffer required on the north east boundary of the site. This will be determined through a planning application.

No amendments to the policy have been made in response to the National Forest Company's comments, as the policy states that a green buffer and landscaping on the north east boundary of the site will be required to help soften the housing development impact in the surrounding rural landscape, creating a new urban edge.

Landscaping along the north east boundary of the site will help soften the housing development on the properties in Hartshorne, it is therefore considered that extensive landscaping along the rear property boundaries in Hartshorne does not need to be included within the policy, in addition to this buffer/landscaping.

In response to County Council comments, the policy has been amended to require contributions toward measures needed to mitigate the transport impact of the development.

Policy H4: Council Depot

Few responses were received which directly relate to the wording of the policy. Instead, the majority of responses received regarding the site are in relation to agreement or disagreement over the allocation of the site. However, those that make reference to the policy include:

Derbyshire County Council supports the policy, but asks that developer contributions be sought toward the Swadlincote Regeneration Route which may provide a long term solution to traffic congestion at the A511/A514 Clock Island junction.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

The Environment Agency suggests that the Policy should be amended to read: “The Council will require the below listed site specifics and accordance with other Local Plan policies: ...An 8 metre wide corridor free from buildings, structures and other obstructions Land shall be protected provided either side of the Darklands Brook that runs along the south of the site and William Nadin Way in order to maintain the integrity of the watercourse and it’s floodplain...”

Natural England state that the site would be closely sited to Breach Leys Farm Meadow County Wildlife Site, which is important for its wet grassland. Natural England suggests that there should be a buffer zone around this County Wildlife Site to protect its nature conservation interests.

The Coal Authority request that the following bullet point should be added to the policy: The presence of coal mining legacy and resulting potential for unstable land will require the submission of a Coal Mining Risk Assessment in support of planning applications.

How, where necessary, these issues were addressed

In regard to the County Council’s comments relating to transport contributions, it is unclear at this stage whether, and to what extent, the transport impacts of the development of this site could be mitigated by the implementation of the proposed Woodville to Swadlincote Regeneration Route. It is therefore proposed that no change be made to the policy in this respect and that contributions toward any offsite transport impact mitigation measures be sought in accordance with the findings of a Transport Assessment required to be submitted with a planning application for development of this sites in accordance with emerging Local Plan policy INF2: “Sustainable Transport”.

In response to the Coal Authority’s comments, the requirement of a Coal Mining Risk Assessment to be submitted alongside a planning application has been included within the policy. Furthermore, the policy has been amended to consider the developments effect on nearby occupiers, which may require buffers to be put in place.

To address the Environment Agency’s comment that land should be free from development either side of the watercourse that runs through the site, the policy requires an appropriate easement along watercourses on the site free of built development.

In addition, the policy has been amended to require an appropriate buffer to be in place around the Breach Leys Farm Meadow County Wildlife Site, in response to Natural England’s comments.

Policy H5: Cadley Hill

Few responses were received which directly relate to the content of the policy. Instead, the majority of responses received are in relation to agreement or disagreement over the allocation of the site. However, those that make reference to the policy include:

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

Derbyshire County Council ask that developer contributions be sought toward the Swadlincote Regeneration Route which may provide a long term solution to traffic congestion at the A511/A514 Clock Island junction.

St Modwen Developments - Planning Prospects Planning states that the plan could now recognise this site as a commitment and indeed may already be accounted for in the current commitments set out in Policy S3.

The Coal Authority request that the following bullet point should be added to the policy: The presence of coal mining legacy and resulting potential for unstable land will require the submission of a Coal Mining Risk Assessment in support of planning applications.

How, where necessary, these issues were addressed

This policy has been removed as development has commenced on the site.

Policy H6: Drakelow Park

Few responses were received which directly relate to the wording of the policy. Instead, the majority of responses received regarding the site are in relation to agreement or disagreement over the allocation of the site. However, those that make reference to the policy include:

One Consultee states that the proposed site is on a flood plain and has been flooded repeatedly in recent years, there will need to be mitigation measures in place. In addition, traffic crossing points for the River Trent need to be considered.

Derbyshire County Council support the policy.

English Heritage welcome the reference to the refurbishment of the listed buildings on the site. However, considers that the policy should be amended to make reference for the need to protect their settings in addition to this, as they are the only surviving remnants of the original parkland and Hall.

Walton and Co on behalf of Drakelow Developments, does not consider that Policy H6 needs to make specific reference to the number of dwellings which may be occupied before the opening of the Walton Bypass (proposed as 100 dwellings), instead the policy could be reworded as follows: "The delivery of the Walton Bypass as part of the development".

How, where necessary, these issues were addressed

In response to English Heritage comments, the last bullet point of the policy has been expanded to include the protection of the settings of the listed buildings. In response to Walton and Co on behalf of Drakelow Developments, the policy has been reworded to state that in agreement with the Council, there will be a restricted number of dwellings to be allowed prior to the opening of the Walton Bypass.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

Traffic crossing points over the River Trent have been considered, as per the requirement for the implementation of the Walton Bypass.

Policy H7: Land at Hilton Depot, Hilton

Few responses were received which directly relate to the wording of the policy. Instead, the majority of responses received regarding the site are in relation to agreement or disagreement over the allocation of the site. However, those that make reference to the policy include:

Derbyshire County Councils supports the policy.

The Environment Agency suggests that opportunity should be taken to restore the unnamed brook running through this site to an open watercourse. An 8 metre wide corridor free from buildings, structures and other obstructions shall be provided either side of the watercourse in order to maintain the integrity of the watercourse and its floodplain.

Natural England state that the site is opposite the Egginton Junction Gravel Pit County Wildlife Site and every opportunity should be taken to protect and enhance the nature conservation interests of this site.

South Derbyshire's Badger Group states that the woodland on the site contains active badger setts and would be interested to discover what provision for the setts and the foraging grounds of these animals is to be made, should the proposed development go ahead.

St Modwen Development-Planning Prospects requests that reference to the potential for some additional retail provision should be made.

How, where necessary, these issues were addressed

The policy has been amended to make reference to the consideration to retail provision on the site, the retention of existing woodland and the delivery of additional planting and habitat creation in the southern boundary of the site. In addition, in response to the Environment Agency's comments, the policy has been amended to include an appropriate easement along watercourses on site which will be free of built development.

Furthermore in response to Natural England's comments, the policy has been amended to include development reflecting the location of Egginton Junction Gravel Pit County Wildlife Site and where possible, should enhance nature conservation interests of that site.

The Policy however, has not been amended to include reference to restore the unnamed brook running through this site to the open watercourse. Further policies within the Local Plan address the restoration of watercourses.

Policy H8: Former Aston Hall Hospital, Aston on Trent

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

Few responses directly related to the content of the policy. Instead, the majority were to do with the principle of allocating the site. However, those that make reference to the policy include:

Derbyshire County Council states that the policy is supported.

English Heritage states that while Grade II* Aston Hall is recognised within the supporting text, no reference is given to other assets (including a conservation area, and a scheduled monument). In addition, no reference is made within the policy to protect the setting of these. English Heritage consider that an additional bullet point requiring this is needed here.

Natural England note that the policy specifies that the woodland buffer to the north east and west of the site will be retained and wish to ensure that the intention of this wording is to protect the Long Walk Woodland County Wildlife Site. This site comprises of broad leaved woodland, which should be conserved and enhanced as part of the wider ecological network of the area.

One consultee suggests that the policy wording and site map are contradicting, as the policy seeks to retain the woodland, however, the plan shows the inclusion of the woodland.

How, where necessary, these issues were addressed

The policy has been amended to make reference to the development not adversely impacting upon the local townscape, Aston Hall, the Aston-on-Trent Conservation Area and other heritage assets. In addition, the policy has been amended to ensure that the existing woodland area is retained and enhanced where possible, in response to Natural England's comments.

With regard to the comment regarding the site plan, wording has been added to the plan explaining that the site areas of the housing sites are not necessarily the developable areas of the site. The site areas include land which could be used for landscape buffers, roads, open space etc.

Policy H9: Land at Longlands, Repton

Few responses directly relate to the content of the policy. Instead, the majority of responses relate to the principle of allocating the site. However, those that make reference to the policy include:

Derbyshire County Council supports the policy. However, the area has been identified as being of Secondary Multiple Environmental Sensitivity 1 and this needs to be taken into account when considering this site for development and any site specific requirements.

English Heritage welcomes the recognition within the supporting text to designated and non-designated heritage assets. However, further comments suggest that this should be reflected in a further bullet point.

Repton Parish Council request that developer contributions should be made towards replacing the Village Hall.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

Turley Associates supports the allocation.

The Environment Agency does not believe that there is spare capacity at Repton Sewage Pumping Station.

How, where necessary, these issues were addressed

The policy has been amended to include the requirement that development of the site shall not adversely impact upon the setting of Repton Conservation Area and other heritage assets.

In response to the Environment Agency's comments, a requirement has been added for a strategy to deal with foul water, to be submitted alongside any development proposal. The policy has also been amended to require the proposed landscaping to link into the surrounding green infrastructure in response to Natural England's comments. The Council considers that the policy ensures that the site will be developed sensitively.

Developer contributions towards a replacement Village Hall have not been included within the policy, as it is not essential to the delivery of the site. Nevertheless, the Council are aware that Repton Village Hall has reached/is nearing the end of its life and have included a replacement Village Hall within the Districts Infrastructure Delivery Plan. In addition, the Pre Submission Local Plan contains a Community Facilities policy that addresses such matters.

Policy H10: Land south of Willington Road, Etwall

Few responses were received regarding the content of the policy. Instead, the majority related to the principle of allocating the site. However, those that made reference to the policy included:

One consultee states that the policy should make reference to the cricket field pitch directly.

Another consultee states that the policy requires provision of a cricket pitch and pavilion and extension to Etwall cemetery. There appears to be no overriding reason why these facilities need to be provided at Willington Road.

One consultee states that it is sad to not see the following requirement within policy H10, which has been included in other housing developments, such as the former Aston Halls Hospital, Aston on Trent. "The development will embrace high quality design standards to reflect the character of Aston on Trent and the surrounding landscape's".

Pegasus Group on behalf of Bloor Homes requests that the site specific policy aspects of the policy be replaced with the following: Development will be expected to: 1) Provide a new cricket pitch and pavilion, 2) Facilitate an extension to Etwall cemetery, 3) Provide appropriate landscaping along the southern site boundary, and 4) Provide pedestrian connections into the village centre.

Sport England note that the policy includes a site specific requirement for a cricket pitch to be delivered. However, it is not clear from the Draft Local Plan

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

how this proposal would relate to the existing cricket pitch in Etwall, or what the detailed rationale is for this requirement. In general, Sport England supports the delivery of on-site sports facilities constructed to appropriate design and technical standards that meet identified need, in conjunction with new development. Subject to this being the case and the requirement being supported by robust and up to date evidence of need and associated strategy, then Sport England would support the inclusion of this on-site sports facility as part of the policy requirement.

English Heritage believe that protection of the setting of the Grade II Listed Etwall Lodge will need to be considered in relation to development on the allocated site.

How, where necessary, these issues were addressed

The policy has been amended to include the land at Willington Road and land at Sutton Lane, Etwall.

The plans design policy requires all new development to be well designed. Any planning application received for the site will be assessed against the plans design policy, therefore the requirement of good design does not need to be included within the policy.

No amendments to the policy have been made in response to the comments received from Pegasus Group on behalf of Bloor Homes. The Council considers that the policy covers the aspects requested by the consultee.

In response to Sport England's comments, a replacement cricket pitch is required due to allocating the existing cricket pitch site for housing. The policy requires that the replacement pitch be of an improved standard on the existing pitch, together with a pavilion within Etwall.

In addition there are cemetery capacity constraints within the district and the proposed site is considered an appropriate site for such provision, due to its location adjacent to the existing cemetery within Etwall.

The policy has been amended to refer to the need to protect the setting of the Grade II Listed Etwall Lodge.

