Appendix E: Verbatim Responses to the Local Plan for Derby, Regulation 19 Consultation

Contents

1. Introduction 1
2. Spatial Portrait 17
3. Vision and Objectives 31
4. Overarching Spatial Strategy 59
5. General Development Principles 76
   Policy GD1: Placemaking Principles 77
   Policy GD2: Character and Context 84
   Policy GD3: Amenity 84
   Policy GD4: Accessible Places 86
   Policy GD5: Community Safety and Resilient Places 88
   Policy GD6: Health and Wellbeing 88
   Policy GD7: Comprehensive and Coordinated Development 98
   Policy GD8: Enforcement 102
   Policy GD9: Infrastructure and Developer Contributions 102
   Policy GD10: Advertisements 116
   Policy GD11: Shopfronts 118
6. Housing 119
   Policy H1: Housing Delivery 123
   Policy H2: Residential Development – General Criteria 365
   Policy H3: House Extensions 388
   Policy H4: Affordable Housing 388
   Policy H5: Looked After Children 408
   Policy H6: Communal Living Accommodation 416
   Policy H7: Accommodation for Older People and People with Disabilities 416

Policy H8: Proposals Which Would Create a New House in Multiple Occupation ... 421
Policy H9: Intensification of Existing Houses in Multiple Occupation ... 428
Policy H10: Student Accommodation ... 428
Policy H11: Self-Build, Custom Build and Community Build Homes ... 428
Policy H12: Gypsies, Travellers and Travelling Showpeople ... 428
Housing Allocations Outside of the City Centre ... 436
Policy HA1: Rykneld Road, Littleover ... 439
Policy HA2: Brook Farm, Chaddesden ... 456
Policy HA3: East of Moorway Lane, Littleover ... 463
Policy HA4: Royal Hill, Spondon ... 468
Policy HA5: The Hollow, Mickleover ... 469
Policy HA6: Kingsway Boulevard ... 493
Policy HA7: Stoney Lane, Spondon ... 493
Policy HA8: Former Police Station, Cotton Lane ... 1104
Policy HA9: Bramblebrook House/Humbleton View, Littleover ... 1107
Policy HA10: Elton Road Works ... 1108
Policy HA11: Shaftesbury Street ... 1112
Policy HA12: North of Sinfin Moor Lane ... 1115
Policy HA13: Former Beaufort Business Centre, Chaddesden ... 1117
Policy HA14: Kitchener Avenue/Browning Street ... 1117
Policy HA15: Former Ivy House School ... 1128
Policy HA16: Gypsy and Traveller Site Allocation ... 1128
7. Economy ... 1175
Policy E1: New Employment Locations ... 1181
Policy E2: Existing Employment Locations ... 1190
Policy E3: Local Labour Agreements ... 1193
Policy E4: Office Development ... 1196
Policy E5: Land South of Wilmore Road (Infinity Park) ... 1196
Policy E6: SmartParc, Spondon ... 1204
Policy E7: Indurent Park ... 1207
Policy E8: Rolls-Royce Operations ... 1207
Policy E9: Defined Centres ... 1207

Policy E10: Main Town Centre Uses Outside of Centres 1209
Policy E11: Tourism and Culture..... 1212
Policy E12: Managing the Proliferation of Specific In-Centre Uses 1212
8. Natural Environment..... 1213
Policy EN1: Green and Blue Infrastructure 1214
Policy EN2: Dark Infrastructure 1240
Policy EN3: Open Space, Sport and Recreation Buildings 1240
Policy EN4: Allotments and Community Gardens..... 1246
Policy EN5: Green Belt 1247
Policy EN6: Green Wedges 1274
Policy EN7: Green Gaps 1293
Policy EN8: Biodiversity and Geodiversity 1294
Policy EN9: Trees and Hedgerows 1297
Policy EN10: Biodiversity Net Gain 1304
Policy EN11: Air Quality..... 1314
Policy EN12: Contaminated Land..... 1322
Policy EN13: Pollution 1323
9. Historic Environment 1330
Policy HE1: Conserving and Enhancing the Historic Environment 1332
Policy HE2: Derwent Valley Mills World Heritage Site 1338
Policy HE3: Darley Abbey Mills Complex..... 1338
Policy HE4: Listed Buildings and Locally Listed Buildings 1338
Policy HE5: Conservation Areas 1339
10. Climate Change..... 1342
Policy CL1: Flood Risk and Water Management 1343
Policy CL2: Our City Our River (OCOR) 1347
Policy CL3: Sustainable Design & Construction 1348
Policy CL4: Renewable & Low Carbon Energy 1360
Policy CL5: Low Carbon Energy Centres 1361
Policy CL6: Embodied Carbon 1361
11. Infrastructure and Community..... 1366
Policy IC1: Social and Community Facilities 1368

Policy IC2: Cemetery 1378
Policy IC3: Education Provision 1380
Policy IC4: Higher and Further Education 1381
Policy IC5: Communication Infrastructure 1381
12. Transport and Movement 1382
Policy T1: Active and Sustainable Transport 1383
Policy T2: Strategic Transport Infrastructure 1388
Policy T3: Servicing, Accessibility and Parking 1409
Policy T4: Protected Routes 1411
Policy T5: Electric Vehicle Charging Facilities 1413
13. City Centre 1415
Policy CC1: City Centre Strategy 1416
Policy CC2, Defining the City Centre 1418
Policy CC3: City Centre Living 1419
Policy CC3: City Centre Living 1422
Policy CC4: Residential Led, Mixed Use Site Allocations 1422
Policy CC5: Non-Residential Regeneration Opportunities 1446
Policy CC6: Tall Buildings 1446
Policy CC7: Business, Creativity and Learning 1455
Policy CC8: Shopping, Eating and Drinking 1457
Policy CC9 Active and Inclusive Frontages 1459
Policy CC10: Streets and Spaces 1462
Policy CC11: Derby Riverside 1462
Policy CC12: University of Derby, City Centre Hub 1478
Policy CC13: Railway Station Quarter 1481
Policy CC14: North Castleward 1506
14. Monitoring and Review 1510
Policy MH1: Monitoring and Review 1511
15. Appendix 1: Monitoring Indicators 1520
16. Appendix 2: Housing Trajectory 1521
17. Appendix 3: Table of Strategic and Non-Strategic Policies 1522
18. Appendix 4: Guidance on Parking Provision 1524

19. Appendix 5: Open Space Standards 1526

20. Appendix 6: List of Wildlife Sites and Locally Important Geological Sites — List of Wildlife Sites and Locally Important Geological Sites 1527

21. Appendix 7: Superseded Policies 1527

22. Glossary 1528

Green Wedge Review 1529

Sustainability Appraisal 1535

Sustainability Appraisal 1586

Local Plan Viability Assessment (Residential) 1639

Infrastructure Delivery Plan 1643

Photographs submitted with representations 1652

This document should be read in conjunction with the Regulation 22 Consultation Statement, Part 2: Regulation 19 document.

The following table is a compendium of representations submitted to the Council in response to the Regulation 19 Submission Draft Plan consultation which ran between 27 July and 8 September 2026.

Each representation is published in full, although there are some instances where text is redacted to ensure that personal information or inflammatory comments are not disclosed.

Representations marked with an asterisk (*) indicates people/organisations who wish to appear at the examination.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
1. Introduction								
OR260	Carney Sweeney on behalf of Peveril Homes Limited*	Introduction	Support			Overall, the Draft Local Plan's strategy to undertake a full review of the adopted Local Plan is appropriate to deal with both strategic and non-strategic matters and to provide a comprehensive and up-to-date basis for decision making in the city. The new Local Plan approach will ensure that the strategic matter of accommodating future growth and unmet housing need in Derby is co-ordinated both within and outside the Derby Housing Market Area ('HMA'). The capacity constraints of Derby are a significant factor and undertaking a full review of the Local Plan allows for		Support welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						strategic policies and proposed allocations to be examined to address the unmet housing need.		
OR233	The Coal Authority	Introduction	N/A	N/A	N/A	The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas. Our records do not indicate the presence of any coal mining features at surface or shallow depth, which may pose a risk to surface stability and public safety, within the Derby City area. On this basis the Planning team at the Coal Authority have no specific comments to make on this consultation document.		Comments noted. The Council welcomes confirmation that no coal mining features at surface or shallow depth are recorded within the city.
OR104 & C519	George Fletcher*	Introduction	Object			Thank you for your notice about the Regulation 19 (Submission Plan) Consultation. As far as I'm concerned the regulation 18 "consultation" is		Details of how the Regulation 18 consultation was carried out and publicised are set out in Part 1 of the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						null and void because nobody was told of its existence. I only heard through another individual who had found out. I assume this lack of publicity was intentional by the council, since clearly a lot of local objections would be against the council's wishes.		Consultation Statement. The Regulation 19 consultation has given all parties a further opportunity to comment on the Plan. No change required.
C507	Community Campaigner David Barton	Section 1.1	Object	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for	Entirety of Document: "Authentic Traditional Architecture Design Codes will be integrated to accord with all key stakeholders' requirements providing practical benefits alongside strong economic, ecological and environmental advantages."	Noted. Design quality is secured through Policy GD1 and the Plan's other design and heritage policies (HE1-HE7), which respond to local character without prescribing a single architectural style or a blanket ban on demolition. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						national and international pressures.		
OR261	Emery Planning on behalf of Seabridge Developments Limited*	Paragraph 1	Object		No	Paragraph 22 of the Framework makes clear that strategic policies are those which make provision for housing, employment and other types of growth. It also requires strategic policies to cover a 15-year plan period from adoption: "Strategic policies should look ahead over a minimum 15 year period from adoption[14], to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery[15]" The proposed plan period is 2023 to 2043. The monitoring	Therefore, the plan period should be extended to 2044 as a minimum based on adoption before 31 March 2029, but preferably 2045 to allow greater flexibility for a longer examination, without having to amend again the plan period and the consequential amendments to the supply.	Noted, please be aware, we are seeking to adopt the plan in late 2027 or early 2028 rather than 2029. The Plan looks ahead to 2043 and paragraph 752 sets out the circumstances that would trigger its review. Recent examinations, including Leicester and Charnwood in 2026, have accepted plan periods of less than 15 years from adoption where extending them would delay plan-led delivery across a housing market area, which would be the case in the Derby HMA. Given the context of proposed local government reorganisation changing local authority boundaries,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						base date for the housing and employment strategic policies is 31 March. Therefore, for the plan to have an end date of 31 March 2043 it will need to be adopted by 31 March 2028, to provide a full 15-year period for the strategic policies on adoption. The Council's proposed timetable for the Local Plan is as follows: Regulation 19 consultation – Summer 2026 Examination in Public – Spring 2027 Adoption – Summer 2027 The Council's timetable is not realistic. It assumes no delays and an examination period of just a few months, with little to no flexibility in the timetable. Many Local Plan examinations have historically taken multiple years. Indeed, the monitoring data shows that for all plans found to be sound (not adoption) in the last two years		and the plan being subject to statutory review significantly before this end date it is the council's view that no change is required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						(2025 and 2026), the median time from submission to being found sound was 561 days[2]. Pendle Borough Council was the quickest, being found sound within 275 days, or just over 9 months. On the other hand, York City Council's plan was not found to be sound for over 6 years and 9 months. Taking the example of a neighbouring authority, the Amber Valley Regulation 19 consultation opened in February 2024 but the plan was only adopted in March 2026. This demonstrates the significant delays that so often occur during the examination process. This issue has also been recently addressed by the Inspectors for the Wiltshire Local Plan. In the Inspector's letter dated 27th February 2025 they stated: "The revised spatial strategy topic paper (SD/16) shows the Plan period of 2020-2038 commencing in advance of the date of the most up-to-date calculation of Local Housing		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Need. In that regard, the plan period would look forward around 13 years from the current date which the Council seeks to justify as being 15 years from the date of the assessments of housing and employment needs. However, paragraph 22 of the Framework (September 2023) expects strategic policies to look ahead over a minimum of 15 years following adoption of the Plan. As a result, the submitted Plan would not appear to look sufficiently far ahead to anticipate and respond to long-term requirements and opportunities. We identify this matter to you at this early stage as it is clearly a matter of concern and one which will have implications for the rest of the examination, including our consideration of whether the Plan is positively prepared and consistent with national policy with respect to the overall amount of housing and employment land to be identified."		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						We also refer to the recent Shropshire Local Plan. In paragraphs 28 and 29 of their letter dated 10 December 2024, the Inspector's stated: "The submitted Plan at paragraph 2.18 anticipated that the Plan would be adopted in 2022 and therefore have a minimum of 15 years from adoption, as expected by paragraph 22 of the National Planning Policy Framework July 2021 (the Framework). The current Plan period is 2016-2038. Given the further work that would be necessary for soundness it is unlikely the Plan would be adopted until 2026, at the earliest. This means there would be a maximum of 12 years left of the Plan period from adoption. Consequently, as well as the increases in the requirements associated with contributing to meeting BC needs, at least three additional years would need to be added to the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						housing and employment requirements, and the Council would need to find at least an additional three years' worth of supply. Any extensions to the plan period would also need to be supported by up-to-date evidence and may have implications for the soundness of the proposed spatial strategy." (our emphasis) The Shropshire Local Plan was ultimately withdrawn from examination, with this being one of the reasons why the plan was unable to proceed to main modifications and be adopted. Clearly, that is a fate that any Council should seek to avoid.		
OR259	Emery Planning on behalf of The Strategic Land Group*	Paragraph 1	Object		No	Paragraph 22 of the Framework makes clear that strategic policies are those which make provision for housing, employment and other types of growth. It also requires strategic policies to cover a 15-year plan period <u>from adoption</u>: "Strategic policies should look ahead over a minimum 15 year period from adoption[14], to	Therefore, the plan period should be extended to 2044 as a minimum based on adoption before 31 March 2029, but preferably 2045 to allow greater flexibility for a longer examination, without having to amend again the plan period	The Plan looks ahead to 2043 and paragraph 752 sets out the circumstances that would trigger its review. Recent examinations, including Leicester and Charnwood in 2026, have accepted plan periods of less than 15 years from

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery[15]" The proposed plan period is 2023 to 2043. The monitoring base date for the housing and employment strategic policies is 31 March. Therefore, for the plan to have an end date of 31 March 2043 it will need to be adopted by 31 March 2028, to provide a full 15-year period for the strategic policies on adoption. The Council's proposed timetable for the Local Plan is as follows	and the consequential amendments to the supply.	adoption where extending them would delay plan-led delivery across a housing market area, which would be the case in the Derby HMA. Given the context of proposed local government reorganisation changing local authority boundaries, and the plan being subject to statutory review significantly before this end date it is the council's view that no change is required. We will also refer to plan period in our updated HMA statement of common ground.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Regulation 19 consultation – Summer 2026 Examination in Public – Spring 2027 Adoption – Summer 2027 The Council's timetable is not realistic. It assumes no delays and an examination period of just a few months, with little to no flexibility in the timetable. Many Local Plan examinations have historically taken multiple years. Indeed, the monitoring data shows that for all plans found to be sound (not adoption) in the last two years (2025 and 2026), the median time from submission to being found sound was 561 days[2]. Pendle Borough Council was the quickest, being found sound within 275 days, or just over 9 months. On the other hand, York City Council's plan was not found to be sound for over 6 years and 9 months. Taking the example of a neighbouring authority, the Amber Valley Regulation 19 consultation opened in February 2024 but the plan was only adopted in March		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						2026. This demonstrates the significant delays that so often occur during the examination process. This issue has also been recently addressed by the Inspectors for the Wiltshire Local Plan. In the Inspector's letter dated 27th February 2025 they stated: "The revised spatial strategy topic paper (SD/16) shows the Plan period of 2020-2038 commencing in advance of the date of the most up-to-date calculation of Local Housing Need. In that regard, the plan period would look forward around 13 years from the current date which the Council seeks to justify as being 15 years from the date of the assessments of housing and employment needs. However, paragraph 22 of the Framework (September 2023) expects strategic policies to look ahead over a minimum of 15 years following adoption of the Plan. As a result, the submitted Plan would not appear to look		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						sufficiently far ahead to anticipate and respond to long-term requirements and opportunities. We identify this matter to you at this early stage as it is clearly a matter of concern and one which will have implications for the rest of the examination, including our consideration of whether the Plan is positively prepared and consistent with national policy with respect to the overall amount of housing and employment land to be identified." We also refer to the recent Shropshire Local Plan. In paragraphs 28 and 29 of their letter dated 10 December 2024, the Inspector's stated: "The submitted Plan at paragraph 2.18 anticipated that the Plan would be adopted in 2022 and therefore have a minimum of 15 years from adoption, as expected by paragraph 22 of the National Planning Policy Framework July		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						2021 (the Framework). The current Plan period is 2016-2038. Given the further work that would be necessary for soundness it is unlikely the Plan would be adopted until 2026, at the earliest. This means there would be a maximum of 12 years left of the Plan period from adoption. Consequently, as well as the increases in the requirements associated with contributing to meeting BC needs, at least three additional years would need to be added to the housing and employment requirements, and the Council would need to find at least an additional three years' worth of supply. Any extensions to the plan period would also need to be supported by up-to-date evidence and may have implications for the soundness of the proposed spatial strategy." (our emphasis) The Shropshire Local Plan was ultimately withdrawn from examination, with this being		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						one of the reasons why the plan was unable to proceed to main modifications and be adopted. Clearly, that is a fate that any Council should seek to avoid.		
OR230	Marrons on behalf of Ainscough Strategic Land	Paragraph 3	Support		Yes	We raise no objection to the proposed plan period. The period to 2043 provides an appropriate long-term framework for planning and investment decisions and is sufficient to support the strategic delivery of housing, employment and infrastructure. Our representations therefore focus on the extent to which the Plan's strategy can be demonstrated to meet identified needs and be effectively delivered over that period, rather than the duration of the plan period itself.		Support for the plan period welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
2. Spatial Portrait								
C507	Community Campaigner David Barton	Paragraph 4	Object	Yes	No	Authentic Traditional Architecture Design Codes must be so integrated to ensure circular success for all key stakeholders.	Entirety of Document- Authentic Traditional Architecture Design Codes must be so integrated to ensure that residents and businesses can harness this greatest USP of Derby.	Noted. Design quality is secured through Policy GD1 and the Plan's other design and heritage policies, which respond to local character without prescribing a single architectural style. No change required.
OR162	Historic England	Paragraph 4	Support			We support the varied references to the historic environment within the first two chapters and consider they are useful to set the scene about the importance of heritage within the City, and its need to be protected and conserved.		Support welcomed.
C537	Rob Hoddinott	Paragraph 6	Object	No	No	HA16 is contrary to this. You mention “however spatial Inequalities persist in regards to the accessibility to Green spaces” this proposal makes this even worse, How can a local plan be authorised to exacerbate a problem.	Move to non green spaces location	Policy HA16 requires the land beyond the fenced pitches to remain as accessible public open space and to be improved with further planting. The alternatives considered are set out

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								in the Gypsy and Traveller Site Provision Topic Paper; no brownfield sites for Gypsy and Traveller use were promoted through the call for sites, or otherwise made available. No change required.
C537	Rob Hoddinott	Paragraph 10	Object	No	No	HA 16 is removing the park space that is to fondly mentioned here.	Move to brownfield location.	Policy HA16 requires the land beyond the fenced pitches to remain as accessible public open space and to be improved with further planting. The alternatives considered are set out in the Gypsy and Traveller Site Provision Topic Paper; no brownfield sites for Gypsy and Traveller use were promoted through the call for sites, or otherwise made available. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
C531*	Roy Woolley*	Paragraph 10	Object	Yes	No	Matter / Policy Reference: Section 2 (Spatial Portrait, Para 10), Section 13 (City Centre, Paras 663, CC4c), and the Infrastructure Delivery Plan (IDP) Soundness Tests Failed: Positively Prepared, Justified, and Consistent with National Policy (NPPF 96(c) – Promoting Healthy and Safe Communities) 'Data Deficits' is the technical background PDF uploaded in response to 485 with file name Data_Deficits_Regulation_19_Draft__Roy_Woolley_FINAL.pdf. Reason the Policy is Unsound: The plan presents an unevidenced and contradictory strategy for sport, leisure, and climate resilience. 1. The Aquatic Infrastructure Deficit: Paragraph 10 cites Moorways Sports Village as providing versatile leisure "for the whole community". In reality, closing Queen Street Baths in the City Centre has centralised aquatic provision into a single facility that is several miles away from the inner-urban core (Data Deficits, Section 8, 12); moreover, this site is already	1. Modify the Infrastructure Delivery Plan (IDP) and developer contribution requirements (CIL / S106 schedules) to ring-fence funding to provide or reinstate an accessible, public indoor sports and aquatic facility within the central/inner-urban area. 2. Extend NO2 and PMx monitoring to the most densely populated/used sections of Osmaston Road. Plan ahead and establish a defined response mechanism should monitored levels approach or exceed relevant limit values. 3. Amend Chapter 10 and City Centre policies to explicitly require public urban cooling infrastructure, accessible green/blue	Decisions on the operation of individual leisure facilities, such as Queen Street Baths, are made outside the Plan process; the Infrastructure Delivery Plan identifies the infrastructure needed to support planned growth and Policy GD9 secures developer contributions where justified. Air quality is addressed through Policy EN11 and the Council's statutory air quality monitoring. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						heavily used by multiple schools, swimming groups and employees located at the large Sinfin Rolls-Royce campus directly adjacent to it. Allocating thousands of new dwellings across the city - including the redevelopment of the Queen Street Leisure Centre site itself under CC4(c) and other areas - while simultaneously failing to replace local civic sports infrastructure, has created and will continue to deepen an acute social deficit. 2. Transport and Health Compounding: Section 96(c) of the 2024 NPFF explicitly states planning policies and decisions should "enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities". Moorways is located in an area (Osmaston) where poverty and reduced life expectancy have	respite spaces, and active health facilities capable of serving high-density residential populations.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						been recorded for decades. It is reasonable to assume that a significant proportion of the thousands of new residents wishing to swim will travel to Moorways by car, further increasing traffic density on an already heavily used stretch of road 3. Failure on Extreme Heat & Climate Respite: Chapter 10 (Climate Change, Paras 556–558) focuses heavily on flood risk but contains a complete policy void regarding urban cooling spaces, public heat respite, and accessible aquatic facilities.		
C507	Community Campaigner David Barton	Paragraph 15	Object	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including	Entirety of Document- Establish authentic Traditional Architecture Design Codes for new construction to bring cohesion amongst all key stakeholders on strong practical grounds.	Noted. Design quality is secured through Policy GD1 and the Plan's other design and heritage policies, which respond to local character without prescribing a single architectural style. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.		
C537	Rob Hoddinott	Paragraph 17	Object	No	No	HA16 exacerbates this inequality by introducing a new group of people who are very deprived. HA16 location sits in Derby 024F neighbourhood for deprecation and this is “more deprived that most neighbourhoods within Derby”	Move to less deprived area.	The Gypsy and Traveller Site Provision Topic Paper explains that the site was chosen because it can meet the full identified need on one site, with independent access and good access to schools, health services and shops. Policy HA16 retains the remainder of the land as accessible public open space. No change required.
OR104 & C519	George Fletcher*	Paragraph 18	Object	No	No	No assessment has been made on the adverse mental health effects on approximately 320 households in Wilmorton loosing their park.	The council needs to show that they have assessed the mental health effects on the residents of	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							Wilmorton, and have compared this with the other 46 parks in Derby.	with further planting, so the park will remain available to local residents. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR104 & C519	George Fletcher*	Paragraph 19	Object	No	No	Destroying the green space in the deprived area of Wilmorton is totally in opposition to the stated aim of improving wellbeing.	The council needs to demonstrate that it has compared the wellbeing effects of destroying the green space in all 46 parks in Derby. For example, the percentage loss of green space in Darley Park would be infinitely less.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting, so the park will remain available to local residents. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
C537	Rob Hoddinott	Paragraph 19	Object	No	No	HA16 sits with Derby 024F neighbourhood for deprivation index and its worst score of all categories is Health and Disability, the policy indicates access to takeaways and the importance of open space to exercise. HA16 proposed area	Move proposed location to less deprived area that can absorb these peoples health needs better	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting, and Policy GD6 addresses health and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						has a very high number of takeaways and the only open space is being removed/limited.		wellbeing in new development. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
C533	Jordan Booth	Paragraph 25	Object	Yes	No	In reference to Policy HA16: These are woodlands with mature trees and a grassy area for recreation. Have you truly evidenced the ecological and arboriculture value of the region? Were alternatives, which wouldn't flatten an ecological area and negate climate control contribution, considered?	The loss of biodiversity which freshens the area around us must be compensated if this plan is to go ahead. First and foremost, Policy HA16 must be reviewed to make sure it abides by the environmental aims of the proposal.	Policy HA16 recognises the mature trees and active travel links on the site and requires the remainder of the land to remain as accessible public open space with further planting; biodiversity net gain will be required under Policy EN10. The alternatives assessed are set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR104 & C519	George Fletcher*	Paragraph 25	Object	No	No	As a key part of the structure of the city, green wedges play a pivotal role, so destroying Wilmorton Park is totally at odds with this. No assessment	Find an alternative location that isn't destroying a key green space for the approx. 320	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						has been made into the proportion of the park will be destroyed by the 17 pitches.	Wilmorton households.	with further planting. The site selection process and alternatives are set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR104 & C519	George Fletcher*	Paragraph 26	Object	No	No	Derby's 1,126.20 hectares of open green space is also protected due to its plentiful benefits such as health, biodiversity and reducing flood risk. Destroying Wilmorton Park is clearly at odds with this.	An alternative location needs to be found that does not involved destroying a key green space for the approx. 320 households of Wilmorton.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process and alternatives are set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR104 & C519	George Fletcher*	Paragraph 29	Object	No	No	A strength is an extensive green wedge and green infrastructure across the city. Destroying Wilmorton Park is completely at odds with this.	An alternative location needs to be found that doesn't involve destroying the key green space for approx. 320 households of Wilmorton.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process and alternatives are set out in the Gypsy and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								Traveller Site Provision Topic Paper. No change required.
C537	Rob Hoddinott	Paragraph 29	Object	No	No	Strength table talks about green spaces. HA16 is contrary to this.	Move to brownfield site	Policy HA16 retains the land beyond the fenced pitches as accessible public open space. No brownfield or other sites were promoted for Gypsy and Traveller use, and the alternatives assessed are set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
C510	Marsha Ramroop Unheard Voice Consultancy Ltd*	Paragraph 29	Support	Yes	No	This plan says the right things about inclusion, and this Publication draft says more of them than the January draft did; my representations are directed at making sure it also does them, through policy wording that will hold at examination, in viability negotiation and on site. I would be glad to appear at examination in support of these representations if helpful, and to support the Council's work on inclusive engagement,	I respond both as a resident of Derby and as Founder and Director of Unheard Voice Consultancy (UVC), an equity, diversity and inclusion consultancy specialising in Cultural Intelligence, inclusive leadership and culture change in the built environment. I am	Comments noted and welcomed. Specific points on inclusion are responded to under the relevant policies, and the Council will continue to engage on inclusive engagement as the Plan progresses. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						equalities assessment and design review as the plan progresses.	the author of Building Inclusion: A Practical Guide to Equity, Diversity and Inclusion in Architecture and the Built Environment (Routledge), was the inaugural Director of Inclusion and Diversity at the Royal Institute of British Architects, and lead-authored the Formula 1 DEI Charter with the Royal Academy of Engineering. I also serve as a Non-Executive Director at the Joint Nature Conservation Committee and the Marine Management Organisation; this response is made in a personal and UVC capacity and does not represent the views of either body. Recognising that representations at	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							this stage should address the tests of soundness, each representation below states the relevant ground. My overall position is supportive: the plan's brownfield and City Centre first strategy is right, its Spatial Portrait is honest, and this Regulation 19 draft is stronger on inequality than the January draft, now acknowledging at paragraphs 6 and 17 that spatial inequalities and uneven patterns of deprivation persist across the city. My representations are directed at one theme: ensuring that the plan's Inclusive City commitments are carried by policy wording strong enough to be effective at	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							examination, in viability negotiation and in delivery. Where I object, I do so constructively and propose specific modifications.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
3. Vision and Objectives								
OR260	Carney Sweeney on behalf of Peveril Homes Limited*	Paragraph 30	Support			Paragraph 15 of the NPPF emphasises that "succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings". We consider that, overall, the proposed Vision does set out a positive vision.		Support welcomed.
OR260	Carney Sweeney on behalf of Peveril Homes Limited*	Paragraph 30	Object			It is noted that the Vision does not specifically deal with the level of housing need. Whilst this matter is discussed in detail at Section 4 in terms of the Spatial Strategy and also in Paragraph 20 of the Spatial Portrait (and identified as a 'threat' in Table 1: Derby's Strengths, Weaknesses, Opportunities and Threats), it does not appear to be reflected in the Vision or Objectives. The Council may wish to consider whether housing need should be more explicitly reflected		Noted. The Vision commits to delivering homes sufficient to meet the needs of a growing population (paragraph 32), and the scale of need and how it will be met is set out in Section 4 and Policy H1. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						within the Vision and Objectives.		
C507	Community Campaigner David Barton	Paragraph 30	Object	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic	Entirety of Document- Authentic Traditional Architecture has the power to unlock Derby's full potential and so must be fully supported across each part of the Vision.	Noted. Design quality is secured through Policy GD1 and the Plan's other design and heritage policies, which respond to local character without prescribing a single architectural style. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.		
OR162	Historic England	Paragraph 30	Support			We support the varied references to the historic environment within the first two chapters and consider they are useful to set the scene about the importance of		Support welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						heritage within the City, and its need to be protected and conserved.		
OR128	Home Builders Federation*	Paragraph 30	Object		No	HBF welcomes the Council's vision for the City Centre and the wider Derby area and the recognition in the Plan of the challenges facing the City, in particular the clarity around the approach to meeting the full requirement for new market and affordable homes, through development beyond the City boundary . However, we would suggest that the Plan could be doing more to support SME builders through additional small and medium sized allocations. HBF request that the role of all new housing, including new open-market housing, in creating a sustainable Derby and wider-Derby region is more explicitly recognised within the Plan's vision and objectives.		The Plan allocates sites of varying sizes, and the windfall allowance is founded on the historic delivery of small sites, which are typically built by SME builders, as set out in the Windfall Allowance Paper. The Vision already recognises the role of 'different types, sizes and tenures of homes, both for market sale and affordable housing in meeting the city's needs' (paragraph 32). Further detail is set out in the Affordable housing topic paper. No change required.
C537	Rob Hoddinott	Paragraph 30	Object	No	No	HA16 is not consistent with this vibrancy and health claim.	Move to brownfield site.	Policy HA16 retains the land beyond the fenced pitches as accessible public open

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								space, to be improved with further planting. No brownfield or other sites were promoted for Gypsy and Traveller use, and the alternatives assessed are set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR255	South Derbyshire District Council	Paragraph 30	Support			SDDC supports the vision of the of Local Plan, in particular (as set out in paragraph 32) that Derby will deliver sufficient homes to meet the needs of a growing population, (paragraph 45) that the City Centre will be transformed through residential led regeneration, and that Derby will remain compact and liveable.		Support welcomed.
OR255	South Derbyshire District Council	Paragraph 31	Object			The vision in the Local Plan should be focused on development within Derby City's administrative area and/or should be clear that development outside of the City's authority boundary is not		Paragraph 51 sets out the Council's aspirations for how urban extensions should be planned and does not bind neighbouring authorities, whose

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						within the direct control of Derby City (e.g. paragraph 51).		own plans govern development outside the city. The Council will continue to work with South Derbyshire District Council through the Statement of Common Ground. No change required.
OR260	Carney Sweeney on behalf of Peveril Homes Limited*	Paragraph 35	Object			The recognition of the Derby Green Wedge review in the Vision is welcomed. It is noted that the term 'narrowed' in reference to the Green Wedge has been used at Paragraph 50 of the Draft Local Plan; this does not accurately reflect all the changes proposed to the Green Wedge which includes proposals for deletion and additions to the Green Wedge. We would suggest that this is reviewed for accuracy and clarity.		Noted. The changes to individual Green Wedges, including additions and deletions, are set out in Policy EN6 and the Green Wedge Review (2025); the Vision is a high-level statement of outcomes and the regulation 19 consultation reflects the plan, and the green wedges at adoption. No change required.
OR104 & C519	George Fletcher*	Paragraph 35	Object	No	No	Destroying Wilmorton Park is completely at odds with the aim of increasing green spaces.	An alternative site needs to be found that does not destroy the key green space for the approx. 320	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							households of Wilmorton.	with further planting. The site selection process and alternatives are set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR162	Historic England	Paragraph 34	Support			We support paragraph 34 and recognise it as a really clear goal for the City Council to help steer appropriate development within the area.		Support welcomed.
C537	Rob Hoddinott	Paragraph 35	Object	No	No	HA16 is totally contrary to this claim.	Move to brownfield site.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process and alternatives are set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR513	Matthew Buchanan*	Paragraph 37	Object	Yes	No	Policy HA16 completely contradicts this paragraph and directly takes vital, accessible landscapes and footpaths away	Policy HA16 is reconsidered and that the Council: publishes or	Policy HA16 retains the land beyond the fenced pitches as accessible public open