Policy H11: Land north east of Hatton

Few responses directly relate to the content of the policy. Instead, the majority related to the principle of allocating the site. However, those that make reference to the policy include:

Derbyshire County Council supports the policy.

The Environment Agency suggest that the policy should be amended to read: "The Council will require the below listed site specifics and accordance with other Local Plan policies: an 8 metre wide corridor free from buildings, structures and other obstructions shall be provided either side of Salt Brook that runs through the site in order to maintain the integrity of the watercourse and it's floodplain..." ...Developer contributions will be made to maintain the flood alleviation works at the lower River Dove Catchment Area..."

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

The Highways Agency broadly welcome policy H11 and will be happy to discuss with the Council, how this may need to apply to delivery of junction improvements on the A50.

John Steedman Planning, on behalf of David Grummett suggests that the number of houses proposed at Hatton should be reduced by 100.

One consultee suggests that the introduction of effective measures to restrict or deter non-essential traffic from passing through Hatton, many of which then go on to use the “rat run” via Scropton to Sudbury, should be taken into consideration. The lack of such a policy will result in a continuing and accelerating reduction in highway safety for local residents and road users.

Savills on behalf of Taylor Wimpey agrees with the following aspects of the policy: the increase of the sites capacity from 300 to 400. The provision of pedestrian and cycle links from the site to the existing residential development to the south of site and the principle of retaining the existing trees on the eastern boundary of the site, subject to the outcome of a tree survey demonstrating that the trees are in a suitable condition,. Accepts the inclusion of wording within the policy, which states that consideration will be given to a relief road to access a large manufacturing plant in Hatton. However, the consultee objectives/ requests alterations to the following aspects of policy H11:

- Policy wording which states that retail provision will be provided on the site.
- Acknowledges the requirement to make contributions towards flood defences on the River Dove and towards education provision / expansion, but considers that the policy wording should be amended to include reference to viability considerations, in accordance with paragraphs 173-174 of the National Planning Policy Framework, which state that careful attention should be paid to viability and costs in plan-making and decision-taking.
- Willing to consider provision of a doctor’s surgery in Hatton, subject to considerations of need and viability and the availability of funding.
- Taylor Wimpey considers that the supporting text to Policy H11 should not seek to restrict access into the site from Station Road, to solely being through the existing Salt Box Cafe access.

How, where necessary, these issues were addressed

In response to the Environment Agency’s comments, the policy has been amended to include an appropriate easement along watercourses on site, free of built development. The typing error within the fourth bullet point of the policy has been amended to state flood alleviation, rather than flood elevation.

The proposed 400 dwellings at land north east of Hatton have been carried forward into the Pre Submission Local Plan.

In regard to comments from Savills on behalf of Taylor Wimpy, the policy has been reworded to “consider” the provision of retail. In addition, the supporting text has removed the comments which require the access of the site from Derby

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

Road and/or through the existing Salt Box Café access from Station Road. No amendments to the policy have been made in respect to the provision of a doctor's surgery, as the policy itself only requires the consideration of such provision. In addition, the requirement that development contributions will be made to maintain the flood alleviation works of the lower River Dove Catchment Area has been carried forward into the Pre Submission Local Plan. The policy is considered to be consistent with the NPPF.

The Council considers that it is not the place of policy H11 to introduce measures to restrict or deter non-essential traffic from passing through Hatton.

Policy H12: Highfields Farm

Few responses directly relate to the content of the policy. Instead, the majority concerned the principle of the allocation of the site. However, those that make reference to the policy include:

Derbyshire County Council supports the policy.

The Highways Agency have identified the need for junction improvements on the A50, to support housing growth on the south side of Derby, particularly at the A50/A514 junction and at the A50/A38 junction in order to safeguard the operation of the SRN. These measures are intended to be delivered through planning conditions on relevant developments, or through a contribution strategy covering significant developments on the south side of Derby. The Highways Agency would wish to see this aspect reflected in the policies of these proposed development sites.

How, where necessary, these issues were addressed

In response to comments from the Highways Agency, the policy has been amended to refer to developer contributions toward highway infrastructure improvements at A50/A38 and A50/A514 junctions to safeguard the operation of the Strategic Road Network.

Policy H13: Boulton Moor

Few responses relate to the content of the policy. Instead, the majority related to the principle of the allocation of the site. However, those that make reference to the policy include:

English Heritage welcome the reference to the protection of the setting of Elvaston Registered Park and Garden within the policy text. However, English Heritage are concerned that the proposed site allocation appears to include part of the designated area of the Grade II* Park and Garden, to the south side of the B5010, which should be avoided. English Heritage also considers that the policy should make reference to the protection and enhancement of the significance of all of the assets in this location. At present, it makes reference to the Registered Park and Garden only and there are a number of heritage assets within this area where consideration of their setting is required.

The National Trust suggest that the statement in the Policy: "The urban extension as a whole shall not adversely impact upon the setting of nearby Elvaston

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

Historic Park and Garden” is welcomed in principle as it recognises the potential for harm to be caused, however as currently worded, it does appear more as a hope than an expectation. A more positive approach would be: “The urban extension as a whole shall ensure the safeguarding and enhancement of the special heritage significances of Elvaston, including its setting, in particular that part of the Registered Historic Park and Garden that is within the overall defined site for development, the approaches to Elvaston, and views to and from the Registered Historic Park and Garden.”

Natural England welcomes the provisions in the policy for improvements to existing green infrastructure, plus new green infrastructure and significant green buffers to soften the housing development, and trusts that these green areas will incorporate the Alvaston Stream County Wildlife Site. Natural England are also supportive of the introduction of high quality pedestrian and cycle routes which could also contribute to the green infrastructure network and welcome the last bullet point of the policy wording, which establishes the protection of the Elvaston Historic Park and Garden.

Derbyshire County Council supports the policy subject to an amendment relating to primary schools. Derbyshire County Council requests that the policy is reworded to "the provision of a two form entry primary school". Derbyshire County Council suggests that further clarification is needed as part of the Boulton Moor development area appears to represent Green Belt land.

The Highways Agency have identified the need for junction improvements on the A50 to support housing growth on the south side of Derby, particularly at the A50/A514 junction and at the A50/A38 junction, in order to safeguard the operation of the SRN. These measures are intended to be delivered through planning conditions on relevant developments, or through a contribution strategy covering significant developments on the south side of Derby. The Highways Agency would wish to see this aspect reflected in the policies of these proposed development sites.

Barton Willmore on behalf of the Chamberlain Family and Central Land Holdings has requested a number of changes to the policy which include the following:

- The development should be referred to as a sustainable urban extension
- Support the request for the provision of a district centre, subject to the approved location of the centre is justified
- Financial contributions will be made towards secondary school provision to serve new residents at Boulton Moor. However the policy wording should be expanded so that it is clear that SDDC will only seek financial contributions which will meet the statutory tests, as set out the Community Infrastructure Regulations (Reg 122) and paragraph 204 of the NPPF.

How, where necessary, these issues were addressed

The policy has been amended to include the provision of a two form entry primary school in response to Derbyshire County Councils comments.

In response to the National Trust and English Heritage comments, the policy wording has been amended so that development of the site shall not adversely affect Elvaston’s Historic Park and Garden and other Heritage Assets. The policy also indicates that development will contribute towards softening the impact of

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

the development on the surrounding countryside. In addition the policy makes clear that any development to the east of the A6 must be consistent with Green Belt policy.

In response to comments from the Highways Agency, the policy has been amended to refer to developer contributions toward highway infrastructure improvements at A50/A38 and A50/A514 junctions to safeguard the operation of the Strategic Road Network.

No amendments have been made in response to comments received from Barton Wilmore on behalf of the Chamberlain Family, the Council considers that the policy already addresses the comments received adequately.

Policy H14: Chellaston Fields

Few responses directly relate to the content of the policy. Instead, the majority relate to the principle of the allocation of the site. However, those that make reference to the policy include:

Derby and Peak District Campaign for Better Transport, request that the policy should require developer contributions for; an extension of bus route 60 to serve the site, for improvements to the difficulties of accessing this site from the A514 and the need to improve the nearby A514 junction with Glenwood Road.

Derbyshire County Council supports the policy.

English Heritage are concerned that no reference is made within the policy and its supporting text with regard to heritage assets and consider that further bullet points in relation to their protection are essential here.

Natural England state that the site is in close proximity to the Chellaston Brickworks Local Nature Reserve and recommend that there should be an undeveloped buffer zone around this site, to protect its nature conservation interests.

The Highways Agency have identified the need for junction improvements on the A50 to support housing growth on the south side of Derby, particularly at the A50/A514 junction and at the A50/A38 junction, in order to safeguard the operation of the SRN. These measures are intended to be delivered through planning conditions on relevant developments, or through a contribution strategy covering significant developments on the south side of Derby. The Highways Agency would wish to see this aspect reflected in the policies of these proposed development sites.

How, where necessary, these issues were addressed

Heritage assets are sufficiently removed from the site to not be directly affected by the allocation.

In addition the policy makes clear that any development to the east of the A6 must be consistent with Green Belt policy.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

In response to comments from the Highways Agency, the policy has been amended to refer to developer contributions toward highway infrastructure improvements at A50/A38 and A50/A514 junctions to safeguard the operation of the Strategic Road Network.

No amendment was made in response to Natural England's comments, as the Chellaston Brookworks County Nature Reserve is located within Derby City and is not adjacent to the site.

Policy H15: Wragley Way

Few responses related to the content of the policy. Instead, the majority related to the principle of the allocation of the site. However, those that make reference to the policy include:

Natural England note that the last paragraph states that there will be enhancements to a defensible boundary along Sinfin Moor. They would wish to ensure that this measure includes a buffer zone between the proposed development and the Sinfin Moor Lane Meadows Local Nature Reserve and SSSI.

Derbyshire County Council supports the policy.

English Heritage have no objections to the site. However, are disappointed that the policy text is not aligned with the text of the Derby City Plan. English Heritage consider that Derby City's draft policy is much more comprehensive, and provides safeguards in terms of ensuring the character of the adjacent settlement is respected and should be better reflected here.

The Highways Agency state that the Integrated Transport link may be required to enable the delivery of development. It would be helpful to clarify the relationship between the delivery of this road and proposed housing development, its phasing and any requirements for developer contributions. The Highways Agency have identified the need for junction improvements on the A50 to support housing growth on the south side of Derby, particularly at the A50/A514 junction and at the A50/A38 junction in order to safeguard the operation of the SRN. These measures are intended to be delivered through planning conditions on relevant developments, or through a contribution strategy covering significant developments on the south side of Derby. The Highways Agency wish to see this aspect reflected in the policies of these proposed development sites. In addition, the Highways Agency suggest the inclusion of the following, "any development should not prejudice the construction of a potential junction connecting the site to the A50, which may potentially be needed following the completion of the South Derby Integrated Transport Link", to be appropriate in the wider context of ensuring the flexibility of the Local Plan.

A consultee would like to see a bollard placed on the north end of the A50 bridge on Arleston Lane, which would restrict traffic from Derby and only allow leisure users access to Arleston Lane from the north.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

How, where necessary, these issues were addressed

The policy has not been amended to reflect the changes proposed by Natural England as it was felt that current wording together with Policy BNE3: “Biodiversity” provided sufficient protection to the Local Nature Reserve.

No change has been made in response to comments by English Heritage as it is considered that the need to reflect the character of existing development is satisfactorily addressed by Policy BNE1: “Design Excellence”.

In response to comments from the Highways Agency, the policy has been amended to refer to developer contributions toward highway infrastructure improvements at A50/A38 and A50/A514 junctions to safeguard the operation of the Strategic Road Network.

Any proposals to close off of Arleston Lane to through traffic can be addressed with reference to the bullet point concerning pedestrian and cycle connections in the context of negotiations with applicants.