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						from a community with a lack of personal private recreation space	identifies the assessment of a distributed-site alternative; demonstrates why HA16 performs better than reasonable alternatives; undertakes or publishes robust site-specific ecological and arboricultural evidence; demonstrates how existing active-travel routes and accessible public open space will be retained; and clarifies how the environmental effects acknowledged in the Sustainability Appraisal are consistent with the Plan's wider policies on green infrastructure, biodiversity and trees.	space and recognises the active travel links and mature trees on the site. The Gypsy and Traveller Site Provision Topic Paper sets out the assessment of nearly 90 Council-owned sites, and SA Appendix G explains that a single site of around 0.85ha meeting the full need is the Council's preferred approach; ecological and tree matters will be addressed at application stage under Policies EN8, EN9 and EN10. No change required.
OR162	Historic England	Paragraph 34	Support			Paragraph 37 would benefit from a reference to heritage.		Noted. The historic environment is

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								addressed throughout the Vision, including paragraphs 38 and 39, and in Policies HE1-HE7. No change required.
OR162	Historic England	Paragraph 38	Support			We support paragraphs 38 and 39 in the Plan and again see this as a clear goal for the City Council to help steer appropriate development within the area.		Support welcomed.
OR162	Historic England	Paragraph 39	Support			We support paragraphs 38 and 39 in the Plan and again see this as a clear goal for the City Council to help steer appropriate development within the area.		Support welcomed.
OR29	The Woodland Trust	Paragraph 40	Object	Yes	No	As drafted, the policy/supporting text does not clearly demonstrate how growth beyond the city's boundaries will be planned and managed in a manner consistent with the protection afforded to irreplaceable habitats in national policy. The plan is therefore not sound because it is not fully consistent with national policy and has not	For the plan to be sound, the Woodland Trust believes the Council should include explicit wording confirming that future site allocations and development proposals required to meet housing needs will avoid loss or	Paragraph 40 concerns development outside the control of the City Council's boundaries. We would work with HMA partners (or within the context of local government re-organisation) to promote a vision for sustainable growth

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						adequately justified how growth requirements can be accommodated whilst avoiding harm to ancient woodland.	deterioration of ancient woodland and other irreplaceable habitats, in accordance with national policy.	(as set out in para 40) which includes these protections. However currently they are outside our planning control and would depend on the adjacent authorities local plans and national policy. Ancient woodland and other irreplaceable habitats are protected by national policy and by Policies EN8 and EN9, which apply to all development in the city. Growth outside the city boundary will be planned through the relevant neighbouring local plans, which are subject to the same national policy protection. No change required.
OR41	Councillor Tim Prosser	Paragraph 46	Object		No	A number of new policy tests and technical standards appear in the document published for Regulation 19 consultation that		The Regulation 19 consultation was carried out on the published Plan, and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						were not in the agreed draft, including: New vision-level statements committing to make "sustainable and active travel the natural choice" and describing the cycling and public transport network as having been "strengthened." Para 46 None of these are corrections of the draft text — each is new policy substance, imposing new obligations on developers or committing the Council to new positions, that a consultee reading only the agreed draft version would not have seen and that were not passed by cabinet or council. It's been explained to me that these changes were made under delegated powers to **"make minor changes for the purposes of presentation, error correction and clarity"** to the document approved by cabinet and council before its publication for Regulation 19		all parties, including councillors, have had the opportunity to comment on its content. The Council is satisfied that the Plan has been prepared in accordance with the relevant legal and procedural requirements, which will be set out in its submission documents, including a schedule of the changes made via delegated powers between Council and Publication, and why they fell within the delegated authority. The EiP will determine the soundness of the plan. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						consultation. This objection concerns whether that delegation has been exceeded and the documents contents altered substantially from the regulation 18 consultation and the agreed draft.		
OR104 & C519	George Fletcher*	Paragraph 50	Object	No	No	How can a "qualitive improvement" compensate for the destruction of Wilmorton Park?	An alternative location that does not lead to the destruction of a key green space for the approx. 320 households of Wilmorton need to be found.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process and alternatives are set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR41	Councillor Tim Proser	Paragraph 51	Object		No	A number of new policy tests and technical standards appear in the document published for Regulation 19 consultation that were not in the agreed draft, including: A new test for “urban extensions,” requiring them to be planned as mixed-use places that “reduce the need for long		The Regulation 19 consultation was carried out on the published Plan, and all parties, including councillors, have had the opportunity to comment on its content. The Council is satisfied that the Plan has been

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						car-based trips" and support "viable public transport, walking and cycling networks." Para 51 None of these are corrections of the draft text — each is new policy substance, imposing new obligations on developers or committing the Council to new positions, that a consultee reading only the agreed draft version would not have seen and that were not passed by cabinet or council. It's been explained to me that these changes were made under delegated powers to **"make minor changes for the purposes of presentation, error correction and clarity"** to the document approved by cabinet and council before its publication for Regulation 19 consultation. This objection concerns whether that delegation has been exceeded and the documents contents altered substantially from the regulation 18 consultation and the agreed draft.		prepared in accordance with the relevant legal and procedural requirements, which will be set out in its submission documents, including a schedule of the changes made via delegated powers between Council and Publication, and why they fell within the delegated authority. The EiP will determine the soundness of the plan. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR104 & C519	George Fletcher*	Paragraph 56 OBJ2	Object	No	No	Destroying the open space at Wilmorton is totally at odds to this.	An alternative location needs to be found that does not involved destroying the key green space used by the approx. 320 households of Wilmorton.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process and alternatives are set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
C537	Rob Hoddinott	Paragraph 56 OBJ2	Object	No	No	56. OBJ2 To develop stronger, safer and more cohesive communities through the provision of quality housing, employment opportunities, education, health care, open space, sport, recreation HA16 is totally contrary to this objective.	Move to brownfield site.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. No brownfield or other sites were promoted for Gypsy and Traveller use, and the alternatives assessed are set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR230	Marrons on behalf of	Paragraph 56 OBJ2	Support		Yes	We support the principle of Objective 2 which seeks to		Support welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
	Ainscough Strategic Land					develop stronger, safer and more cohesive communities through the provision of quality housing, employment opportunities, education, health care, open space, sport, recreation, leisure and community facilities.		
OR80	Councillor J Wright	Paragraph 56 OBJ2	Object		No	Not justified: The Council at its meeting dated 26th February approved an amendment to the MTFP that: It was moved by Councillor J Wright and seconded by Councillor Smale that the minute was amended by the addition of the following words: 1. That £0.150m be added to the budget for Communities and Place for the purposes of Regeneration of the City Centre through Housing, to be funded from resource to support additional capacity as defined by the Delivery Board to deliver future savings and efficiencies of £0.250m. 2. To note that a £0.150m one-off external, specialist consultancy report		The City Centre housing capacity work commissioned following the Council's budget decision has identified further opportunities for homes on upper floors and infill sites, which supports the Plan's City Centre strategy and windfall allowance. The City Centre Topic Paper which was part funded from this budget will be published alongside the evidence base at submission. The Plan already follows a brownfield and City Centre first approach, releasing Green Belt

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						will identify suitable locations in the city centre for homes. The city centre having better/closer public transport, health, education, employment prospects and leisure facilities than green field sites will provide the infrastructure required for residents that would benefit most: younger residents, older (including those with extra care needs), looked-after children, and temporary accommodation. The report will focus on: • building upon the capacity work already undertaken for the local plan to consider the provision of minimum, maximum and average unit numbers for the strategic city centre sites Riverside, Castleward, Northern Gateway and Station Gateway • the capacity testing should include master-planning/layouts for the major city centre housing led regeneration sites as stated above. Particularly for Riverside • the report could additionally provide some high level evidence around strategic housing requirement, viability		and Green Wedge land only where needed, as set out in the Housing Requirement and Spatial Strategy Topic Paper. It is important, and we have ensured that all allocations proposed in the submission plan are demonstrably deliverable. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						testing, market demand/requirement and deliverability of these sites. The report will also aim to identify sufficient locations/numbers to reduce / remove the pressure on our green belt and green wedges. The initiative will lead to increased certainty for developers by providing a robust demand analysis, increased social housing for the city and protection of 8 our precious green spaces. This motion provided a counter-balance to the previously completed 'Green Belt Review' that examined the city's green belt, wedges and other green spaces to identify sufficient locations to help to meet the city's housing needs requirement. This review focussed only on protected green spaces within the city boundaries and there was no comparative brownfield site review to support the Council's stated ambitions of a) protecting and enhancing the green belt/wedges and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						utilising a 'brownfield first' approach. The budget amendment, above, was agreed to support a comprehensive review of brownfield/other non-green sites within the city centre and develop 'City centre regeneration through housing' strategy. This report has not yet been produced to provide that balance to the green belt review and so preceding with the emerging plan is not balanced, is inconsistent with national policy, local policy 'brownfield and city centre first (para 81) and fails to comply with Council policy regarding the budget whilst also frustrating the will of the Council by not waiting for the 'city centre regeneration through housing' review to be completed and integrated into the process.		
C537	Rob Hoddinott	Paragraph 57 OBJ3	Object	No	No	Concreting over a park is contrary to this objective. It adds to climate change not reduces it.	Move to brownfield site where the impact will be reduced.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting, and Policy CL3 sets sustainable design

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								and construction standards for new development. No private brownfield or other sites were promoted for Gypsy and Traveller use, as set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR36	Derby Climate Coalition	Paragraph 59 OBJ5	Object	Yes	No	We see no reason to mention tall buildings as an objective, especially given the restrictions proposed in policy CC6.	Leave out the phrase "developing tall buildings in appropriate locations"	Policy CC6 and the Tall Buildings Study identify where tall buildings may be appropriate, so their reference in Objective 5 is consistent with the Plan's approach to making the best use of previously developed land. Construction of tall buildings is implicit in the capacity numbers being assumed in the city centre. No change required.
C537	Rob Hoddinott	Paragraph 59 OBJ5	Object	No	No	I provided a list of numerous sites which could be considered, non of this was mentioned	Plenty of small brownfield sites are	No privately owned sites were promoted for Gypsy and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						when the local plan post consultation document was issued. We have seen no efforts in securing a site which meets this criteria. It's as if the site was already decided and everything else available has been ignored (one site which has been empty for 10 years and would have been suitable is evidently now being developed for retail.	available.	Traveller use through the call for sites, so the Council assessed nearly 90 of its own sites to secure a deliverable site, as set out in the Gypsy and Traveller Site Provision Topic Paper. Sites suggested during consultation that are not in Council ownership, and not promoted could not be shown to be available for this use. No change required.
OR255	South Derbyshire District Council	Paragraph 59 OBJ5	Support			SDDC are also very supportive of objective 5 of the local Plan which aims to make the best use of previously developed land and vacant or under used buildings in urban or other sustainable locations, including bringing empty homes back into use and developing tall buildings in appropriate locations.		Support welcomed.
C537	Rob Hoddinott	Paragraph 60 OBJ6	Object	No	No	This is not balanced with the HA16 proposals. Bringing people in the lowest	Move to less deprived area than	The Gypsy and Traveller Site Provision Topic Paper

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						socioeconomic category into one of the most deprived areas of this city is not balanced, it's the opposite.	can absorb this.	explains that the site was chosen because it can meet the full identified need on one site, with independent access and good access to schools, health services and shops. Policy HA16 retains the remainder of the land as accessible public open space. No change required.
OR230	Marrons on behalf of Ainscough Strategic Land	Paragraph 60 OBJ6	Support		Yes	Similarly, it is right to recognise through Objective 6 that there is a continued need to work with neighbouring authorities to make the best provision for unmet need.		Support welcomed.
OR255	South Derbyshire District Council	Paragraph 60 OBJ6				In addition, the Local Plan should contain a stand-alone housing objective to support the maximum feasible delivery of housing within the City boundary and that it is should not rely solely on a stand-alone housing objective that supports the delivery of Derby's unmet housing need outside of your administrative area		Noted. Objective 5 prioritises the best use of previously developed land within the city, and Policy H1 maximises delivery within Derby's evidenced capacity, as agreed through the Dec 2024 HMA SoCG and set out in the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								Housing Requirement and Spatial Strategy Topic Paper. No change required.
OR104 & C519	George Fletcher*	Paragraph 61 OBJ7	Object	No	No	Objective to protect and improve Derby's natural environment by developing a network of green infrastructure based around our parks and other green open spaces is totally at odds with destroying Wilmorton Park.	An alternative location that does not involve the destruction of the key green space for approx. 320 households of Wilmorton.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process and alternatives are set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
C537	Rob Hoddinott	Paragraph 61 OBJ7	Object	No	No	HA16 is contrary to the "Green City" objective.	Move to brownfield site.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. No brownfield or other sites were promoted for Gypsy and Traveller use, as set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR36	Derby Climate Coalition	Paragraph 62 OBJ8	Object	Yes	No	The current plan says "To enhance the role of Derby's Green Wedges by recognising and protecting them in terms of their contribution towards creating a network of Green Infrastructure that improves access to open spaces and the countryside, brings the countryside into the city, defines the character of our neighbourhoods and providing opportunities for supporting education, sport, recreation, healthy lifestyles, biodiversity and adapting to climate change." The S19 draft says "To enhance and strengthen the role of Derby's Green Belt, Green Wedges and Green Gaps by reviewing, recognising and protecting them in terms of their contribution ……" However, reviewing appears to mean not strengthening Green Wedges but deleting them or downgrading the remains to "Green Gaps" thereby negating their purpose.	The plan does not support this objective, so it should be deleted, or preferably, the plan proposals changed to support the objectives as defined in the 2017 plan.	Reviewing the Green Wedges as part of the plan making of this plan was essential to ensure they remain robust into the future in planning terms. The Green Wedge Review (2025) assessed the function of each Green Wedge, and land has been released only where the wedge function is weak and /or a viable wedge can be retained, as set out in the Housing Requirement and Spatial Strategy Topic Paper. Policy EN6 continues to protect the remaining Green Wedges. Whilst we are narrowing some Wedges, deleting Lees Brook and re-allocating Littleover / Mickleover as a Green Gap, the majority of land currently allocated is being

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								protected; also some significant areas are being added into GW designations. Therefore, overall it is reasonable to say that taken as a whole, we are protecting the principle of GWs at a citywide level. No change required.
OR161	Derbyshire County Council	Paragraph 62 OBJ8	Support	Yes	Yes	In its comments on the Regulation 18 Draft Local Plan, the County Council considered that there was one important omission from the Plan's objectives relating to Green Belt, noting that although there are limited areas of Green Belt within the City, which are mainly located to the north-west, north-east, east and south-east of the City, these areas of Green Belt have previously been assessed as being of significant strategic importance in previous Green Belt reviews of the Nottingham Derby Green Belt, particularly in meeting a number of key Green Belt purposes set out in the NPPF (see further comments		Support welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						below relating to Green Belt policy). The County Council, therefore, recommended that the importance of the Green Belt should be reflected in the Objectives for the Plan. It is welcomed and supported, therefore, that this issue has now been addressed in the Regulation 19 Plan in Objective OBJ8, which now includes reference to the need 'To enhance and strengthen the role of Derby's Green Belt, Green Wedges and Green Gaps…'		
OR161	Derbyshire County Council	Paragraph 62 OBJ8	Support	Yes	Yes	The objective above is fully supported by the County Council, which recognises the importance of the City's Green Wedges. Historically, Derbyshire County Council has been supportive of the City Council's policy approach to defining Green Wedges dating back to the 1990 and 2001 Derby and Derbyshire Structure Plans, which has previously recognised the importance of Green Wedges in the City in helping to frame the district		Support welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						identity of its different neighbourhoods and provide green lungs extending from within the city to the open countryside and Green Belt beyond the City's urban areas, providing a valuable recreational resources for the City's residents. The County Council has been aware that the City's Green Wedges have experienced significant development pressure in recent years, particularly from new housing developments given the City's limited capacity for additional housing land and so the County Council fully supports the Plan's objective to enhance and strengthen the role of the remaining Green Wedges in the City.		
OR104 & C519	George Fletcher*	Paragraph 62 OBJ8	Object	No	No	Objective to enhance and strengthen the role of Derby's Green Belt, Green Wedges and Green Gaps by reviewing, recognising and protecting them in terms of their contribution towards creating a network of Green Infrastructure	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	The Wilmorton site is not Green Belt, Green Wedge or Green Gap. Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						that improves access to open spaces. Destroying Wilmorton Park is totally at odds to this objective.		with further planting. The site selection process and alternatives are set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
C537	Rob Hoddinott	Paragraph 62 OBJ8	Object	No	No	HA16 is contrary to everything here.	Use a brownfield site.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space. No brownfield or other sites were promoted for Gypsy and Traveller use, as set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
C537	Rob Hoddinott	Paragraph 63 OBJ9	Object	No	No	HA16 is contrary to just about every element of these objectives. Open space and opportunity for play is being reduced.	Move to brownfield site.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process and alternatives are set out in the Gypsy and Traveller Site

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								Provision Topic Paper. No change required.
OR162	Historic England	Paragraph 64 OBJ10	Support			Page 64, we support Objective 10.		Support welcomed.
OR36	Derby Climate Coalition	Paragraph 66 OBJ12	Object	Yes	Yes	We support the addition of “as well as access to green and blue spaces for all within easy walking distance” to this objective.		Support welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
4. Overarching Spatial Strategy								
OR260	Carney Sweeney on behalf of Peveril Homes Limited*	Overarching Spatial Strategy	Support			The Spatial Strategy refers to the constraints of the city's boundaries and the pressure such constraints place on accommodating growth. To accommodate the city's growth for the plan period, it is noted that Derby City Council have been working closely with the HMA authorities of Amber Valley and South Derbyshire ('Derby HMA'), with Paragraph 77 of the Draft Local Plan stating as follows: "Taking these studies together with the statement of common ground between the HMA authorities and the progress on the Amber Valley and South Derbyshire Local Plans, the HMA's housing needs can be most sustainably met with the delivery of 12,500 homes through this plan, and the remaining requirements being delivered through the Amber Valley and South Derbyshire Local Plans."		Support for the HMA approach and Policy H1 noted and welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						A Statement of Common Ground between the Derby HMA authorities is published as part of the Evidence Base (dated February 2026) ('the Derby HMA SofCG'). The Derby HMA SofCG is noted to set out the housing need and housing supply position of each of the three HMA authorities in Tables A and B, extracts of which are below: Refer to Annex 1, Table 1 Refer to Annex 1, Table 3 The continued work between the Derby HMA Authorities is acknowledged through Policy H1: Housing Delivery of the Draft Local Plan, which sets out the approach to meeting housing needs in Derby over the Plan Period (2023-2043). Parts a) and b) of Policy H1 state that the Council will: "a) facilitate the delivery of a minimum of 12,500 new, high-quality mixed tenure homes within the city between 2023 and 2043;		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						b) work with neighbouring local authorities to co-ordinate and plan urban extensions to the city to ensure comprehensive development, connectivity and integration with established areas…" Overall, we are supportive of the Council's approach to liaise with the Derby HMA authorities and to accommodate the minimum housing requirement of 12,500 new homes within the city, which our client's site, forming part of proposed allocation Policy HA5: The Hollow, Mickleover, will contribute to.		
OR240	Pegasus Planning on behalf of Catesby Estates*	Overarching Spatial Strategy	Object	No	No	The draft Plan confirms that the City Council is not able to fully meet the Local Housing Need identified for the City through the Government Standard Method. It is noted at paragraph 77 of the draft Plan that the scale of development that can be met within the city is a minimum of 12,500 homes over the plan period.	The capacity for housing within Derby City should be reassessed in light of updated supply information, and the proposed plan period, and the overarching Spatial Strategy should be modified in light of the up to date	The interim capacity statement was published in October 24 and provided a position as at July 24. We then published the Reg 18 in January 2026 and the Reg 19 in the Summer of 2026. The publication of the Reg 18 and 19 both provided an

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Paragraphs 75 and 76 of the Submission Draft Plan provide the Council's explanation for the 12,500 homes. Paragraph 75 refers to the work undertaken jointly by the Derby Housing Market Area (HMA) authorities 'Derby Housing Market Area Growth Options Study 2021' whereas paragraph 76 refers to 'Derby City and South Derbyshire Councils Local Housing Needs Assessment'. It should however be noted that the 12,500 capacity is the same as expressed in the Local Plan consulted upon at Regulation 18 in March 2026, and which our client made representations outlining that the figure was not based upon up to date information. The figure of 12,500 quoted for the March 2026 Regulation 18 consultation was taken from the Derby Housing Land Capacity: Position Paper October 2024 which estimated that their housing capacity supply over the period 2022-2039 (17 years)	capacity position. The SA report section 5.2 should be modified to include clear reasons for the selection and rejection of each reasonable alternative identified.	update to the capacity position. The derivation of the 12,500 capacity figure is set out in Section 11 of the Housing Requirement and Spatial Strategy Topic Paper, and the figure is agreed across the Derby HMA through the Statement of Common Ground, which will be updated as the HMA plans progress. The Sustainability Appraisal outlines the reasons for selecting the alternatives assessed (Section 5 and Appendix C), as Schedule 2 of the SEA Regulations requires, and the reasons for preferring Option A are explained in Section 4 of the Site Selection Topic Paper. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						was 12,500 and set out the components of this potential supply. The plan period now being proposed is 2023-2043, this is a 20 year plan period with an additional three years to that considered in the Position Paper. It is therefore unclear whether the evidence underpinning the capacity figure is up to date and reflects this longer period. It is anticipated that over an additional three years there may be further windfalls for example and there may be larger sites that may not have been completed within the previous plan period where further homes might be delivered. The updated Statement of Common Ground (February 2026) notes that the new plan period '*rolls forward the 2024 Standard Method with May 2025 inputs by 4 years but does not factor in any additional supply for these 4 years as there*		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						is no updated evidence of additional capacity beyond the 12,500 already identified'. As presented, the capacity figure of 12,500 dwellings stated in the draft Plan is based on evidence from 2024, does not take account of latest Government Local Housing Need figures and does not take account of up to date monitoring. The Plan is therefore not positively prepared, not justified and inconsistent with the NPPF. *Meeting Unmet Need* There is an acknowledged unmet need for housing in Derby City and as was the case when the last Local Plan was prepared, the City Council is committed to working with the other Derby Housing Market Area authorities, South Derbyshire and Amber Valley, to meet the City's housing needs. The Submission Draft Local Plan sets out that through ongoing, collaborative working with		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Amber Valley and South Derbyshire a housing growth strategy has been established which will see Derby City's housing and other growth needs met in full across a range of sites in sustainable locations both within and on the edge of the City. The updated Statement of Common Ground (February 2026) however does not fully address the unmet need arising from the City. The calculation in Table B, which appears to show an overprovision across the Housing Market Area, is flawed. It is based on a calculation which uses a mixture of the 2023 and 2024 standard method figures, and because the lower of the two figures is used for each authority, the figures do not add up to the total need of the Housing Market Area. The Statement of Common Ground (February 2026) starts by setting out that the overall housing need across the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Housing Market Area has not significantly changed following the changes to the standard method in December 2024, with just a small increase from **2,102** to **2,152** homes a year. Table A in the Statement highlights this, however it also shows that the distribution of the housing need changes significantly, shifting away from the city to the two districts. Table B in the Statement then goes on to use a mixture of the 2023 and 2024 standard method figures (the lower figure for each authority) to demonstrate an over provision. The third column of the table shows the expected provision, and this is measured against the figures in the fourth column. The fourth column shows the plan requirement for each authority based on the 2023 standard method for the two districts (Amber Valley's 2023 figure is 351 + South Derbyshire's 2023 figure is 507) and the 2024 standard method figure for Derby		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						(Derby's 2024 figure is 917). This means total provision is measured against a total annual need figure of **1,775** (351+507+917). As the table below highlights, this is 327-377 homes short a year of the housing need in the Derby Housing Market Area (based on 2023 standard method total for the Housing Market Area of 2,102 a year or the 2024 standard method total of 2,152 a year). Under the 2026 Standard Method the figure is even higher at 2,226 dwellings per year. Refer to Annex 1, Table 6 The approach taken to identifying whether the housing need of the City has been met is fundamentally flawed and leaves in the region of a need for 4,000-6500 homes not accounted for over the plan period. The total housing need for Housing Market Area using the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						2023 standard method figures is 2,102 homes a year, which over a 19 year plan period is a total of 39,938 homes (Amber Valley is planning for 18 years, South Derbyshire 19 years and Derby City 20 years, so 19 is used as a reasonable proxy). Table B in the Statement of Common Ground identifies that the three Local Plans are planning for 35,714 homes, this is more than 4,200 homes short of the overall market area's need. If the 2026 standard method figure for the Housing Market Area is used (2,226), the total is 42,294 homes, and the provision shortfall is then 6,580 homes. This level of shortfall is a significant concern and does not meet the positively prepared test of soundness. *Spatial Strategy Sustainability Appraisal* The Sustainability Appraisal outlines the spatial options that have been assessed in Section 5 and Appendix C. This identifies six options that have been		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						assessed and identifies Option A as the preferred strategy. Option A focuses development on brownfield, and City Centre sites identified through the allocations process, then the residual need met by sustainable greenfield sites within the Derby administrative boundary and meeting need through HMA contributions. The spatial strategy is supported. It is noted that the Sustainability Appraisal supporting the Regulation 19 Pre-Submission version of the Local Plan in Section 5.2 set out conclusions at the end of the assessment of each set of option, however the SA Report does not set out the clear reason(s) that the preferred option has been selected, and the reasons for not selecting reasonable alternatives. This is a requirement of the Environmental Assessment of Plans and Programmes Regulations 2004, and so SA		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Report does not meet these legal requirements.		
C507	Community Campaigner David Barton	Paragraph 70	Object	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic	Entirety of Document- Traditional Architecture will make best possible use of all resources old and new whilst conferring the greatest practical advantages for everyone.	Noted. Design quality is secured through Policy GD1 and the Plan's other design and heritage policies, which respond to local character without prescribing a single architectural style. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.		
OR128	Home Builders Federation*	Paragraph 70	Object		No	Although HBF do not comment on individual sites but would wish to see the Plan set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of		Derby is a single urban area, so a settlement hierarchy is not relevant. The spatial strategy prioritises the City

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the housing market, with a range of sites proposed for allocation. The Plan should provide for a wide range of deliverable and developable sites across the area, in order to provide competition and choice to ensure that housing needs are met in full. HBF suggest that this policy and/or the supporting text will need to be updated for the Plan to be consistent with, and better reflect, the new NPPF DM policies and the presumption in favour of development within settlement boundaries.		Centre and previously developed land and allocates a range of site sizes and types, as set out in the Site Selection Topic Paper. The Plan has been prepared under, and will be examined against, the December 2024 NPPF in line with the transitional arrangements. No change required.
OR255	South Derbyshire District Council	Paragraph 72				SDDC have, and will continue to work in partnership with Derby City Council to ensure that development to the Derby Fringe located within SDDC delivers appropriate infrastructure and connections to the City. SDDC has worked in close collaboration with Derby on these two-housing led Strategic allocations to deliver approximately 4,500 homes in sustainable locations on the Derby urban fringe, and we look forward to continuing this work		Comments welcomed. The Council will continue to work with South Derbyshire District Council on the masterplanning, infrastructure and connections for the urban extensions on the edge of the city.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						through the masterplan process with consultants now appointed.		
OR104 & C519	George Fletcher*	Paragraph 81	Object	No	No	There is no evidence that any assessment has been carried out of other green spaces, including 46 other parks, before Wilmorton Park was selected for destruction. It is requirement of this process to do this.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	The Gypsy and Traveller Site Provision Topic Paper sets out how nearly 90 Council-owned sites were assessed and shortlisted to nine, which were appraised against the same criteria. Policy HA16 retains the land beyond the fenced pitches as accessible public open space. No change required.
C537	Rob Hoddinott	Paragraph 81	Object	No	No	This has not been followed with regards HA16. Brownfield land is not being used and nothing the public have been given says anything to the contrary.	Use a suitable brownfield location.	No private brownfield or other sites were promoted for Gypsy and Traveller use, so the Council assessed nearly 90 of its own sites, as set out in the Gypsy and Traveller Site Provision Topic Paper. Policy HA16 retains the land beyond the fenced pitches as accessible

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								public open space. No change required.
OR104 & C519	George Fletcher*	Paragraph 85	Object	No	No	Wilmorton Park forms a vital function for the approx. 320 households.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting, so the park will continue to serve local residents. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
C537	Rob Hoddinott	Paragraph 85	Object	No	No	HA16 is contrary to this.	Use brownfield site.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space. No brownfield or other sites were promoted for Gypsy and Traveller use, as set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR104 & C519	George Fletcher*	Paragraph 88	Object	No	No	The city's green infrastructure will be protected and enhanced	An alternative location needs to be	Policy HA16 retains the land beyond the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and where possible made accessible to communities. Destroying Wilmorton Park is completely at odds with this.	found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	fenced pitches as accessible public open space, to be improved with further planting, consistent with the aim of improving green infrastructure. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
C537	Rob Hoddinott	Paragraph 88	Object	No	No	The city's green infrastructure will be protected and enhanced and where possible made accessible to communities. HA16 does the opposite of this.	Use brownfield land.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. No brownfield or other sites were promoted for Gypsy and Traveller use, as set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
5. General Development Principles								
C507	Community Campaigner David Barton	Paragraph 91	Object	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concernWrightng new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic	Entirety of Document- Authentic Traditional Architecture combined with properly sourced Placemaking will ensure the full success of the City for future generations.	Noted. Design quality is secured through Policy GD1 and the Plan's other design and heritage policies, which respond to local character without prescribing a single architectural style. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.		
Policy GD1: Placemaking Principles								
OR162	Historic England	GD1: Placemaking Principles	Support					Support welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR128	Home Builders Federation*	GD1: Placemaking Principles	Object		No	*Policy GD1 is not considered to be sound as it is not justified, not effective and not consistent with national policy* By including reference to another document within a policy seeks to give that document full Local Plan status which is not appropriate. As such the reference to the Council's Design Code should be moved to the supporting text.		Policy GD1 signposts the National Design Guide and the Council's own design guidance as sources of further information; it does not give them development plan status. No change required.
OR104 & C519	George Fletcher*	GD1: Placemaking Principles	Object	No	No	Placemaking Principle: Optimise opportunities to incorporate green infrastructure and biodiversity and protects habitats. Destroying Wilmorton Park is completely at odds with this.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process and alternatives are set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR256	Pegasus Group on behalf of Miller Homes,	GD1: Placemaking Principles	Support	Yes	Yes	Policy GD1: Placemaking Principles sets out at (d) under the heading 'Built Form' that proposals should make efficient use of land through compact		Support welcomed. Policy GD1 seeks to optimise densities rather than impose a minimum outside the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
	William Davis and Miller Gadsby (Heatherton) Ltd*					forms of development and optimising development densities. Compact forms of development may not be appropriate in edge of City locations. It will therefore be important that sufficient flexibility is provided for developments to respond to the suburban, lower density character of locations on the edge of the built-up area of the City and to ensure development integrates with the existing built form and future development beyond the City boundary in the neighbouring authority. Whilst a minimum density is set for the City Centre, it is welcomed that a minimum density is not set for non-City Centre development in this policy. Although it is noted that Policy H2: Residential Development does include a minimum density of 35 dwellings per hectare outside the City Centre. This policy includes a caveat that this is unless there are clear		City Centre, and Policy H2 allows lower densities where there are clear environmental reasons, so development can respond to edge-of-city character.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						environmental reasons for a lower density, which is welcomed. In this context the final part of the policy, which sets out that all proposals will be assessed in terms of their response to these placemaking principles, taking account of context, function and cumulative impacts, is welcomed.		
C510	Marsha Ramroop Unheard Voice Consultancy Ltd*	GD1: Placemaking Principles				I strongly support the policy's commitment to resist the dilution of design quality after permission, and the supporting text's honesty at paragraph 102 that value engineering harms the longer-term sustainability of proposals and the character, identity and distinctiveness of Derby, creating a negative perception of new development among residents. I also welcome paragraph 95's recognition that quality depends on development teams with 'adequate skills and the right mindset': outcomes are produced by people and culture, not documents alone. This is one of the most	• For major schemes, require a schedule of the design, social and environmental commitments on which permission was granted, fixed at consent. • Require that amendments reducing any scheduled commitment be supported by explicit trade-off analysis and signed off at a defined senior or committee level, with a transparent	Support for the commitment to resist the dilution of design quality is welcomed. The procedures for considering amendments to permitted schemes are a matter for the Council's development management practice rather than the Plan. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						important commitments in the plan, and I want it to survive contact with reality. Resistance needs a mechanism. Dilution is not an aesthetic misfortune; it is a governance and culture risk. Amendments arrive late, framed as technical, when public scrutiny is lowest and delivery pressure is highest, and each individual change seems too small to refuse. 'Carefully appraised' (paragraph 102) is not a defence against that dynamic, and without a defined process the commitment cannot be applied consistently.	decision log, rather than absorbed through officer-level non-material amendment. • On design review (paragraph 110): panel composition matters as much as panel existence. Panels should reflect the diversity of the city whose character they assess, and include access and community perspectives alongside architectural ones; whose eye reviews design determines what review	
OR104 & C519	George Fletcher*	Paragraph 94	Object	No	No	In Derby, where a significant gap in healthy life expectancy exists between communities, the design of the built environment is a critical tool in reducing long term inequalities. Destroying the park in the deprived area of Wilmorton is completely at odds with this.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process and alternatives are set

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR104 & C519	George Fletcher*	Paragraph 100	Object	No	No	Green infrastructure should be considered at the outset of planning for development and fully incorporated into the design of schemes, including all masterplans taking into account the principles of Natural England's Green Infrastructure Planning and Design guide. Destroying Wilmorton Park is completely at odds with this.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process and alternatives are set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR104 & C519	George Fletcher*	Paragraph 108	Object	No	No	Harmful and/or irregular intrusion into open countryside, Green Wedges, Green Gap or Green Belt should be avoided, such as destroying Wilmorton Park.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting, and SA Appendix G notes the pitches are located in a less prominent part of the open space. The site selection process is set out in the Gypsy and Traveller Site

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								Provision Topic Paper. No change required.
C537	Rob Hoddinott	Paragraph 108	Object	No	No	HA16 is harmful to green space, contrary to this section.		Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR104 & C519	George Fletcher*	Paragraph 121	Object	No	No	Character and context are also important in the context of creating a defined and meaningful urban boundary and maintaining Green Wedges and Green Gaps. Destroying Wilmorton Park is completely opposed to this.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
Policy GD2: Character and Context								
OR162	Historic England	Policy GD2: Character and Context	Support			Policy GDP2, we support this policy and the references to heritage. We would recommend that there is additional detail for this policy about what evidence base will be required to be submitted with planning applications to ensure that the policy is effective and enforceable.		Support welcomed. The evidence required to accompany planning applications is set by the Council's validation requirements rather than the Plan. No change required.
Policy GD3: Amenity								
C537	Rob Hoddinott	Policy GD3: Amenity	Object	No	No	HA16 will bring more traffic to some of the narrowest and most densely parked streets in Derby. This will affect life adversely for the current residents.	Move to venue with easier access and less congested side roads.	The Gypsy and Traveller Site Provision Topic Paper identifies the potential for an independent access from the main road adjacent to the site, and Policy HA16 requires the exact access arrangements to be considered in detail at application stage. Policy GD3 will protect the amenity of existing residents. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR104 & C519	George Fletcher*	Paragraph 122	Object	No	No	There is no evidence that the council has assessed the affects of replacing Wilmorton Park with a traveller camp on the approx. 320 households. A so-called consultation took place in spring 2026, but none of the 320 household affected by the policy were informed of the consultation's existence. This section 19 consultation is only been extended to the few individuals that did respond to the first consultation.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	Details of how the Regulation 18 consultation was carried out and publicised are set out in Part 1 of the Consultation Statement, and the Regulation 19 consultation was open to all. The site selection process for Policy HA16 is set out in the Gypsy and Traveller Site Provision Topic Paper, and the policy retains the land beyond the fenced pitches as accessible public open space. No change required.
C537	Rob Hoddinott	Paragraph 122	Object	No	No	HA16 will have a significant effect on the lives of the current neighbourhood. No impact assessment on the effects of increased traffic has been shown to the public.	Move to less congested area.	The Gypsy and Traveller Site Provision Topic Paper identifies the potential for an independent access from the main road adjacent to the site, and Policy HA16 requires the exact

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								siting and access arrangements to be considered in detail at application stage. No change required.
Policy GD4: Accessible Places								
C510	Marsha Ramroop Unheard Voice Consultancy Ltd*	Policy GD4: Accessible Places	Object	No	No	Policy GD4 is the thinnest policy in the General Development Principles chapter, yet it covers the dimension with the strongest statutory underpinning in the Equality Act 2010 and the Public Sector Equality Duty, which the supporting text at paragraph 129 rightly cites. Three short clauses ask applicants to 'demonstrate' inclusive design and 'have regard to current best practice' without naming any standard, threshold or evidence requirement. Compare the granularity of Policy GD1, which specifies densities, design process requirements and detailed placemaking principles. The contrast tells applicants what the Council considers negotiable, and a policy that names no benchmark cannot be applied consistently in decision-	• Name in the policy the standards applicants must design to, including relevant Building Regulations accessibility standards and recognised sector guidance such as the RIBA Inclusive Design Overlay, rather than an unspecified 'current best practice'. • Require an inclusive design statement, proportionate to scale, for all major development, setting out how access needs across age, disability and circumstance have	Policy GD4 requires applicants to demonstrate inclusive design, while technical accessibility standards are set by the Building Regulations and the Plan's optional accessible housing standards. The NPPF (2026) will be a key part of decision making, even after the adoption of this plan, and each development will differ as to the relevant design standards to apply. Because this area has such strong statutory underpinning through building regs, it was important not to

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						making: it is not effective. The plan's own Spatial Portrait records at paragraph 16 that 8.8% of Derby residents identify as disabled and limited in their daily activities, and that the city's population is ageing. I welcome the new paragraph 131 linking accessible places to the natural environment. But inclusive environments are not achieved by 'regard'; they are achieved by requirement, evidence and the involvement of disabled people themselves.	been addressed from concept stage, not retrofitted. • Require evidence of engagement with disabled people and access experts in the design development of major and City Centre schemes. • Commit the Council to including access expertise and lived experience of disability on the design review panels described at paragraph 110. Who reviews design shapes what design review sees.	duplicate these. Naming particular non-statutory guidance in policy would risk it becoming out of date during the plan period. No change required.
C537	Rob Hoddinott	Paragraph 129	Object	No	No	HA16 reduces the areas which can bring people together to improve social cohesion.	Use brownfield site so as to not reduce vital green space.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process is set out in the Gypsy and Traveller Site

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								Provision Topic Paper. No change required.
Policy GD5: Community Safety and Resilient Places								
No representations were received for this policy.								
Policy GD6: Health and Wellbeing								
C537	Rob Hoddinott	Policy GD6: Health and Wellbeing	Object	No	No	providing access to the natural environment, including wildlife sites, river corridors, open spaces and leisure, recreation and play facilities to encourage physical activity and mental wellbeing HA16 is contrary to this.	Use a brownfield site.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. No brownfield or other sites were promoted for Gypsy and Traveller use, as set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
C537	Rob Hoddinott	Policy GD6: Health and Wellbeing	Object	No	No	providing access to social, community and healthcare facilities, community halls, spiritual buildings and arts and cultural facilities. These will be protected and improved to ensure that they can be accessed by sustainable and/or active transport modes. There is	Move to an area with less over subscription to healthcare.	The Gypsy and Traveller Site Provision Topic Paper confirms that education, health and shopping facilities are within easy reach of the site by vehicle and active travel, and the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						no healthcare at all in the immediate area and what is accessible by bus and car is oversubscribed.		Infrastructure Delivery Plan addresses healthcare capacity across the city. No change required.
OR128	Home Builders Federation*	Policy GD6: Health and Wellbeing	Object		No	*Policy GD6 is not considered to be sound as it is not effective, justified, or consistent with national policy* The requirement for HIA assessment on all schemes of more than 10 homes does not seem proportionate or justified.		Policy GD6 does not require a full Health Impact Assessment for every scheme: a screening assessment determines whether one is needed, with the detail proportionate to the development. This is justified by the significant health inequalities in the city set out in paragraphs 19 and 138. No change required.
OR39	NHS Property Services	Policy GD6: Health and Wellbeing	Support	Yes	Yes	Draft Policy GD6 sets out the Council's commitment to making sure that new developments promote healthier lives and help reduce health inequalities through the built and natural environment. NHSPS support the inclusion of a standalone health policy that		Support welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						supports healthy lives. There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health. <u>Health Impact Assessment (HIA)</u> Draft Policy GD6 also includes a requirement for a HIA to be submitted for major development proposals and recommends a screening assessment to first be undertaken to assess if a full HIA is needed, with the level of detail to be proportionate to the development and agreed with the relevant case officer. Supporting paragraphs 141-142 refer to guidance on HIA published by Public Health England and recommend the use of the NHS Healthy Urban		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Development Unit (HUDU) Rapid HIA toolkit to quickly assess the impacts of a development plan or proposal and recommend measures. It is recommended for the tool to be used as early as possible in the planning process and established at pre-application stage. NHSPS welcome the inclusion of a HIA requirement within Draft Policy GD6. The use of HIA is a useful tool to ensure planning applicants and the Local Planning Authority have the right information to make sound planning decisions in promoting healthy and safe communities. NHSPS supports the requirement for Health Impact Assessment to focus on major developments with potential for significant health impacts. We would also encourage future applicants to have regard to the forthcoming NHSPS guidance on HIA, which will build upon existing guidance, including the HUDU Rapid HIA toolkit, once		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						published. Overall, NHSPS considers Draft Policy GD6 to be positive and effective, and therefore sound.		
OR258	Pegasus Group on behalf of Infinity Park Derby LLP*	Policy GD6: Health and Wellbeing	Object	Yes	No	**Requirements for Health Impact Assessments** Draft Policy GD6: Health and Wellbeing indicates a requirement for Health Impact Assessments for all major development proposals. This is an unnecessarily onerous additional requirement. Major applications (including EIA development) will already be supported by significant evidence. This will include, as necessary, a Design and Access Statement, Transport Assessment, Travel Plan, Noise Assessment, Air Quality Assessment, Lighting Strategy, Contaminated Land Assessment and Flood Risk Assessment. The current significant evidence required to support a planning application addresses the matters covered by Health Impact Assessment. The	Policy GD6: Health and Wellbeing should be modified and the requirement for Health Impact Assessment should be removed. The requirement does not satisfy the tests of soundness as it is not justified and does not add any value to supporting evidence for major planning applications.	Policy GD6 does not require a full Health Impact Assessment for every major scheme: a screening assessment determines whether one is needed, with the detail proportionate to the development. This is justified by the significant health inequalities in the city set out in paragraphs 19 and 138. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						requirement for Health Impact Assessment therefore adds no value but adds to the burden of preparing a planning application. The requirement for a Health Impact Assessment is unnecessary duplication of existing evidence, adds no value, is not consistent with the NPPF and is not justified.		
OR256	Pegasus Group on behalf of Miller Homes, William Davis and Miller Gadsby (Heatherton) Ltd*	Policy GD6: Health and Wellbeing	Object	Yes	No	Policy GD6: Health and Wellbeing advises that Health Impact Assessments may be required to be submitted as part of planning application for major development proposals. A screening assessment should be undertaken to assess if a full Health Impact Assessment is required. This is an unnecessarily onerous additional requirement. Larger residential applications will already be supported by significant evidence. This will include, as necessary, a Design and Access Statement, Transport Assessment, Travel Plan, Noise Assessment, Air	Delete the Health Impact Assessment requirement from Policy GD6 or amend it so that any requirement is triggered only by a clearly evidenced, proportionate and locally justified threshold.	Policy GD6 does not require a full Health Impact Assessment for every major scheme: a screening assessment determines whether one is needed, with the detail proportionate to the development. This is justified by the significant health inequalities in the city set out in paragraphs 19 and 138. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Quality Assessment, Lighting Strategy, Contaminated Land Assessment and Flood Risk Assessment. The current significant evidence required to support any major application will deal with all the issues that a Health Impact Assessment would address. The requirement for a Health Impact Assessment is unnecessary duplication of existing evidence and not supported. As currently drafted, Policy GD6 does not establish a clear threshold or sufficiently evidenced justification for when an HIA would be required. The requirement for a screening assessment also introduces an additional procedural requirement for major development proposals without demonstrating that this would provide proportionate additional value in decision-making. The policy is therefore considered not justified and not effective and should be deleted or substantially amended.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
C510	Marsha Ramroop Unheard Voice Consultancy Ltd*	Policy GD6: Health and Wellbeing	Support	Yes	No	I strongly support the requirement for Health Impact Assessments on major development and the policy's recognition of the social determinants of health at paragraph 140. The plan's evidence is stark and commendably honest: paragraphs 19 and 138 record that men in Derby's most deprived areas can expect to live 11.1 years less than those in the least deprived, and women 10.9 years less; Table 1 records that 45 of the city's 151 LSOAs are among the 20% most income-deprived in England; and paragraph 16 records that the city's Asian and Black communities are concentrated in four wards at 35 to 54% of the population. Paragraph 17 now acknowledges plainly that patterns of deprivation are uneven and that not all communities experience the city in the same way. The gap is that the policy never requires the HIA to ask who. Health impacts in Derby are not evenly distributed; an assessment that	• Amend Policy GD6 to require that HIAs for major development assess impacts disaggregated by deprivation, ethnicity, age and disability, drawing on the JSNA data the plan already cites at paragraphs 17 and 138, at ward or LSOA level. • Require HIAs to identify explicitly who bears adverse impacts and who receives benefits, and how any inequitable distribution will be mitigated. • Add a monitoring indicator to Appendix 1 tracking health-equity outcomes of development, not only provision of facilities: Policy GD6 is currently marked 'Not applicable' in the	Support welcomed. Policy GD6 already requires development to address health and wellbeing inequalities, and the scope of individual Health Impact Assessments can reflect the distribution of impacts where relevant. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						reports aggregate effects will systematically conceal the inequality the policy exists to reduce. Without disaggregation, 'reduce health and well-being inequalities' is an aspiration audited by anecdote, and the plan will be unable to evidence progress against its own Inclusive City objectives, OBJ2 and OBJ11. A policy whose central commitment cannot be measured is not effective.	monitoring framework, which leaves the plan's flagship health commitment unmonitored.	
C537	Rob Hoddinott	Paragraph 135	Object	No	No	HA16 is contrary to this policy regarding open spaces being important to health.		Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
C537	Rob Hoddinott	Paragraph 139	Object	No	No	HA16 will only make this worse - " This aligns with the downwards trend in physical activity levels"	Move to brownfield site.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								so opportunities for physical activity are maintained. No change required.
C537	Rob Hoddinott	Paragraph 140	Object	No	No	HA16 brings in more people in the lowest socioeconomic group to one of the most deprived areas in the city.	Use less deprived area.	The Gypsy and Traveller Site Provision Topic Paper explains that the site was chosen because it can meet the full identified need on one site, with independent access and good access to schools, health services and shops. Policy HA16 retains the remainder of the land as accessible public open space. No change required.
C537	Rob Hoddinott	Paragraph 141	Object	No	No	Has this been completed for HA16, it has never been made public if it has.		Any planning application for the site will be considered against Policy GD6, including the need for a Health Impact Assessment following screening. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
Policy GD7: Comprehensive and Coordinated Development								
OR229	Lichfields on behalf of Derbion*	Policy GD7: Comprehensive and Coordinated Development	Object		No	*Policy Consideration* Whilst Derbion supports the Council's intention to secure comprehensive and coordinated development through Policy GD7, Derbion does not support the requirement for a masterplan or framework where this becomes a barrier to delivery in its own right. In particular, the policy wording that 'no significant development will be permitted' within City Centre allocations until an acceptable masterplan/framework is in place, risks delaying delivery where this is contingent upon agreement with third parties, or where infrastructure or design coordination extends beyond land within an applicant's control or ownership. This risks impeding the delivery of individual allocations, such as Bradshaw Way, Eagle Quarter and Riverside, rather than facilitating regeneration. *Tests of Soundness* 1 Effective – The current	Policy GD7 should retain sufficient flexibility to allow individual sites to come forward in advance of, or independently from, a wider masterplan/framework. *"~~In circumstances where a masterplan/framework~~ Development sites may come forward independently of a masterplan/framework, where an indicative is ~~to be~~ put forward as part of a planning application, to meet the requirements detailed above. In such circumstances, early and effective engagement with the Council, and consultation with the local community and*	Policy GD7 allows the masterplan or framework to be put forward by the applicant as part of a planning application, so it need not delay individual schemes, and SA Appendix G confirms that Bradshaw Way and Eagle Quarter already have planning permission. A coordinated approach is needed on the larger City Centre allocations to secure connections and infrastructure across sites. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						policy wording makes no significant development acceptable until a masterplan/framework has been agreed with the Council, with may rely on processes entirely out of an applicant's control. This could introduce delays for the delivery of allocations, where it is reliant on masterplans/frameworks coming forward which involve third-party land. The policy does not allow for the delivery of allocations (or existing permissions) to proceed independently where not all of the triggers in criteria (a) to (d) apply, and in its current wording is therefore ineffective. Consistent with national policy – A lack of flexibility which does not allow for sites to come forward independently risks the delivery of allocations in a timely manner and is therefore at odds with the NPPF's presumption in favour of sustainable development.	*other stakeholders should also take place in advance of the submission of an application."*	
C510	Marsha Ramroop	Policy GD7: Comprehensiv	Support	Yes	No	The January 2026 Regulation 18 draft helpfully reported	• Amend Policy GD7 to require, for	Support welcomed. The Regulation 18 and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
	Unheard Voice Consultancy Ltd*	e and Coordinated Development				consultation numbers throughout its 'You Told Us' sections: 448 respondents on character and context, 470 on care homes, and so on. What was never reported, there or in this Publication draft, is who responded. In a city where paragraph 16 records that more than a quarter of residents are from global majority communities and 8.8% are disabled, and where paragraph 17 acknowledges that communities experience the city unevenly, it is not possible to know whether the plan's priorities were shaped by the whole city or by the sections of it most comfortable with written, portal-based, formal consultation. Those formats are not neutral: they encode the communication norms of the professionals who design them, and they structurally advantage residents who share those norms. The communities most affected by the plan's biggest decisions are frequently those least served by its methods of asking. I ask that the Statement	masterplans and frameworks, a statement of community involvement covering: co-design methods rather than presentation of near-final options; accessible and multilingual formats; engagement taken to where communities already gather; a community role in designing the engagement process itself; and published feedback showing how input changed the scheme. • Recognise resourcing: meaningful participation has a cost, and unresourced participation is extraction. Developer contributions under Policy GD9 can	Regulation 19 consultations do not come with reliable data as regards demographics because the large majority of responses were made by email and did not contain demographic information. The Local Plan Prioritises consultation does include a brief section on demographics. The Consultation Statement sets out how the consultation was carried out and publicised, and engagement on individual masterplans will follow the Council's Statement of Community Involvement. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						of Consultation accompanying submission address the demographic representativeness of responses and the steps taken to reach underrepresented groups. Policy GD7 carries the same issue into delivery: masterplans and frameworks must involve 'proper consultation of the local community' (paragraph 146), with no standard for what that consultation must involve, who it must reach, or how communities learn what changed as a result. Without standards, the requirement cannot be applied consistently and is not effective.	legitimately support it on major schemes. • In the Statement of Consultation, publish demographic monitoring of consultation responses against the city's Census profile, with the outreach undertaken to close gaps.	
C537	Rob Hoddinott	Paragraph 146	Object	No	No	HA16 is not complaint with this. Open spaces are being reduced.	Use brownfield site.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR162	Historic England	Paragraph 147	Object			Paragraph 147, clause f, amend to 'harm'.		Noted. The Council will continue to work with Historic England, including through a Statement of Common Ground, on the wording of the Plan's heritage references.
Policy GD8: Enforcement								
No representations were received for this policy.								
Policy GD9: Infrastructure and Developer Contributions								
OR128	Home Builders Federation*	Policy GD9: Infrastructure and Developer Contributions	Object		No	*Policy GD6 is not considered to be sound as it is not effective, justified, or consistent with national policy* By including reference to another documents within a policy seeks to give that document full Local Plan status which is not appropriate. As such the reference to the Planning Obligations SPD should be moved to the supporting text. In order for the Plan to be justified and in compliance with		Policy GD9 refers to the Planning Obligations SPD as the existing basis for calculating contributions without giving it development plan status, and all obligations remain subject to the statutory tests in Regulation 122 of the CIL Regulations 2010. Health contributions will be sought only where justified by evidence on a case-

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						national policy, it will be important for any s106 contributions to be assessed against the CIL tests at the time that a planning application is being determined. The policy should therefore include explicit reference to this fact. HBF also would draw attention to the High Court Decision on R (on the application of the University Hospitals of Leicester NHS Trust) versus Harborough District Council. This has drawn into question the legitimacy of asking for develop contributions for acute healthcare that is funded through general taxation.		by-case basis. No change required.
OR35 & OR237	Johnson Mowat on behalf of Harworth Group*	Policy GD9: Infrastructure and Developer Contributions	Object		No	Policy GD9 states that proposals for major new development will only be permitted where a comprehensive and co-ordinated approach to both phasing and infrastructure can be demonstrated. It also states that Section 106 agreements, the Community Infrastructure Levy (CIL) or successor regulations/ guidance will be used to secure developer	Harworth Group request that this is clarified in the supporting text to Policy GD9 and suggest the following text addition: *S106 agreements and CIL or other successor regulations will operate in parallel to help deliver the*	Support for the principle of the policy is welcomed. Any future CIL charging schedule would be prepared alongside the Council's approach to planning obligations so that developers do not pay twice for the same

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						contributions and, where appropriate, these contributions will be pooled to allow the provision of strategic infrastructure that individual schemes cannot justify on their own. Harworth Group is supportive of the principle of this policy and recognises the importance of delivering infrastructure to mitigate the impacts of development. The approach set out is considered to be appropriate. However, if CIL is to be adopted it is essential to ensure that this and Section 106 requirements are compatible and do not duplicate or double contributions for infrastructure.	*necessary and appropriate infrastructure, facilities and amenities to mitigate the impact of development. There will be no "double counting" (developers paying twice towards the same item of infrastructure) between S106 and CIL contributions.*	infrastructure. No change required.
OR160	National Highways	Policy GD9: Infrastructure and Developer Contributions				Policy GD9 continues to require infrastructure contributions from all allocations, and it remains essential that these allocations are supported by a robust and proportionate transport evidence base.		Noted and agreed. The Council continues to work with National Highways on the transport evidence supporting the Plan's allocations.
OR258	Pegasus Group on behalf of	Policy GD9: Infrastructure	Object	No	No	Draft Policy GD9: Infrastructure and Developer Contributions sets out that there may be	Policy GD9: Infrastructure and Developer	All planning obligations, including any sought under

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
	Infinity Park Derby LLP*	and Developer Contributions				occasions where the Council will require additional contributions including, for example, for public realm improvements and public art, and enhancement of cultural heritage. Developer contributions should be fully justified in line with the Community Infrastructure Levy tests of being necessary, directly related and fairly and reasonably related in scale and kind. It is however unclear how the requirements listed in criteria j, k and l can satisfy the tests in Community Infrastructure Levy.	Contributions should be modified to confirm that developer contributions will only be sought where they satisfy the Community Infrastructure Levy tests of being necessary, directly related and fairly and reasonably related in scale and kind. Some of the requirements of Policy GD9 appear to go beyond what Community Infrastructure Levy Regulations allow, and without such clarification, appear to support the collection of contributions which do not meet legal tests.	criteria (j) to (l), must meet the statutory tests in Regulation 122 of the CIL Regulations 2010, which apply in any event. No change required.
OR256	Pegasus Group on behalf of Miller Homes,	Policy GD9: Infrastructure and Developer Contributions	Support	Yes	Yes	Policy GD9: Infrastructure and Developer Contributions sets out that there may be occasions where the Council will require additional contributions		Support welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
	William Davis and Miller Gadsby (Heatherton) Ltd*					including for example for public realm improvements and public art and protection or enhancement of cultural heritage. It is important that any such developer contributions are fully justified in line with the CIL tests of being necessary, directly related and fairly and reasonably related in scale and kind. The priority for contributions towards affordable housing, education, transport and biodiversity ahead of other contributions where there is a viability issue is welcomed and is helpful to inform discussions in these circumstances.		
OR226	The Planning Bureau Limited on behalf of McCarthy & Stone & Churchill	Policy GD9: Infrastructure and Developer Contributions	Object		No	We note that policy GD9 says 'Where a developer can provide robust evidence to demonstrate that it is not viable to deliver the policy requirement, the Council may require developers to enter a 'clawback' agreement which will allow contributions to be increased in the future should higher levels of viability become achievable during the	*Possible proposed wording:* **Single-phased development schemes will not be subject to a review mechanism.** **Where sites have a**	Policy GD9 sets out the circumstance in which a review mechanism may be required, namely where reduced contributions are justified by robust viability evidence, consistent with national guidance on

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						lifetime of a development. In these circumstances, the Council will prioritise the infrastructure types a to e above. The exact priority order will be determined on a site-by-site basis.' This is similar to the wording in policy H4. Para 5 of policy H4 also requires a clawback mechanism or review mechanism when a developer can provide robust evidence that it is not viable to provide the maximum policy requirement. Paragraph: 010 Reference ID: 10-010-20251216-of the government guidance on Viability states the following: 'Plans should set out circumstances where review mechanisms may be appropriate, as well as clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy compliance and optimal public benefits through	**construction programme which is proposed to extend beyond 2 years, the planning obligation will provide for the affordable housing component of later phases to be reviewed based on updated viability evidence which may result in an increase of the affordable housing requirement**.	viability. Its application will be proportionate to the scale and phasing of each scheme. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						economic cycles. Policy compliant means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies. In order to introduce such a review mechanism, there must be a clear and specific policy basis for any review mechanism being imposed in line with PPG Viability para 009 Reference ID: 10-009-20190509. A significant number of recent Planning Appeals and case law have reinforced this point. A review mechanism and detail within it that sits within a planning obligation needs to be considered and assessed through the Local Plan process. This should include the consideration of variables such as trigger points, costs, land values, how surplus is split and other definitions. The Local Plan does not achieve this and therefore the requirement at point 5 of the plan is contrary to national policy.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						In addition, for a large or multi-phase development which will be delivered over a long period it makes sense to check whether the scheme's viability has changed with market movements. However, for a small single phased site, such as an older persons housing scheme that is built in one phase , the Inspectorate have repeatedly noted that review mechanisms are unnecessary. For example, under Appeal decision reference APP/C4235/W/120/3256972 dated 1st April 2021, the Inspector noted in paragraph 17 that 'as the development would almost certainly be completed in a single phase with an estimated build time of 12-18 months, it is not the sort of large multi-phased scheme where stronger arguments for a review/clawback mechanism may otherwise exist'. This is also becoming the case in local Plans and for example the Local Plan Inspectors report for the East Riding of Yorkshire		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Local Plan notes the following: 170. The final section of the policy addresses the use of review mechanisms for Section 106 agreements. To provide certainty, and thus the effectiveness of the policy, it is necessary for MM55 to amend the wording so that it clarifies that this relates to larger sites that will come forward over a longer period of time, and not all proposals. This is also the case in for example Amber Valley and Cannock Chase. Therefore, if a review mechanism is to be introduced the detail within any review mechanism needs be published so it can be fully assessed through the Local Plan process, this must also include an exemption for single phased schemes as repeatedly noted by the planning inspectorate.		
OR43	Ann Mason	Policy GD9: Infrastructure and Developer Contributions	Objects		No	I have read a lot of this policy. I do not believe that the correct infrastructures will be put on place by developers. A prime example of this is the new		Policy GD9 and the transport policies (T1 to T3) require new development to provide the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						estates off Chellaston Lane. There are absolutely no footpaths from the island on Shardlow Road to those estates or the old peoples home. This means that no-one can safely walk or cycle to Chellaston or Shardlow Road from those new developments. It is not safe to get to Elvaston Castle either. The airport bus is also inaccessible from those estates. This is very restrictive to those residents and contributes to the short journeys by car that you are wanting to reduce. There are no Doctors, Dentists or Shops within walking distance, the lack of pavements does not help with that either, so everyone has to get the car out. Anyone in a wheelchair has no chance of getting anywhere. I haven't even read all of it as most of it is word salad and heavy going. If I get around to reading it in full I'm sure I will just get more frustrated than I already am.		infrastructure needed to mitigate its impacts, including safe walking and cycling connections. Concerns about existing developments are noted. No change to the submission plan required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR39	NHS Property Services	Policy GD9: Infrastructure and Developer Contributions	Support	Yes	Yes	Draft Policy GD9 states that all new development will be supported by necessary and appropriate infrastructure, facilities and amenities to mitigate the impact of development. Where it is not appropriate for this to be dealt with through planning conditions or Section 278, developer contributions towards infrastructure will be sought, including health and community facilities (part (i)). All new development will be required to provide for the necessary on-site or off-site infrastructure requirements arising from the proposal, or by making financial contributions towards its provision and/or maintenance. The policy states that where full policy compliance is demonstrably unviable, the Council may require a clawback agreement, allowing contributions to increase if viability improves over the lifetime of the development. In these circumstances, the		Support welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Council will prioritise the infrastructure types (a) to (e) in the Draft Policy GD9, with the exact priority order to be determined on a site-by-site basis. Contributions will be made in accordance with the saved Planning Obligations Supplementary Planning Document (SPD) except where indicated otherwise. NHSPS welcomes the recognition of health infrastructure as infrastructure for which development proposals are expected to make provision to meet the cost of additional infrastructure for, where the need arises from the development, also in line with Policy IC1. In areas of significant housing growth, appropriate funding must be consistently leveraged through developer contributions for health and care services to mitigate the direct impact of growing demand from new housing. Additionally, the significant cumulative impact of smaller		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						housing growth and the need for mitigation must also be considered by the Plan. Noting healthcare infrastructure's strategic importance, the Council should include health and community facilities in infrastructure priorities to ensure that the impact on healthcare service provision is appropriately mitigated. The Draft Infrastructure Delivery Plan (IDP) includes a dedicated health chapter (chapter 8) which demonstrates clear engagement with NHS Derby and Derbyshire Integrated Care Board (ICB), as the local health commissioners. NHSPS supports the Council's engagement with the ICB in drafting the IDP to identify the appropriate form of contribution towards the provision of healthcare infrastructure where this is justified. We request that the Council continue its engagement with the NHS to further refine the identified healthcare needs and proposed solutions to support the level of		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						growth proposed by the Local Plan, as identified in the draft IDP. Healthcare providers should have flexibility in determining the most appropriate means of meeting the relevant healthcare needs arising from a new development. Where new development creates a demand for health services that cannot be supported by incremental extension or internal modification of existing facilities, this means the provision of new purpose-built healthcare infrastructure will be required to provide sustainable health services. Options should enable financial contributions, new-on-site healthcare infrastructure, free land/infrastructure/property, or a combination of these. It should be emphasised that the NHS and its partners will need to work with the Council in the formulation of appropriate mitigation measures.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Overall we consider Draft Policy GD9 to be positive and effective, and therefore sound.		
Policy GD10: Advertisements								
OR162	Historic England	Policy GD10: Advertisements	Support			Policy GD10, we welcome the references to heritage within this policy.		Support welcomed.
OR229	Lichfields on behalf of Derbion*	Policy GD10: Advertisements	Object		No	As currently drafted, the Policy is not sound. Derbion considers the restrictions set out in GD10 limiting the use of poster display boards and vinyl stickers to be overly restrictive. Vinyl can provide a useful method for operators to screen back-of-house areas and is often an operational necessity that assists in maintaining tidy frontages. Digital screens are set to play an increasingly central role in how retailers and operators animate frontages and attract footfall within competitive city centre environments. Digital formats are an important tool for enhancing vibrancy and visual interest. Digital screens are set	The Policy amendments set out below should be applied to ensure that the Policy can be found sound: *"Applications for internally illuminated digital display advertising screens will ~~only~~ be permitted where they demonstrate reasonable measures to safeguard public safety and visual amenity.* *The installation of vinyl stickers or similar coverings on shop windows, particularly those*	Policy GD10 permits advertisements, including digital displays, unless they would harm amenity or public safety, and its further criteria protect the quality of frontages and the significance of heritage assets. It is not considered that Policy GD10 is unduly restrictive or inconsistent with the tests of soundness; the policy is intentionally worded to provide flexibility and does not impose a blanket restriction on shop window

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						to play an increasingly central role in how retailers and operators animate frontages and attract footfall within competitive city centre environments. Digital formats are an important tool for enhancing vibrancy and visual interest and these should be more actively supported in the Policy. *Test of Soundness* Positively Prepared – The discouragement of vinyl is not necessary and should be removed from the policy to allow for their use, where serving a clear functional or visual purpose. The Policy should also acknowledge the shift towards digital screens and ensure that policies remain proportionate, enabling well-designed digital displays in appropriate locations rather than inadvertently deterring major occupiers through overly restrictive controls.	*that obscure at least more than a quarter of the glazing, will generally be discouraged unless it can be demonstrated that active frontages can be safeguarded and visibility into shop interiors can be preserved, where this contributes towards the frontage.* *Proposals for vinyl or window graphics that exceed the thresholds permitted under deemed consent will require formal advertisements consent prior to installation."*	coverings. Instead, vinyl stickers and other coverings are "generally discouraged" where they would obscure over 25% of the glazing area. As such, no change is required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
Policy GD11: Shopfronts								
OR162	Historic England	Policy GD11: Shopfronts	Support			Policy GD10, we welcome the references to heritage within this policy.		Support welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
6. Housing								
C507	Community Campaigner David Barton	Paragraph 176	Object	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be	Entirety of Document- Authentic Traditional Architecture will provide the greatest boost to everyone across the City reinvigorating the appeal for the area whilst providing purpose.	Noted. Design quality is secured through Policy GD1 and the Plan's other design and heritage policies, which respond to local character without prescribing a single architectural style. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.		
OR162	Historic England	Paragraph 176	Support			Housing allocations, we note that where site allocations have already received planning permission, we have not raised the need for heritage assessment, as this will have been considered as part of the		Support welcomed. A draft Heritage Impact Assessment (HIA) of the housing allocations has been prepared. The draft HIA work has been