Policy H16: Primula Way, Sunny Hill

Few responses relate to the content of the policy. Instead, the majority are in relation to principle of allocating the site. However, those that make reference to the policy include:

Derbyshire County Council support the following aspects of the policy: The development will have pedestrian connections into the existing residential areas within Derby City and developer contributions to be made to secondary and primary school provision, on an agreed strategy with the Council.

The Highways Agency have identified the need for junction improvements on the A50 to support housing growth on the south side of Derby, particularly at the A50/A514 junction and at the A50/A38 junction in order to safeguard the operation of the SRN. These measures are intended to be delivered through planning conditions on relevant developments or through a contribution strategy covering significant developments on the south side of Derby. The Highways Agency would wish to see this aspect reflected in the policies of these proposed development sites.

How, where necessary, these issues were addressed

In response to comments from the Highways Agency, the policy has been amended to refer to developer contributions toward highway infrastructure improvements at A50/A38 and A50/A514 junctions to safeguard the operation of the Strategic Road Network.

Policy H17: Stenson Fields Estate, Stenson Fields

Few responses relate to the content of the policy. Instead, the majority relate to the principle of the allocation of the site.

Derbyshire County Council is in support of the policy.

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

How, where necessary, these issues were addressed

This policy has been removed. The scale of the sites development is such, that it will be carried forward into the Local Plan Part 2.

Policy H18: Land west of Holmleigh Way

Few responses were received which directly relate to the wording of the policy. Instead, the majority of responses received regarding the site are in relation to agreement or disagreement over the allocation of the site. However, those that make reference to the policy include:

The Canal and River Trust welcomes the acknowledgement of the importance of continuing to safeguard the route of the former Derby-Sandiacre Canal within the policy. Any development should have regard to the aspirations of the Derby and Sandicare Canal Trust to restore the canal and return it to navigable status and should not prejudice these aspirations.

Derbyshire County Council requests that the policy be amended to ensure developer contributions are made towards primary school provision and greenway construction, and that development of the site enables the provision of high speed broadband services.

Natural England are glad to note that the explanatory text included recognition of the importance of the Derby Canal County Wildlife Site.

Turley Associates on behalf of Bellway Homes request that the wording within the policy, which currently identifies the site as 'land at Wragley Way' is corrected to 'land west of Holmleigh Way'.

The Highways Agency have identified the need for junction improvements on the A50 to support housing growth on the south side of Derby, particularly at the A50/A514 junction and at the A50/A38 junction in order to safeguard the operation of the SRN. These measures are intended to be delivered through planning conditions on relevant developments or through a contribution strategy covering significant developments on the south side of Derby. The Highways Agency would wish to see this aspect reflected in the policies of these proposed development sites

How, where necessary, these issues were addressed

The Council notes The Canal and River Trust comments, however does not consider that amendments to the policy are required.

In addition no amendment to the policy has been made in regards to the comments received from Derbyshire County Council. The beginning of chapter 5 has been amended to clarify that relating to all housing development/allocations; there will be a need for expanded and/or new facilities at both primary and secondary level. Furthermore the Local Plan Part 1 contains a Green Infrastructure policy, which seeks to conserve, enhance and wherever possible extend green infrastructure in the district.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

No change is proposed in respect of the proposal that the plan address the provision of high speed broadband in the design of development as this is considered to be a matter for the developers and the relevant utility providers.

The name of the policy has been changed, as suggested by Turley Associates.

In response to comments from the Highways Agency, the policy has been amended to refer to developer contributions toward highway infrastructure improvements at A50/A38 and A50/A514 junctions to safeguard the operation of the Strategic Road Network.

Policy H19: Stenson Fields

Few responses relate to the content of the policy. Instead, the majority relate to the principle of the allocation of the site. However, those that make reference to the policy include:

Derbyshire County Council supports the policy.

The Highways Agency have identified the need for junction improvements on the A50 to support housing growth on the south side of Derby, particularly at the A50/A514 junction and at the A50/A38 junction in order to safeguard the operation of the SRN. These measures are intended to be delivered through planning conditions on relevant developments or through a contribution strategy, covering significant developments on the south side of Derby. The Highways Agency would wish to see this aspect reflected in the policies of these proposed development sites.

How, where necessary, these issues were addressed

This policy has been removed, due to the development of the site.

Policy H20: Land at Hackwood Farm, Mickleover

Few responses relate to the content of the policy. Instead, the majority relate to the principle of the allocation of the site. However, those that make reference to the policy include:

Derbyshire County Council supports the policy.

Natural England state that as well as a Sustrans route, they would like the policy to recognise that the disused railway is also a County Wildlife Site. Therefore, its nature conservation interest should be protected and links maintained with the surrounding green infrastructure network.

English Heritage have expressed their disappointment that the wording of this policy is not aligned with that of Derby City. We welcome the bullet point which references the need to protect the setting of the Hall, this is a significant shortcoming of the draft wording in Derby City's policy which we will be seeking to address with the City Council. That said, a joint policy approach should be considered here, including reference to the protection of heritage assets at Radbourne Hall.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

Pegasus Planning on behalf of Miller Homes broadly agrees with the requirements of the policy. However, recommends the following amendments so that the policy can accord with paragraphs 256 and 157 of the NPPF:

- “The existing landscaping elements to the south of the site should be retained, subject to highway improvement or secondary site access that would be required”, this element of the policy should be deleted. It is unclear what ‘landscaping elements’ are being referred to, and it is not a strategic priority.
- “The site should provide links into the existing cycle route, rights of ways and also the residential area to the south, preferably through a pedestrian/cycle bridge provided across the Mickleover to Egginton Greenway”. The addition of the word preferably is recommended.
- As officers will be aware, Miller Homes is committed to delivering a pedestrian/cycle bridge and have taken efforts to design and cost a suitable structure. However, it should be recognised that there are factors beyond Miller Homes’ control that could prevent the bridge being delivered and this should not impede the delivery of the development as a whole.
- “Provision for a new primary school that is likely to be within the Derby City part of the site”. Miller Homes is committed to providing land for the provision of a new primary school. However, the details of how the school will be delivered have yet to be determined. The school will also be required to cater for growth resulting from cumulative housing development in the local area, including Onslow Road. Other developers will therefore be expected to contribute to the school’s delivery in accordance with Regulation 122 of the CIL Regulations.
- “The urban extension shall not substantially, adversely impact upon the setting of nearby Radbourne Hall.” The test for at paragraph 132 of the NPPF is that substantial harm to Grade I listed buildings should be wholly exceptional. Rewording the policy as suggested brings it into line with the NPPF. The Environmental Statement that forms part of the existing outline planning application provides evidence that the setting of Radbourne Hall would not be impacted by the proposals.

How, where necessary, these issues were addressed

The policy has been amended to include the comments received from Natural England regarding the wildlife site status of the Greenway.

Discussions have taken place between Derby City Officers and South Derbyshire’s officers to ensure that the policies are aligned to address comments received from English Heritage. No change is proposed to the South Derbyshire policy in this respect.

It was not necessary to amend the reference to existing landscape elements and no change has been made in this respect.

The word “preferable” has not been added into the policy in regards to provision of cycle route, rights of way etc. as the Council considers such a connection to represent an important element of the development of the allocated site. No change has been made in relation to the provision of a pedestrian/cycle bridge across the Greenway.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

The reference to primary school provision has been amended to indicate that “contributions” toward the development of a primary school will be required.

No amendment to the policy has been made in regard to the request by Pegasus Planning on behalf of Miller Homes to reword the Radbourne Hall reference. The Council considers that whilst the NPPF states that substantially harm to a Grade I listed building shall be “wholly exceptional” this does not imply that any harm that is less than substantial shall always be acceptable.

Policy H21: Reserve Sites

There was large scale opposition to the possibility of Newhouse Farm becoming a reserve site, but not in regard to the principle of allocating a reserve site.

How, where necessary, these issues were addressed

The idea of a reserve site and a reserve site policy has not been carried forward into the Pre Submission Local Plan Part 1. The Council considers that if South Derbyshire is not meeting its required housing target, then a plan review would be more beneficial, than a reserve site policy. It is considered that if the housing target is not being met, then other policies within the Local Plan would also need to be reviewed.

Moreover, simply releasing a reserve site for housing development does not denote that the site will be deliverable at that point in time. Smaller sites may be required to boost delivery of South Derbyshire’s housing target if delivery of sites is failing, instead of promoting a large scale reserve site.

In addition, South Derbyshire’s housing needs and part of Derby City’s housing needs will be met through allocations within the Local Plan Part1 and 2 and windfall sites. It is considered that there is no need to offer further sites, unless through a full plan review.

Further to this, one of the potential reserve sites – Woodville Regeneration Site is progressing quicker than anticipated, in regards to the sites development. The site is being progressed as an employment led scheme, with housing numbers allocated for the site within Policy SD9 of the Pre Submission Local Plan. The site can therefore, no longer be considered for a reserve site.

Logic suggests that a reserve site should be readily capable of delivering housing if one of the housing allocation sites under performs. Further information has since been received regarding Newhouse Farm and Lowes Farm, which suggests that neither site could readily be developed, due to transport and educational constraints.

Policy H22: Housing Balance

There is support for this policy, particularly in regards to housing density being considered on a site by site basis.

However, some consultees have suggested alterations. Some suggested that the policy should make reference to market needs and that market demand should be taken into account in arriving at an appropriate housing mix.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

Furthermore, it has been suggested that housing mix should be founded on an up to date evidence base; that viability should be a consideration in the determination of a schemes housing mix and that the Council should provide additional details on the role of specialist accommodation for the elderly in meeting the wider housing needs of the District, either in the Local Plan or subsequent Supplementary Planning Documents.

How, where necessary, these issues were addressed

No alteration has been made to the policy in regard to making reference to market needs or market demand in the determination of a schemes housing mix or housing mix being evidenced by an up to date evidence base. The Strategic Housing Market Assessment (SHMA) has assessed the housing mix need across the Derby Housing Market Area and will be used to determine schemes housing mix. This is stated within the policy.

In regard to the Council providing additional details on the role of specialised accommodation for the elderly, the policy acknowledges that a mix of housing is required, including for the elderly and seeks to promote a mix of dwellings. It is not considered that this issue needs to be dealt with more comprehensively in the Local Plan Part 1. Further detail on this matter will be set out within a Design Supplementary Planning Document.

The policy however, has been amended to allow viability of a scheme to be a consideration in the determination of housing mix.

Policy H23: Affordable Housing

The main concern raised related to the target of up to 40% of affordable housing (as defined by the NPPF) on new residential development on sites exceeding 15 dwellings or 0.5 hectares. It was suggested that the target was too high. Some consultees suggested that the Council's policy should be in line with the Strategic Housing Market Assessment (SHMA), which states that on an average basis 25% affordable housing can be achieved on sites across the Derby Housing Market Area over the plan period.

How, where necessary, these issues were addressed

The percentage of affordable housing the Council seeks to achieve on new housing developments on sites over 15 dwellings or 0.5 hectares has reduced from up to 40% to up to 30%. Viability studies show that housing development within the district has some viability if policy H23 is set as up to 30% affordable housing. This alteration has received member support.

Policy H24: Sites for gypsies and Travellers and Travelling Showpeople

The National Federation of Gypsy Liaison Groups considered that policy H24 did not comply with national policy, with no reference to keeping a Gypsy and Traveller Accommodation Assessment up to date; no mention of a procedure for allocating sites; failure to distinguish between making allocations and determining applications and the implication that there has to be an identified need for sites. The criteria, as set out, were considered reasonable.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

The consultation response from North West Leicestershire District Council raised concerns over the lack of targets in the policy, questioned how sites were being positively planned for and provision made through the plan making process and how the supply of sites was being identified.

Other comments were received in support of the policy.

How, where necessary, these issues were addressed

Reference has been added to Policy H24, regarding the setting of pitch/plot targets, how those pitches will be provided for through the Local Plan and keeping needs assessments up to date, thereby providing for Policy H24 to comply with 'Planning Policy for Traveller Sites' guidance. The reference to identified need that the National Federation of Gypsy Liaison Groups referred to, has been removed. The distinction has been made between allocations and determining planning applications. A further criterion, regarding pedestrian access, has been added to the criteria listed in the policy.