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						wider planning application process. We note currently that the housing allocations are not supported by a heritage impact assessment, though we are aware that there is a draft now available and that we are currently commenting on this draft, outside of the Regulation 19 process. We will make comments formally through the HIA process and then request that where comments relate to the housing sites, and where avoidance and mitigation measures are required, that these can be incorporated into the specific policy wording if needed. We would aim to work with the local authority through a Statement of Common Ground to address any concerns in relation to the housing sites once we have commented on the evidence base documents.		shared with Historic England and a Statement of Common ground will be prepared if necessary. The Council will continue to work with Historic England. No change required.
OR255	South Derbyshire District Council	Paragraph 177				The spatial portrait (paragraph 20) sets out the existing mix of housing within the City and this is dominated by semi detached and detached housing, within the context of falling home ownership, SDDC consider that		The Plan already concentrates high-density, predominantly flatted and townhouse (Friar Gate) development in the City Centre, with

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Derby City Council could focus on delivering smaller (more affordable) dwellings at higher density, predominantly in the form of flats. High density development, such as flatted accommodation, is more suited to urban areas within a City, particularly around transport hubs such as the railway station. A focus on supporting high density development through both policy and allocations would assist Derby significantly with meeting their housing target. Information from the recently approved Friar Gate and Cathedral Quarter developments show that flatted development within the city centre is in high demand. With this in mind, references to Derby's limited ability to meet its own housing need (e.g. paragraph 20, 70) and limited availability of re-developable land is questioned. The SHLAA also includes a number of potential sites within the City Centre that are identified as suitable for residential development but delivery is		Policies GD1 and H2 seeking a minimum of 80 dwellings per hectare there and Policy CC3 supporting City Centre living. The city's capacity, including City Centre sites identified in the SHLAA, is set out in Section 11 of the Housing Requirement and Spatial Strategy Topic Paper. No change required. The Plan makes a pragmatic and evidenced attempt to promote city centre regeneration and city centre living, use brownfield land at high densities and be aspirational and realistic in the quantum of dwellings that can be expected to be delivered within the Plan period.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						uncertain, regeneration of these sites may be assisted through a Local Plan allocation as this provides certainty for developers / investors and can assist with delivery.		
Policy H1: Housing Delivery								
OR265	P&DG on behalf of JGP Properties*	Paragraph 176	Objects	Yes	No	JGP controls Land South of Lime Lane, Oakwood (SHLAA Ref: DER/0209), which is shown outlined in red on the location plan included in Appendix 1. It consists of two fields and is herein called 'the Site.' The fields are referred to as the 'eastern field' and the 'western field'. The Site's total area is 8.2ha, with the eastern field being the smaller of the two at 2.94ha. It is adjacent to Chaddesden Wood, which a Local Nature Reserve (LNR) and Ancient Woodland. The Site was previously the subject of a planning application for 150 dwellings, which was refused in July 2025 (ref: 24/01023/OUT). The		(See also response in the green wedge response schedule). The site's exclusion reflects its effects on the Green Wedge and on Chaddesden Wood Local Nature Reserve and ancient woodland, which led to the refusal of application 24/01023/OUT, and the continuing concerns of Derbyshire Wildlife Trust and the Woodland Trust, as summarised in SA Appendix G. The Sustainability Appraisal will be updated to confirm the assessment of the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						reasons for refusal related to impacts on the role and function of the Green Wedge, along with impacts on Chaddesden Wood Ancient Woodland and veteran trees. JGP subsequently promoted the 'Eastern Field at Land South of Lime Lane, Oakwood' for a reduced-scale residential development of up to 49 dwellings, with the western field retained to deliver a comprehensive package of habitat creation, plus associated recreational public open space on what is currently private land i.e. that promoted at the Reg.18 Stage in March this year and via a concurrent Call for Sites submission. The measures detailed for the western field included woodland creation/expansion, the creation of species-rich grassland and semi-natural wetland habitats, together with new opportunities for public recreation in accordance with the adopted Local Nature		reduced eastern-field scheme which was introduced after the green wedge review concluded. The submission SA has corrected the reference to the site containing ancient woodland, which is adjacent rather than within it. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Recovery Strategy and Green Infrastructure aims for the Green Wedge. However, the approach was devised primarily to mitigate any potential adverse effects of the development on Chaddesden Wood alongside a commitment to funding long-term measures to assist with the better management of the woodland to address its ongoing deterioration. The wood is classed as being in an 'unfavourable managed state'. Ultimately, proposals present a significant opportunity to meet not only Derby's identified housing needs within its own boundary, including unmet affordable housing needs, but also to secure a scheme of ecological mitigations and improvements and alternative recreational space that would benefit Chaddesden Wood in the long term. Despite this, the Council has not taken the Site forward as a residential allocation targeting dwellings on the eastern field only within		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the Regulation 19 Local Plan. This has included no approaches being made to P&DG to discuss the concurrent Reg. 18 and Call for Sites submissions. There is, however, limited evidence to support the exclusion of the Site with housing on the eastern field only alongside the stated benefits on the 5.26ha western field. In particularly, the Council does not appear to have sufficiently considered the overall potential for mitigation measures to address any potential impacts of development and indeed provide certain betterments, particularly in relation to Chaddesden Wood, including the potential for new natural and semi natural POS to reduce its recreational pressures. It is noteworthy that only through the Reg.19 consultation has P&DG become aware of the responses of the Woodland Trust and Derbyshire Wildlife		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Trust (DWT) to JGP's Reg.18 submission i.e. dwellings on the eastern field only. Following a request to the Council in August, P&DG received copies of the Woodland Trust's letter dated 6th May 2026 and the DWTs email on 2nd September 2026. These responses raised a number of concerns in terms of the impact of the Reg.18 scheme on the Ancient Woodland, including some questioning JGP's suggested mitigations and enhancements. Unfortunately, the Council did not seek additional information from P&DG in response to these concerns before completing the Regulation 19 Sustainability Appraisal which refers to them, nor before issuing the Regulation 19 draft Local Plan. In light of this, certain raised concerns will be commented upon herein. However, Derbyshire Wildlife Trust's comments broadly align with JGP's proposals terms of		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the western field and are particularly welcomed: 'Ideally the Green Wedge provides an opportunity not only to protect the woodland but also provide additional green space to take pressure of the woodland and if circumstances allowed the creation of complementary habitats and expansion of the woodland. If this were to happen the future of the woodland and improvements to its condition would be more secure.' The first part of these representations provides an assessment of the soundness of the plan and resulting requested modifications, including the allocation of the Site. Such are split into summary and detailed sections. This is followed by a Site Assessment covering the Site's suitability, development potential and deliverability for a now revised scheme of up to 60- 65 dwellings on the eastern		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						field, alongside substantial habitat creation including woodland creation/expansion, and habitat creation and associated recreational POS on the western field. This updates information submitted previously for a 49 dwelling scheme. There is some inherent overlap in the information provided in the separate Soundness Assessment and Site Assessment as the relevant issues overlap.		
OR167	Amber Valley Borough Council	Policy H1: Housing Delivery	Objects		No	The draft Local Plan sets out that the Derby Urban Area comprises the urban area of Derby and planned extensions to it in the administrative boundaries of Derby City, South Derbyshire and Amber Valley. There is history of positive collaborative working between the Derby Housing Market Area (HMA) authorities, which has included the Derby HMA Joint Advisory Board playing an important role in overseeing the co-ordination of evidence and	It would be helpful in Appendix 2 to detail the sources of supply for each monitoring year, to show which sites with permission, which sites which are allocated are delivering as well as assumptions on windfall.	The derivation of the 12,500 capacity figure is set out the Housing Requirement and Spatial Strategy Topic Paper, and Table 2 of the submission plan lists the supply over the full plan period to 2043, totalling 12,641 homes including windfalls and allocations. The Council welcomes Amber Valley's continued

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						strategy development between the three local authorities. We support the ongoing cooperation between our authorities to allow for appropriate delivery of housing across the Derby HMA. This is increasingly important given the changing context within which the HMA authorities are working. There are challenges due to different plan periods, changes to the local plan making system including transition arrangements, changes to how local housing need is calculated, a new version of the NPPF, and Local Government Reorganisation. Despite the obvious challenges, the HMA authorities are still proactively to working together. With respect to collaborative working, the HMA authorities have previously produced a Statement of Common Ground to document the joined up approach to working across the HMA area. The Statement of		cooperation and notes the Inspectors' conclusion in the Amber Valley Local Plan examination that the 1,320 homes represent a pragmatic first step in addressing housing need across the HMA, with any unmet need to be reassessed through future plans. The Statement of Common Ground is being updated to reflect the latest position, including terminology, and no change to the Plan is required. The full housing supply will need to be updated at end of the 2026/7 monitoring year (31 March 2027) to update the supply position. This will probably require factual modification to Table 2 (Housing

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Common Ground is currently being updated to reflect the latest position of each of the Local Authorities and combined HMA needs. <u>Housing need and delivery</u> Policy H1: Housing Delivery This policy now states: Over the Plan period (2023 to 2043) Derby's housing needs will be met through the delivery of high-quality new homes in sustainable locations. New homes will be provided to meet a range of housing needs including market and affordable homes, and across a variety of types and sizes, and which are capable of meeting specialist needs which are identified in the Local Housing Needs Assessment. In particular, the Council will: facilitate the delivery of a minimum of 12,500 new, high		Supply Table) on adoption. The supply update will also inform an updated 5 year housing supply

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						quality mixed tenure homes within the city between 2023 and 2043; work with neighbouring local authorities to co-ordinate and plan urban extensions to the city to ensure comprehensive development, connectivity and integration with established areas and communities and ensure that infrastructure needs are met; ... It is noted that the supporting text to this policy that it has been updated to include a new standard method housing need figure of 953 net new dwellings per annum (previously 917 net dwellings per annum), with an overall 20-year housing need figure of 19,060 net new homes. However, the most recent standard method annual housing need figure of 960 net new dwellings per annum, as of June 2026, is not reflected in the plan. We consider that the plan should use 960dpa to		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						calculate its housing needs but should only be applied from 2026. This would give a need of 16,320 over the period 2026 to 2043. Paragraph 74 of the Reg 19 submission draft Local Plan for Derby highlights that Derby City's ongoing housing needs determined through the standard method are unable to be wholly met within the city's boundaries given spatial constraints. It indicates that 'later work' has identified that the city would be able to provide a minimum of 12,500 homes during the plan period. However, this later work does not appear within the published evidence base. Derby City Council previously indicated that based on work updated in 2024 and covering the period to 2039, the City would have capacity to provide approximately 12,500 homes to 2039 (16 years). The figure of 12,500 is now being used in relation to the time frame of		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						2023 – 2043 as the plan period has been extended. It is unclear if any further work has been undertaken to review the earlier work which led to the 12,500 dwellings figure to see if further capacity can be identified for the additional years of 2039 – 2043. It is also unclear if the supply that was previously identified to make up the 12,500 dwellings is the same supply being relied upon in the Reg 19 Local Plan. For example, the windfall allowance (120 dwellings pa) has been extended for a further 4 years and there are allocations delivering 1,150 homes in the same period. We consider that these should be additional to the 12,500 figure. Therefore the plan should state that the supply is 14,130. This made up of the 12,500 supply for the period 2023-2039, plus 480 homes windfall for the period 2039-2043, plus the 1,150 homes being delivered on proposed allocated sites.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Accordingly, it is concluded that this policy is unsound as is it is not justified by the evidence. However, this could be rectified through modifications as detailed above. <u>Accommodating HMA unmet need</u> In terms of where HMA unmet need can be accommodated, the draft local plan at paragraph 77 and 180 implies that all of Derby's unmet housing needs will be accommodated within South Derbyshire and Amber Valley. In this regard: Paragraph 77 states: 'Taking these studies together with the statement of common ground between the HMA authorities and the progress on the Amber Valley and South Derbyshire Local Plans, the HMA's housing needs can be most sustainably met with the delivery of a minimum of 12,500 homes through this plan, and the remaining requirements being		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						delivered through the Amber Valley and South Derbyshire Local Plan.' Paragraph 180 States: 'A strategic approach to meeting the housing needs of the Derby HMA has been agreed by the three HMA authorities which means that Derby City's unmet needs will be accommodated in sustainable locations within South Derbyshire and Amber Valley.' For clarity, the agreed position between the authorities as detailed in the signed Statement of Common Ground is that the local housing need calculated using the previous version of the Government standard methodology for the time period to 2040 could be met within the HMA based on the plans being developed at that time. As noted above there is a changing context that will require the HMA to consider needs arising beyond 2040 in future plans.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The current standard method figure for Amber Valley of 670 homes is a substantial increase from the Adopted Local Plan requirement of 434 dwellings, which used the standard method calculation figure at the time of 350 dwellings per annum and incorporated unmet HMA need of 1320 dwellings. It is noted that as the Amber Valley housing requirement will be substantially higher under the new standard method this could result in a situation where Amber Valley may add to the HMA unmet need, subject to analysis of the housing need during the plan period 2026 – 2044 which has yet to be undertaken and work to assess future potential supply. Amber Valley Borough Council is currently undertaking a Housing and Economic Needs Assessment (HEDNA) to establish housing and economic need in the Borough, a green belt review and undertaking a Strategic Housing land Availability Assessment This		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						work is not expected to be completed until summer of 2027. However, at this point in time Amber Valley Borough Council is unable to determine a position with respect to accommodating HMA unmet need beyond that it has committed to, and therefore it cannot say that HMA unmet need can be met in appropriate sustainable locations. As previously advised, relevant references in the plan should refer to HMA unmet need rather than Derby unmet need.to accord with the changes set out by the Planning Inspectorate to the Amber Valley Local Plan.		
OR236	Caddick Land*	Policy H1: Housing Delivery	Objects		No	The draft Derby Local Plan correctly identifies unmet needs will be addressed in the South Derbyshire and Amber Valley local plans. However, the draft Derby Local Plan then specifically identifies sites within these authorities to meet those unmet needs (specifically		Policy H1 does not allocate land outside the city; paragraphs 181 and 182 describe the urban extensions proposed through the South Derbyshire Local Plan, which will be tested at that

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						sites in South Derbyshire on the edge of the Derby urban area). The approach of specifically identifying sites in other authority areas is unsound as the sites in South Derbyshire are not allocated sites, there are no current planning applications, and the draft plans which identify these sites have not been submitted for examination. The sites in question (South Derbyshire Draft Local Plan Part 1 Review sites STRA1 Infinity Garden Village and STRA2 Land South of Mickleover) have significant unresolved objections. This has direct implications for the Derby Local Plan as draft allocations within the plan (namely draft allocation HA5) are reliant on those sites within South Derbyshire. For example, if STRA2 on land South of Mickleover in South Derbyshire is not found sound then HA5 would not be deliverable.		plan's examination. Policy HA5 requires a comprehensive cross-boundary approach to the planned extension South of Mickleover, which the two councils are currently undertaking, as South Derbyshire's representation confirms. Despite this, applications in this area are ongoing and may run ahead of the Plan, preceding the requirement for master planning being adopted. No change required.
OR236	Caddick Land*	Policy H1: Housing Delivery	Objects		No	Caddick welcomes that emerging policy H1 has been updated to remove specific		Support for the revised wording of Policy H1 is

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						references to sustainable urban extensions in South Derbyshire being the means of meeting Derby's unmet need. This is a sensible and logical change which recognises the Derby Local Plan cannot lawfully allocate or direct development to particular locations in other authority areas. However, we remain concerned that through emerging plan paragraphs 181 and 182 there remains an implication that South Derbyshire sites at Mickleover and Infinity Garden Village are the intended or preferred locations. The emerging plan remains **unsound** in this regard, and references to sites in other authorities should be removed from the plan policies and supporting text.		welcomed. Paragraphs 181 and 182 are factual descriptions of the urban extensions proposed in the emerging South Derbyshire Local Plan and do not allocate or direct development outside the city. No change required.
OR161	Derbyshire County Council	Policy H1: Housing Delivery	Support	Yes	Yes	Derbyshire[DB3.1] County Council supports the approach set out in Policy H1. Derbyshire County Council has been working jointly with Derby City Council, Amber Valley		Support welcomed. The Council will continue to work with Derbyshire County Council and the HMA authorities on cross-boundary

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Borough Council and South Derbyshire District Council for a number of years now as the three local planning authorities have been reviewing their respective Local Plans. This joint working has been facilitated through a number of Member and Officer Working Groups, to consider the future housing requirements of the whole of the Derby Housing Market Area (HMA) and for the individual local authority areas which includes the Derby HMA Joint Advisory Board, Derby HMA Officer Coordination Group and Derby HMA Growth Strategy Officer Working Group. These Member and Officer Groups have also considered the likely potential strategic infrastructure requirements that are likely to be required to support housing and employment growth across the HMA. To this end, a Derby HMA Transport Strategy Group has recently been established to consider the highways and transport implications of		infrastructure, including the HMA transport modelling.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						planned growth across the HMA, which recently commissioned Systa Consultants to carry out transport modelling works of all the strategic and housing allocations that are being proposed in the three respective Local Plans (see further comments below). Under the requirements of the Duty to Cooperate, the four HMA authorities have also engaged with Erewash Borough Council on a regular basis over the last three or four years through these Member and Officer Groups to consider cross boundary strategic housing matters and future housing needs arising in Erewash Borough and the Derby HMA. The joint working arrangements within the Derby HMA have underpinned the preparation of separate but aligned local plans for each local authority areas, over a common timeframe as far as possible. This joint working has included:		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						• sharing of officer expertise • joint commissioning of technical studies and other work to develop a comprehensive, shared evidence base; • ensuring that planning policies for each authority area complement one another, to enable the long-term provision of housing and economic growth over the plan period and for future development to be supported by appropriate services and infrastructure. On the basis of the above, it is welcomed and supported that the Regulation 19 Local Plan has been prepared and drafted to reflect the considerable and extensive joint working that has taken place between the four HMA authorities and the key strategic issues that have been identified and joint approaches that have been agreed on key		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						strategic cross boundary planning matters. This joint working is fully reflected in Chapter 4: The City's Spatial Strategy and Policy H1. Housing Provision and Meeting Derby City's Unmet Need It is noted that the supporting text to Policy H1 of the Plan, indicates the following: 179. Derby's housing needs are set through the Government's 'Standard Method' calculation which identifies a need of 953 net new dwellings per annum. Over the 20-year plan period that equates to a need for a minimum of 19,060 net new homes. 183. Derby's capacity to provide new homes has been evidenced and agreed across the HMA as a minimum of 12,500 net new dwellings. The Derby HMA Joint Advisory Board has played an important role in overseeing the co-ordination of evidence and strategy development between the three local authorities.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						In this context, Policy HO1 of the new NPPF requires that strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. It is considered that this requirement in the NPPF has been appropriately reflected in the Regulation 19 Local Plan. As noted above, Derbyshire County Council has been working jointly and collaboratively for some time with Derby City Council, Amber Valley Borough Council and South Derbyshire District Council that comprise the Derby HMA, to consider cross boundary housing matters and particularly the future housing requirements of both the Derby HMA as a whole, and the individual local authority areas that will be set out in the three		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						councils' local plan reviews. This collaborative working has been carried out in the context that each of the three authorities are preparing their Local Plan Reviews to aligned timescales but slightly differing plan periods, with the Amber Valley Local Plan being the most advanced of the three plans, which has recently been adopted in March 2026. The implications of this are considered further below. Derby City Council has recently carried out extensive work to assess the City's capacity for accommodating future housing needs in the City, which has been assisted by the other HMA authorities including the County Council. The City Council's capacity work has been concluded and peer reviewed for robustness by consultants AECOM. This capacity work has concluded that the City can only accommodate around 12,500 new homes over the City Council's Local Plan Review		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						period against the new standard methodology housing need of around 19,000 new homes. In the context of the above, three HMA authorities supported by the County Council commissioned consultants (Clearlead) to undertake a Sustainability Appraisal (SA) of a range of options of how Derby City's unmet need could be accommodated within Amber Valley Borough and South Derbyshire District. The HMA authorities identified three alternative scale options to be tested through the SA which included: Scale 1: Standard method in full (including 35%); 36,584 dwellings; Scale 2: Standard method (no 35% uplift); 31,008 dwellings; and Scale 3: Standard method (no 35% uplift) + 10%; 34,109 dwellings.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Within each of these scale options, the SA considers different apportionment options between the three local authority areas, including distribution between sites adjoining Derby (the Derby Urban Area, or 'DUA'), towns and key villages. The assessment was informed by the HMA Growth Options Study. Within the SA, the Broad Areas of Search identified in the GOS have been compared to the sites submitted to the Strategic Housing and Economic Land Availability Assessment (SHELAA) for Amber Valley and South Derbyshire in order to provide an indication of site capacity for residential development. The overall conclusion of the SA is that meeting the unmet need arising from Derby as close as possible to the City amounts to the most sustainable development option. Given the above, Derbyshire County Council considers that		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the City Council's approach to assessing the City's future housing needs and its proposed approach in the Pre-Submission Plan that makes provision for a minimum of 12,500 dwellings over the plan period with the City's unmet need being met as large sustainable urban extensions on the edge of the City in Amber valley and South Derbyshire, is robust and well justified and is supported by a range of up-to-date evidence and takes appropriate account of the Government's new standard methodology for assessing housing need. In seeking to help meet part of Derby City's unmet need, the Regulation 19 Pre-Submission South Derbyshire Local Plan proposes to allocate two large strategic sites that form sustainable urban extensions to the City on land at Infinity Garden Village (IGV) for 2000 homes and on land south of Mickleover for 2,500 dwellings. The location of these sites fully reflects the conclusion of the SA		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						work above, which indicated that the most sustainable location to meet Derby's unmet need was for sites located as close to the City boundary as possible. In principle, therefore, the allocation of these two strategic sites has been supported by the County Council in its response to the South Derbyshire Local Plan Regulation 19 consultation, in which the County Council has also committed its support to work with the District Council to ensure that the key necessary strategic infrastructure required to support the delivery of the urban extensions, is delivered in a timely manner, which includes the provision of a new A50 junction and link road and new secondary school at IGV allocation and a new primary school on the Mickleover allocation. Statement of Common Ground		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Given the context above, an updated Statement of Common Ground has recently been agreed and finalised by the three HMA local planning authorities, to which Derbyshire County Council is also a signatory as strategic infrastructure provider. The SoCG sets out an agreed approach of how the authorities will work together to seek to ensure that the unmet needs of Derby City are met in full through the Local Plans of Amber Valley Borough Council and South Derbyshire District Council. The SoCG has been tested through the Examination of the recently adopted Amber Valey Local Plan, through which the Inspector deemed the joint working approach between the HMA authorities to be robust and legally compliant.		
OR261	Emery Planning on behalf of Seabridge Developments Limited*	Policy H1: Housing Delivery	Object		No	Housing need Policy H1 of the Draft Local Plan sets out a minimum housing requirement of 12,500 dwellings between 2023 and 2043, equivalent to 625 dwellings per annum. This is a		The 12,500 figure is the city's evidenced capacity over the plan period, agreed across the Derby HMA, and completions since the 2023 base date (3,164

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						capacity-led figure which is well below local housing need, which equates to 19,200 dwellings over the proposed plan period (960 dpa). We consider that the extent of the housing land supply has been overstated, meaning that the shortfall to be met in other authorities has been underestimated. We assess the robustness of the housing land supply position below. Base date and completions during 2023-2025 The plan sets out a minimum requirement of 12,500 dwellings over the period 2023-2043. Over the 20-year plan period, this is an average of 625 dwellings per annum (dpa) (12,500 / 20 = 625). This compares with the current LHN of 953 dpa. From the start of the plan period in 2023/24 to 2025/26, the Council has delivered 3,164 dwellings, which equates to an		homes, more than 1,000 a year) form part of that capacity rather than a reason to rebase the requirement. The deliverability of the remaining supply is evidenced in SA Appendix G, available during consultation and detailed in the Site Selection and the Windfall Allowance Papers, with funding-dependent City Centre sites phased beyond the first five years. No change required. The way the housing supply was updated through evidence during plan preparation is set out in the Strategy topic paper. The Plan period itself has changed during this process, as well as the Standard Method

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						'oversupply' of 1,289 dwellings against an annual requirement of 625 dpa. This effectively reduces the requirement over the remainder of the plan period to just 549 dpa (i.e., 12,500 – 3,164 / 17 = 549). Therefore, the plan seeks to reduce the forward requirement by factoring in past 'over-delivery' against a housing requirement which is significantly lower than local housing need. This approach is inconsistent with the Framework and the PPG. For the reasons below, we consider that the Council should not reduce its requirement based on previous oversupply: Firstly, the calculation of LHN is a forward-looking assessment of housing needs. LHN takes into account previous completions through step 2 (the affordability ratio, which is in part calculated by house sales, some of which will have been through new completions).		need calculation. The 'capacity' has also been updated over time. This has all culminated in the final submission Plan. Whilst it is true the that standard method continues to change, had there been under delivery in the first three years, the development sector would undoubtedly be arguing that it should be taken into account in looking forwards. The lack of flexibility in regard to supply reflects the capacity limitations of the City, these have been apparent for over a decade and are acknowledged by the current set of plans in the wider region (adopted 2016/17). The lack of reasonable

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Secondly, the housing requirement is a minimum figure and to reduce it by over-supply would be contrary to the Government's objective of significantly boosting supply. Thirdly, the update to the PPG referred to at the end of paragraph 77 of the December 2023 Framework, which made reference to "the circumstances in which past shortfalls or over-supply can be addressed" was never made. Rather, the Government removed this reference in the 2024 Framework. Fourthly, 'over-supply' is being measured against a constrained housing requirement which does not reflect local housing need. It is not 'over-supply' at all. In reality, there has been under-delivery against LHN. In relation to supply, paragraph 68-032 of the PPG answers the question: "How can past over-supply of		alternative sites identified through the call for sites or promoted as omission sites underline this constraint. The windfall allowance and how it has been calculated is detailed in the windfall Allowance Topic Paper.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						housing completions against planned requirements be addressed?" as follows: "Where areas deliver more completions than required, the additional supply can be used to offset any shortfalls against requirements from previous years." However, in this case the Council is seeking to reduce the housing requirement moving forward. For the reasons set out above, such an approach is incompatible with how LHN is calculated, incompatible with the HDT, and contrary to the Government's objective of significantly boosting supply. It is therefore unsurprising that the approach is not supported by the PPG. The same issue in similar circumstances was considered by the Inspector examining the Winchester Local Plan. In that case, the Council sought to reduce the local housing need requirement by the over-supply.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Inspector's post hearing note (ref: ED38a dated 10th September 2025) stated: "However, I am not convinced by the way in which the Council has derived the Plan's housing requirement from LHN. The Plan's most recent calculation of LHN was in 2024. The Plan's housing requirement as set out in policy H1 runs from 2020-2040. The Plan's housing requirement therefore includes completions since the start of the Plan period. It therefore includes completions that took place before the latest calculation of LHN. The calculation of LHN is a forward-looking assessment of housing needs. From the point at which LHN is calculated it takes account of what has happened in previous years. The National Planning Practice Guidance (PPG) confirms that in calculating LHN using the standard method, the affordability adjustment is applied to take account of past under delivery. Whilst the PPG		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						refers to past under delivery in this light, and is silent on over-delivery, I take a common-sense approach on this matter. For this reason, past supply prior to the latest calculation of LHN (2024) should not be taken into account in deriving the Plan's housing requirement due to the effect of the affordability ratio in the standard method." (our emphasis) Paragraphs 98 and 99 of the Inspector's final report state: "98 Local plans should be up to date, and the calculation of LHN should be a forward-looking assessment of housing needs. National guidance expects LHN to be calculated at the start of Plan making and kept under review and revised where appropriate. However, each calculation of LHN amends the previous calculation. 99. Using the most recent calculation of LHN results in a LHN of 10,816 dwellings 2024-2040. The Plan should be		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						corrected to indicate the latest calculation of LHN in 2024 running to the end of the Plan period which is 2040. That is necessary to ensure that the Plan accords with national policy, is positively prepared, justified and effective." (our emphasis) Within this context, the housing requirement should not be reduced to account for past over-supply prior to the base date of the LHN. Derby's housing land supply The chronology of how the housing land supply, and therefore the housing requirement, has been arrived at is briefly outlined below: In 2021, Derby City Council's officers identified a supply of between 11,900 to 13,600 dwellings across an 18-year plan period. AECOM reviewed the City Council's position in 2022 and concluded that a lower capacity of 10,400 dwellings was 'more realistic' based on viability and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						deliverability of sites and locations. Derby City Council's officers 'updated' the assessment in March 2023 and concluded that the capacity figure should be 12,041 dwellings, across a shorter 17-year plan period3. This included re-instating city centre capacity which Derby City Council's officers accept are 'highly ambitious', whilst AECOM considered them to be unrealistic. There were further updates by Derby City Council's officers, including additional sites and increasing the proposed windfall allowance, with the claimed supply now jumping to 12,500 dwellings over a 17-year period as of July 2024 based on 'rounding up' from 12,361 dwellings without any apparent evidence. As is clear from the chronology, despite AECOM concluding that Derby City Council's supply position was overstated, the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						City Council's officers have repeatedly increased the supply, despite assessing a shorter 17-year period. None of the assumptions applied have ever been tested at examination. We consider that the true extent of the supply is likely to be significantly lower than is claimed by the City Council. It is also notable that the Derby Housing Land Capacity: Position Paper October 2024 is not listed within the housing evidence base as part of the Regulation 19 consultation, and does not appear to have been updated. The Derby Housing Market Area Joint Advisory Board has also not published any meeting notes since December 2025. Furthermore, the assessments are now several years old and do not reflect the significant viability challenges that have arisen in recent years for house builders. For example, research from Zoopla has revealed that residential development is unviable in 48% of England. This is a result of build cost		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						increasing far more rapidly than house prices in recent years. Although house prices have increased by around 20% since 2020, construction costs have risen by more than 35%4. While some of those increases are a result of inflationary pressures in the wider economy, house building has been particularly impacted by increased regulatory costs. These increases are set to continue, with the Future Homes Standard set to add c. £9,700 to the cost of an individual dwelling5, along with further increases deriving from the Building Safety Levy and a doubling of landfill tax at the last budget (which will add £2,000 to the cost of building a new home). As these viability measures stem from general economic inflation and regulatory changes, they are not simply cyclical changes or short-term volatility whose impact we can expect to dissipate over the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						plan period. Rather, they are entrenched and structural. It is therefore logical that they would impact upon the viability and deliverability of Derby's claimed capacity as it is underpinned by reports which do not take these current challenges into account. Table 2 of the draft Local Plan for Derby sets out the following housing land supply position: Refer to Annex 1, Table 1 There are fundamental issues relating to the housing land supply, which we discuss below. Flexibility The proposed supply provides just 1.1% of flexibility over the plan period. The letter dated 27 July 2023 from Derby City Council to South Derbyshire's Head of Planning and Strategic Housing7 explicitly states: "The capacity figure of 12,500 will require all of these sites to		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						come forward, at high-capacity assumptions." The likelihood of sites not coming forward is therefore a critical factor and should be a significant consideration in relation to the Duty to Cooperate. Most plans include a flexibility allowance in the overall housing land supply of at least 10%. In Derby there is a strong case that the flexibility allowance should be higher given the previous delivery record. Given that Derby City's requirement will be a supply led figure, the potential for delivery issues and Derby's inability to meet its own housing requirement should be further accommodated within the neighbouring authorities in addition to the shortfall identified against the housing requirement. Windfall		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The windfall allowance makes up almost 15% of the total housing land supply. Paragraph 75 of the Framework states: "Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area." The key findings from the AECOM report in January 2023 stated that the windfall allowance of 100dpa is 'broadly logical and appropriate' 8 . Furthermore, the 2024 Position Paper states that AECOM's		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						recommendation relating to windfall allowance was one of the reasons for recommending an overall lower capacity of 10,400 dwellings within Derby. The June 2023 Capacity Update set out within the 2024 Position Paper states that one of the key updates was the increase of the windfall allowance from 100 to 120 dwellings per annum. The reasoning for this being: "…to account for the fact that an unspecified amount of surplus employment land is likely to be redeveloped during the plan period and historic trends" Given that the amount is stated to be unspecified, lack of historic evidence or assessment of future capacity for redevelopment and/or conversion, it is not considered that compelling evidence exists to justify the increase. The Employment Land Review October 2023 states at paragraph 8.10 that in the case		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						of Derby, data on losses to other uses (including residential) has not been consistently monitored. The Council has acknowledged multiple times that the employment land is in demand, of average or above quality and should be protected. Appendix 2 of the 2024 Position Paper further states: "Whilst some capacity is likely to arise from the redevelopment of existing employment land, we believe the opportunities for this are not significant. Most of the existing employment land in Derby is not suitable for residential development, whether it is considered to be surplus or not, largely due to issues such as flood risk, land contamination and the proximity of incompatible uses. The emerging ELR also identifies most of our employment land as being average quality or above and therefore recommended to be retained in employment use. Nonetheless,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						we acknowledge that over the Plan period, areas of existing employment land that is suitable for residential redevelopment will become available and this is reflected in the windfall allowance. Our revised capacity figure of 12,500 includes an increased windfall assumption of 120 dwellings per year, which is an increase from the 100 dwellings per year presented to JAB." (our emphasis) It appears that the initial figure of 100 dwellings per annum took account of the above mentioned constraints and aligned with the conclusions reported by AECOM. However, it has since been inflated without justification. Paragraph 188 of the draft plan states: "Derby's industrial and manufacturing history means that the city contains a lot of previously developed (brownfield) land which is in a wide range of uses. Historically,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						sites and areas of brownfield land have become available for development over time and have been developed for residential uses, including through permitted development rights for changing commercial uses into new homes. This trend is expected to continue but it is impossible to identify in advance all of the sites and locations which might contribute to housing supply and so a 'Windfall Allowance' is included as part of the housing supply in the Plan. The allowance, which is excluded from the first three years of the supply, asserts that 120 dwellings a year will derive from these sources. There is compelling evidence in the form of past windfall completions that the allowance is a conservative one. In the period from 2016 to 2026 over 100 windfall dwellings were delivered on average each year on small sites alone (1-9 dwellings). This figure does not include any housing delivered within the city centre. The		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Council is aware of a number of possible sites which could contribute to the windfall allowance but does not have the absolute certainly to allocate them in the plan. However, many windfalls will simply come from unknown sites that we could not have planned to happen. That is the nature of the city and is supported by past trends." (our emphasis) The supporting text therefore appears to be claiming that there will be additional windfall sources, but these are not evidenced (let alone is there 'compelling' evidence), and we would question why such sites are not allocated. It is incumbent upon the Council to adduce the compelling evidence as required by the Framework. Without such evidence, a windfall allowance should not be included.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Notwithstanding our view that the housing land capacity within Derby City has been overstated, even based on the Council's figures there remains a shortfall of 6,559 dwellings against the local housing need of 19,200 dwellings over the proposed plan period9, which the Council is expecting South Derbyshire and Amber Valley to meet. We assess the wider HMA context below. Derby HMA The February 2026 HMA SoCG remains the most up to date agreement. A further revision has not been provided since the Regulation 18 consultation was undertaken. Table A within the SoCG provides the housing need figures for each authority based on the 2023 and 2024 standard method and May 2025 inputs. An extract is shown below: Refer to Annex 1, Table 2 Table B of the SoCG claims that the supply to be provided across the HMA over the plan		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						period is sufficient to meet housing needs, with a claimed surplus across the plan area of 1,423 dwellings: Refer to Annex 1, Table 3 However, there are a number of flaws in terms of the position set out. Firstly, Table B provides a mismatch of the 2023 standard method and the 2024 standard method, and does not reflect local housing need across the HMA on any basis. Secondly, Table A only sets out housing need over the period 2022 – 2039. The plan period for the Derby Local Plan is 2023 – 2043 (notwithstanding our view that the plan period should be 2025 – 2045). Using the housing needs as shown in the above table and the proposed plan period 2023 to 2043 results in the following housing need across the Derby HMA: Refer to Annex 1, Table 4		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Based on current local housing need figures (as at September 2026), the proposed plan period 2023 to 2043 results in the following need: Refer to Annex 1, Table 5 Therefore, without prejudice to our view that the proposed plan period is incorrect, and that Derby's housing land supply has been over-stated, housing needs are not being met across the HMA during the current proposed plan period for the Derby Local Plan. The need over the period 2023 – 2043, applying the current standard method is actually 44,520 dwellings. Taking the supply figures in Table B of the SoCG, there is a shortfall in provision of some 8,806 dwellings over the plan period, before any allowance is made for flexibility and contingency. It is important to note that the plan periods of the emerging local plan for South Derbyshire and the adopted Amber Valley		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						local plan only extend up to 2042 and 2040 respectively. At present, Derby City does not benefit from any assistance from the HMA authorities in relation to its unmet needs beyond those periods. Nevertheless, the SoCG proposes contributions from South Derbyshire and Amber Valley follows: 4,867 dwellings in South Derbyshire 1,320 dwellings in Amber Valley This equates to a total of 6,187 dwellings. As mentioned earlier in these representations, the SoCG has not been updated since February despite Amber Valley having adopted its plan in March 2023 and South Derbyshire having undertaken a further Regulation 19 Consultation in June 2026. We provide comments on the proposed and adopted contributions below. South Derbyshire		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Sustainability Appraisal (SA) supporting this Regulation 19 consultation sets out the Spatial Strategy Option. Options A, the preferred option, states: "Housing Growth – 12,500, capacity. Meeting the Derby HMA target for Derby, but capped below the 18,340 net new homes needed over the plan period (2023-2043). Due to the agreed capacity cap, the Derby HMA authorities of Amber Valley and South Derbyshire meet the unmet need by 5,840. Employment Land -133ha" (our emphasis) The adopted Amber Valley Local Plan provides a contribution of 1,320 dwellings towards the unmet needs of Derby. This therefore leaves a remainder of 4,520 dwellings to be accommodated by South Derbyshire, which is 347 dwellings less than agreed within the most recent SoCG. Given the various figures provided and the uncertainty		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						resulting from Policy S1 of the draft South Derbyshire Local Plan Part 1, it is not clear to what extent these contributions can be relied upon. South Derbyshire carried out their Part 2 Local Plan Regulation 18 Consultation in January 2026, the Part 1 Local Plan Regulation 19 consultation in April 2025, and more recently a Part 1 Local Plan Regulation 19 Addendum consultation in June 2026. Representations on behalf of SLG were submitted in response to all consultations. The agreed SoCG states that the emerging plan will contribute 4,867 dwellings towards the unmet needs of the HMA. However, Policy S1 of the emerging South Derbyshire Part 1 Local Plan (as amended by main modification PM3) states as follows: “i) Over the plan period (2022 – 2042) at least 15,263 dwellings will be built within South Derbyshire. This comprises 10,140 homes to meet South		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Derbyshire's own needs and the remainder to help meet Derby City's unmet need to reflect the high level of housing delivery experienced in South Derbyshire in recent years; to provide flexibility in regard to site delivery and to help match affordable housing need with delivery as closely as possible. The housing sites required will be met on a mixture of brownfield and greenfield sites with encouragement given to the re-use of previously developed land." (our emphasis) This leaves a total of 5,123 dwellings to address the other needs outlined within South Derbyshire's Policy S1. The draft Local Plan Part 1 and the Issues and Options Document relating to the emerging Local Plan Part 2 do not provide a further breakdown of this figure, and it is not clear how the figure is proposed to be distributed between Derby City's unmet need, additional flexibility, and affordable housing delivery. If		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						South Derbyshire is indeed delivering the 4,867 dwellings outlined within the SoCG to meet Derby's need, it would leave just 256 homes over the entirety of South Derbyshire's plan period to contribute to the other objectives identified in South Derbyshire's Policy S1. . On this basis, the true contribution toward the unmet needs of Derby City may well amount to less than 4,867 dwellings and further clarification is required in that regard. Whilst an assessment has been carried out of South Derbyshire needs together with the HMA and specifically the unmet needs of Derby City, there has been no examination of options to meet its own needs in the first instance. The two comprise distinct and separate exercises. Indeed, in the case of Shropshire, the Sustainability Appraisal assessed its standalone housing needs, but there was an issue relating to the amalgamation of its own		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						needs with those of the Black Country when considering an uplift to meet the neighbouring authorities' unmet needs. Paragraph 4.1 of the Inspectors letter dated 16 January 2024 states: "4.1 What the Council has not done as part of the revised SA work is to look at what the environmental impacts are of meeting some of the unmet needs of the Black Country i.e. 1500 homes and 30ha of employment land, in addition to meeting its own needs. Instead, what the revised SA does is amalgamate the Black Country's unmet needs into its own growth options and at the same time alter the growth options compared to earlier SA work. This needs to be assessed as a distinct and separate exercise. We will cover the growth options issue in other questions you have posed." Policy S1 refers to affordable housing needs and flexibility alongside the provision towards		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Derby's unmet needs, therefore amalgamating the three matters which should be assessed and quantified in their own respect. Without quantifying how many homes are needed for affordable housing needs and flexibility, it is not possible to know how many homes South Derbyshire are actually proposing to deliver to meet need in Derby. The emerging South Derbyshire Local Plan Part 1 remains untested through examination, SLG have submitted representation to its consultations highlighting a number of unresolved issues as outlined above, and there is no guarantee that it will be found sound by Inspectors appointed by the Secretary of State. Amber Valley It is acknowledged that Amber Valley's draft Local Plan proposes to provide 1,320 dwellings over the plan period toward meeting the unmet need of Derby. However, this		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						figure originated from the number of dwellings to be delivered on the proposed allocation at Brun Lane, Mackworth10. The landowners advised during the examination that they would only release land for approximately 500 dwellings in this location. The Inspectors have consequently concluded as follows: “The main landowner for the site has advised that they no longer wish to develop the number of houses proposed but would be content to release land to provide in the region of 500 homes. This would, in our view, risk a piecemeal approach to development which would not ensure the appropriate provision of necessary infrastructure.” Whilst the site remains identified as an area for future growth within the plan, it remains the case that the site is not available to the extent initially envisaged.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						In addition, Table B of the SoCG shows that Amber Valley's expected housing land supply over the Council's proposed plan period is 8,714 dwellings. However, the housing requirement in the recently adopted Local Plan is only 7,656 dwellings. The contribution set within the table is therefore overstated. Allowances for flexibility cannot be conflated with a contribution for Derby. As the emerging local plan meets less than 80% of local housing need as calculated using the standard method, Amber Valley is also required to prepare a new plan under the revised plan-making system upon adoption of the currently emerging plan. The Council's new local plan will need to reflect the housing need calculated using the current standard method, which at present increases the housing need from 351 to 670 dwellings per annum. The ability of Amber Valley to meet any unmet housing needs of Derby		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						in the future is therefore uncertain and should be taken into consideration in respect of the long term housing needs of Derby City. Conclusions on Policy H1 / meeting housing needs Derby's housing needs, whilst recently reduced, remain significant. There are a number of issues relating to both the housing requirement and supply, which we summarise as follows: Derby City's capacity is significantly overstated and by its own admission, highly ambitious. The shortfall to be addressed by neighbouring authorities should therefore be much higher. There is a lack of updated evidence, namely Statements of Common Ground and in respect of the housing land capacity position. The plan period should cover the period 2025 – 2045. Past completions from 2023 - 2026		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						should not be included in the supply. Derby's supply, along with the contributions from other authorities, do not provide sufficient flexibility against under delivery. The increase to the windfall allowance within Derby's supply is unjustified. South Derbyshire's proposed contribution toward Derby's unmet needs is amalgamated with delivery of affordable housing and provision of flexibility. It is not clear how many homes South Derbyshire will actually be delivering to meet Derby's needs, and whether it is, in fact, planning to deliver the 4,867 dwellings agreed through the SoCG. The figure cannot be relied upon in full until this is clarified. Amber Valley's contribution toward Derby's unmet needs of 1,320 dwellings was based upon the delivery of a single site		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						which has since been found to be unavailable. Although at face value Derby's housing requirement and HMA contributions meet Derby's needs over the plan period, the above issues cast serious doubt over the deliverability of these assumptions. We therefore consider that the needs of Derby are unlikely to be met over the plan period. Consequently, significant further assistance is required from the neighbouring authorities to ensure that Derby's needs, and the needs of the HMA as a whole, are met in full. The position needs to be detailed within the plan and the SoCG with South Derbyshire and Amber Valley should be reviewed and updated accordingly.		
OR259	Emery Planning on behalf of The Strategic Land Group*	Policy H1: Housing Delivery	Object		No	Housing need Policy H1 of the Draft Local Plan sets out a minimum housing requirement of 12,500 dwellings between 2023 and 2043, equivalent to 625 dwellings per annum. This is a		The 12,500 figure is the city's evidenced capacity over the plan period, agreed across the Derby HMA, and completions since the 2023 base date (3,164