Policy E1: Strategic Employment Land Allocations

Former Drakelow Power Station site

There is concern regarding the loss of established employment at the former Drakelow Power Station site.

Hilton Business Park

Planning and Design Group on behalf of Hallam Land Management consider that a greater proportion of the Hilton Business Park should be retained for employment use than is currently envisaged in Policy E1, to balance housing growth in the village. For the same reason, another respondent considers that land forming part of the Hilton Business Park should be retained for employment use, rather than housing-led mixed use development.

Restriction of uses on allocated employment sites

There is concern from Gladman Developments that by restricting the uses of strategic employment sites to industrial and business uses, other legitimate ancillary and sui generis uses would be excluded.

Employment Land Provision

Pegasus on behalf of Christ Church consider that it is unclear whether the National Planning Policy Framework approach to employment land provision has been followed in regard to taking account of job growth, cross-boundary migration assumptions and qualitative needs. There is therefore, a danger of an undersupply of employment land. A revised assessment of employment needs is required to match the respondent's proposed revised assessment of housing need.

How, where necessary, these issues were addressed

Former Drakelow Power Station Site : Planning permission for the redevelopment of the site for mixed use purposes has already been granted and

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

the existing major employer has stated the intention to relocate within site, rather than to leave the area. No change is proposed in response to this representation.

Hilton Business Park: It should be borne in mind that besides the area allocated for new employment development in the Local Plan, part of the established Hilton Business Park is to be retained for industrial and business use. Given the fact that sufficient land has been identified elsewhere to meet the employment needs of the district, the strong national planning policy emphasis on boosting housing delivery and the lack of suitable alternative housing sites, it is considered that it would not be possible to sustain a case for retaining a larger area of land at Hilton for employment use.

Restriction of Use on Allocated Employment Sites : The policies indicate that the default policy position for these sites is that they should be developed for industrial and business uses. If proposals are made for ancillary uses such as shops, crèches and power generation, they can be considered on their merits and granted where other material considerations weigh in their favour. A more loosely expressed policy could lead to non-industrial and business development, on a scale that would compromise the capacity of these sites to make an appropriate contribution toward meeting the industrial and business development needs of the District. No change is proposed in response to this representation.

Employment Land Provision

Proposed employment land provision does take account of job growth and migration trends as well as qualitative needs. Employment land needs would only need to be reviewed if housing needs were to be reviewed and the latter is not currently being proposed.

Policy E2: Other Industrial and Business Development

Rural Economy: Gladman Developments and Derbyshire County Council are concerned that the Draft Plan does not address rural economic diversification. Gladman Developments believe that the economic development policies are over restrictive and could contribute to rural economic decline. Gregory Grey Associates consider that the policy should allow for the re-use of previously developed sites in rural locations. The National Forest Company request that the policy be amended to allow well designed new buildings for employment purposes in rural areas. The National Trust is concerned that the policy could have a detrimental impact on the character and amenities of smaller settlements, as there are few requirements about the form of development.

Redevelopment of Employment Sites: The promoters of the redevelopment of the former premises of HK Wentworth, at Midland Road, Swadlincote, suggest that the Plan should be more accommodating toward the redevelopment of redundant industrial and business premises.

How, where necessary, these issues were addressed

Rural Economy: Rural industrial and business development is addressed under Policy E2 which allows for new industrial and business development within and on the edge of Key Service and local villages and allows for the conversion and change of use of existing buildings in rural areas. A policy allowing redevelopment of such sites for employment purposes could have a detrimental

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

impact on the character of parts of the countryside. Amenity and design considerations will be addressed with reference to other relevant policies, specifically addressing these issues, in the Local Plan. However, part (ii) of the policy has been amended to refer to these considerations alongside impacts on heritage assets. Considerations have been made to make Policy E2 less restrictive, it has been changed to allow existing buildings to be replaced by well-designed new buildings of equivalent scale.

Redevelopment of Employment Sites: Policy E3 fully addresses cases such as this. No change is proposed in response to this representation.

Policy E3: Existing Employment Areas

The promoters of the redevelopment of the former premises of HK Wentworth, at Midland Road, Swadlincote, suggest that the Plan should be more accommodating towards the redevelopment of redundant industrial and business premises.

How, where necessary, these issues were addressed

Policy E3 fully addresses cases such as this. No change is proposed in response to this representation.

Policy E4: Small Business Space (appears as part of Policy E1 in the Pre Submission Local Plan)

No comments were received in respect of this policy.

How, where necessary, these issues were addressed

To improve the brevity of the Local Plan, the context of the policy has been moved to policy E1.

Policy E5: Strategic Location for Global Technology Cluster Extension (redesignated E4 in the Pre Submission Local Plan)

The promoters of land at Sinfin Moor consider that the land should be formally allocated for employment development, during the plan period. Objection has been made by Councillor David Shepherd, to the protection of land at Sinfin Moor for employment development, subject to queries as to why it should be included when it is not expected to be developed during the plan period and regarding whether transport mitigation is needed to support it, should it be released.

How, where necessary, these issues were addressed

Formal allocation of the site for employment development would be unnecessary, as sufficient land has been identified in Derby and South Derbyshire, to meet the strategic employment development needs of the district. In addition, transport mitigation measures needed to allow the site to come forward, have not yet been identified. The land is protected, as it is important to the future economy of the area to protect potential for the further expansion of the proposed high value Infiniti Park employment site, beyond the plan period. The policy protects against development that might compromise this potential. Transport mitigation can be

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

addressed when the site is needed and is not a concern for the emerging Local Plan. No change is proposed in response to these representations.

Policy E6: Safeguarded Employment Sites – Dove Valley Park (redesignated E5 in the Pre Submission Local Plan)

The proposed strategic allocations were generally supported.

The promoters of this site challenge the approach to the apportionment of employment land between the three HMA local authorities, as they consider that it pays no regard to the location and economic growth potential of employment sites. They also consider that the policy requirement, that development should only be accommodated on the site in the event that it cannot be met elsewhere, should be removed.

Concern is also expressed regarding how the site will be accessed.

How, where necessary, these issues were addressed

It is considered that the policy does allow for employment land to come forward on sites with growth potential. For example, plots of various sizes remain available for development at Dove Valley Business Park and have been allocated for this purpose under Policy E1. Sufficient land has been identified to meet the objectively assessed needs of the Housing Market Area. If existing plots at this site, or elsewhere, prove too small to accommodate the needs of an individual business, Policy E6 allows for the land to the north of Dove Valley Business Park to come forward, thus providing the flexibility needed to accommodate economic growth opportunities. The site will be accessed via established estate roads from the A50 and not via country lanes in the locality. No change is proposed in response to these representations.

Policy SD1: Energy Efficiency and Zero Carbon Development (redesignated

The main issue raised was that the policy seeks to require building performance beyond that required by Building Regulations. Some have suggested that the policy should be removed.

In addition, Central Government is said to be critical of locally imposed standards in its latest consultation document 'DCLD Housing Standards Review Consultation August 2013' and suggests that the Council allows Central Government to deal with the matter and that localised policy references should be removed.

It has also been suggested that the requirement for zero carbon development is not sound, as there is no evidence base concerning implications for scheme viability. One consultee considers that the identified measures to achieve energy efficient and zero carbon development do not need to be implemented through Local Plan Policy.

How, where necessary, these issues were addressed

Within the Pre Submission Local Plan, Policy SD1 and SD2 have been merged together to form policy S3.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

In regard to consultees comments, a decision has been made to not to remove the policy. Instead, the requirements set out within the policy have been amended to support the delivery of building regulation targets, rather than exceed those through gold plated local standards. In addition, the policy has been reworded to promote energy efficiency through on site measures, rather than setting requirements that go beyond wider Government proposals.

The Council has an enabling role to achieve energy efficiency and zero carbon development and whilst it is accepted that policy should stop short of requiring stricter requirements, the plan can encourage on-site provision of carbon reductions against off-site delivery.

Policy SD2: Environmental performance in new homes and other new buildings

The majority of consultees question the need for this policy, as the Government proposes to remove the Code for Sustainable Homes and improvements in sustainable building are likely to be addressed through changes to Building Regulations. It has been suggested that it is unnecessary to set any standards beyond Building Regulations and the lack of evidence to support the policy has also be questioned.

In addition, consultees point out that there is no current statutory requirement for commercial properties to meet a minimum BREEAM “Good Standard” by 2016 and “Very Good Standard” by 2019 and changes to Building Regulations will secure zero carbon targets for non-domestic buildings. Consultees suggest that the reference to BREEAM is unnecessary.

How, where necessary, these issues were addressed

Within the Pre Submission Local Plan, Policy SD1 and SD2 have been merged together to form policy S3.

In response to the representations received, the requirement for all residential dwellings to be expected to meet as a minimum Code for Sustainable Homes by 2016 and the expectation that all commercial properties to meet as a minimum BREEAM Good Standards by 2016 and very good standards by 2019 has been removed.

The policy has been reworded to reflect this and be consistent to building standards set out in the Housing Standards review.

Policy SD3: Sustainable Energy and Power Generation

No main points were raised in regard to this policy. There was support and comments made in relation to the detail of the policy.

The National Trust suggested that the word ‘local’ should be removed from the term ‘local landscape’ as the relevance of the word it is unclear.

One consultee considers that the policy is over prescriptive and that the need for sustainable energy is so pressing that the benefits may sometimes outweigh the significant detrimental impacts. Another suggests that the plan needs to be much clearer in terms of the protection of existing residential clusters in relation to wind turbine development proposals outside the area controlled by the Local Plan.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

How, where necessary, these issues were addressed

The word “local” in regards to local landscape has been removed from the policy.

Whilst the comment that the policy is over prescriptive has been noted, proposals should still be considered in the context of their impacts. The policy will allow consideration of the scale of benefits to be considered against the significance of impacts.

In regard to protecting existing residential clusters from wind turbines, it would not be appropriate to restrict renewable energy development, simply because there have been historic applications, or there could be future applications for renewable energy. All schemes should be considered on their own merits as they come forward. This policy seeks to protect local amenity as well as landscape character and will be used to control the effects of development, where schemes come forwards.

Policy SD4: Flood Risk

No main issues were raised in regard to policy SD4, but comments were made about the detail of the policy.

The Environment Agency requested that the last bullet point of the policy be amended to read “Where appropriate the Council will require developers to restore watercourses within regeneration or development sites to a natural state (i.e. break the channel out of culvert, remove redundant structures, replace/improve existing structures, to provide a restored watercourse profile) in order to reduce flood risk and provide local amenity and/or ecological benefits. To contribute to the enhancement of watercourses in accordance with the objectives of the Water Framework Directive, developers will be expected to work with the regulating Authorities to develop watercourse restoration schemes”

The Home Builders Federation suggested that the policy would require viability testing.

The National Trust supported the policy. However, it considered that whilst an explicit reference to heritage exceptions within the policy would be welcomed, the current wording would enable such cases to be promoted.

Natural England said that they would expect to see some reference to the “Our City Our River” (OCOR) master plan within the policy, which aims to implement a flood risk defence scheme that delivers significant improvements along the Lower Derwent.

St Modwen Development – Planning Prospects consider that the policy should make reference to the wider sustainable benefits to the community, which can outweigh flood risk. This would align more closely with the exceptions test in the NPPF.

Three comments relate to the policy and proposed housing allocations. One considers that policy SD4 means that Hackwood Farm, Mickleover cannot be developed, as houses adjoining the land to the west of Ladybank Road already flood. Another considers that the 13,500 additional homes planned for South Derbyshire is excessive and that the flood risk impact will be significantly increased with this scale of development, putting yet more pressure on what will

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

be the ever decreasing green land and wildlife habitat and that this will impact on SD4. The third suggests that Policy SD4 directs that site H7 should not be allocated as Hilton Depot is at high risk of flooding and no wider sustainability benefits have been identified to the extent that the high flood risk of the site should be set aside.