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						capacity-led figure which is well below local housing need, which equates to 19,200 dwellings over the proposed plan period (960 dpa). We consider that the extent of the housing land supply has been overstated, meaning that the shortfall to be met in other authorities has been underestimated. We assess the robustness of the housing land supply position below. Base date and completions during 2023-2025 The plan sets out a minimum requirement of 12,500 dwellings over the period 2023-2043. Over the 20-year plan period, this is an average of 625 dwellings per annum (dpa) (12,500 / 20 = 625). This compares with the current LHN of 953 dpa. From the start of the plan period in 2023/24 to 2025/26, the Council has delivered 3,164 dwellings, which equates to an		homes, more than 1,000 a year) form part of that capacity rather than a reason to rebase the requirement. The deliverability of the remaining supply is evidenced in SA Appendix G, available during consultation and detailed in the Site Selection and the Windfall Allowance Papers, with funding-dependent City Centre sites phased beyond the first five years. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						'oversupply' of 1,289 dwellings against an annual requirement of 625 dpa. This effectively reduces the requirement over the remainder of the plan period to just 549 dpa (i.e., 12,500 – 3,164 / 17 = 549). Therefore, the plan seeks to reduce the forward requirement by factoring in past 'over-delivery' against a housing requirement which is significantly lower than local housing need. This approach is inconsistent with the Framework and the PPG. For the reasons below, we consider that the Council should not reduce its requirement based on previous oversupply: Firstly, the calculation of LHN is a forward-looking assessment of housing needs. LHN takes into account previous completions through step 2 (the affordability ratio, which is in part calculated by house sales, some of which will have been through new completions).		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Secondly, the housing requirement is a minimum figure and to reduce it by over-supply would be contrary to the Government's objective of significantly boosting supply. Thirdly, the update to the PPG referred to at the end of paragraph 77 of the December 2023 Framework, which made reference to "the circumstances in which past shortfalls or over-supply can be addressed" was never made. Rather, the Government removed this reference in the 2024 Framework. Fourthly, 'over-supply' is being measured against a constrained housing requirement which does not reflect local housing need. It is not 'over-supply' at all. In reality, there has been under-delivery against LHN. In relation to supply, paragraph 68-032 of the PPG answers the question: "How can past over-supply of		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						housing completions against planned requirements be addressed?" as follows: "Where areas deliver more completions than required, the additional supply can be used to offset any shortfalls against requirements from previous years." However, in this case the Council is seeking to reduce the housing requirement moving forward. For the reasons set out above, such an approach is incompatible with how LHN is calculated, incompatible with the HDT, and contrary to the Government's objective of significantly boosting supply. It is therefore unsurprising that the approach is not supported by the PPG. The same issue in similar circumstances was considered by the Inspector examining the Winchester Local Plan. In that case, the Council sought to reduce the local housing need requirement by the over-supply.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Inspector's post hearing note (ref: ED38a dated 10th September 2025) stated: "However, I am not convinced by the way in which the Council has derived the Plan's housing requirement from LHN. The Plan's most recent calculation of LHN was in 2024. The Plan's housing requirement as set out in policy H1 runs from 2020-2040. The Plan's housing requirement therefore includes completions since the start of the Plan period. It therefore includes completions that took place before the latest calculation of LHN. The calculation of LHN is a forward-looking assessment of housing needs. From the point at which LHN is calculated it takes account of what has happened in previous years. The National Planning Practice Guidance (PPG) confirms that in calculating LHN using the standard method, the affordability adjustment is applied to take account of past under delivery. Whilst the PPG refers to past under delivery in		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						this light, and is silent on over-delivery, I take a common-sense approach on this matter. For this reason, past supply prior to the latest calculation of LHN (2024) should not be taken into account in deriving the Plan's housing requirement due to the effect of the affordability ratio in the standard method." (our emphasis) Paragraphs 98 and 99 of the Inspector's final report state: "98 Local plans should be up to date, and the calculation of LHN should be a forward-looking assessment of housing needs. National guidance expects LHN to be calculated at the start of Plan making and kept under review and revised where appropriate. However, each calculation of LHN amends the previous calculation. 99. Using the most recent calculation of LHN results in a LHN of 10,816 dwellings 2024-2040. The Plan should be corrected to indicate the latest		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						calculation of LHN in 2024 running to the end of the Plan period which is 2040. That is necessary to ensure that the Plan accords with national policy, is positively prepared, justified and effective." (our emphasis) Within this context, the housing requirement should not be reduced to account for past over-supply prior to the base date of the LHN. Derby's housing land supply The chronology of how the housing land supply, and therefore the housing requirement, has been arrived at is briefly outlined below: In 2021, Derby City Council's officers identified a supply of between 11,900 to 13,600 dwellings across an 18-year plan period. AECOM reviewed the City Council's position in 2022 and concluded that a lower capacity of 10,400 dwellings was 'more realistic' based on viability and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						deliverability of sites and locations. Derby City Council's officers 'updated' the assessment in March 2023 and concluded that the capacity figure should be 12,041 dwellings, across a shorter 17-year plan period3. This included re-instating city centre capacity which Derby City Council's officers accept are 'highly ambitious', whilst AECOM considered them to be unrealistic. There were further updates by Derby City Council's officers, including additional sites and increasing the proposed windfall allowance, with the claimed supply now jumping to 12,500 dwellings over a 17-year period as of July 2024 based on 'rounding up' from 12,361 dwellings without any apparent evidence. As is clear from the chronology, despite AECOM concluding that Derby City Council's supply position was overstated, the City Council's officers have		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						repeatedly increased the supply, despite assessing a shorter 17-year period. None of the assumptions applied have ever been tested at examination. We consider that the true extent of the supply is likely to be significantly lower than is claimed by the City Council. It is also notable that the Derby Housing Land Capacity: Position Paper October 2024 is not listed within the housing evidence base as part of the Regulation 19 consultation, and does not appear to have been updated. The Derby Housing Market Area Joint Advisory Board has also not published any meeting notes since December 2025. Furthermore, the assessments are now several years old and do not reflect the significant viability challenges that have arisen in recent years for house builders. For example, research from Zoopla has revealed that residential development is unviable in 48% of England. This is a result of build cost		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						increasing far more rapidly than house prices in recent years. Although house prices have increased by around 20% since 2020, construction costs have risen by more than 35%4. While some of those increases are a result of inflationary pressures in the wider economy, house building has been particularly impacted by increased regulatory costs. These increases are set to continue, with the Future Homes Standard set to add c. £9,700 to the cost of an individual dwelling5, along with further increases deriving from the Building Safety Levy and a doubling of landfill tax at the last budget (which will add £2,000 to the cost of building a new home6). As these viability measures stem from general economic inflation and regulatory changes, they are not simply cyclical changes or short-term volatility whose impact we can expect to dissipate over the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						plan period. Rather, they are entrenched and structural. It is therefore logical that they would impact upon the viability and deliverability of Derby's claimed capacity as it is underpinned by reports which do not take these current challenges into account. Table 2 of the draft Local Plan for Derby sets out the following housing land supply position: Refer to Annex 1, Table 2 There are fundamental issues relating to the housing land supply, which we discuss below. Flexibility The proposed supply provides just 1.1% of flexibility over the plan period. The letter dated 27 July 2023 from Derby City Council to South Derbyshire's Head of Planning and Strategic Housing7 explicitly states: "The capacity figure of 12,500 will require all of these sites to		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						come forward, at high-capacity assumptions." The likelihood of sites not coming forward is therefore a critical factor and should be a significant consideration in relation to the Duty to Cooperate. Most plans include a flexibility allowance in the overall housing land supply of at least 10%. In Derby there is a strong case that the flexibility allowance should be higher given the previous delivery record. Given that Derby City's requirement will be a supply led figure, the potential for delivery issues and Derby's inability to meet its own housing requirement should be further accommodated within the neighbouring authorities in addition to the shortfall identified against the housing requirement. Windfall		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The windfall allowance makes up almost 15% of the total housing land supply. Paragraph 75 of the Framework states: "Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area." The key findings from the AECOM report in January 2023 stated that the windfall allowance of 100dpa is 'broadly logical and appropriate' 8 . Furthermore, the 2024 Position Paper states that AECOM's		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						recommendation relating to windfall allowance was one of the reasons for recommending an overall lower capacity of 10,400 dwellings within Derby. The June 2023 Capacity Update set out within the 2024 Position Paper states that one of the key updates was the increase of the windfall allowance from 100 to 120 dwellings per annum. The reasoning for this being: "…to account for the fact that an unspecified amount of surplus employment land is likely to be redeveloped during the plan period and historic trends" Given that the amount is stated to be unspecified, lack of historic evidence or assessment of future capacity for redevelopment and/or conversion, it is not considered that compelling evidence exists to justify the increase. The Employment Land Review October 2023 states at paragraph 8.10 that in the case		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						of Derby, data on losses to other uses (including residential) has not been consistently monitored. The Council has acknowledged multiple times that the employment land is in demand, of average or above quality and should be protected. Appendix 2 of the 2024 Position Paper further states: "Whilst some capacity is likely to arise from the redevelopment of existing employment land, we believe the opportunities for this are not significant. Most of the existing employment land in Derby is not suitable for residential development, whether it is considered to be surplus or not, largely due to issues such as flood risk, land contamination and the proximity of incompatible uses. The emerging ELR also identifies most of our employment land as being average quality or above and therefore recommended to be retained in employment use. Nonetheless,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						we acknowledge that over the Plan period, areas of existing employment land that is suitable for residential redevelopment will become available and this is reflected in the windfall allowance. Our revised capacity figure of 12,500 includes an increased windfall assumption of 120 dwellings per year, which is an increase from the 100 dwellings per year presented to JAB." (our emphasis) It appears that the initial figure of 100 dwellings per annum took account of the above mentioned constraints and aligned with the conclusions reported by AECOM. However, it has since been inflated without justification. Paragraph 188 of the draft plan states: "Derby's industrial and manufacturing history means that the city contains a lot of previously developed (brownfield) land which is in a wide range of uses. Historically,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						sites and areas of brownfield land have become available for development over time and have been developed for residential uses, including through permitted development rights for changing commercial uses into new homes. This trend is expected to continue but it is impossible to identify in advance all of the sites and locations which might contribute to housing supply and so a 'Windfall Allowance' is included as part of the housing supply in the Plan. The allowance, which is excluded from the first three years of the supply, asserts that 120 dwellings a year will derive from these sources. There is compelling evidence in the form of past windfall completions that the allowance is a conservative one. In the period from 2016 to 2026 over 100 windfall dwellings were delivered on average each year on small sites alone (1-9 dwellings). This figure does not include any housing delivered within the city centre. The		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Council is aware of a number of possible sites which could contribute to the windfall allowance but does not have the absolute certainly to allocate them in the plan. However, many windfalls will simply come from unknown sites that we could not have planned to happen. That is the nature of the city and is supported by past trends." (our emphasis) The supporting text therefore appears to be claiming that there will be additional windfall sources, but these are not evidenced (let alone is there 'compelling' evidence), and we would question why such sites are not allocated. It is incumbent upon the Council to adduce the compelling evidence as required by the Framework. Without such evidence, a windfall allowance should not be included.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Notwithstanding our view that the housing land capacity within Derby City has been overstated, even based on the Council's figures there remains a shortfall of 6,559 dwellings against the local housing need of 19,200 dwellings over the proposed plan period9, which the Council is expecting South Derbyshire and Amber Valley to meet. We assess the wider HMA context below. Derby HMA The February 2026 HMA SoCG remains the most up to date agreement. A further revision has not been provided since the Regulation 18 consultation was undertaken. Table A within the SoCG provides the housing need figures for each authority based on the 2023 and 2024 standard method and May 2025 inputs. An extract is shown below: Refer to Annex 1, Table 1 Table B of the SoCG claims that the supply to be provided across the HMA over the plan		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						period is sufficient to meet housing needs, with a claimed surplus across the plan area of 1,423 dwellings: Refer to Annex 1, Table 3 However, there are a number of flaws in terms of the position set out. Firstly, Table B provides a mismatch of the 2023 standard method and the 2024 standard method, and does not reflect local housing need across the HMA on any basis. Secondly, Table A only sets out housing need over the period 2022 – 2039. The plan period for the Derby Local Plan is 2023 – 2043 (notwithstanding our view that the plan period should be 2025 – 2045). Using the housing needs as shown in the above table and the proposed plan period 2023 to 2043 results in the following housing need across the Derby HMA: Refer to Annex 1, Table 4		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Based on current local housing need figures (as at September 2026), the proposed plan period 2023 to 2043 results in the following need: Refer to Annex 1, Table 5 Therefore, without prejudice to our view that the proposed plan period is incorrect, and that Derby's housing land supply has been over-stated, housing needs are not being met across the HMA during the current proposed plan period for the Derby Local Plan. The need over the period 2023 – 2043, applying the current standard method is actually 44,520 dwellings. Taking the supply figures in Table B of the SoCG, there is a shortfall in provision of some 8,806 dwellings over the plan period, before any allowance is made for flexibility and contingency. It is important to note that the plan periods of the emerging local plan for South Derbyshire and the adopted Amber Valley		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						local plan only extend up to 2042 and 2040 respectively. At present, Derby City does not benefit from any assistance from the HMA authorities in relation to its unmet needs beyond those periods. Nevertheless, the SoCG proposes contributions from South Derbyshire and Amber Valley follows: 4,867 dwellings in South Derbyshire 1,320 dwellings in Amber Valley This equates to a total of 6,187 dwellings. As mentioned earlier in these representations, the SoCG has not been updated since February despite Amber Valley having adopted its plan in March 2023 and South Derbyshire having undertaken a further Regulation 19 Consultation in June 2026. We provide comments on the proposed and adopted contributions below. South Derbyshire		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Sustainability Appraisal (SA) supporting this Regulation 19 consultation sets out the Spatial Strategy Option. Options A, the preferred option, states: "Housing Growth – 12,500, capacity. Meeting the Derby HMA target for Derby, but capped below the 18,340 net new homes needed over the plan period (2023-2043). Due to the agreed capacity cap, the Derby HMA authorities of Amber Valley and South Derbyshire meet the unmet need by 5,840. Employment Land -133ha" (our emphasis) The adopted Amber Valley Local Plan provides a contribution of 1,320 dwellings towards the unmet needs of Derby. This therefore leaves a remainder of 4,520 dwellings to be accommodated by South Derbyshire, which is 347 dwellings less than agreed within the most recent SoCG. Given the various figures		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						provided and the uncertainty resulting from Policy S1 of the draft South Derbyshire Local Plan Part 1, it is not clear to what extent these contributions can be relied upon. South Derbyshire carried out their Part 2 Local Plan Regulation 18 Consultation in January 2026, the Part 1 Local Plan Regulation 19 consultation in April 2025, and more recently a Part 1 Local Plan Regulation 19 Addendum consultation in June 2026. Representations on behalf of SLG were submitted in response to all consultations. The agreed SoCG states that the emerging plan will contribute 4,867 dwellings towards the unmet needs of the HMA. However, Policy S1 of the emerging South Derbyshire Part 1 Local Plan (as amended by main modification PM3) states as follows: "i) Over the plan period (2022 – 2042) at least 15,263 dwellings will be built within South Derbyshire. This comprises		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						10,140 homes to meet South Derbyshire's own needs and the remainder to help meet Derby City's unmet need to reflect the high level of housing delivery experienced in South Derbyshire in recent years; to provide flexibility in regard to site delivery and to help match affordable housing need with delivery as closely as possible. The housing sites required will be met on a mixture of brownfield and greenfield sites with encouragement given to the re-use of previously developed land." (our emphasis) This leaves a total of 5,123 dwellings to address the other needs outlined within South Derbyshire's Policy S1. The draft Local Plan Part 1 and the Issues and Options Document relating to the emerging Local Plan Part 2 do not provide a further breakdown of this figure, and it is not clear how the figure is proposed to be distributed between Derby City's unmet need, additional flexibility, and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						affordable housing delivery. If South Derbyshire is indeed delivering the 4,867 dwellings outlined within the SoCG to meet Derby's need, it would leave just 256 homes over the entirety of South Derbyshire's plan period to contribute to the other objectives identified in South Derbyshire's Policy S1. . On this basis, the true contribution toward the unmet needs of Derby City may well amount to less than 4,867 dwellings and further clarification is required in that regard. Whilst an assessment has been carried out of South Derbyshire needs together with the HMA and specifically the unmet needs of Derby City, there has been no examination of options to meet its own needs in the first instance. The two comprise distinct and separate exercises. Indeed, in the case of Shropshire, the Sustainability Appraisal assessed its standalone housing needs, but there was an issue relating to		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the amalgamation of its own needs with those of the Black Country when considering an uplift to meet the neighbouring authorities' unmet needs. Paragraph 4.1 of the Inspectors letter dated 16 January 2024 states: "4.1 What the Council has not done as part of the revised SA work is to look at what the environmental impacts are of meeting some of the unmet needs of the Black Country i.e. 1500 homes and 30ha of employment land, in addition to meeting its own needs. Instead, what the revised SA does is amalgamate the Black Country's unmet needs into its own growth options and at the same time alter the growth options compared to earlier SA work. This needs to be assessed as a distinct and separate exercise. We will cover the growth options issue in other questions you have posed." Policy S1 refers to affordable housing needs and flexibility alongside the provision towards		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Derby's unmet needs, therefore amalgamating the three matters which should be assessed and quantified in their own respect. Without quantifying how many homes are needed for affordable housing needs and flexibility, it is not possible to know how many homes South Derbyshire are actually proposing to deliver to meet need in Derby. The emerging South Derbyshire Local Plan Part 1 remains untested through examination, SLG have submitted representation to its consultations highlighting a number of unresolved issues as outlined above, and there is no guarantee that it will be found sound by Inspectors appointed by the Secretary of State. Amber Valley It is acknowledged that Amber Valley's draft Local Plan proposes to provide 1,320 dwellings over the plan period toward meeting the unmet need of Derby. However, this		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						figure originated from the number of dwellings to be delivered on the proposed allocation at Brun Lane, Mackworth10. The landowners advised during the examination that they would only release land for approximately 500 dwellings in this location. The Inspectors have consequently concluded as follows: "The main landowner for the site has advised that they no longer wish to develop the number of houses proposed but would be content to release land to provide in the region of 500 homes. This would, in our view, risk a piecemeal approach to development which would not ensure the appropriate provision of necessary infrastructure." Whilst the site remains identified as an area for future growth within the plan, it remains the case that the site is not available to the extent initially envisaged.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						In addition, Table B of the SoCG shows that Amber Valley's expected housing land supply over the Council's proposed plan period is 8,714 dwellings. However, the housing requirement in the recently adopted Local Plan is only 7,656 dwellings. The contribution set within the table is therefore overstated. Allowances for flexibility cannot be conflated with a contribution for Derby. As the emerging local plan meets less than 80% of local housing need as calculated using the standard method, Amber Valley is also required to prepare a new plan under the revised plan-making system upon adoption of the currently emerging plan. The Council's new local plan will need to reflect the housing need calculated using the current standard method, which at present increases the housing need from 351 to 670 dwellings per annum. The ability of Amber Valley to meet any unmet housing needs of Derby		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						in the future is therefore uncertain and should be taken into consideration in respect of the long term housing needs of Derby City. Conclusions on Policy H1 / meeting housing needs Derby's housing needs, whilst recently reduced, remain significant. There are a number of issues relating to both the housing requirement and supply, which we summarise as follows: Derby City's capacity is significantly overstated and by its own admission, highly ambitious. The shortfall to be addressed by neighbouring authorities should therefore be much higher. There is a lack of updated evidence, namely Statements of Common Ground and in respect of the housing land capacity position. The plan period should cover the period 2025 – 2045. Past completions from 2023 - 2026		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						should not be included in the supply. Derby's supply, along with the contributions from other authorities, do not provide sufficient flexibility against under delivery. The increase to the windfall allowance within Derby's supply is unjustified. South Derbyshire's proposed contribution toward Derby's unmet needs is amalgamated with delivery of affordable housing and provision of flexibility. It is not clear how many homes South Derbyshire will actually be delivering to meet Derby's needs, and whether it is, in fact, planning to deliver the 4,867 dwellings agreed through the SoCG. The figure cannot be relied upon in full until this is clarified. Amber Valley's contribution toward Derby's unmet needs of 1,320 dwellings was based upon the delivery of a single site		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						which has since been found to be unavailable. Although at face value Derby's housing requirement and HMA contributions meet Derby's needs over the plan period, the above issues cast serious doubt over the deliverability of these assumptions. We therefore consider that the needs of Derby are unlikely to be met over the plan period. Consequently, significant further assistance is required from the neighbouring authorities to ensure that Derby's needs, and the needs of the HMA as a whole, are met in full. The position needs to be detailed within the plan and the SoCG with South Derbyshire and Amber Valley should be reviewed and updated accordingly.		
OR266	Fisher German on behalf of Bloor Homes Ltd	Policy H1: Housing Delivery	Object	Yes	No	The NPPF states at Paragraph 8a that in securing the social objective of sustainable development, "sufficient number and range of homes can be provided to meet the		Paragraphs 179 to 185 and Table 2 set out the city's housing need, its evidenced capacity of 12,500 homes and the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						needs of present and future generations". Paragraph 11a affirms that Plans should "promote a sustainable pattern of development that seeks to: meet the development needs of their area". Part B of paragraph 11 states "strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area ; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits,		resulting unmet need, which will be met across the HMA as set out in the Statement of Common Ground now being updated with Amber Valley and South Derbyshire. The Site Selection Topic Paper and SA Appendix G explain why further Green Belt release, including at Locko Road, is not justified: the 2025 Green Belt Review found that site does not meet the definition of grey belt. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						when assessed against the policies in this Framework taken as a whole." Paragraph 20 of the Framework states "Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for: a) homes (including affordable housing)". Paragraph 61 states "to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed". Paragraph 62 continues "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance".		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Derby City Position The applicable Local Housing Need (LHN) has been updated since the Regulation 18 consultation in January 2026, increasing from 917 dwellings per annum to 953 dwellings per annum to reflect the latest affordability adjustment (2026). This updated position is supported. Over the 20-year Plan period, the Council acknowledges that this equates to a requirement for 19,160 net additional homes. However, despite recognising this level of need, the City Council concludes that it is unable to accommodate the full requirement within its administrative area. Paragraph 183 of the consultation document confirms that the requirement of 12,500 dwellings (which equates to the maximum capacity of the City over the Plan period) is agreed over the HMA through the Derby HMA Joint Advisory Board, with the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						remainder of LHN unable to be accommodated in the City. A Statement of Common Ground (SoCG) has been prepared (states written Autumn 2025 though labelled 2026 – 2026 used for the purposes of referencing within this document), albeit does not set out a clear strategy as to the distribution of unmet needs. BHL made clear representations at the Regulation 18 consultation stage that evidence of HMA agreement to the capacity of Derby City and a willingness for unmet needs to be met in the form of a SoCG was required. This is a fundamental matter of soundness to ensure both agreement as to the quantum of unmet needs, and to provide certainty that any unmet needs being exported from the City will be delivered within the HMA. The last tested SoCG within the HMA was produced to support the Amber Valley Local Plan		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Examination. This was published on 6 December 2024, thus pre-dates the most recent changes to NPPF and PPG, and was undertaken to predominantly support the pre-NPPF 2024 compliant plan being advanced in Amber Valley, but is also relevant for the emerging Plan in South Derbyshire, both of which could proceed under transitional arrangements under previous versions of the NPPF (2023). That SoCG agreed that Derby City is constrained and will have unmet need. Derby City Council committed to delivering a minimum of 12,500 homes over the period 2022-2039 (735 per annum). This left a shortfall of over 8,500 units to be delivered in the neighbouring authorities. The 2026 SoCG remains untested and lacks clear detail as to how any unmet need arising from the 2024 Standard Method will be met in the Derby HMA. It again accepts a supply of 12,500 dwellings in		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Derby City, this time over the period 2023-2043, and highlights a shortfall of 5,840 dwellings utilising the 2025 standard method calculation for the city (Derby's LHN updated in 2026 through this R19 document results in a higher shortfall). The application of Policy H1 as drafted, utilising a 2026 assessment of Derby City's LHN, results in a shortfall of 6,560 dwellings (19,160 (Plan period LHN) minus 12,500 (plan period supply)). Despite the Plan's assertion that this position is agreed, it is only agreed in the context of Amber Valley and South Derbyshire's emerging Plans where their own Local Housing Need was significantly lower than now applicable. There is no agreed position in respect of the exporting of Derby City's needs against the 2024 standard method. Regardless, prior to exporting any unmet needs, {DCC must demonstrate clearly that it has		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						exhausted all its own supply. Paragraph 11b does allow for needs not to be met where Footnote 7 areas provide 'strong reason' for restricting development. As discussed later within these representations, in relation to BHL land interests, the Council's evidence base does not show that the exclusion of this site provides a strong reason for restricting development. Therefore, BHL interests at Locko Road should be allocated, to reduce the quantum of unmet needs. The adopted Amber Valley Local Plan, provides only 1,320 homes towards meeting Derby City's unmet needs up to 2040, equating to 73 dwellings per year, over their 17-year Plan period. This contribution however must be read in the context that Amber Valley's own needs at that time was only 351 dwellings per annum versus the 666 dwellings now applicable.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Turning to the current Local Housing Need of 958 dwellings (2026-2036 base and having regard for the March 2026 affordability ratio as assumed in the draft Plan), and looking over the proposed Plan Period of 2023-43, Derby City are still maintaining a deliverable supply of 12,500 homes - though now over a 20-year Plan period. Having regard for a need of 19,160 dwellings, that results in unmet needs of 6,660 dwellings. This is an increase of 820 dwellings from the 2025 SoCG, due to the increased LHN now applicable in Derby City. HMA Position Amber Valley's updated Local Housing Need is 666 dwellings per annum. This is in contrast to an adopted requirement of 424 dwellings per annum (to meet a Local Housing Need of 351 dwellings per annum and to provide the 1,320 commitment to Derby City's unmet needs). This means, against the adopted strategy, there could be argued to be no contribution to unmet		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						needs currently. On the contrary, Amber Valley would need to increase their housing requirement by some 242 dwellings per annum simply to meet their own current needs, let alone meet any of Derby City's unmet needs. There is no agreement in the most recent Statement of Common Ground that Amber Valley would seek to increase its needs in its Plan review both to meet its own LHN and a similar level of contribution as per the adopted Plan. Turning to South Derbyshire, their updated Local Housing Need (2026) amounts to 592 dwellings per annum. The proposed requirement in the Regulation 19 and addendum document is 763 dwellings per annum, or 15,263 dwellings per annum. The Local Plan, despite a 2026 update, still uses 2024 LHN of 507, not the 592 now applicable. For consistency, using a 2026 base date, this representation considers the 592 now applicable.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						It is noted that South Derbyshire's Regulation 19 Local Plan Part 1 consultation draft is clear that overprovision in South Derbyshire is not solely to meet Derby City's unmet needs. Policy S1 of the Regulation 19 document states "Over the plan period (2022 – 2041) at least 14500 dwellings updated to 15,263 in the SDDC Regulation 19 addendum] will be built within South Derbyshire. This comprises 9633 homes to meet South Derbyshire's own needs and the remainder to help meet Derby City's unmet need to reflect the high level of housing delivery experienced in South Derbyshire in recent years; to provide flexibility in regard to site delivery and to help match affordable housing need with delivery as closely as possible". It is clear therefore that not all oversupply in SDDC is intended to meet unmet needs. For simplicity and given the Plan is not explicit on a split, which will no doubt need to be considered at SDDC's examination, these		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						representations will assume all oversupply in SDDC can be used to offset Derby City unmet needs, but the reality is this likely overestimates any contribution SDDC can make. This means against the proposed strategy, South Derbyshire could be argued to being capable of contributing 171 dwellings per annum, or 3,420 dwellings over Derby City's unmet needs over a 20-year Plan period. Using 2026 LHN unmet need of 6,660 dwellings, assuming no agreed and tested contribution from Amber Valley, and a contribution of 3,420 dwellings from South Derbyshire, that leaves a shortfall of 3,240 dwellings over the Plan period unmet need over the Plan period. Even if Amber Valley could contribute a further 1,320 dwellings, which is not explicit within the SoCG, it would still leave a shortfall of around 2,000 dwellings in the HMA.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The 2026 SoCG (Page 5) sets out there is sufficient supply across the HMA to meet Housing Needs in full, however, unmet need cannot be arbitrarily met by oversupply in other locations. It must be formally declared and formally met in Plans, which is not the case currently as identified above. Moreover, the additional supply proposed in South Derbyshire is explicitly not just for meeting Derby City's unmet need, it is also to provide contingency for delivery of South Derbyshire's own housing requirement, and to align affordable housing delivery. Similarly, any oversupply above Amber Valley's requirement is contingency only to meet Amber Valley's unmet need. Moreover, this SoCG is now out of date in respect of Derby City's unmet needs having regard for the updated Derby City LHN, which is larger than previously identified. It also results in South Derbyshire potentially meeting Amber Valley unmet need, which is a		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						position not agreed or tested politically or at examination. An updated LHN is required as a matter of urgency to clearly state how, against a 2026 compliant LHN, unmet needs will be distributed and the justification for any remaining unmet need. Conclusions on Housing Requirement There is no agreed SoCG which clearly distributes Derby City's unmet need against the 2026 LHN. Both the adopted Amber Valley Local Plan and emerging South Derbyshire Local Plan make some commitment to meeting Derby City's unmet needs, however this is in the context of the pre-2024 Standard Method. A clear and updated SoCG is required as a matter of urgency to establish an agreed 2024-method compliant position (using 2026 as a base date). Before exporting unmet needs, Derby City must demonstrate without any doubt that it has		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						exhausted all options to meet its needs in full, with any residual need be met by the HMA neighbouring authorities, as agreed through a SoCG. As discussed later in these representations, Derby City has sites it should - and in fact is obligated to - allocate to ensure as much of the City's needs are met as possible, prior to exporting to neighbours. Turning to the tests of soundness, the Plan fails: • Positively prepared – The Plan does not provide a strategy which meets the areas objectively assessed needs, both within Derby City and the wider HMA. • Effective – No agreed evidence that any quantum of unmet needs can be met by HMA neighbours utilising the 2024 Standard Method (2026 base date of		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						calculation). SoCG provided is vague and provides no certainty that SDDC and Amber Valley will increase their housing requirement sufficiently above their own higher LHN. • Consistent with national policy – Inconsistent with Paragraphs 8, 11, 20, 61 and 62 as set out above. Fails to utilise sites in accordance with paragraph 148, as discussed below. Plan Period This Regulation 19 Plan updates the date of the Standard Method calculation from 2025 to 2026. The Standard Method is inherently forward looking. The standard methodology is based on both stock growth and affordability ratios which can be impacted by delivery in previous years. Such delivery is already intrinsically counted as part of calculation through		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						affordability adjustment. Thus, the housing delivered prior to the calculation will have informed the onward projection. It is clear that the role of the Standard Method is to be forward looking, as demonstrated below. Therefore, delivery in years preceding the calculation of Local Housing Need have already been included in the Standard Method Calculation and therefore should be excluded as years of the Plan period. As such, the Plan period should have a base date of 2026 to reflect the calculation of Local Housing Need. A number of recent Local Plan examinations have grappled with the issue of the relationship between the date on which the Local Housing Need is calculated and the base date of the Plan. Note these reflect examinations both pre and post the 2024 Standard Method, but ultimately all remain relevant.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						In North Norfolk the Inspector's Report1 (October 2025) at Page 29 states "the base date of the plan should correspond to the date from which the housing needs of the district have been quantified, and as explained below, this exercise was undertaken using up to date statistics as at April 2024. In order to be consistent with national policy the plan period should therefore be amended to 2024-40". The Isle of Wight Post Hearings Letter2 (April 2025) states at paragraph 25 "in already accepting the standard method figure as the basis for the housing need, the Council has indicated that the plan period would need to be modified to be forward looking. As such the base date of the plan should move from 1 April 2022 to 1 April 2024 to reflect the latest local housing need figure prior to the point of plan submission. As submitted the end date of the plan is 31 March 2037".		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						In the Amber Valley Inspectors Report3 (January 2026) the Inspector concluded “it has been put to us that to do so should also require the base date of the Plan to be altered to align with the date of the new SM figure as to do otherwise would “double count” dwellings in the Plan’s housing supply which will also have been counted as existing housing stock for the purposes of the SM. Although the PPG is silent on this matter, having regard to the responses made to the MM consultation we consider that the Plan should use the most up to date SM figure. In doing so, to avoid “double counting” a recalibration of the base date for the purposes of housing supply is necessary”. Also of relevance is nearby Greater Nottingham, where the Inspectors Post Hearing Note4 (August 2026) Paragraph 13 states “since the calculation of local housing need is a forward-looking assessment, it runs from the date it was calculated to the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						end of the plan period. Any under or over supply of housing prior to the date of calculation is irrelevant for the purposes of the Plan. To that end the housing trajectories and five year housing land supplies need updating by deletion of housing supplies prior to the latest calculation of local housing need. We will comment further on how that might affect the housing requirement(s) of the Plan in any subsequent post hearing note" [our emphasis]. It is clear therefore that the base date of the Plan should be updated to reflect the date of calculation of the Standard Method, which in this case should reflect 2026/27 as the base year. Five-Year Housing Land Supply Paragraph 72 of the Framework states that "Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of: a) specific, deliverable sites for five years following the intended date of adoption; b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period." Whilst the Council has not provided a full trajectory of anticipated housing supply, it does identify housing projections over the Plan period, enabling consideration of whether the Plan can comply with Paragraph 72 of the NPPF, notwithstanding that it proposes a housing		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						requirement of 625 dwellings per annum, below the identified Local Housing Need. Having regard for a base date of 2026, which is clearly applicable in Derby given the update to Local Housing Need figure now proposed, it is possible to calculate a position. Delivery for the 5-years from 26/27-30/31 (according to the Council's trajectory) amounts to 3,722 dwellings. The requirement over that period is 3,125 dwellings (625x5). Derby City has failed the Housing Delivery Test (2025), achieving only 71% of the required level of growth. As such, it is necessary to apply a 20% buffer to any 5-year housing land supply calculation (20% of 3,125 = 625). This means a 5-year requirement of 3,750 dwellings, against an anticipated supply of 3,722 dwellings, or 4.96 years, meaning Derby City cannot demonstrate a housing land supply currently, prior to any critical examination of the Council's supply, windfall		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						allowance or applying a lapse rate. Considering the assumptions on Local Plan Allocations, the Council has estimated delivery of 417 dwellings across 10 sites in the year 28/29. Of those, eight are yet to have a permission granted, and many do not have an application even submitted. For example, Brook Farm (Policy HA2), delivery anticipated in 2-years, with 100 dwellings in the 5-year supply, without an application submitted. Likewise for Stoney Lane Spondon (Policy HA7), where 120 dwellings are assumed, including 60 dwellings in two years, where again no planning application has yet to be submitted. Whilst a shortfall can be demonstrated without consideration of supply, it is clear from even a cursory review that the position is likely to be overoptimistic regardless. Again, this points to a clear need for additional supply to be		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						found within the city boundary for compliance with Paragraph 72 of the Framework. BHL's site at Locko Road can make a valuable contribution to this requirement. Windfall It is noted that Table 2 confirms the Council assume a windfall contribution of 120 dwellings per annum. Paragraph 188 states that between "2016 to 2026 over 100 windfall dwellings were delivered on average each year on small sites alone (1-9 dwellings). This figure does not include any housing delivered within the city centre". However, the Council do not state what level of delivery was delivered within the city centre. As such, it is not clear there is compelling evidence for a windfall delivery rate of 120 dwellings. More evidence is required to justify the windfall allowance of 120 dwellings. Such evidence should be provided to the examination so it can be properly scrutinised and comment made in detail.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Without such evidence, the windfall allowance should be reduced to 100 dwellings per annum.		
OR128	Home Builders Federation*	Policy H1: Housing Delivery	Object		No	*Policy H1 is not considered to be sound as it is not effective, justified, or consistent with national policy* HBF recognise the long history of joint working between the three Derby HMA local authorities, Derby City, Amber Valley and South Derbyshire and the conclusion that Derby cannot meet all of its housing needs within the city. However the Plan needs to set out in policy that this has been acknowledged by both Amber Valley and South Derbyshire and that a strategic approach to meeting the housing needs of the Derby HMA has been agreed. It will be important for monitoring of housing delivery to be undertaken across the three HMA authorities to ensure that housing which is meeting Derby City's unmet needs but being accommodated in sustainable locations within South		Paragraphs 179 to 185 and Table 2 in the submission plan set out the city's need, its capacity-led requirement and the resulting unmet need, which is addressed through the Derby HMA Statement of Common Ground. Small sites make a substantial contribution to supply: small sites with planning permission (320 homes) and the windfall allowance, founded on small-site completions of 1,680 (table 2) together represent around 16% of the requirement. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Derbyshire and Amber Valley is being delivered. The policy should clearly set out the total housing requirement for Derby, how much of this is being met within the City and how much is remaining unmet need that will be met elsewhere. In order to be effective and justified the Plan's policies and evidence base should set out how the plan will deliver 10% of homes on sites of less than one hectare, as required by paragraph 69 of the NPPF. Indeed, HBF would advocate that a higher percentage of small sites are allocated if possible. Such sites are important for encouraging the growth in SME housebuilders who will tend to develop these sites but rarely see the benefits that arise from the allocation of sites in a local plan. Up until the 1980s, small developers once accounted for the construction of half of all homes built in this country resulting in greater variety of product, more competition, and faster build-out rates. Since		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						then, the number of small companies has fallen by 80%. The Government has a long-standing desire to diversify the house building sector and has actively looked to see what more can be done support for SME builders. One of these actions is the requirement in the new NPPF (Aug 2026) for small and medium sites to be allocated in Local Plan. HBF has long called for allocations, rather than windfalls, to be the way that the small-site requirement is delivered, as this provides greater certainty needed for SME developers. As such we would request additional small and medium allocations are made in the Derby City Local Plan to ensure the Plan is effective and deliverable. Although small sites may come forward as windfall, HBF believe that in order for the Plan to be effective and justified the small sites requirements should be met through allocations		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR237	Johnson Mowat on behalf of Harworth Group*	Policy H1: Housing Delivery	Support		Yes	Policy H1 of the draft Local Plan for Derby seeks to ensure Derby's housing needs are met over the Plan period (2023 to 2043) through the delivery of high-quality new homes in sustainable locations. The draft policy wording states that the Council will facilitate the delivery of a minimum of 12,500 new, high quality mixed tenure homes within the city between 2023 and 2043. Harworth Group is supportive of Policy H1 and consider that the overall strategy has been positively prepared to meet Derby's objectively assessed needs. It is considered critical that sites in sustainable locations are allocated for housing development, such as 'Land at Stoney Lane, Spondon' which is subject of allocation reference HA7 in the Regulation 19 Submission Draft Plan. The site is located in a highly sustainable location and has the capacity to deliver around 450 high quality, new homes to		Support welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						meet a range of housing needs across a range of sizes and tenures.		
OR235	Little Ships Housing CIC	Policy H1: Housing Delivery	Object	Yes	No	Policy H1 and paragraphs 74 to 77 set the housing requirement at a minimum of 12,500 homes over the plan period and explain that the balance of the housing market area's need will be met through the Amber Valley and South Derbyshire Local Plans. We accept that the requirement is a minimum, not a ceiling, and we support the brownfield and City Centre first approach in paragraph 81 and Objective 5. Our representation concerns how the city's capacity was established, and what the Plan does about the part of the city's land that was not assessed. The Council has described 12,500 homes as the limit of the city's capacity (Council statement, November 2025). The evidence for that limit is the call for sites and the Strategic Housing Land Availability Assessment. Both	Modification 1: Policy H1 supporting text (new paragraph after paragraph 77) and Policy MH1. "The Council will assess the capacity of land and buildings in the ownership of the Council and other public bodies within the city, including surface car parks, depots and the airspace above existing and replacement public buildings and car parks, to accommodate new homes without displacing existing uses. The assessment will be completed within 12 months of adoption, reported through the Authority Monitoring	Council-owned land has been assessed where promoted through the call for sites, and several allocations are on Council land, including HA9, HA11, HA13 and HA14 (SA Appendix G). The City Centre housing capacity work commissioned by the Council has identified further opportunities on upper floors and infill sites, and the requirement in Policy H1 is a minimum. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						assess land that owners choose to promote. Land in public ownership is different. The Council and other public bodies own a substantial estate in the city: surface car parks, depots, and the airspace above low-rise civic, health and education buildings and car parks. Whether such land is offered for housing is a landowner decision, taken on grounds wider than planning. The Council's Planning Policy team confirmed to us on 4 September 2026 that Council land has been assessed where it came forward through the call for sites, and that the one estate-wide review of Council-owned sites was carried out for gypsy and traveller provision. There has been no estate-wide assessment of the public estate's capacity for housing. The Plan therefore exports part of the city's need without having tested a source of supply that sits within the city, in single	Report, reflected in the Brownfield Land Register and the housing land supply, and used to inform any review of the Plan." Add a corresponding indicator to Appendix 1: homes permitted on or above land in public ownership.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						public ownership, on previously developed land, in the most sustainable locations, and which can be developed without displacing the existing use where homes are built above it. In our view this engages three of the tests of soundness: Positively prepared. The strategy should seek to meet the area's needs as a minimum. Capacity within the city was not fully established before part of the need was passed to neighbouring authorities. Justified. The reasonable alternative of intensifying the public estate does not appear to have been assessed among the spatial options in the Sustainability Appraisal (we have not found it in Appendix C). Effective. Land in public ownership is among the most		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						deliverable in the city: single ownership, no land assembly and no purchase price. The City Centre figure of around 5,500 homes rests largely on sites outside the Council's control. National policy points the same way. The NPPF asks plans to promote the effective use of land, to support the development of under-utilised land and buildings, especially where land supply is constrained, and to support the use of the airspace above existing premises for new homes (NPPF paragraphs 124 and 125, December 2024 edition). The Plan describes Derby as a constrained authority (paragraph 20).		
OR230	Marrons on behalf of Ainscough Strategic Land	Policy H1: Housing Delivery	Object		No	The Housing Requirement Paragraph 179 (previously Paragraph 183) of the Emerging LDP states that “Derby’s housing needs are set through the Government’s ‘Standard		Paragraphs 179 to 185 and Table 2 set out the city's need, its evidenced capacity and the resulting unmet need, which

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Method' calculation which currently identifies a need of 953 net new dwellings per annum. Over the 20-year plan period that equates to a need for a minimum of 19,060 net new homes." Policy H1 sets out Derby's overarching approach to housing delivery over the Local Plan period from 2023 to 2043. The policy confirms that the city will deliver a minimum of 12,500 new homes during this time, reflecting what the Council considers to be the city's practical capacity for growth within its constrained urban boundary. Patently, planned delivery is lower than the housing need by at least 6,560 homes. Because Derby cannot meet its objectively assessed housing need within the city, the policy makes clear that additional housing to meet the city's unmet need will be provided in sustainable urban extensions to the city located in South		will be met across the HMA as set out in the Statement of Common Ground now being updated with Amber Valley and South Derbyshire, including on the alignment of plan periods. The Viability Topic Paper sets out the Council's response to the viability evidence, and funding-dependent City Centre sites are phased beyond the first five years (Site Selection Topic Paper). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Derbyshire and Amber Valley. Acknowledging Unmet Need In light of the above, our first concern in respect of Policy H1 is that it does not clearly declare the extent of unmet need to be accommodated in neighbouring authorities. For clarity, Policy H1 should clearly identify the consequent shortfall of 6,560 and state expressly that this needs to be accommodated within the wider HMA. Meeting Unmet Need over the Plan Period The Regulation 19 Plan continues to rely heavily upon strategic cooperation between Derby City Council, Amber Valley Borough Council and South Derbyshire District Council. Paragraphs 180-183 explain that Derby's unmet need will be addressed within Amber Valley and South Derbyshire and that		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						this approach has been developed through ongoing HMA cooperation and Statements of Common Ground. In principle, the Housing Market Area approach is supported. However, whilst the headline figures suggest that neighbouring authorities may collectively be providing sufficient housing to offset Derby's unmet need, the Plan still fails to demonstrate that Derby's needs will be met throughout the entirety of the Plan period. The critical issue is not simply the overall amount of housing being provided across the Housing Market Area, but whether that provision aligns with the Derby Local Plan period. Derby's Local Plan extends to 2043, whereas the adopted Amber Valley Local Plan extends only to 2040 and the emerging South Derbyshire Local Plan extends only to 2041. Whilst both authorities are		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						making provision towards Derby's unmet housing needs, the Derby City Regulation 19 Plan does not explain how housing needs arising during 2042 and 2043 will be met. This concern is compounded by Derby's own evidence, which indicates that the City's identified housing capacity of 12,500 dwellings is expected to be largely exhausted before the end of the plan period. As a result, Derby becomes increasingly reliant upon neighbouring authorities during the latter years of the Plan period, precisely at the point where those authorities plans no longer provide for unmet need arising from the City. Although Amber Valley's adopted Local Plan includes provision intended to contribute towards Derby's unmet housing needs, it remains unclear how needs arising beyond 2040 will be addressed. Similarly, whilst South Derbyshire's emerging		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Local Plan proposes to accommodate a substantial proportion of Derby's unmet requirement, there remains very limited flexibility within the strategy. Any delay or under-delivery within Derby would place additional pressure on neighbouring authorities, yet no meaningful contingency appears to have been identified elsewhere within the Housing Market Area. Taken together, these factors raise doubt as to whether Derby's housing needs will be met throughout the full plan period. Whilst it is recognised that Derby City Council cannot dictate the content of neighbouring Local Plans, it remains incumbent upon the Council to demonstrate that its housing strategy is effective. In the absence of clear evidence explaining how housing needs arising between 2041 and 2043 will be accommodated, the Plan		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						does not currently demonstrate that cross-boundary housing needs have been fully resolved. Accordingly, further evidence should be provided to demonstrate how housing needs arising across the entirety of the period to 2043 will be met. Until such evidence is provided, serious concerns remain as to whether the housing strategy satisfies the effectiveness test of soundness set out in paragraph 36 of the NPPF. Viability The Council's Residential Viability Assessment1 forms an important component of the evidence base supporting the Regulation 19 LDP and is intended to demonstrate that the proposed housing strategy is capable of being delivered over the Plan period. Whilst the viability evidence is welcomed, the conclusions of the assessment raise important questions regarding the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						deliverability of the housing strategy proposed through Policy H1. The Viability Assessment concludes that significant viability challenges exist across large parts of Derby, particularly within the City Centre, low value housing markets and parts of the medium value market. It further identifies that affordable housing requirements, accessibility standards, planning obligations, the Future Homes Standard and the Building Safety Levy collectively place considerable pressure on development viability. Significantly, the report recommends that the Council maintain flexibility in the application of policy requirements and continue to allow site-specific viability considerations where justified. These findings are directly relevant to the housing strategy set out within the Regulation 19 Plan. Policy H1 seeks delivery of a minimum of 12,500 dwellings within Derby between 2023 and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						2043, with a substantial proportion of that supply expected to come from city centre regeneration opportunities and previously developed land. The Plan is therefore heavily reliant upon development typologies that the viability evidence itself identifies as facing the greatest delivery challenges. Whilst the Assessment ultimately concludes that the Plan can proceed on the basis of flexible policy application, this nevertheless calls into question the extent to which the housing trajectory is dependent upon development coming forward in circumstances where policy requirements may need to be reduced or negotiated. Accordingly, further evidence should be provided demonstrating that the housing trajectory remains realistic and achievable in circumstances where significant parts of the strategy are reliant upon		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						development forms that the viability evidence identifies as financially challenging. In the absence of such evidence, concerns remain regarding whether the housing strategy is sufficiently justified and effective to satisfy the soundness requirements of paragraph 36 of the NPPF. Sources of Supply Sources of supply are set out in Table 2 of the Plan. The key areas of concern for us related to the “City Centre Allocations” and windfalls. Urban Capacity: We remain concerned by the absence of proportionate and objective evidence underpinning Derby City Council's assumed housing capacity of 12,500 dwellings. An understanding of this evidence will be necessary to satisfy the tests of soundness and we suggest the Council provide such clarity ahead of a future		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Examination. Whilst the Regulation 19 Plan contains minor clarification regarding City Centre regeneration opportunities within the supporting text of Policy H1 when compared to the Regulation 18 draft, there has been little additional evidence produced to demonstrate that the assumptions underpinning the 12,500 dwelling capacity figure are realistic and achievable. Rather than providing additional deliverability evidence, the Regulation 19 Plan simply retains the focus on city centre allocations with only minor variation2 presumed to reflect the updated position on applications. Table 2 identifies 2,574 dwellings arising from City Centre allocations alone, whilst Policy CC3 seeks delivery of at least 5,600 homes within the defined City Centre through a combination of permissions, mixed-use redevelopment opportunities, strategic regeneration areas and upper		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						floor conversions. This is significant when compared to the 12,641 dwellings identified within the Plan. As such, this further reinforces the need for clear evidence to support such an approach, without which concerns in respect of viability, timescales, delivery risk and implementation remain largely unanswered. In addition, there remains a notable absence of contingency planning within the housing strategy. Table 2 indicates a total housing supply of 12,641 dwellings against a target of 12,500 dwellings, representing a buffer of just 1.1%. This provides no meaningful allowance for delays or non-delivery of the city-centre or other allocations. Even a minor delay in projected trajectories could result in the failure to deliver the 12,500 homes required. Therefore, the need for supporting evidence to demonstrate delivery must		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						remain a clear focus for the Council. Windfall Allowance: Paragraph 188 of the Draft LDP seeks to justify the continued inclusion of a windfall allowance of 120 dwellings per annum from 2029 onwards. In doing so, the Council has sought to address concerns raised through the Regulation 18 consultation by providing additional supporting text regarding historic rates of delivery. Specifically, the Council notes that more than 100 windfall dwellings per annum have been delivered on average from small sites between 2016 and 2026 and states that the allowance of 120 dwellings per annum (dpa) is considered to be conservative. Paragraph 75 of the NPPF is clear that where a windfall allowance is relied upon as part of anticipated housing supply, there should be "compelling evidence" that such sites will		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						continue to provide a reliable source of supply. Any allowance must be realistic having regard to historic delivery rates, expected future trends and evidence from housing land assessments. The difficulty with the Council's position is that the evidence relied upon is principally retrospective rather than forward looking and only indicates that more than 100 windfall dpa have been delivered historically, rather than 120 dpa or higher. The fact that windfall development has occurred historically does not necessarily demonstrate that it will continue to occur at similar levels throughout the remainder of the Plan period. This concern is particularly acute given that paragraph 186 of the Regulation 19 Plan acknowledges that there is a "scarcity of suitable sustainable development land for housing in the city". If opportunities for development land are		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						increasingly constrained, it is not immediately apparent why unidentified development opportunities would continue to emerge at a rate capable of consistently delivering 120 dwellings per annum until 2043. Consequently, whilst the justification provided at Regulation 19 is stronger than that available at Regulation 18, it remains unclear whether the evidence reaches the threshold of "compelling evidence" required by national policy. In our view, further evidence should be provided to demonstrate that the assumed rate of windfall delivery is realistic and capable of being sustained throughout the remainder of the Plan period. Without this additional evidence, there remains a risk that the windfall allowance is not adequately justified. Given the reliance placed upon windfall development within the overall housing trajectory, this raises concerns regarding		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						whether the housing supply strategy is sufficiently robust to satisfy the justified and effective tests of soundness set out at paragraph 36 of the NPPF.		
OR257	Marrons on behalf of BDW Trading Ltd (Redrow Homes Midlands)*	Policy H1: Housing Delivery	Object		No	**The Housing Requirement** Policy H1 of the Submission Draft details Derby's approach to housing delivery over the LPD period from 2023 to 2043. The policy confirms that the Council will facilitate the delivery of a minimum of 12,500 new dwellings, reflecting what is considered to be the city's urban capacity. Whilst Derby's inability to accommodate objectively assessed housing needs is not expressly identified within the policy wording, paragraph 180 of the supporting text concedes and makes clear that unmet need will be accommodated in sustainable locations within the neighbouring authorities of South Derbyshire and Amber Valley. Plainly, the housing strategy		Paragraphs 179 to 185 and Table 2 set out the city's need, its evidenced capacity and the resulting unmet need, and Policy H1 does not allocate land outside the city or prescribe how the neighbouring plans meet it. Cross-boundary provision is addressed through the Derby HMA Statement of Common Ground, which is being updated with Amber Valley and South Derbyshire. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						promulgated within Policy H1 extends beyond Derby's administrative boundary. It is determinative of not only the scale of housing growth *within* the city but is predicated on the agreement of neighbouring authorities to accommodate Derby's unmet need. It follows, therefore, that the housing requirement, sources of supply and delivery assumptions underpinning Policy H1 (explored in more detail below) must be supported by proportionate evidence and demonstrate a reasonable prospect of materialising within the plan period. Paragraph 179 of the Submission Draft states that Derby's housing needs are derived from the Government's Standard Method calculation which identifies a need of 953 net new dwellings per annum ("dpa"). That represents a 4% increase over the 917 dpa identified within the Regulation 18 Plan. Over the 20-year plan period, it also equates to a		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						minimum housing need of 19,060 dwellings. On that basis alone, the Plan would result in an unmet need of *at least* 6,560 dwellings, which would need to be accommodated within the wider HMA. However, since embarking upon the Regulation 19 consultation, the Council has published a Local Housing Needs ("LHN") Assessment Addendum (June 2026), which uses the most recent statistical inputs in the Standard Method calculation, resulting in a LHN of 960 dpa, equivalent to 19,200 dwellings over the plan period. Preferring the most recent calculation of LHN, Derby faces an unmet need of approximately 6,700 dwellings. Either figure represents a material increase over and above the shortfall identified by the respondent at Regulation 18 stage and now pushes the HMA into a housing shortfall (explored below). Notwithstanding the magnitude of Derby's unmet need, and that the respondent raised		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						similar concerns at Regulation 18 stage, Policy H1 continues to omit express reference to the *extent* of those needs. Whilst paragraph 180 of the supporting text acknowledges that Derby cannot meet all of its housing needs, neither the policy itself nor the supporting text clearly declares the extent of the unmet need to be accommodated within the wider HMA. These are not mere matters of drafting. Rather, the housing strategy (howsoever formulated in policy) is, or ought to be, informed by the extent of Derby's unmet need. Indeed, it directly influences the scale of development to be accommodated within neighbouring authorities and informs the cross-boundary arrangements upon which the Council relies. Given that the extent of Derby's unmet need is material to the effectiveness of the Plan, it must be conveyed in policy so as to inform prospective developers and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						decision-makers. **Pre-Determination** At Regulation 18 stage, the respondent raised concerns as to the formulation of Policy H1, insofar as it prescribed the nature in which Derby's unmet need is to be accommodated (i.e., sustainable urban extensions to Derby). Given that the Submission Draft substantively retains the drafting of Policy H1, those concerns persist. Whilst the Council is properly entitled to identify that unmet needs will be accommodated within the HMA, the mechanism through which that is achieved is ultimately a matter for the respective local plan examinations of South Derbyshire District Council ("SDDC") and Amber Valley Borough Council ("AVBC"). Notwithstanding the recent adoption[4] of the Amber Valley Local Plan 2022 - 2040, there is no clear strategy within that		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						plan for meeting Derby's unmet needs in terms of specific allocations. Therefore, the apportionment of Derby's unmet need figure to Amber Valley must be determined through a plan review. As regards South Derbyshire District Council, the emerging local plan has reached Regulation 19 stage and is yet to be submitted for examination. Whilst its strategy is to accommodate unmet need from Derby in the form of sustainable urban extensions, that strategy will be tested at examination in due course. Therefore, it is unjustified for Policy H1 to take it upon itself and prescribe the manner in which Derby's unmet need is to be accommodated within the HMA. **Cross-Boundary Provision** As detailed within preceding sections of these representations, the extent of Derby's unmet need has		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						increased since Regulation 18 stage, by virtue of the Council using more recent statistical inputs in the Standard Method calculation. The uplift in LHN does not alter what is assumed to be uncontroversial, in that Derby is unable to meet its own housing needs. However, it does materially increase the *extent* of unmet need and, in so doing, increases the degree to which the LPD is reliant upon neighbouring authorities accommodating that shortfall. In this respect, the mechanism through which the Council seeks to demonstrate HMA-wide agreement is the February 2026 Statement of Common Ground ("SoCG"), which is predicated upon Derby's previous LHN figure of 18,340 dwellings, and a corresponding unmet need of 5,840 dwellings. However, the LHN Assessment Addendum, which post-dates the executed SoCG, identifies a need of between 19,060 and 19,200 dwellings over the plan period, and an unmet need of between		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						6,560 and 6,700 dwellings. The extent to which the SoCG continues to provide a robust basis for addressing Derby's unmet need is, therefore, unclear. As regards its content, the SoCG identifies 1,320 dwellings within Amber Valley (to 2040) as contributing towards Derby's unmet need, together with a contribution of 4,867 dwellings within South Derbyshire. However, South Derbyshire's Regulation 19 Addendum: Proposed Modifications extends the plan period to 2042 and, thus, increases the authority's contribution to 5,123 dwellings. Accordingly, the two neighbouring HMA authorities plan to deliver 6,443 homes towards Derby's unmet need (nominally less than the 6,700 dwelling shortfall Derby faces). Plainly, the combined contributions do not go far enough in 'resolving' Derby's unmet need numerically. In any		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						event, those commitments are tied to the respective plan periods of either authority; both ceasing before the LPD. Indeed, Amber Valley's Local Plan period ends in 2040 and South Derbyshire, in 2042. It follows that, notwithstanding the overall deficit identified above, the timing of delivery also renders neither authority capable of providing for Derby's unmet need in the final years of the LPD period. In addition, the SoCG, together with the Derby Housing Land Capacity: Position Paper (October 2024) indicates that Derby's capacity (12,500 homes) will deliver by 2039. In fact, the SoCG states that: *"It is agreed by the HMA authorities that Derby City is constrained, with DCiC having undertaken work that estimates that their housing capacity supply over the period 2022 - 2039 is 12,500."* Therefore, if Derby itself		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						delivers no housing after 2039 (because its capacity has been exhausted), the entire delivery of Derby's housing need from 2039 - 2043 hinges on sites within Amber Valley and South Derbyshire, notwithstanding that the respective plans do not cover the full period to 2043. This leaves significant uncertainty as to how the city's needs will be addressed after 2040/41 (when Amber Valley's plan period ceases). Those concerns are reinforced by the delivery trajectory set out in PM42 of South Derbyshire's Regulation 19 Addendum: Proposed Modifications. For, the trajectory indicates a sustained reduction in housing delivery over the latter stages of the plan period. Between 2033/34 and 2041/42, projected completions fall to a consistently lower level, meeting on average 76% of the combined Derby / South Derbyshire annual requirement. In the final seven years of the South Derbyshire plan period,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						anticipated completions average approximately 571 dpa, substantially below the 763 dpa required to meet both Derby's and South Derbyshire's needs. While some of this under-delivery is offset by higher completions in earlier years, the South Derbyshire Local Plan trajectory illustrates a clear issue - its capacity to accommodate Derby's unmet need diminishes markedly towards the end of the plan period, at precisely the point Derby's reliance upon delivery outside its boundary increases. Beyond 2042 there are extremely limited sources of supply within South Derbyshire capable of absorbing any further requirement, and no identified mechanism to meet Derby's needs beyond that point. The inevitable conclusion is that the HMA does not have a credible plan in meeting objectively assessed housing needs across the full LPD period.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Within Amber Valley, the additional provision to meet Derby's needs lies within a broad area of growth with known availability issues. Delivery in that area will be contingent upon a further plan review, the timescales for which are unclear. Therefore, there remains uncertainty as to the extent to which Amber Valley can meaningfully contribute towards Derby's unmet need before 2043. Whilst it is recognised that Derby City Council cannot dictate the content of the South Derbyshire and Amber Valley local plans, it should be cause for concern that these do not address unmet need within the city over the full plan period. Similarly, the respondent raises concerns that, in the case of South Derbyshire, which is to accommodate the majority of Derby's unmet need, no material contingency has been made above the minimum figure required for its own needs and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						those of Derby. In effect, this means that for the 12,500 dwellings that make up Derby's overall provision, there is practically no allowance for delay or non-delivery. **Urban Capacity** Within its Regulation 18 representations, the respondent raised concerns as to the absence of proportionate and objective evidence underpinning Derby's assumed housing capacity of 12,500 dwellings. The level of growth the city can accommodate is a critical determinant of the scale of development that must be planned for in neighbouring authorities, given Derby's tightly constrained urban form and limited opportunities for outward expansion. If the city's assumed capacity is overstated, the consequence will be that insufficient provision will be made elsewhere in the HMA, and the full extent of housing need will not be met.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Indeed, the only substantive evidence available in this regard is the Derby Housing Land Capacity: Position Paper (October 2024). That document records a number of significant uncertainties and methodological concerns, including the fact that AECOM (Derby City Council's appointed advisors) recommended a substantial reduction in the assumed capacity attributed to the City Centre typology. The city's capacity figure recommended by AECOM was 10,400 dwellings, yet 12,500 has been the number carried forward. Despite this professional advice, the Council elected not only to retain the highly ambitious figures, but to increase them further. Throughout the Position Paper, the assumed capacity of 12,500 homes is repeatedly described as 'ambitious', highlighting the extent to which the figure relies on optimistic assumptions. The Framework requires plans to be both		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						ambitious and deliverable; though there is little assurance that the Plan is the latter. The respondent also notes the contents of Appendix 2 to the 2024 Position Paper, which consists of a letter from DCiC, to SDDC, dated July 2023. Perhaps most telling is the following paragraph: *"We have looked again, long and hard, at what we think is both* a *stretching* as *well* as a *realistic and deliverable capacity figure for the city, taking into account net completions for 2022/23. As* a *result, our assessment is for* a *capacity of 12,500. We believe that this figure is deliverable, subject to significant public sector intervention, but is also stretching and does not* come *without real risk of not being delivered."* The letter continues that, the capacity figure of 12,500 will require <u>all</u> sites to come forward at high-capacity		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						assumptions. Turning then to the Council's Local Plan Viability Scoping Report (Residential) (April 2026)5, Avison Young's assessment demonstrates that the viability of residential development is highly dependent on location, site characteristics and development type. While several development typologies can accommodate the Submission Draft requirements, the cumulative effect of affordable housing, accessible housingstandards, SPD financial contributions, the Building Safety Levy and the Future Homes Standard creates 'significant viability pressures' across large parts of the city. Indeed, development within low value areas and the City Centre is unviable even before policy obligations are applied, indicating that delivery in these locations is likely to remain reliant on public sector intervention, regeneration initiatives or site-specific flexibility.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Drawing the above together, the respondent submits that Derby's capacity assumptions are 'ambitious' and absent substantive evidence as to the deliverability and developability of the sites proposed for allocation. **Sources of Supply** The Council's supply sources are detailed within Table 2 of the Submission Draft which amount to 12,641 dwellings over the plan period (inclusive of commitments). For ease of reference, the respondent's concerns will be communicated under the respective headings below, corresponding to the relevant entries within Table 2. **Net Completions 2023 - 2026** Table 2 of the Submission Draft attributes 3,164 dwellings to net completions between 2023 2026, comprising the following[6]: 2023/24: 1,345 net completions; 2024/25: 806 net completions;		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and 2025/26: 1,013 net completions. Accordingly, whether one measures past completions against the Submission Draft LHN figure of 953 dpa, or the more up-to-date figure advanced by the Council of 960 dpa, there has been a modest oversupply in the early years of the LPD period. Appreciably, however, the Council's most recent assessment of LHN is detailed within the LHN Assessment Addendum, which applies up-to-date statistical inputs to the Standard Method calculation, correct as of May 2026[7]. In this respect, the respondent notes the Inspectors' Post-Hearing Note 1: Housing Supply[8], as it relates to the examination of the Greater Nottingham Strategic Plan ("GNSP"). There, the Inspectors referenced the recent local plan examination reports at Winchester and Amber Valley. Those reports concluded that		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the affordability adjustment made as part of the calculation of LHN accounts for past under or over-delivery of housing and that, as a result, there is no requirement to specifically address under or over-delivery prior to the date to which the affordability adjustment relates[9]. In the case of the GNSP, the Inspectors set out that the calculation of the affordability adjustment used data published in March 2025, being the latest available information when the revised LHN figure was calculated after submission1°. In conclusion, the GNSP Inspectors found that the Councils' housing trajectories should be updated through the deletion of housing supply prior to the latest calculation of LHN[11]. In the instant case, and as set out above, the Council has calculated its LHN with statistical inputs correct as of May 2026. It has provided no substantive evidence which		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						might justify a departure from the Inspectors' findings on the GNSP. In practical terms, this necessitates a rebasing exercise to the LPD's housing trajectory and reduces the assessment period from 20 years to the remaining 17 years of the plan period (2026/27 - 2042/43). Put simply, the rebasing exercise necessitates the removal of 3,164 dwellings from the identified housing supply, reducing the overall supply position within Derby from 12,641 dwellings to 9,477 dwellings. As regards housing need, the Council's LHN Assessment Addendum identifies a LHN figure of 960 dpa, equivalent to 19,200 dwellings over the full 20-year plan period. However, to ensure consistency with the rebased supply position, the respondent has annualised this requirement and projected it across the residual 17-year plan period. Accordingly, the rebased LHN requirement for Derby is 16,320 dwellings.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The implications are significant. Even before taking account of the respondent's site-specific analysis below, the rebased supply falls short of LHN by approximately 6,843 dwellings. This exceeds the extent of unmet need currently identified by the Council and reinforces the importance of demonstrating that the remaining sources of supply are supported by robust evidence as to deliverability and developability.		
OR257	Marrons on behalf of BDW Trading Ltd (Redrow Homes Midlands)*	Policy H1: Housing Delivery	Object		No	**Implications for Supply** The analysis above illustrates significant issues in respect of Derby's identified housing supply. As regards net completions between 2023 - 2026, the rebasing exercise necessitates the removal of 3,164 dwellings from the identified supply, reducing the overall supply position within Derby to 9,477 dwellings. In ensuring consistency with the rebased housing supply position, the respondent has		The 12,500 figure is the city's evidenced capacity over the plan period, agreed across the Derby HMA, and completions since the 2023 base date form part of that capacity rather than a reason to rebase the requirement. The deliverability of the allocations is evidenced in SA Appendix G, available during consultation

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						also annualised **LHN** and projected it across the residual 17-year plan period. Accordingly, the rebased **LHN** figure for Derby is 16,320 dwellings, against which there is a corresponding unmet need of 6,843 dwellings. However, the respondent's analysis extends beyond the rebasing exercise. In preceding sections, concerns have been raised as to the deliverability and developability of a number of sites proposed for allocation through the **LPD.** Together, the 'disputed sites' account for a substantial proportion of the housing trajectory. In several instances, the Council's own evidence concludes that sites are unavailable, unachievable, unsuitable, or incapable of forming deliverable/developable supply sources over the plan period. In others, delivery remains contingent upon extensive land assembly, public sector intervention, infrastructure provision, relocation of existing		and detailed in the Site Selection Topic Paper, with funding-dependent City Centre sites phased beyond the first five years. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						uses, or the resolution of ownership constraints. At face value, the respondent's concerns relate to sites which, cumulatively, account for 1,539 dwellings allocated *outside* the city centre, and 1,500 dwellings allocated *within* the city centre. The respondent does not suggest that each of those sites will necessarily fail altogether. However, the evidence currently before it does not provide sufficient certainty as to the scale, timing and developability of each allocation. Consequently, even relatively modest levels of under-delivery or delay would materially increase Derby's unmet housing needs beyond the 6,843 dwellings identified through the rebasing exercise. For the purposes of quantifying the 'disputed sites', Figure 1 is annexed to these representations (Appendix 1), which provides a detailed breakdown. Refer to Annex 1, Table 8		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR160	National Highways	Policy H1: Housing Delivery				Our Regulation 18 representation identified National Highways' interest in a number of the Plan's site allocations by reference to their likely impact on specific parts of the SRN, namely: HA1 (Rykneld Road, Littleover) and HA3 (East of Moorway Lane, Littleover), both likely to impact the A38 / Rykneld Road Findern Interchange, with HA3 also likely to affect the A50 to the south); HA7 (Stoney Lane, Spondon), likely to impact the A52 / Derby Road Spondon Roundabout, and the A52 to the south; and the City Centre allocations at Derby Riverside, Railway Station Quarter and North Castleward, which together with other CC4 allocations require assessment of impacts on the A52, A61 and A38.		Comments noted. The Council continues to work with National Highways on the transport evidence for these allocations, and the allocation policies and Policy GD9 secure the necessary transport mitigation.
OR265	P&DG on behalf of JGP Properties*	Policy H1: Housing Delivery	Object		No	JGP's overall soundness concerns, which remain unresolved at Regulation 19 stage, can be summarised as follows:		The derivation of the 12,500 capacity figure is set out in Section 11 of the Housing Requirement and Spatial Strategy Topic

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						• **Housing Capacity:** It is recognised that the City Council has a housing land capacity issue, which requires a proactive approach to meet as much as possible of its local housing need within its own boundaries. There is, however, a lack of clarity regarding how the 12,500 capacity figure has been derived and evidenced, which forms the basis of the '*a minimum of 12,500 dwellings*' requirement figure in the Reg.19 Draft Local Plan (**draft Policy H1** – Housing Delivery and supporting text in **Paragraph 184**). There is also inconsistency between the available evidence base and the Plan period, with the plan period now running to 2043 whilst the main evidence runs to 2039. This draws into question whether there is proportionate evidence to justify a housing capacity figure of 12,500. • **Unmet Need:** As a consequence of the above, there is a lack of clarity and proportionate evidence to		Paper, and Table 2 shows the supply over the full plan period to 2043. The resulting unmet need is addressed through the Derby HMA Statement of Common Ground, which is being updated with Amber Valley and South Derbyshire. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						appropriately justify the amount and full extent of unmet housing need to be exported to neighbouring authorities in the wider Housing Market Area. The lack of clarity has a potential impact on the overarching spatial strategy and has wider consequences for directing unmet housing growth towards more rural authorities. This includes Amber Valley, which since the adoption of its plan earlier this year, immediately has its own much increased local housing need figure to plan for in a restricted context including Green Belt land. • **Exclusion of Eastern Field, Lime Lane, Oakwood:** There is a lack of proportionate evidence to justify the exclusion of eastern field, Lime Lane, Oakwood as a residential allocation alongside habitat creation, woodland expansion and recreational public open space on the western field. The Council's site assessment process (as detailed in Appendix G of the Reg.19 Sustainability		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Appraisal) acknowledges that with the western field remaining undeveloped *'functional Green Wedge to remain'*. However, the Site is treated differently to other Green Wedge sites put forwarded as allocations, with adverse effects on the Ancient Woodland cited as the main issue. It is not clear whether the Council's assessment of the Site has adequately considered the extent to which potential Ancient Woodland impacts can be addressed through appropriate mitigation, and indeed enhanced through certain offered proposals. The Reg.19 SA also incorrectly refers to the Site as *'containing'* Ancient Woodland rather just being adjacent to it. • **City Centre focused Housing Allocations:** The Reg.19 draft Local Plan lists the housing supply in terms of consented schemes, allocations and windfalls (**Table 2, Page 50**). Supporting text in **Paragraph 187** states that housing will be focused primarily focused in the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						City Centre. This clearly meets national aims of developing previously developed land and locating dwellings in highly sustainable locations. However, the city centre focus raises concerns regarding the mix of housing types that could be achieved across the Plan Period. Whilst some city centre units will be dwellings, many more would be apartments. Such would not fully meet demand for family homes with gardens, and the proposed M4(2) and M4(3)a targets of **draft Policy H2** are unlikely to be delivered at high rise apartment lead developments. Similarly, the proposed affordable housing and city centre living policies (draft Policies H4 and CC4) propose just 5% affordable housing at city centre sites, which will clearly limit provision with a city centre focused housing strategy. These various issues support the allocation of additional land beyond the city centre in sustainable locations where family dwellings, and affordable and accessible		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						dwellings, can be more readily secured. In summary, the overriding issue is that there is acknowledged housing land capacity issue within the City of Derby and, therefore, the Council must seek to maximise available sustainable residential opportunities to meet as much of its local housing need (**19,060 dwellings**) as possible within the administrative boundary over the 20-year plan period. This must include proper consideration of how identified constraints could be mitigated to enable otherwise suitable development opportunities to come forward, with such suitably evidenced. On the basis of the above, JGP considers that the Plan, in its current form, has not been positively prepared, is not justified or effective and, as a consequence, is not consistent with the National Planning Policy Framework that the plan is being prepared under i.e. the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						2024 NPPF 2024. The unresolved soundness concerns regarding issues (i), (ii) and (iii) above are considered in detail below. <u>Detailed Assessment</u> Housing Capacity As highlighted above, JGP has raised concerns throughout the preparation of the emerging Local Plan regarding the derivation and evidential basis of the Council's Housing Land Capacity figure. Those concerns do not appear to have been adequately addressed at Regulation 19 stage. The Council relies upon a Housing Land Capacity figure of **12,500 dwellings** to establish the amount of its local housing need that can be accommodated within Derby and, consequently, the extent of unmet need that must be accommodated elsewhere within the wider Housing		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Market Area (HMA). It is, therefore, important that the Council can demonstrate that this figure represents a robust assessment of the realistic and deliverable capacity of the City and that all reasonable opportunities to maximise housing supply and delivery within Derby have been appropriately assessed. It terms of this capacity matter, JGP's concerns relate principally to: How have the 2021 high-level desktop housing capacity assessment and related reviews up to 2024 (which state a rounded capacity to 12,500) been reviewed and refined by later work to provide the capacity figure of 12,500 upon which the 2026 Reg.19 draft Local Plan is based? In relation to the above, concerns regarding the lack of an updated Housing Land Capacity Position Paper, or equivalent reconciliation, as part of the latest evidence base		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						to clarify how the later assessments/evidence have informed, confirmed or amended the May and July 2024 position; Whether the capacity assessment has been appropriately reconsidered following the extension of the Plan period from 2039 to 2043; The treatment of potential Green Wedge capacity, including whether previously identified constraints and opportunities have been appropriately reconsidered; and The treatment of the Land South of Lime Lane site, as an example of the approach taken to potential development constraints and mitigation. These matters are addressed in turn below. Housing Land Capacity Position As identified within JGP's previous representations, the Council's housing capacity position is summarised in the Derby Housing Land Capacity		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Position Paper dated October 2024. The Position Paper explains that the 2021 capacity assessment originated in an '*officer-led desktop review of potential residential land capacity with the administrative area of the city*'. It further explains that this was undertaken to provide an early indication of realistic housing land capacity within Derby in the next plan period (2021 to 2039 at that time) and, consequently, the potential scale of unmet need. Importantly, the Position Paper notes that this desktop capacity exercise was progressed in preference to producing a new Strategic Housing Land Availability Assessment (SHLAA). The Council acknowledged that whilst a SHLAA is the usual method for assessing land supply, it was considered that the circumstances required an earlier indication of potential capacity to assist HMA partners		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						with their plan-making. This officer-led exercise identified a potential capacity range of 11,900 to 13,600 dwellings, with the Position Paper clarifying that capacity was expressed as a range to reflect '*the significant uncertainties associated with assessing potential capacity at such an early stage in plan making'*. The paper states that lower figure in the range was considered to be a realistic baseline, but '*nonetheless ambitious'*, whilst the achievement of the higher figure would require a '*… more ambitious approach in the city centre, additional releases from Green Wedges and potential release of Green Belt land'*. The Position Paper contends that the original officer-led exercise adopted a '*no stone left unturned'* approach. However, it nonetheless remained a high-level desktop exercise based on professional judgement and assumptions regarding matters		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						including future policy direction and potential changes to Green Belt and Green Wedge boundaries. At that stage, infrastructure and mitigation requirements were also not been fully factored into the assessment. Of particular relevance, the Position Paper expressly states that the desktop study: *'… does not provide a detailed assessment of the specific sites and locations that have been considered through the capacity work as further assessment is required to fully assess the merits of locations, including through Sustainability Appraisal.'* It also states that the capacity exercise was undertaken: *without having undertaken the full, detailed assessment of sites that would normally be required to justify a housing requirement figure.'* The Position Paper explains that in response to a request from		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						other HMA partner authorities, the desktop capacity exercise was subjected to an independent review by AECOM in 2022. Whilst AECOM found the officer-led desktop review to be '*broadly robust*' in identifying the main sources of future housing supply based on the information then available, it recommended that the Council should ensure that its land supply was kept under review. The Position Paper states that such periodic reviews were undertaken between 2023 and 2024 with housing capacity found to be: 12,041 dwellings in March 2023 (with the Plan Period amended from 18 years to 17 years) 12,361 dwellings in June 2023 (rounded to circa 12,500 in July 2023 to aid HMA working) 12,247 dwellings in May 2024. The **May 2024** figure of **12,247 dwellings** was reported as the '*current figure in **July 2024***', and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						again rounded to **12,500 dwellings**, with the Position Paper stating: *'Whilst acknowledging that calculation of urban capacity is a **fluid process**, there is a broad acceptance from HMA partners that their respective plans should progress on the basis that DCC's capacity is **capped at 12,500** as agreed by JAB.'* The provisional nature of the capacity exercise up to July 2024 is reflected in Appendix 3 of the Position Paper, which describes the capacity figure as:' *purely working assumptions that require further refinement around policy direction technical feasibility, viability and on-site requirements, as plan making progresses.'* In recognition of the need for further testing and refinement as the Local Plan evidence progressed, the Position Paper confirmed in October 2024 that an updated SHLAA would be		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						published 'shortly' to identify the range of sites under consideration and provide a broad assessment of their respective merits. A Sustainability Appraisal was also expressly identified as part of the further assessment work required to establish the merits of locations. Additionally, the latest Statement of Common Ground between the Derby HMA authorities, published in February 2026, identifies that the Council was further developing its evidence base in relation to various matters including allocations and windfalls, urban capacity and trajectory, Green Belt/Green Wedge, plan-wide viability and the Sustainability Appraisal. However, it is not sufficiently clear from the Regulation 19 evidence how the SHLAA (published in late 2024), later work in 2026 and the Reg.19 Sustainability Appraisal have		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						informed the Housing Land Capacity position as reported in May and July 2024 (i.e. 12,247 rounded to 12,500). In particularly, it is not apparent how sites considered through the 2023-2024 SHLAA relate to those assumed within the earlier capacity exercise; whether additional opportunities or different site capacities have been identified; or whether more detailed assessment of suitability, availability, achievability and mitigation has altered the assumptions previously made. If the later evidence base (including the SHLAA) confirms that the reasonable identified opportunities were already captured within the original assessment up to May and July 2024 and that 12,500 dwellings remains an appropriate capacity figure, this should be capable of being transparently demonstrated. Equally, if the subsequent work has identified additional opportunities/capacity, those		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						findings should be reflected in the overall capacity position. JGP would, therefore, have expected the Regulation 19 evidence base to contain an updated Housing Land Capacity Position Paper, or equivalent reconciliation, clarifying how the later assessments/evidence has informed, confirmed or amended the May/July 2024 position. At present it is entirely unclear how the assessed the capacity figure in May 2024 (12,247 rounded to 12,500 in July 2024) and the published capacity figure in 2026 (12,500) have remained practically the same, despite the SHLAA and other later work.		
OR265	P&DG on behalf of JGP Properties*	Policy H1: Housing Delivery	Object			The above issues draw into question the soundness of the Council's site assessment and identified methodology when considering whether sites are suitable or, as the case may be, could be made suitable for residential development.	To address the above soundness concerns, JGP request that the Regulation 19 Local Plan is modified to allocate the Land South of Lime Lane, for up to 60-65 dwellings on the	The site's exclusion reflects its effects on the Green Wedge and on Chaddesden Wood Local Nature Reserve and ancient woodland, and the continuing concerns of Derbyshire Wildlife

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						It would be appropriate and proportionate for any robust and well-justified site assessment process to take into account the ability for identified constraints to be mitigated, including through reconsideration of assumptions around density, development extent and overall development potential. As stressed above, a constraint does not necessarily render a site unsuitable where there is a reasonable prospect that it can be satisfactorily addressed through the design, scale and form of development and appropriate mitigation. This distinction is particularly relevant in this instance. JGP has responded directly to the previously identified concerns (including the refusal of the 150 scheme) by substantially reducing the extent of development from the earlier proposal, including retaining all of the western field for ecological and	eastern field alongside linked habitat creation, woodland creation/expansion, public open space and SuDS on the western field. As set out above, when properly assessed on the basis of the reduced development proposal and having regard to the ability to appropriately mitigate identified impacts, JGP consider that the Site represents a suitable and sustainable opportunity for residential development. In the context of the significant constraints on housing land capacity within Derby, it is important that suitable opportunities to	Trust and the Woodland Trust, as summarised in SA Appendix G. The Sustainability Appraisal will be updated to confirm the assessment of the reduced eastern-field scheme. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						recreational purposes. Further detailed assessment has subsequently demonstrated that approximately 60-65 dwellings can be appropriately accommodated within the eastern field without altering that fundamental strategy. JGP acknowledges that the Council has reconsidered the Site in light of the Reg.18 submission and that Derbyshire Wildlife Trust and Woodland Trust continue to raise concerns. However, as noted above, the evidence does not make it sufficiently clear what the nature or significance of those residual concerns are ; how the opportunities presented by the western field have been taken into account; nor why appropriate mitigation could not overcome the identified constraint. This is directly relevant to whether the Local Plan is justified. Where a reasonable alternative has been materially	contribute towards meeting the city's identified housing needs are fully utilised. Suitable green field sites will also secure a suitable housing mix and the delivery of affordable housing at a rate (25% AH) that will insist in the overall delivery of AH across the plan area, which will be limited in relation to city centre sites (5% AH). The Council should also correct the factual assertion that the promoted site contains Ancient Woodland and reconsider the conclusions reached in relation to SA8 having regard to the capacity of the eastern field and the mitigation and	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						amended specifically to respond to previously identified constraints, there should be a clear and evidenced basis for concluding why those changes and associated mitigation are nevertheless insufficient to make the site suitable for allocation. The factual error within the Sustainability Appraisal regarding the presence of Ancient Woodland on the Site, together with the lack of clarity regarding the residual ecological concerns and the treatment of the mitigation and enhancement opportunities associated with the western field, means that JGP does not consider that the evidence presently provides a sufficiently robust basis for the exclusion of the site. There are also implications for whether the Plan has been positively prepared. As outlined, Derby has acknowledged the significant	enhancement opportunities afforded by the retention of the western field. Greater public clarity should also be provided as to the nature of the residual concerns raised by Derbyshire Wildlife Trust and Woodland Trust and the extent to which those concerns could be addressed through appropriate mitigation. JGP would welcome the opportunity to engage constructively with the Council and relevant stakeholders regarding the form and scope of measures necessary to appropriately mitigate potential impacts upon Chaddesden Wood and the measures	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						constraints affecting its ability to accommodate housing needs within its administrative boundary. Against that background, it is particularly important that potentially deliverable residential sites are not discounted where identified constraints are capable of being appropriately addressed. The eastern field provides the opportunity to deliver approximately 60-65 dwellings at 35 dph, including affordable and accessible housing, whilst retaining the substantial majority of the wider landholding for ecological and recreational purposes and providing an opportunity to secure positive intervention in relation to Chaddesden Wood. Accordingly, JGP consider that the exclusion of the Site as an allocation (with dwellings on the eastern field only) has not been adequately justified by the evidence currently presented and hence raises concerns as	that could form part of a comprehensive woodland, habitat and ecological scheme for the western field. On a proper and proportionate assessment, JGP considers that the eastern field is suitable for a housing allocation. Its allocation would make a valuable contribution towards addressing Derby's constrained housing land capacity and identified housing needs (including affordable homes), whilst providing a mechanism through which substantial and long-term woodland, habitat and ecological benefits could be secured, including new public recreation	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						to whether the Reg.19 Local Plan satisfies the tests of soundness in this particular respect.	opportunities. The latter would assist in deflecting footfall from the existing woodland which suffers the effects of recreational pressure as an LNR, particularly in the long term. Such would also meet various LNRS and Green Wedge Review aims	
OR265	P&DG on behalf of JGP Properties*	Policy H1: Housing Delivery				Site Assessment – Land South of Lime Lane, Oakwood (a) Introduction The following section of this submission demonstrates that the Site, with residential development restricted to the eastern field, is suitable and available for residential development; and also deliverable; and hence capable of contributing positively to the Council's identified market and affordable housing needs. The Site should, therefore, be allocated for residential development as part of the new		The site's exclusion reflects its effects on the Green Wedge and on Chaddesden Wood Local Nature Reserve and ancient woodland, and the continuing concerns of Derbyshire Wildlife Trust and the Woodland Trust, as summarised in SA Appendix G. The Sustainability Appraisal will be updated to confirm the assessment of the reduced eastern-field