How, where necessary, these issues were addressed

Two policy amendments have been made as a result of the consultee responses. The changes requested by the Environment Agency have been implemented into the policy and in response to Natural England's comment, the policy has been amended to encourage biodiversity gain and green infrastructure delivery. Specific reference to the OCOR project has not been included within the policy, as the policy could equally apply to other infrastructure projects brought forward to address flood risk within the plan period.

With regard to the concern over viability of the policy, most of the allocated sites are located outside of areas at flood risk and those which are not, are defended or could accommodate growth away from areas at flood risk. Nonetheless, the Authority will work with developers to ensure that the site which could be affected by flooding, are viable.

A reference to heritage exceptions has not been included within the policy, as the existing policy should allow heritage exceptions to be made.

No change has been made in regard to St Modwen Developments-Planning Prospects comments, as the first part of the policy states: "The development of sites with a higher risk of flooding will be considered where essential for regeneration or where development provides wider sustainability benefits to the community that outweigh flood risk." As such the suggested clause is already included in the policy.

In regards to Hackwood Farm, the site is not at risk of fluvial flooding and surface water flood risk is limited on site. Any application would be supported by a flood risk assessment due to the scale of the proposal and this would be expected to demonstrate that the site would not exacerbate flood risk elsewhere.

Regarding the proposed housing allocation at Hilton Depot, the Environment Agency flood maps (fluvial) indicate that the site is at low risk of flooding. Moreover, the site is a previously developed former military base which would be regenerated by development of the site. In addition, development of the site would deliver a primary school within the village (for which there is an identified need).

In response to the districts housing provision and flood risk impact, South Derbyshire District Councils housing number is based on an objectively assessed need. The Council seeks to locate development in areas which will not be subject to flood risk in accordance with the NPPF.

Policy SD5: Sustainable Water Supply, Drainage and Sewerage Infrastructure

No main concern was raised in regard to this policy, as each consultee made different comments.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

North West Leicestershire District Council supported aspects of the policy. The Home Builders Federation stated that the policy will need to be viability tested. Two consultees made reference to the policy and proposed housing allocations. One consultee considered that drainage and sewerage requirements should be evaluated before deciding to allocate the Former Aston Hall Hospital for residential development. Others suggested that in Etwell, the sewer is at capacity.

The Environment Agency suggested additions to the policy, including:

- Ensuring that new homes meet the water efficiency standards consistent with level $\frac{3}{4}$ of the Code of Sustainable Homes and new non-residential development achieve BREEAM Very Good Standard for Water;
- Surface water from new development will be expected to be managed using SuDS, discharge to watercourse, or connection to surface water mains sewers. Only where these options are not technically feasible and in consultation with Water Companies, will surface water discharge to be a combine's sewer be permitted.
- Foul flows generated by new development will be expected to connect to the main sewer.

How, where necessary, these issues were addressed

In regard to the comments received concerning the policy and proposed housing allocations, both sites have been evaluated by Seven Trent Water on behalf of the Authority. Seven Trent Water have identified the need for local capacity improvements. However, there are no strategic capacity constraints.

In response to the policy requiring viability testing, the cost of achieving higher standards proposed is given as £42 for a flat or £68 for a house. Development in South Derbyshire has been subjected to viability testing and could stand the nominal cost of this requirement.

All minor changes that the Environment Agency suggested have been made, expect the change in respect of water efficiency, as this approach is at odds with the Housing Standard Review.

Policy SD6: Contaminated Land and Mining Legacy Issues

No main concerns were raised in regard to this policy, but a number of individual comments were made.

The Coal Authority welcomed the inclusion of the policy, but considered that it failed to make any direct reference to unstable land, focusing instead on made ground, contaminated land and rising mine water.

The Environment Agency suggested that the last paragraph of the policy should be amended to read:

“the council will work with to bring forward the regeneration of derelict or contaminated sites, *and investigate options for the sustainable management of rising mine water levels within the South Derbyshire Coalfield.*”

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

In addition, one consultee suggests that the plan needs to be much clearer in terms of the protection of existing residential clusters, in relation to wind turbine proposals.

How, where necessary, these issues were addressed

In response to the Coal Authority's comment, "instability" has been inserted into the title of the policy and the word "unstable" has been added to the following sentence:

"Planning permission for development on land which is known to be comprise made ground or which is *unstable*....."

The Environment Agency's suggested alteration to the policy has been made.

With regard to the comment regarding wind turbines, it is considered that there is no merit in singling out specific forms of development, as the policy applies to all development.

Policy SD7: Minerals Safeguarding

Very few responses were received in regard to this policy. No main concerns were raised, but comments were made on the detail of the policy.

The Coal Authority welcomed the inclusion of the policy and did not request any amendments.

One consultee suggested that the plan needed to be much clearer in regard to the protection of residential clusters in relation to wind turbine proposals. This also referred to under policy SD6.

How, where necessary, these issues were addressed

No amendments to the policy have been made in response to the consultees comments.

With regard to the comment regarding wind turbines, it is considered that there is no merit in singling out specific forms of development, as the policy applies to all development within the mineral safeguarded area identified by Derbyshire County Council.

Policy SD8: Amenity

Only two consultees made comments on the policy. Natural England broadly supported it.

The Environment Agency suggested the following amendments: that the title of the policy be altered to "Environmental Quality", as the term "amenity" is not well defined and can be widely interpreted in planning terms: that the integrity and continuity of flood defences be included within this policy, rather than SD4: Flood Risk and that the policy should read:

"The Council will take into consideration the following:

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

Ensuring there is sufficient buffer between conflicting land uses such that they do not disadvantage each other, particularly with regards to amenity issues such as noise, odour, litter/dust, (e.g. housing and waste management facility)."

How, where necessary, these issues were addressed

All changes suggested by the Environment Agency have been made. The title of the policy has been changed to "Environment Quality and Amenity", the integrity and continuity of flood defences has been removed from Policy SD8 and inserted into SD4: Flood Risk and the following statement has been included within the policy:

"The need for a strategic buffer between conflicting land uses such that they do not disadvantage each other, in respect of amenity issues such as odours, fumes, or dust and other disturbance such as noise, vibration, light or shadow flicker."

Policy SD9: Woodville Regeneration Area

North West Leicestershire District Council requests clarity as to whether any employment development in the Woodville Regeneration area would be over and above the 69 ha of employment land provision, referred to under Policy E1. They would want to see that an assessment/consideration has been given to the impact on settlements and the road network in North West Leicestershire. They would expect that the Local Plan would demonstrate that consideration has/will be given to the relationship between the Regeneration Area and adjoining land in North West Leicestershire. It is also suggested that consideration be given to the need for joint working with NWLDC to deliver the Woodville Regeneration Area, whilst protecting the amenity of North West Leicestershire and the separate identity of Albert Village.

How, where necessary, these issues were addressed

Comments made by NWLDC have been agreed. The wording of the explanation accompanying Policy E1 has been amended to indicate that any employment land provided in connection with Policy SD9 would be additional to the identified strategic provision. The explanation accompanying Policy SD9 has been amended to indicate that development, including any that may come forward on adjacent land outside South Derbyshire, will be brought forward through joint working with North West Leicestershire District Council, to deliver regeneration, whilst protecting the amenity of the neighbouring district and maintaining the separate identity of nearby Albert Village. It has also been amended to indicate that account will be taken of the need to avoid unacceptable traffic impacts both within Derbyshire and in the neighbouring district of North West Leicestershire.

Policy BNL1: Design Excellence

Consultees either stated support (Natural England, National Trust and Derbyshire County Council) or requested changes to the policy.

The National Forest Company requested that the policy be amended to specifically refer to the National Forest character.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

Sport England requested that an additional principle be added, relating to sport and physical activity, to reflect its importance in terms of design.

The Environment Agency considered that the District Council had an important role to play in reducing water produced, implementing the waste hierarchy and maximising recycling. They requested that there be a stand-alone waste policy to cover a number of elements.

Nathaniel Lichfield and Partners on behalf of Commercial Estates Group suggested that the policy wording was onerous and that it is was not clear what documents would need to be considered and therefore what standard would need to be met in order to achieve high performance. It was suggested that the following sentence be deleted from the policy: "All proposals for major development shall perform highly when assessed against current best practice guidance and standards for design, sustainability and place making".

How, where necessary, these issues were addressed

Reference to the National Forest Design Charter has been included within the policy and the policy's section on sustainability has been widened to support the provision of public open space and sports provision, in response to Sport England's comments.

In response to the Environment Agency's comments, a separate waste management policy has not been created. Instead the Agency's concerns have been addressed in policy BNL1.

The second part of the policy has not been deleted as requested by Nathaniel Lichfield and Partners, on behalf of Commercial Estates Group. It is considered that the policy is consistent with Section 7 of the NPPF Requiring Good Design. The Authority however, acknowledges comments regarding uncertainty about which documents would need to be considered to achieve high performance. It is proposed that a design Supplementary Planning Document would be published to help provide greater clarity in respect of this issue.

Policy BNL2: Heritage Assets

English Heritage considered that it was unclear as to whether the policy served development management purposes as well as setting strategic policy. If it serves as a development management policy, it will need augmenting to provide a more practical framework for decision making as required by the NPPF.

How, where necessary, these issues were addressed

No changes to the policy have been made. The Local Plan will make clear that existing heritage policies within the adopted 1998 Local Plan will be retained. Heritage assets policies will be included in Part 2 of the Local Plan.

Policy BNL3: Biodiversity

The National Trust suggested that the first bullet point could be interpreted to only refer to proposals to develop all, or part of one of these designated sites. However, such sites were well managed and the threat from nearby new development was often the greatest concern. The addition of the wording "that

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

would directly or indirectly impact upon them” at the end of this bullet point is suggested.

The Woodland Trust stated that the protection of ancient woodland, ancient and veteran trees and other irreplaceable semi natural habitats should be included within the policy.

The Environment Agency requested that the policy be amended to include the Water Framework Directives.

Natural England suggest that the first sentence of the policy be reworded, such that it seeks to achieve net gains for nature thereby better reflecting the advice in paragraphs 9 and 109 of the NPPF.

One consultee suggests that biodiversity should be encouraged everywhere and not just in specialised protected areas. Development should attempt to encourage biodiversity by appropriate design.

How, where necessary, these issues were addressed

The word “biodiversity” has been added into the first sentence of the policy, to reflect Natural England’s comment concerning the need to deliver biodiversity gain, as set out in the NPPF.

The words within and adjacent to sites have been added to the first bullet point within the policy, to reflect concern from the National Trust about the ability of sites to be affected by surrounding development.

To reflect the the Environment Agency’s comments, the second bullet point of the policy has been amended to reflect that water quality, means in respect of the Water Framework Directive objectives.

To reflect concern from the Woodland Trust, a sentence has been included within the policy which seeks to protect ancient woodland and veteran trees, unless the needs for and benefits of the development would clearly outweigh the loss.

In response to the comment that biodiversity needs to be encouraged everywhere, the first sentence of the policy has been reworded to state: *“The Local Planning Authority will support development which contributes towards protecting, or improving local biodiversity or geodiversity and delivering net gains in biodiversity wherever possible by”*.

Policy BNL4: Landscape Character and Local Distinctiveness

The National Trust and English Heritage suggest that the policy should make reference to historic landscape character.

Natural England suggests that the plan should safeguard the long term capability of Best and Most Versatile (BMV) agricultural land and make clear that areas of lower quality agricultural land should be used for development, in preference to BMV land.

Nathaniel Lichfield and Partners on behalf of Commercial Estates Group suggest that the following text should be added before the final sentence of the first

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

paragraph, to provide more certainty for developers: “This may include demonstrating that the landscaping proposed will mitigate this loss”.

How, where necessary, these issues were addressed

The proposed changes suggested have been included within the policy. The policy has been amended to; make reference to the historic landscape, the council seeking to protect soils that are Best and Most Versatile and where possible, direct development to areas with lower quality soils. Development will not be permitted if an unacceptable impact on landscape character cannot be satisfactorily mitigated.

Policy I1: Infrastructure and Developer Contributions

A response from a planning consultant highlighted the changes to S106 that would come into effect as a result of the CIL regulations, and emphasised the importance of a thorough viability study to ensure that the CIL did not make development unviable. A resident raised concerns about the ability of Mickleover’s infrastructure to cope with further major housing development.

The National Trust, whilst broadly supportive, noted that the policy and supporting text made no reference to potential heritage related works. The County Council, whilst supportive, considered that the Policy could be improved by providing more detail as to what infrastructure was required. Repton Parish Council raised the need for a new village hall.

How, where necessary, these issues were addressed

A CIL viability study has already been commissioned to ensure that any CIL levy that may be adopted by the Council in the future has been robustly assessed. Furthermore, reference is now made to viability in the Policy when calculating how much infrastructure can be provided on site. A reference to sustainability has been added with respect to the need to provide infrastructure at the right place at the right time. The details of the infrastructure required in order to deliver the Local Plan are set out in the Infrastructure Delivery Plan, rather than in Policy INF1. A replacement for Repton Village Hall has been included within the Infrastructure Delivery Plan.

Policy 12: Sustainable Transport

Gladman Developments believe that Policy I2, Sustainable Transport, is overly long and prescriptive.

Another consultee considers that consideration should be given to the potential for use of canals as a form of transport.

The words “seek to negotiate” in section E(ii) should be replaced by the stronger “secure through negotiation”.

The County Council is disappointed that the transport evidence base outside the Derby Urban Area, has not been fully developed.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

How, where necessary, these issues were addressed

The policy has been drafted in such a way as to ensure that it is capable of achieving its intended purpose, although changes have been made to reduce complexity and improve clarity.

The Trent and Mersey Canal does not lend itself to use for transport purposes.

Wording change regarding negotiation agreed and policy amended accordingly.

Transport modelling for the area of South Derbyshire outside the Derby Urban Area is currently underway.

Policy 13: Strategic Rail Freight Interchange

Queries are raised as to whether and how the potential development of a strategic rail freight interchange at Egginton Common is to be addressed in the Local Plan.

The site promoter and the Environment Agency query the fact that land at Egginton Common is not explicitly protected for this purpose in the Local Plan and that the reference, in Policy I3, to such a development leading to a requirement to review the Local Plan should be deleted. It is also requested that the lower case text be amended to indicate that an application would be determined by the Secretary of State for Transport.

Two respondents suggest that the reference to the rail gauge should be amended to read "W10". English Heritage would like the policy to refer to all types of heritage assets, rather than just listed buildings and conservation areas.

Egginton Parish Council considers that any policy should stem from a strategic approach to this type of development, involving the relevant local authorities. There is a need for a more robust policy statement clarifying the Council's position and indicating support for such development in South Derbyshire, only if it serves the needs of the wider region. Policy criteria should stipulate that no manufacturing or service based development shall take place on site, unless directly related and forming an ancillary part of the existing operation primarily involved in the transport hub business. Evidence in the form of the AECOM report may no longer be relevant due to the withdrawal of the Regional Plan, upon which it was predicated. If it still stands, its conclusions should be checked and challenged.

How, where necessary, these issues were addressed

A criteria based policy, I3, against which any such proposal would be assessed is included in the Draft Plan. Any planning application would be determined by the Secretary of State for Transport. The Draft Local Plan makes provision to accommodate forecast levels of housing and employment growth within a given set of circumstances over the plan period. That set of circumstances does not include the development of a Strategic Rail Freight Interchange. Such development would generate new employment on a large scale, leading to additional population growth in the HMA, with attendant pressure for further housing development. Although there are plans to upgrade the gauge of rail lines, Government guidance on strategic rail freight interchanges indicates that

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

the minimum acceptable gauge to serve this type of development is W8 and no change is therefore proposed. The currency and adequacy of available evidence and consideration as to whether such a facility in South Derbyshire would serve the needs of the wider region would be matters for the decision making body, should an application be submitted. It is not proposed to stipulate that manufacturing or service development should be ancillary to the transport hub business, as it would not be possible to precisely define the limits of this requirement and its enforcement would be impracticable. The policy has been amended to refer to the character and setting of all heritage assets and the lower case text has been altered to refer to applications being determined by the Secretary of State for Transport. No change has been made in respect of the other comments received.

Policy I4: New Road Schemes

Some respondents believe that the transport modelling supporting the South Derby Integrated Transport Link proposal is not credible. One respondent believes that if the link is to be built, phases 1 and 2 should be completed at the same time, as terminating at Stenson Road would be disastrous.

The plan does not refer to improved links between the new river crossing at Drakelow and Swadlincote. Nor does it refer to bringing the redundant railway line in this location back into use.

The County Council is concerned that there is as yet no evidence that the Woodville to Swadlincote Regeneration Route would be feasible, or would mitigate the transport impacts of development proposed under Policy SD9. Nor is there evidence of its environmental impacts. Development at Broomy Farm proposed under Policy H3, will involve the development of a new link road between the A511 and A514, but its value in terms of bringing relief to the rest of the highway network is unknown. The Local Plan ought to be seeking developer contributions from all strategic sites in the Swadlincote urban area toward the delivery of the Woodville to Swadlincote Regeneration Route. The Environment Agency ask that the alignment of the route be shown on the Area Profile map. North West Leicestershire District Council indicates that it would expect an assessment of such a proposal to consider the impact on the wider road network and the neighbouring district. Planning Prospects on behalf of Dyson Group and St Modwen Developments request that the alignment of the proposed Woodville to Swadlincote Regeneration Route be referred to as indicative.

The Highways Agency ask that Policy I4 be amended to refer to all transport schemes required to support the plan. This should include the A38 Derby junction grade separation and junction improvements at the A50/A38 and A50/A514 junctions.

How, where necessary, these issues were addressed

In regard to the South Derby Integrated Transport Link, the Council is satisfied that the modelling methodology and outputs are credible. The outputs demonstrate that the proposed strategic site allocations in this location, as identified in the Draft Local Plan, can be adequately mitigated by the proposed package of measures, which includes the South Derby Integrated Transport Link, Phase 1.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

Proposed strategic development can be accommodated without the need for improved highway links between Swadlincote and Drakelow. Policy I2 within the Draft Local Plan protects land at Castle Gresley for the development of a new railway station and at Tetron Point for a possible rail freight facility. It also protects the line for the possible establishment of a passenger rail service. No changes are proposed.

The gaps in the evidence base relating to the Woodville to Swadlincote Regeneration Route are to be addressed prior to the formal Submission of the Local Plan. It would not be feasible to require developer contributions toward the Woodville to Swadlincote Regeneration Route in relation to all strategic sites in the Swadlincote urban area, as many of these already have the benefit of planning consent. If emerging modelling evidence demonstrates that this piece of infrastructure would help to mitigate the transport impacts of the remaining strategic sites, the need for any contribution can be addressed with reference to Policy I2. The explanation accompanying the policy has been amended to indicate that in planning for the link, account will be taken of the need to avoid any unacceptable impacts on the wider road network, including highways in the adjacent District of North West Leicestershire. The Area Profiles and Area Profile maps will not be carried forward into the Pre Submission Local Plan, instead will be located within the Local Plan Part 2. For the Local Plan Part 2 it will be necessary to amend the Area Profile map to show the indicative alignment of the route and to amend the Area Plan to show indicative alignment of the Woodville to Swadlincote Regeneration Route.

In regard to Highways Agency comments, the A38 Derby junction grade separation scheme lies outside South Derbyshire and it would therefore, be inappropriate to include among the schemes listed in Policy I4. However, the policy has been amended to refer to the A50/A38 and A50/A514 junction improvement schemes.

Policy 15: East Midlands Airport

No comments received in respect of this policy

Policy 16: Community Facilities

An resident commented that the provision of a new cricket pitch in Etwall could not be regarded as a community facility as it would not be accessible to the majority of residents. Another considered that there should be a requirement to provide community facilities to serve Blagreaves and new developments. The Theatres Trust requested a firm, NPPF-compliant, definition of the term 'community facilities' within the policy text or a glossary.

How, where necessary, these issues were addressed

An addition has been made to the policy wording to allow for community facilities to be provided by developers as part of a scheme, rather than only via contributions.

A definition of 'community facilities' has been included in the Local Plan glossary.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

Policy 17: Green Infrastructure

Natural England and the National Trust both expressed support. The House Builders Federation suggested that the policy required viability testing and the National Forest suggested that the policy did not specify a mechanism through which green infrastructure would be delivered and expressed concern that the policy lacked focus on other landscape-scale green infrastructure strategies and plans.

In addition, the National Farmers Union hoped the third paragraph of the policy's explanatory text would apply to larger, rather than smaller, developments as it would not be easy to demonstrate how such proposals would contribute to the Local Biodiversity Action Plan.

How, where necessary, these issues were addressed

In response to the National Forests concern that policy fails to specify a mechanism in which Green Infrastructure will be delivered, the following wording has been added to the policy: *The District Council will seek to conserve, enhance and wherever possible, extend green infrastructure by working with developers and other parties to preserve, improve and create new multifunctional green spaces within development sites and, where appropriate, through financial contribution to fund offsite works. In particular the Council will work with partners to:*

In addition, the following paragraph has been added to reflect the National Forests concern about the policies lack of focus on other landscape scale Green Infrastructure strategies and plans. *Elsewhere new developments will be expected to support and help deliver landscape scale change consistent with the strategy and priorities set out in the 6Cs Green Infrastructure Vision and Strategy and the National Forest Strategy.*

In response to the National Framers Union comments; text has been added to the policy's commentary, regarding the Biodiversity Action Plan and how developers can access further information.

In regard to the policy requiring viability testing, the conservation of biodiversity and delivery of biodiversity gain and wider Green Infrastructure is a requirement of the NPPF. Most sites include elements within a scheme needed to support delivery, such as SuDS, open space provision and strategic planning. This policy seeks to ensure that such spaces which occur on sites are delivered in a multifunctional and coordinated way without increasing costs.

Policy 18: The National Forest

The National Forest Company requests that consideration be given to the inclusion of the Planting Guidelines within the policy, rather than the supporting text, to give them further weight. It suggests direct reference be made to the National Forest Guide for Developers and Planners, with hyperlinks. In addition, the National Forest Company considers that the table within the policy is incorrect and needs amending to show the commuted sum of £20k per hectare, rather than £10k per hectare. Paragraph 5 should specifically refer to the Design Principles of Policy BNL1 to emphasise the requirement to incorporate a National Forest character into new development.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

Planning Prospects on behalf of Dyson Group and St Modwen and Planning Prospect and St Modwen object to the policy. They consider that it should acknowledge that as a policy aim, as opposed to a development mitigation, viability in the provision of National Forest planting is important. In addition, the consultees state that it should be recognised that it may in some instances be preferable to provide for National Forest planting off site, or by way of a commuted sum, rather than only in exceptional circumstances. The need to take account of viability should be acknowledged in the policy. The potential for commuted sums towards off site provision being preferable in some instances should be reflected in policy.

The Heart of the National Forest is pleased that the policy supports the development of tourism and leisure activities, but considers that this seems at odds with policy I10, which is more restrictive in this regard.

In addition, Natural England and National Trust submitted representation in support of the policy.

How, where necessary, these issues were addressed

A hyperlink to the National Forest Company's Guide for Developers and Planners, has been added to the explanatory text. In addition, amendments to the table have been made to reflect the National Forest Company's requested alterations.

Planting guidelines have not been included within the body of the policy. The Council considers that planting guidelines are best excluded from the policy in order that, should guidelines change in the future, it will not render the policy itself out of date. In addition, the Design Principles of Policy BNL1 have not been included within the policy, as Strategic Policy S2 sets out that it is implicit that all developments will be assessed against the plan as a whole.

Policies I8 and I10 have been amended to be consistent with each other. In regards to the comments that viability should be acknowledged within the policy, an amendment has been made to the explanatory text which addresses schemes viability issues.... *"where it can be demonstrated that it would be preferable to deliver planting off site, for example due to lack of land or viability issues, a commuted sum will be negotiated"*.

No amendments have been made in regard to the concerns raised about development mitigation and viability. The policy does not state that forest planting is for mitigation. Further, it is explicit in the explanatory text that where viability is an issue, alternative forest contributions will be sought on a guideline rate.

Policy I9: Open Space, Sport and Recreation

Alterations were suggested as follows:

Cemeteries are a typology of open space, their need is not related to open space, sport and recreation need. If cemeteries are needed, then a separate policy would be required to address this need.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

The Woodland Trust would like to see more commitment to woodland creation in association with new development in part of the district, not covered in the National Forest.

Sport England suggest that the wording of the policy needs to be reviewed in order to ensure that it fully aligns with the NPPF and Sport England's playing fields policy, the use of the term good provision does not fully correspond to the supporting text which correctly refers to the robust assessment of needs and opportunities etc. underpinning the policies. Reference should be made to identifying sites for sports facilities and not just allotments and cemeteries.

In addition Natural England expressed general support for the policy.

How, where necessary, these issues were addressed

Woodland creation has been included within the policy, the term good provision has been removed from the policy, reference has been made to identify sites for sports facilities and the policy wording has been amended to be further aligned to the NPPF.

The Council considers that the reference to the Council working with developers and stakeholders to identify suitable sites for cemetery's where there is an identified lack of provision locally, can be included within the policy and a separate policy is not required.

Policy I10: New Permanent Self Catering Accommodation

The Heart of the National Forest Foundation has asked that Policy I10 be amended to allow the development of any form of self-catering tourist accommodation throughout the Heart of the National Forest area.

Mercia Marina considers that overnight accommodation in marinas should be addressed by Policy I10 and that marina development should also be addressed by Policy E2. Mercia Marina should be identified in the Local Plan for mixed use rural diversification.

The National Trust considers that the policy should be amended to make clear that development that has an adverse impact on heritage assets will not be approved.

How, where necessary, these issues were addressed

The wording of Policy I10 has been amended to refer to all tourism development, including overnight accommodation, in respect of which a less restrictive approach has been taken, whilst the lower case text now specifically refers to marinas. It is considered unnecessary to address marina development in Policy E2, which deals with development in Use Classes B1, B2 and B8 (industrial and business uses). Any potential impact on heritage assets will be addressed with reference to Policy BNL2 "Heritage Assets".

Planning for Places

A few comments were received in support of the chapter, whilst others suggested alterations. These included:

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

The Southern Village Area does not appear to take account of the Burton-on-Trent HMA, within which the area falls, and the close physical connection with the Burton Urban Area.

Objective 2 for the Hatton area is too strong and the wording should be changed to “seek to alleviate”.

Environmental objectives should include the safeguarding of Calke Abbey, its Registered Historic Park and Garden and its wider setting and the safeguarding of the National Nature Reserve at Calke, including from adverse external impacts.

The Registered Historic Park and Garden at Calke is not shown on the Repton Area plan.

How, where necessary, these issues were addressed

It is considered that the Planning for Places section of the Draft Local Plan Part 1 would sit more logically in the Local Plan Part 2. The Local Plan Part 2 will include non-strategic sites to meet comparatively smaller scale development needs and will propose any necessary detailed amendments to settlements and Green Belt boundaries. The Planning for Places section has, therefore, not been carried forward into the Pre-Submission Local Plan Part 1.

Additional Policy Comments

One consultee considers that the District Council should incorporate an appropriate criteria-based policy in the plan for town centre and retail developments, consistent with the NPPF.

How, where necessary, these issues were addressed

The retail element of the strategic policy S1 has been removed and replaced by a strategic retail policy supporting Swadlincote town centre. Further retail policies, including town centre boundaries, will be addressed within Part 2 of the Local Plan.

Do you have any comments on the scope and findings of the Sustainability Appraisal (SA)?

In total 17 consultees answered “no” to this question and 5 responded that they had not seen the SA.

In regard to housing allocations, proposals for development in Etwall received the most comments. These raised questions regarding the SA analysis of the impacts of development in Etwall. Comments included: the SA is incorrect in stating that development is unlikely to have a significant impact on the village road infrastructure. The site appraisal states that there will be beneficial effects in reducing flood risk and the release of surface run off. However there is nothing within the IDP that suggests that this is being addressed. Consultees consider that the development will not reduce flood risk and surface water run-off.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

In addition, a few consultees consider that the John Port is currently offers no spare capacity; that it is unlikely that there will be improved accessibility other than by car and that development will not provide access to healthcare, contrary to what SA states will be the case.

A further consultee states that drainage and sewage requirements must be evaluated.

Comments regarding flooding concern have also been received in regard to Etwall Aston/Weston on Trent, Hilton and Wragley Way, Sinfin.

Comments were also received regarding other settlements. One respondee considers that land at Broomy Farm represents one of the more sustainable options for growth around Swadlincote. Another questions Hackwood Farm's negative scoring compared to other sites, particularly in regards to protecting the existing landscape character and protecting and enhancing the setting of historic cultural, architectural and archaeological features in the District. Another considers that unless the proposed increase in housing is supported by equivalent local employment opportunities, the result may be significant increase in travel by car, which is contrary to a sustainability objective in the Local Plan to reduce the need to travel and encourage sustainable travel modes. One consultee suggests that the SA does not go far enough in looking at whether the level of growth proposed at Sinfin (Stenson Fields) can be delivered.

In regard to site assessments, one consultee considers that no site level consideration of proposed allocations has been made and the SA contains no explanation of the consideration of alternative sites. Another suggests that detailed site assessments need to be undertaken in order for the SA to fully comply with the NPPF. Another considers that housing development in the rural villages has been assessed at a village level, rather than a site level. However, in light of the need for the Council to allocate additional housing in order to meet its full and objectively assessed housing needs, rural sites should be appraised at this stage rather at the Part 2 Local Plan stage.

Additional comments refer to specific aspects of the SA, but have not been mentioned more than once. These include:

- It does not appear that the Lea Farm site is considered in the SA. This needs to be included in order to comply with the SEA Regulations.
- Regarding housing options, the Government housing projection is the highest performing option in terms of delivering sustainability objectives. Therefore, the Council's justification of the lower growth option does not sit comfortably with the board mix appraisal.
- The SA will need to be revisited to consider the implications of planning properly to meet its full and objectively assessed housing needs.
- Under Section 5.4, renewable energy is identified as a Themed Option. However, by 5.62 it is downgraded simply to "energy efficiency".
- Would like to see an explanation of "sustainable" within the documents.
- One consultee questions particular indicators/targets within the SA.
- One consultee questions the SA conclusion that a criteria based policy for the determination of Strategic Rail Freight Interchanges would be appropriate. The Consultee goes on to add a list of changes which should be made to the SA regarding the Etwall Common analysis.

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

How, where necessary, these issues were addressed

The Council considers that a large majority of the comments received do not materially relate to the Sustainability Appraisal, but are objections the proposed housing allocations.

However site assessments have now been undertaken for potential development sites exceeding 5ha in size or which are capable of accommodating 100 dwellings or more.

Do you have any comments regarding the Draft Consultation Statement?

The majority of responses made no any comments in regard to this question. Those that did commented on how South Derbyshire had consulted stakeholders, as follows:

- The National Federation of Gypsy Liaison Groups says that the Draft Consultation Statement reinforces its concern that no serious attempt has been made to engage with the Gypsy population in the area.
- According to the document, efforts have been made to involve communities. However, it needs to be recognised that despite numerous methods of communication being employed, many individuals have great difficulties accessing information and therefore cannot respond.
- Those without internet access are “handicapped” in commenting.
- The Statement supports the view that the District Council has followed due process, whilst ignoring the views of residents opposed to the intended relentless urbanisation of South Derbyshire.
- The Draft Local Plan consultation events were not publicised or timed well enough to allow all local residents to attend.
- Documents for feedback were not promoted correctly and were not user friendly.
- One consultee does not understand the lengthy process and is not clear as to the next steps.
- Unable to find, or has not seen the document to comment.
- Consultation seems to be set for everyone to agree, not taking on board the worries of residents.
- It seems to ask people to rubber stamp decisions that they are not sufficiently qualified, or experienced, to judge.
- There have been meetings for local residents, which were informative.
- On Page 23 (21 of the document) there is an indication that Etwall residents, again favoured affordable housing, which supports the validity of their original parish plan.
- Cannot find a reference in previous consultations to the District Council identifying Etwall sites for consultation, prior to the Bloor Homes proposal to develop the Willington Road site. It would appear that this proposal is driven by private commercial interest rather than democratic process.
- Central Government needs to be aware of local feelings and should not be allowed to force unwelcome building prospects in Derby.
- There is too much detail within the documents to enable consultees to comment.

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

How, where necessary, these issues were addressed

The responses received regarding the Draft Consultation Statement make reference to how South Derbyshire has consulted stakeholders, not the soundness of the document. No alterations to the content of the document have been made based on the result of consultees comments.

Although not directly related to the content of the Consultation Statement in terms of its soundness, a comment has been raised that the Draft Local Plan consultation events were not published or timed well enough to allow all local residents to attend. To address this issue for the Pre Submission Local Plan Part 1 consultation, Parish Councils and Parish Meetings have been emailed or sent a hard copy (for those without an email address) of a poster advertising the upcoming consultation events. The poster was sent out 18 days before the start of the consultation period. In addition, the Pre Submission Local Plan Part 1 consultation events will carry on later into the evening than the drop in events for the Draft Local Plan Part 1.

Do you have any comments regarding the Infrastructure Delivery Plan (IDP)?

A total of 23 consultees stated that a replacement of Repton Village Hall should be included within the IDP. This was the most frequently made comment received. A further 11 consultees simply stated “no” in response to this question.

The majority of comments were regarding issues within the respondees own communities. The main concerns raised were road infrastructure, school and healthcare capacity and sewerage and drainage problems.

In addition, the following comments were made:

- The Theatre Trust referred to the inclusion of the quotation in the IDP of the NPPF reference to “social care”, commenting that the term did not appear anywhere else in the document indicating inconsistency. They also considered that the Infrastructure Delivery Plan should include community and cultural facilities within item 17 to reflect one of the 12 Core Planning Principles.
- The Royal Mail considered that the scale of the proposed growth might place a significant burden on the existing delivery offices, potentially resulting in a need for a new delivery office. A new site for such a facility or developer contributions through Section 106 or community Infrastructure Levy, may be needed.
- Sport England queried the absence of sports provision in the Social Infrastructure Delivery Schedule and queried the background to social infrastructure.
- The Highways Agency was satisfied that the Draft IDP addressed key transport issues and welcomed the inclusion of "A50 Junction Improvements Local Mitigation to the south of Derby", whilst suggesting that the stated cost be changed from £1 million to £2 million. They were

South Derbyshire District Council Consultation Statement (Regulation 22 Statement)

content with the majority of the rankings in the IDP, but considered that the South Derbyshire Integrated Transport Link and A50 Junction Improvements could be regarded as "high" rather than "medium" priorities.

- The Environment Agency asked to be involved in discussions with Severn Trent Water Ltd in regard to wastewater treatment infrastructure, as a constraint to growth identified in the Water and Flooding chapter. They also listed the sites affected by inadequate sewerage infrastructure.

A number of comments from developers and planning agents included specific reference to particular sites and requests for alterations to the IDP. These included:

- The Transport Delivery Scheme is lacking any reference to potential SFRI development.
- The IDP states that "the proposed development at Hackwood Farm will require a new high voltage cable running from Derby City to the west of the City" and indicates that a Section 106 agreement is a potential funding source. The planning agent/developer wants to make clear that funding for such infrastructure improvements would be agreed in a contract between Miller Homes and Western Power Distribution.
- The IDP identifies a need for a new temporary double classroom at Hilton Primary School and indicates that funding for this has been committed. The IDP does not refer to the need for a new primary school, yet housing allocation H7 is in part justified on the basis that a site for such a facility would be provided.

How, where necessary, these issues were addressed

The replacement of Repton Village Hall has been included within the Infrastructure Delivery Plan. Road infrastructure requirements, school capacity and provision and healthcare capacity and provision are covered by Policy INF1: Infrastructure and Developer Contributions and in producing the Infrastructure Delivery Plan, the Council continues to work with the Highways Agency, Highways Authority, Education Authority and Healthcare providers to establish where new provision is, or will be, required. The provision of sewerage and foul water drainage is a statutory requirement for water companies.

The term 'social care', quoted from paragraph 162 of the NPPF in the Infrastructure Plan is not considered to be the same thing as social infrastructure. Rather, it is considered that social care falls under the banner of health infrastructure. The twelfth Core Planning Principle, as listed in paragraph 17 of the NPPF has been included in the Infrastructure Delivery Plan.

The existing Royal Mail delivery offices and Royal Mail's possible requirements as a consequence of future growth are now referred to in the text of the Infrastructure Delivery Plan. A new delivery office has not been included in the Schedule at this stage, particularly because the requirement is not a definite one.

As part of continuing work on the Infrastructure Delivery Plan, the 'Social' infrastructure delivery schedule has become 'Sport, Recreation, Open Space and

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

Social' infrastructure and now includes several infrastructure projects which fall under that banner.

Following the Highways Agency response, the cost of delivering 'A50 Junction Improvements Local Plan Mitigation to the south of Derby' has been increased from >£1million to >£3million. The ranking used within the IDP has been removed, instead prioritisation will be resolved as the Local Plan is implemented.

The infrastructure concerns highlighted by the Environment Agency have been included in the IDP.

With regard to the SRFI, the Council is not promoting the development of an SRFI in the District and any decision would be for the Secretary of State for Transport to make. No assumptions can be made as to whether an SRFI will be developed in the District, nor concerning measures that may be needed to support such development. The IDP has been amended to reflect the comment regarding the high voltage cable, in relation to the proposed development at Hackwood Farm. The IDP now includes a new primary school at Hilton in the Schedule.

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

List of appendices

Pre Submission local Plan

Appendix H1:	Statement of Representation Procedure
Appendix H2:	Poster
Appendix H3:	Advert on screens in Main Reception
Appendix H4:	Banner
Appendix H5:	Response Form
Appendix H6:	Summary Leaflet
Appendix H7:	Press Release
Appendix H8:	Twitter Page

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

Issues and Ideas appendix

Appendix A1:	Letter sent to statutory consultees
Appendix A2:	Letter sent to general amenity consultees
Appendix A3:	Letter sent to South Derbyshire Councillors
Appendix A4:	Letter sent to Parish Councils
Appendix A5:	Summary leaflet
Appendix A6:	Email to Local Strategic Partnership Board Members
Appendix A7:	Emails to Partners of Local Strategic Partnership
Appendix A8:	Follow up email to consultees
Appendix A9:	Questionnaire
Appendix A10:	Press release (6 th February 2009)
Appendix A11:	Burton Mail news article
Appendix A12:	Poster advertising Etwall public meeting (produced by residents)
Appendix A13:	Notes from Etwall consultation meeting
Appendix A14:	Burton Mail news article
Appendix A15:	Burton Mail news article
Appendix A16:	This is Derbyshire article
Appendix A17:	PowerPoint slides presented to the Local Strategic Partnership (09/01/2009)
Appendix A18:	PowerPoint slides presented at the LFF Member Workshop (17/03/2009)
Appendix A19:	PowerPoint slides presented at the member priorities seminar (14/07/2009)
Appendix A20:	Burton Mail article
Appendix A21:	Burton Mail article
Appendix A22:	Issues and Ideas consultation summary report

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

Issues and Alternative Options appendix

Appendix B1:	Letter to consultees
Appendix B2:	Email to consultees
Appendix B3:	Email to South Derbyshire Councillors
Appendix B4:	Letter to South Derbyshire Councillors
Appendix B5:	Letter to Parish Councils
Appendix B6:	Letter to South Derbyshire's MP
Appendix B7:	Further email to consultees (10 th February 2010)
Appendix B8:	Further letter to consultees (26 th March 2010)
Appendix B9:	Poster
Appendix B10:	Leaflet
Appendix B11:	Questionnaire
Appendix B12:	HMA joint press release
Appendix B13:	South Derbyshire press release
Appendix B14:	South Derbyshire press release
Appendix B15:	Derby Telegraph news article (26 th January 2010)
Appendix B16:	Example of presentation given to the Area Forums – example from Swadlincote (26 th January 2010)
Appendix B17:	Issues and Alternative Options consultation summary report

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

Your Neighbourhood: Talk to Us appendix

Appendix C1:	Letter to consultees
Appendix C2:	Email to consultees
Appendix C3:	Letter to South Derbyshire MP
Appendix C4:	Email to South Derbyshire Councillors
Appendix C5:	Letter to Parish Councils
Appendix C6:	Follow up email to consultees
Appendix C7:	Letter to school pupils
Appendix C8:	Flyers
Appendix C9:	Poster with all consultation dates on
Appendix C10:	Example of poster targeted to specific neighbourhood area (Swadlincote and Woodville)
Appendix C11:	Example of poster target to specific neighbourhood area (Aston)
Appendix C12:	Questionnaire
Appendix C13:	Exhibition Boards
Appendix C14:	Example of a PowerPoint presentation used at exhibitions targeted to specific neighbourhoods area (Swadlincote and Woodville example)
Appendix C15:	Example of Twitter posts
Appendix C16:	Press release 31 st January 2011
Appendix C17:	Press release 24 th February 2011
Appendix C18:	Melbourne Village Voice Press Release (April 2011)
Appendix C19:	Article in the Burton Mail community page (6 th February 2011)
Appendix C20:	Derbyshire First Newspaper article (January Edition)
Appendix C21:	Say no to Mickleover Sprawl webpage screenshots
Appendix C22:	Invite to HMA training events for elected members

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

- Appendix C23: HMA training events for elected member's agenda
- Appendix C24: PowerPoint presentation used at HMA training events for elected members
- Appendix C25: PowerPoint slides used at Parish Liaison meeting
- Appendix C26: PowerPoint slides used in values and attributes group
- Appendix C27: Your Neighbourhood: Talk to Us consultation summary report

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

Options for Housing Growth appendix

Appendix D1:	Letter to consultees
Appendix D2:	Email to consultees
Appendix D3:	Email to South Derbyshire Councillors
Appendix D4:	Letter to Parish Councils
Appendix D5:	Letter to South Derbyshire's MP
Appendix D6:	Follow up email to consultees
Appendix D7:	Letter to primary school pupils
Appendix D8:	Poster
Appendix D9:	Questionnaire
Appendix D10:	Exhibition boards at the drop in events
Appendix D11:	Summary Leaflet
Appendix D12:	Twitter announcements
Appendix D13:	Press release 7 th July 2011
Appendix D14:	Press release 21 st July 2011
Appendix D15:	Hilton and Dove Valley Life press release
Appendix D16:	Repton magazine press release
Appendix D17:	Hatton News press release
Appendix D18:	Etwall Express press release
Appendix D19:	Melbourne Village Voice press release
Appendix D20:	Willington Magazine press release
Appendix D21:	Posting made by Council on mickleoverpeople.co.uk
Appendix D22:	Article – Burton Mail Community Page
Appendix D23:	Banner on South Derbyshire's District Councils webpage
Appendix D24:	PowerPoint slides from Derby HMA Business Community ACS Phase 2 Consultation Event

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

- Appendix D25: PowerPoint slides used for presentation to the Sustainable Development Partnership, Sustainable Development Group
- Appendix D26: PowerPoint slides used for Parish Council Training
- Appendix D27: PowerPoint slides used at the Derby HMA Housing Requirement Study stakeholder workshop
- Appendix D28: Derby HMA Local Development Framework newsletter
- Appendix D29: Options for Housing Growth Consultation summary report

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

Preferred Growth Strategy appendix

Appendix E1:	Letter/email to consultees and Parish Councils
Appendix E2:	Letter to South Derbyshire's MP
Appendix E3:	Letter to Parish meetings
Appendix E4:	Follow up email to consultees (24 th October 2012)
Appendix E5:	Follow up email to consultees (5 th December 2012)
Appendix E6:	Follow up letter to Parish Councils (24 th October 2012)
Appendix E7:	Flyer
Appendix E8:	Poster
Appendix E9:	Advert on screens in main reception
Appendix E10:	Banner
Appendix E11:	Questionnaire
Appendix E12:	Display Boards used in drop in events
Appendix E13:	Summary Leaflet
Appendix E14:	Updated poster
Appendix E15:	Case study of the social media used by Northgate Public Services to promote the Preferred Growth Strategy consultation
Appendix E16:	Etwall Express press release
Appendix E17:	Hatton News press release
Appendix E18:	Hilton Dove Valley magazine press release
Appendix E19:	Melbourne Village Voice press release
Appendix E20:	Repton Parish Magazine press release
Appendix E21:	Walton Newsletter press release
Appendix E22:	Willington Resource 2012 press release
Appendix E23:	Derbyshire First press release
Appendix E24:	Press release 10 th October 2012

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

- Appendix E25: Press release 12th October 2012
- Appendix E26: Press release 21st September 2012
- Appendix E27: Press release 21st September 2012
- Appendix E28: Press release 7th December 2012
- Appendix E29: Melbourne Village Voice article (November 2012)
- Appendix E30: Swadlincote Post article (30th November 2012)
- Appendix E31: Derby Telegraph Online article (14th November 2012)
- Appendix E32: List of stakeholders who attended HMA stakeholder event
- Appendix E33: Content of Local Plan Blog
- Appendix E34: PowerPoint presentation Slides used at Local Strategic Partnership, Sustainable Development Group
- Appendix E35: Print Screen of You Tube Video
- Appendix E36: Preferred Growth Strategy Consultation summary report

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

Draft Local Plan Appendix

Appendix F1:	Letter to consultees
Appendix F2:	Email to consultees
Appendix F3:	Letter to Parish Councils and meetings
Appendix F4:	Letter to Parish Council
Appendix F5:	Letter to Parish meetings
Appendix F6:	Additional email to consultees
Appendix F7:	Email to Parish Councils with attached poster
Appendix F8:	Poster
Appendix F9:	Advert on screens in main reception
Appendix F10:	Banner
Appendix F11:	Paper Questionnaire
Appendix F12:	Online Questionnaire with discrepancy
Appendix F13:	Online questionnaire uploaded on website on the 24 th October
Appendix F14:	Letter to consultees regarding online questionnaire
Appendix F15:	Screenshots of South Derbyshire District Council website
Appendix F16:	Exhibition Boards
Appendix F17:	Summary Leaflet
Appendix F18:	Press release 26 th September 2013
Appendix F19:	Press release 26 th September 2013
Appendix F20:	Burton Main Article, 28 th September 2013
Appendix F21:	Flyers
Appendix F22:	Screenshots of Local Plan Blog
Appendix F23:	Screenshots of South Derbyshire District Council Twitter posts
Appendix F24:	Email regarding attendance of Infrastructure Planning Briefing
Appendix F25:	Invitation to Infrastructure Planning Briefing
Appendix F26:	Infrastructure Planning Briefing Programme
Appendix F27:	Draft Local Plan consultation responses

**South Derbyshire District Council
Consultation Statement (Regulation 22 Statement)**

Miscellaneous appendix

Appendix G1: Number of people attending each drop in events in each consultation

Appendix G2: List of consultees