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Local Plan, with the western field being defined as being for associated ecological and recreational mitigation and enhancement measures. The following plans/drawings are provided in Appendices 2, 3 and 4: • Illustrated Land Use Plan (ILUP) • Aerial Overview Sketch (view from the north) • Annotated Aerial Photo and sketches (including woodland buffer cross section) (b) The Site & Context The overall Site is 8.2ha and comprises agricultural land located to the south of Lime Lane, and between existing residential development of Oakwood to the east and west. Lime Lane acts as a defensible edge to this part of Oakwood with open countryside beyond to the north. The Site's southern boundary abuts Chaddesden Wood, which is an Ancient Woodland. The		scheme. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Ancient Woodland does not extend onto the Site. There are two veteran trees towards the front of the western field. The Site forms the northern extent of the North Oakwood Green Wedge between Chaddesden Wood and Lime Lane. The eastern field, which is hereby promoted as the residential part of an allocation, is 2.94 hectares. The Illustrative Land Use Plan (ILUP) shows the associated illustrative proposals for the whole site including the 5.26ha western field. Chaddesden Wood is a Local Nature Reserve (LNR) that is well used by the public, and managed by Friends of Chaddesden Wood (FoCW) alongside the owners, the City Council. It is the subject of a Woodland Management Plan, with the latest document being the 2023 Review. This assesses the woodland as being in an 'Unfavourable Managed State' The eastern field is separated		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						from the neighbouring western field by a gappy hedgerow with trees which runs north south between Chaddesden Wood and Lime Lane. Further north-south hedging and trees are situated between the eastern field and the existing residential estate to the east, with such forming a partial tree belt. As noted above, the Site has previously been brought to the Council's attention as part of a planning application for up to 150 dwellings across both the eastern and western fields within JGP's ownership, which was refused in July 2025 (24/01023/OUT). These combined fields also formed the basis of a previous promotion (DER/0209 SHLAA 2024), whilst the March 2026 Reg.18 scheme promoted housing on the eastern field only (alongside details of the associated ecological and recreational proposals for the western field). The outline application was refused in relation to the functions of the Green Wedge		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and the suggested harm to the Ancient Woodland and veteran trees. The latter included a concern that the extent of the proposed residential development (i.e. across both fields) would lead to the isolation and fragmentation of the woodland from the countryside to the north, with a detrimental impact on the movement of wildlife between the two implied. Since the refusal of the application the Council published a new Green Wedge Review dated September 2025, which forms part of the evidence base for the emerging Local Plan. As discussed above, the GWR 2025 includes consideration of the development of both fields for housing (together) but not just the eastern field alone. In response to the reasons for refusal and the GWR 2025, JGP seeks to promote just the eastern field for residential development alongside the retention of the larger western		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						field as Green Wedge with habitat creation including woodland creation/expansion and public recreation opportunities. The proposals for the western field alongside the supplementation of north south hedgerows would be in accordance with stated Green Infrastructure recommendations within the Green Wedge Review 2025 and items in the Local Nature Recovery Strategy (LNRS) to which it refers: Explore opportunities for new woodland creation to enhance habitat connectivity (Priority WT-3 and Measure 022). Opportunities to target species-rich grassland creation to enhance connectivity within the grassland network on land to the north of Chaddesden Wood (Priority GL-3 & Measure 043). Contribute to the future wetland resource through the creation of new semi-natural wetlands and other complementary habitats (Priority WL-3 & Measure 083).		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						(c) Site Suitability The Site sits south of Lime Lane and north of Chaddesden Wood between existing residential estates to the east and west. It forms part of the Oakwood settlement with open countryside north of Lime Lane. Residential development on the eastern field would represent a logical and physically coherent development within Oakwood, with this field being particularly well related to residential estate to the east. Lime Lane provides a strong defensible boundary between the Site and the open rural landscape to the north, which is Green Belt. As an established large suburb, Oakwood is well served by services and facilities including a district shopping centre, health related facilities, schools, public houses, Oakwood Leisure Centre and formal public open space. Any lack of medical and educational capacity would be a matter for a Section 106 Agreement to secure		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						appropriate contributions towards new capacity/infrastructure. A pair of bus stops on the nearby main road (A608 'Hilltop') to the west, are served by a regular bus service (H1) to Derby and nearby villages. Beyond the A608 is 'The Great Northern Greenway', which is part of the National Cycle network connecting through to Derby. In assessing the application for 150 dwellings the Council agreed that the land south of Lime Lane is a sustainable location for new dwellings in terms of access to services and facilities by non-car modes subject to various mitigations. These included the provision of a new dedicated footway/cycleway along Lime Lane connecting the site with the A608 bus stops to the west and the long-established path to the east of the Site. The latter is a well-used path that runs north south, connecting		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Lime Lane with housing development to the east. It connects with the Council owned path that runs to the east of Chaddesden Wood. Any residential development of the eastern field only, would still provide a frontage cycleway/footway, a toucan across the A608 and pedestrian/cycle links to the existing estates to the east and west. Such paths are shown illustratively on the accompanying ILUP including a section of an east west Lime Lane cycleway/footway sitting rear of the hedge and veteran tree that fronts the road, avoiding the RPA of the latter. Overall, there is clear scope for future residents to have a genuine choice of transport modes through harnessing opportunities to promote walking and cycling and access of public transport. A toucan across the main road would provide a safe crossing facility to the northbound bus stop and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						'The Greenway'. The Site is not the subject of any landscape designations, nor is it within a Conservation Area or the setting of any designated or non-designated heritage assets. It is in Flood Zone 1 and has no surface water drainage issues. The refused application for up to 150 dwellings across the two fields was supported by a suite of technical information and was not refused on any technical grounds (e.g. highway safety, network capacity, flood risk, noise) subject to various planning conditions and Section 106 requirements, as set out in the officer's report. The above included the LLFA being satisfied that suitably designed on-site SuDs would prevent flood risk being increased elsewhere including downstream in Breadsall Village. Similarly, the Highway Authority raised no highway safety or network capacity objections subject to various		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						measures including securing the proposed access visibility splays and a Traffic Regulation Order to reduce the speed on the adjoining section of Lime Lane. The accompanying ILUP shows the vehicular access and visibility splays as per the proposed access for the previous scheme that was not objected to by the Highway Authority or the LPA. Technically, there is no reason why a scheme for residential development on just the eastern field would not be similarly acceptable subject to agreed mitigations. Notwithstanding the above, and as already noted, the Site is located within the North Oakwood Green Wedge and adjacent to the Ancient Woodland. Whilst the woodland may include veteran trees recent survey work concludes that there are none on or near the woodland's northern edge that		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						would impact on any development proposals at the Site. The impact of the proposed development on the Green Wedge, Ancient Woodland and the 2 frontage veteran trees can be mitigated as part of any future development with dwellings on the eastern field only, as detailed herein. Overall, it is considered that the Site is suitable for housing development on the eastern field when assessed in the round taking account of its sustainable location; contained nature as a single field south of a defensible northern edge and where appropriate frontage planting can be secured; its physical relationship with existing housing and associated connectively (existing and proposed); relevant Green Wedge functions being suitably retained with certain Green Wedge aims/functions enhanced by the proposals for the western field; measures to fully protect and indeed		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						enhance the Ancient Woodland; and significant tree planting that would more than offset loss of 3 Category A TPOd trees to facilitate the previously supported Lime Lane access. i. Green Wedge Functions As noted above, the Council accepts that with the retention of the western field will allow the 'functional Green Wedge to remain' (Reg.18 Sustainability Appraisal, Appendix G). JGP agrees with this finding. Policy CP18 of the adopted Local Plan identifies Green Wedge functions as: '… areas of land that define and enhance the City's urban structure, maintain the identity of the different residential neighbourhoods, provide an uninterrupted link to the countryside, form part of the wider green infrastructure network and play an important role in climate change adaptation'.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						This wording is largely repeated in the proposed Green Wedge Policy (draft Policy EN6) whilst the Green Wedge Review (GWR) 2025 assessed the Green Wedge against the following 3 primary functions and 8 secondary functions regarding health, well-being and community. The former are: Urban Structure and Neighbourhood Definition Promoting Residential Amenity Connection to the Countryside [visual and physical connections] In terms of the primary functions, the GWR 2025 concludes that the Green Wedge (in terms of the North Oakwood Green Wedge as whole) '…plays a vital role in breaking up dense residential areas and providing visual and physical separation'. The GWR 2025 acknowledges that the Green Wedge does not perform the role of: Maintaining the identity of		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						different residential areas or preventing the coalescence of Oakwood and Breadsall Village. Preventing urban sprawl into the open countryside (i.e. beyond Lime Lane). Flood water storage. Whilst developing the eastern field for housing would remove part of the northern extent of Green Wedge this would be a limited parcel as outlined above, leaving the western field 'intact'. As illustrated on the enclosed Annotated Aerial View (see Appendix 4), a circa 240m – 350m wide area would remain as undeveloped and open Green Wedge, consisting of the whole of the western field, existing neighbouring Public Open Space at the Persimmon estate to the west and the far NE corner of the eastern field. This would start at the woodland and widen to around 350m where it meets with Lime Lane. As noted in the proceeding Soundness		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Assessment, this retained width would be similar to that assessed as acceptable for proposed Moorway Lane allocation (draft Policy HA3). This wide retained area of Green Wedge between Chaddesden Wood and Lime Lane would allow the following functions to continue: The undeveloped western field acting to break up the new residential area and the existing Permission development, providing ongoing visual and physical separation. The retained wedge across the western field defining the urban structure and neighbourhoods of this part of Oakwood. Penetration of open land into the urban area with such providing visual and physical connections to the open countryside north of Lime Lane. A significant area of green space of woodland and grassland providing an ongoing rural setting for the majority of		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the woodland as viewed from the north. Views from the expanded woodland of the countryside to the north, providing an open character and visual connection with the rural landscape. The promotion of residential amenity through views towards green space and/or access to new POS. This accords with the Council's positive conclusion regarding continued Green Wedge functionality with the western field retained (as provided in Appendix G of the Reg.18 SA). In terms of openness and views, the woodland planting would impact on the current uninterrupted nature of the western field but it would remain 'green', open and undeveloped in terms of built form. Whilst certain existing views would be altered to accommodate much needed		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						housing , the Illustrative Land Use Plan (Appendix 2) provides an illustration how viewpoints towards the countryside could be incorporated into the woodland planting, such as a north facing view with the existing loan tree as a meaningful focal point. The expanse of the view is also highlighted on the Aerial Overview Sketch (Appendix 3). In assessing the proposal, it must be acknowledged that both the eastern and western fields are currently private land, being ploughed fields lacking in established vegetation other than the boundary hedges and trees. There are no PROW across the fields. The following Green Wedge functions and Green Infrastructure recommendations in the GRW 2025 are, therefore, not currently supported on the land within JGP's control: Access to the countryside/public recreation/open space provision;		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Improved wildlife habitat/wildlife corridors between the wood and the countryside; and Such functions/aims would, however, be introduced or enhanced as part of the illustrated proposals by way of: Woodland planting/expansion onto the western field as shown indicatively on the enclosed Illustrative Land Use Plan and annotated aerial view, in accordance with an LNRS aim for the site (as repeated in the GWR 2025). This would be additional to a 30m woodland buffer on the eastern field to separate new housing from the Ancient Woodland; The creation of further natural and semi natural habitat on the western field including species rich grassland and potential semi-wetland habitat, in accordance with an LNRS aim for the site (as repeated in the GWR 2025); The overall enhancement of habitat corridors between the woodland and the countryside, including supplementing		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						various gaps in existing north-south hedges to enhance local landscape character and provide enhanced habitat connectivity (LNRS and GWR 2025); New public recreation opportunities on the western field including paths through parts of the new natural and semi natural habitat, including up to 3ha of new woodland; The creation of a community woodland and orchard. Significant new green infrastructure and public open space around and within the developed eastern field, in the form of policy compliant Green Amenity Space including a LEAP. The general greening/habitat creation at the western ploughed field would also enhance the foreground north views between the expanded woodland and the countryside north and Lime Lane and offer new a vegetative outlook from the dwellings at the Persimmon site that face the western field (The latter being suggested as		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						secondary function in the GWR 2025). Overall, the proposals for The Site and the adjoining western field would allow the relevant Green Wedge functions, and Green Infrastructure recommendations of the GWR 2025, to be achieved or significantly enhanced, alongside modest residential development. ii. Ancient Woodland and Veteran Trees JGP recognises the importance of safeguarding the Ancient Woodland and frontage Veteran Trees to prevent loss or deterioration of irreplaceable habitat. Indeed, the proposals go well beyond a safeguarding response to an overall safeguarding and enhancement response. Firstly, by moving away from any plans to develop the western field for housing and instead provide habitat enhancements here, the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Council's previous concerns regarding the 'isolation and fragmentation' of the woodland from the countryside is overcome. Indeed, connecting habitat would be substantially increased. As noted above, wildlife habitat and recreational use cannot successfully coexist, with such being apparent at many local and National sites. Secondly, a woodland buffer of 30m is shown on the enclosed Illustrative Land Use Plan and a sketch cross section with Appendix 4. A 30m buffer exceeds what the relevant guidance seeks as a minimum (15m) and JGP's appointed ecologist and arborist, who have visited the site and undertaken various survey work, conclude that there is no technical justification for a buffer that exceeds 15m subject to no land level changes within such. This includes there being no veteran trees close to the woodland edge that would require a wider		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						buffer. However, a 30m buffer is offered nonetheless to help appease concerns and give a larger area for a new woodland planting alongside a regenerative woodland edge. The Woodland Trust suggested that a 50m buffer was required in relation to the for refused 150 dwelling scheme, partly with reference to its assertion that such a scheme would fully enclose the woodland with residential development. Any such effect is negated, however, with the proposed 60-65 dwelling scheme whereby the western field will remain completely devoid of housing and other built form. However, in its response to the Reg.18 submission, the Woodland Trust questions the rationale behind and the adequacy of a 30m buffer with reference to noise, light and invasive species. JGP accepts the advice of its appointed consultants that a 30m buffer with no gardens backing onto it would allow the suitable mitigation of any such operational impacts. A detailed		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						CEMP would protect the woodland from adverse effects at the construction stage. Scrub planting, hedging and fencing would prevent direct access to the woodland along its full northern edge, save the existing entry point from adjoining POS land to the west which leads to a designated woodland path. This is not to say that new residents would not use the wood at all, but it would prevent access into the woodland from the Site other than by the designated routes. Such demarcation and scrub along the northern boundary would also serve the aim of the POS on the western field being a distinctly separate recreational offer to the LNR. Thirdly, and perhaps most significantly, the indicative proposals for the western field show new woodland planting to allow the Ancient Woodland's expansion northwards, not only within the proposed eastern buffer but also onto a large part		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						of the western field. The ILUP illustrates around 3ha of new woodland with woodland paths and an east to west path. As noted in the Soundness Assessment of these representations, the Chaddesden Park LNR is 10ha, such that 3ha of new woodland would provide up to a 30% increase in woodland coverage. Such woodland planting/expansion onto land north of Chaddesden Wood is identified in FoCWs Woodland Management Plan as a key measure to improve the health of the Ancient Woodland, which has been assessed by FoCW as being in an 'Unfavourable Managed State'. This potential woodland expansion is hence an important benefit for the Council to take into account when assessing JGP's residential promotion of the eastern field alongside the illustrated proposals for the western field. As a suburban LNR Chaddesden		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Wood is well used by the public leading to various recreational pressure and certain associated negative effects (e.g. degradation of paths). However, the GWR 2025 encourages public access to the woodland for welfare reasons. The proposed 60-65 dwellings have the potential to increase footfall in the woodland for recreational reasons, and hence increase the existing recreational pressure by a certain amount in percentage terms. The percentage increase in such footfall would, however, be significantly lower than the percentage increase in proposed new woodland (up to 30%) plus adjoining new grassland POS on the 5ha western field. The proposed significant woodland expansion and new public recreational opportunities at the western field would certainly help relieve the overall footfall pressure on the Ancient Woodland, including existing		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						users/locals. The grassland and paths would provide immediate opportunities whilst the woodland would provide longer term recreational alternatives to the existing LNR. These proposals tend to align with DWTs recent comments as reported above. Additionally, JGPs appointed specialists note that there are measures in the current Woodland Management Plan that are not fully funded and/or implemented at present, including the enforcement of dogs on leads. The residential development at the eastern field would contribute towards targeted ecological and recreational management measures, potentially including measures relating to the wood's hydrology. JGPs appointed ecologist notes various potential ecological improvements such as more ground level planting of the wood's central area. This would also assist deter recreational access beyond the designated		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						paths. It is appreciated that the wood's hydrology is primarily a function of its own land levels, which fall away from the application site. This is reported as being accepted by the Council's Drainage Engineer in the Committee Report for the 150-dwelling scheme. However, there may be scope to secure the disruption of the ditch that runs down the centre of the wood to reduce the speed that rainwater leaves the wood, which is mentioned in the Woodland Management Plan as an aim. Additionally, retaining land levels within 30m of the woodland edge and the proposed drainage scheme would ensure that any current limited flows of surface water towards the Ancient Woodland, including within the east-west ditch along the boundary, would not be reduced. Methods to increase surface water flows from the Site to the woodland		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						edge ditch would be secured if technical advice concludes such would be desirable for the woodland edge trees and feasible. There would be no development, including no paths, within the root protection areas of any trees, including the 2 veteran trees at the front of the western field (one in the central hedge). These could be fenced off with ornate fencing as seen in various Derby Parks under the Council's control to prevent public access to safeguard both the public and the tree. This responds positively and proportionately to an issue raised by Woodland Trust to JGP's Reg.18 submission. All of the above measures could be secured through various mechanisms. It is, therefore, concluded that the overall package would ensure no loss or deterioration of the woodland or veteran trees and instead secure various enhancements. The provision of		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						plentiful alternative natural and semi natural POS to the existing woodland LNR, including new areas of woodland and recreational paths linking to the Greenway, would be a significant benefit to the wood in terms of reducing long term recreational pressure. Woodland expansion aims of current Woodland Management Plan, the GWR 2025 and the adopted LNRS would be met on what is currently private land to the benefit of the LNR as set out above. This, together with the other habitat creation, offers a real opportunity for betterment associated with the limited release of Green Wedge land for housing on the eastern field. iii. Site Suitability Conclusion In conclusion, the Site is considered suitable for residential development subject to this being new dwellings being restricted to the eastern		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						field and coordinated with plans for the western field, including various planning conditions and Section 106 requirements. Any site-specific considerations, including the Ancient Woodland, access, flood risk and drainage, ecology, or landscape matters, are capable of being appropriately addressed through the planning application process and the implementation of suitable mitigation measures. d. Development Potential Indicative capacity assessments suggest that the site could accommodate approximately 60-65 dwellings, based on a density of 35 dwellings per hectare, as sought by draft Policy H2 of the Reg.18 draft Local Plan. This is based on an assumed net developable area on the eastern field of around 1.72-1.82 ha taking account of the required woodland buffer, frontage infrastructure including visibility splays and a		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						cycleway/footway, eastern and western buffers relating to existing hedges, trees and a ditch, and required on site Green Amenity Space, including a LEAP. The proposed development would deliver a mix of market and affordable housing units. The precise number, mix, and layout of homes would be determined through detailed design work and in accordance with relevant planning policy requirements. Based on draft Policy H4, a policy compliant scheme (25%) would provide up to 16 affordable homes, which would be a significant benefit given the Council's difficulties in fulfilling the ever-increasing demand for such properties. In accordance with the above site suitability assessment, policy compliant and good quality public open space and landscaping would be achieved, including new pedestrian and cycle paths and informal and formal space for childrens play.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Significant habitat enhancement and creation across the Site would result provide in excess of 10% BNG alongside Ancient Woodland and veteran trees not being harmed. As noted above a new cycleway and pavement serving Lime Lane, partly rear of existing boundary vegetation, would provide a new sustainable and safe link for new and existing residents to existing bus stops on the A608, and pedestrian and cycle connections to the wider countryside. Although the site lies within the Green Wedge, as described above, it will leave the western field undeveloped, being around 350m wide at its mouth including the neighbouring POS. The dwellings would be of an appropriate density and style and have a landscaped character to respond positively to the site's rural edge location i.e. opposite the open		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						countryside to the north. This would include new frontage hedging and trees to each side of the new access to blend the frontage with nearby roadside hedging and trees east and west that would be retained. The dwellings would integrate with the nearby residential areas to the east and west through some physical intervisibility and by new footpath and cycleway links. This would include a formal connection onto the long-established path to the east of the Site where it meets with Lime Lane. A new path would also be provided in the south-eastern corner of the eastern field where there is an established gap of compacted ground in the eastern tree belt. This would likely operate as a desire line to and from the eastern path. New and existing communities would all have access on foot or bike to the new POS, the community woodland and orchard and the LEAP, assisting in developing		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						social connections and community cohesion. Houses either side of tree belts is part of the prevailing character of Oakwood, which the scheme would follow in terms of the trees along part of the eastern boundary. Overall, the proposal would make effective use of land to meet the identified and future housing needs of the City, while suitably safeguarding and enhancing the surrounding environment, the Ancient Woodland, Green Wedge functions, GI recommendations of the GWR 2025 and key aims of the LNRS. The development of the Site presents an opportunity to create a high-quality, sustainable, and well-designed place that contributes positively to the area's character and provides benefits for both existing and future residents, wildlife and the adjoining Ancient Woodland.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						e. Site Availability The landowner is supportive of development and is actively seeking to promote the site through the plan-making process. Although not currently owned by developers, there is long-standing interest in this site. A residential allocation for around 60-65 dwellings is likely to be an attractive proposition for additional housebuilders. Alongside supportive landowners, there are no known legal, covenant, or title issues that would inhibit delivery on this site. Furthermore, no significant infrastructure would be required before the development could come forward (e.g. a link road) and there are no abnormal costs or issues that would undermine the viability or delivery of the scheme (e.g. land contamination). The above assessment illustrates that development can be anticipated on this site within 1-5 years of allocation.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						This would, therefore, be a meaningful contribution to the council's housing needs. f. Conclusion The Site is a suitable, available, achievable and deliverable residential opportunity that could and should make a contribution to addressing the Council's identified market and affordable housing needs. There are no planning and technical constraints that would preclude the residential development of the site, which could not be appropriately mitigated, or indeed enhanced. The Site should, therefore, be allocated for residential development as part of the emerging Local Plan, with residential development of up to 60-65 units restricted to the eastern field. P&DG and JPG continue to welcome the opportunity to discuss the merits of the Site as such a residential allocation with the Council as part of the ongoing plan making process.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR256	Pegasus Group on behalf of Miller Homes, William Davis and Miller Gadsby (Heatherton) Ltd*	Policy H1: Housing Delivery	Object	Yes	No	Policy H1: Housing Delivery sets out the approach to the delivery of 12,500 new homes over the plan period 2023 to 2043. Policy H1b) makes clear that Derby City will work with neighbouring local authorities to coordinate and plan extensions to the City. The clear indication that meeting the full housing need of the City will require delivery within South Derbyshire and Amber Valley is welcome. The Planning Data (England) Regulations 2026 mandate that local planning authorities publish plan timetables and housing requirements in standardised formats. The regulations states that the housing requirement is the minimum number of homes that a local plan expects to be provided during the period of the plan. It is also vital that housing requirement is expressed as an annual figure so that monitoring, including housing	Amend Policy H1 to set out a total figure for the full housing need for Derby City, as well as the capacity of the City to meet this need, and also set out an annual housing requirement to ensure it is clear what the Council's housing land supply and housing delivery should be measured against.	Policy H1 sets a requirement of a minimum of 12,500 homes over 2023-2043, equivalent to 625 homes a year, against which delivery and supply can be monitored, and paragraph 179 sets out the full housing need. The Planning Data (England) Regulations 2026 govern how plan data is published rather than the content of the Plan. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						delivery and housing land supply can be calculated as required by NPPF paragraph 78. Policy H1 does not clearly set out an annual housing requirement for the plan period and is therefore inconsistent with national planning policy and the requirements for housing requirement data under the Planning Data (England) Regulations 2026. The policy as currently drafted fails to provide a clear and effective housing requirement for monitoring purposes.		
OR238	Planning Limited on behalf of National Grid	Policy H1: Housing Delivery				The draft Local Plan does not propose any residential allocations on land affected by 132kV overhead lines.		Comments noted.
OR537	Rob Hoddinott	Policy H1: Housing Delivery	Object	No	No	“encourage the regeneration of brownfield land” - multiple brownfield sites were submitted for consideration for HA16, the public have seen no evidence of how this was considered and /or discounted.	Consider brownfield sites submitted.	No brownfield or other sites were promoted for Gypsy and Traveller use through the call for sites, so the Council assessed nearly 90 of its own sites, as set out in the Gypsy and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								Traveller Site Provision Topic Paper. Sites suggested during consultation that are not in Council ownership could not be shown to be available for this use. No change required.
OR240	Pegasus Planning on behalf of Catesby Estates*	Policy H1: Housing Delivery	Object	No	No	*'Housing Requirement' Terminology* Policy H1 states that: *"Over the Plan period (2023 to 2043) Derby's housing <u>needs</u> will be met through the delivery of high-quality new homes …"* *"In particular, the Council will:* *<u>facilitate the delivery</u> of a minimum of 12,500 new, high quality mixed tenure homes within the city between 2023 and 2043"* The Planning Data (England) Regulations 2026 mandate that local planning authorities publish plan timetables and	In order that Policy H1 aligns with The Planning Data (England) Regulations 2026, it should modified so it provides a clear housing requirement, this should also be expressed an annual figure as required by the NPPF paragraph 78. The capacity for housing within Derby City should be reassessed in light of updated supply information, and the proposed plan period, and Policy H1 should be	Policy H1 sets a requirement of a minimum of 12,500 homes over 2023-2043, equivalent to 625 homes a year, against which delivery and supply can be monitored, and the derivation of the capacity figure is set out in Section 11 of the Housing Requirement and Spatial Strategy Topic Paper. The Planning Data (England) Regulations 2026 govern how plan data is published rather than the content of the Plan. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						housing requirements in standardised formats. The regulations states that the housing requirement is the minimum number of homes that a local plan expects to be provided during the period of the plan. It is also vital that housing requirement is expressed as an annual figure so that monitoring, including housing delivery and housing land supply can be calculated as required by NPPF paragraph 78. Policy H1 does not clearly set out an annual housing requirement and so it is inconsistent with national planning policy and with The Planning Data (England) Regulations 2026. *Justification for 12,500 'Housing Requirement'* The figure of 12,500 homes in Policy H1 is based upon the Council's estimated capacity of Derby City. As set out above this is based on out of date	modified in light of the up to date capacity position.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						information and on the basis of a different plan period and therefore needs to be revisited. As presented, the capacity figure of 12,500 dwellings stated in the draft Plan is based on evidence from 2024, does not take account of up to date monitoring. The Plan is therefore not positively prepared, not justified and inconsistent with the NPPF.		
OR104 & C519	George Fletcher*	Paragraph 178	Object	No	No	Destroying Wilmorton Park is the opposite of protecting important open land, green infrastructure and recreational facilities.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR537	Rob Hoddinott	Paragraph 178	Object	No	No	HA16 is totally contrary to this claim.	Use brownfield sites.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space. No brownfield or other sites were

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								promoted for Gypsy and Traveller use, as set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR255	South Derbyshire District Council	Paragraph 183				SDDC consider that Derby City could plan more positively for housing growth particularly in the later years of the Local Plan. Paragraph 74 of the Local Plan, and the Derby Housing Land Capacity: Position Paper October 2024 provide a summary of capacity work undertaken by Derby City to date. SDDC are not aware of further updates to this work since 2024 and consider it would be good planning and consistent with the ongoing effective cooperation between our Councils for Derby to update its capacity study, including site specific information and realistic estimates of housing delivery for the later years of the plan (2039 to 2043). It would also be helpful if this update is published to inform the Local Plan Examination.		The derivation of the 12,500 capacity figure is set out in Section 11 of the Housing Requirement and Spatial Strategy Topic Paper, and Table 2 shows the supply over the full plan period to 2043. The City Centre housing capacity work commissioned by the Council has identified further opportunities on upper floors and infill sites in the later years of the plan, and the Council will share its updated capacity evidence through the Statement of Common Ground. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR265	P&DG on behalf of JGP Properties*	Paragraph 184	Object		No	It is noted that the original capacity work was undertaken in the context of a Plan period ending in 2039. The Position Paper records that the June 2023 assessment of 12,361 dwellings related to a 17-year Plan period, before that figure was rounded to circa 12,500 for HMA working. Appendix 3 similarly calculates components of supply, including the windfall allowance, by reference to a period ending in **2039**. However, the Plan period has subsequently been extended to **2043**. The latest Statement of Common Ground confirms that housing need has been rolled forward to reflect those additional years but that no additional supply has been attributed to them on the basis that there is '*no updated evidence of additional capacity*' beyond the 12,500 dwellings. This has been used for the '*minimum requirement figure*'		The derivation of the 12,500 capacity figure is set out in Section 11 of the Housing Requirement and Spatial Strategy Topic Paper, and Table 2 shows the supply over the full plan period to 2043, including windfalls and allocations. The Plan's requirement is a minimum and paragraph 752 sets out the circumstances that would trigger its review. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						of 12,500 dwellings in Paragraph 184 of the Reg.19 draft Local Plan. JGP does not suggest that extending the Plan period by four years must automatically result in additional capacity being found and reported, but the Council itself describes urban capacity as a '*fluid process'* which should be kept up to date as plan-making progresses. It should, therefore, be clearly demonstrated that the implications of the additional four years have been considered in assessing the City's stated capacity and, if no further realistic opportunities for housing delivery over that period can be identified (excluding anticipated windfalls), the evidence should explain why.		
OR257	Marrons on behalf of BDW Trading Ltd (Redrow Homes Midlands)*	Paragraph 185 & Table 2	Object		No	Table 2 of the Submission Draft attributes 2,574 dwellings (net of commitments) to allocations within the city centre over the plan period. However, as with the allocations outside the city		The deliverability of the City Centre allocations is evidenced in SA Appendix G, which records that the Friar

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						centre (above), the respondent submits that several allocations are supported by insufficient objective evidence of deliverability and developability. Indeed, the PPG[16] makes clear that plan-makers will need to assess the suitability, availability and achievability of sites, including whether the site is economically viable. This will provide information on which a judgement can be made as to whether a site can be considered deliverable within the next 5 years, or developable over a longer period. The analysis which follows is intended to convey the respondent's site-specific concerns.		Gate Goods Yard and Full Street sites are under construction and Bradshaw Way and Eagle Quarter have planning permission. Funding-dependent sites are phased beyond the first five years, as detailed in the Site Selection Topic Paper. No change required.
OR265	P&DG on behalf of JGP Properties*	Paragraph 185	Object		No	The Housing Land Capacity figure is fundamental to determining how much of Derby's housing need the Council considers can be accommodated within the Council's administrative area and how much must be met elsewhere within the HMA. JGP considers that the		The derivation of the 12,500 capacity figure, including the role of the Green Wedge Review and the detailed site assessment, is set out in Section 11 of the Housing Requirement and Spatial Strategy Topic Paper and in the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Regulation 19 evidence base does not currently provide a sufficiently clear reconciliation between the high-level and provisional capacity position established by July 2024 (12,500) and the later more detailed Local Plan evidence, which still finds the capacity to be 12,500. In particularly, further clarity is required as to the treatment of Green Wedge opportunities and constraints; whether all reasonable opportunities for residential development have been appropriately assessed; and how the extension of the Plan period to 2043 has been reflected in the capacity assessment. JGP, therefore, considers that the Council should demonstrate, through an updated Housing Land Capacity Position Paper or equivalent evidence, how the subsequent detailed evidence has informed the 12,500 dwelling capacity figure and that all reasonable		Site Selection Topic Paper. Table 2 shows the supply over the full plan period to 2043. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						opportunities to accommodate additional housing within Derby have been appropriately explored before concluding the extent of housing need that must be accommodated by neighbouring authorities. Unmet Need The concerns identified above in respect of Derby's housing capacity have direct implications for the amount of unmet housing need arising from the City and, consequently, the extent to which that need is expected to be accommodated elsewhere within the wider Housing Market Area (HMA). JGP considers that significant uncertainty remains regarding the scale of Derby's unmet housing need to be distributed to neighbouring authorities and, critically, the genuine capacity of those authorities to accommodate that need. This issue was considered through the recent examination		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						of the Amber Valley Local Plan. At Paragraph 64 of their report, the Inspectors concluded that *'… the three authorities recognise that unmet need from the city will need to be met within the adjoining authorities but have failed to agree an appropriate apportionment during the preparation of the Plan'*. Whilst the adopted Amber Valley Local Plan makes provision for 1,320 dwellings towards Derby's unmet need, the Inspectors expressly regarded this as a *'pragmatic first step in the longer-term process of addressing housing need across the HMA'*. Importantly, the figure was not derived from an agreed apportionment of Derby's unmet need but originated from the proposed allocation at Brun Lane, Mackworth, which was subsequently removed from the Plan. JGP acknowledges the complexities arising from		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						changes to national planning policy, the different plan-making timetables across the HMA and pending LGR. Nevertheless, establishing the full extent of Derby's unmet housing need, and how and where that need can sustainably be accommodated, is currently a fundamental strategic matter which must be supported by proportionate evidence. The position in Amber Valley is particularly acute, as its recently adopted Local Plan is based on a housing requirement of 434 dpa, compared with a current Local Housing Need figure of approximately 670 dpa. The adopted requirement, therefore, represents only around 65% of current LHN, which is well below the 80% threshold. The Council is hence required to undertake an immediate review of its Local Plan. The new LHN figure of circa 670 dwellings clearly represents a material change in		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						circumstances and places significant additional pressure on Amber Valley to meet its own housing need. Any contribution towards Derby's unmet need would represent an additional requirement over and above the substantially increased level of housing for which Amber Valley must now plan. Against this context, there can be no reasonable assumption that Amber Valley will have capacity to still accommodate a significant proportion of Derby's unmet need, particularly given the environmental and policy constraints affecting the Borough, including Green Belt land and the Derwent Valley Mills World Heritage Site. This materially alters the context in which Amber Valley's realistic capacity to accommodate unmet need from Derby must now be assessed. South Derbyshire District Council's emerging plan, which proposes to take around 4000 of Derby's unmet need, is being		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						prepared under the legacy plan making system and has not been submitted for examination to date. Hence, its soundness has not been established and nor have the proposed allocation sites been examined. The above cases reinforce the need for robust evidence regarding Derby's own capacity and the realistic capacity of authorities across the HMA to accommodate Derby's unmet need. Consequently, JGP considers that there remains insufficient clarity and proportionate evidence to justify the amount and full extent of Derby's unmet housing need that is proposed to be exported to neighbouring authorities across the HMA. This has direct implications for the justification of the overarching spatial strategy and the need for scrutiny of the stated capacity position. The sustainability consequences of directing housing growth away from		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Derby, as the principal and most sustainable urban area, towards more rural and constrained authorities such as Amber Valley, should also be fully considered and justified. Without greater certainty regarding the scale, distribution and realistic capacity to accommodate Derby's unmet housing need, JGP considers that the spatial strategy has not been demonstrated to be justified or positively prepared and is, therefore, unsound in these respects. • The Exclusion of Land South of Lime Lane, Oakwood (with dwellings on eastern field only) As noted above, following the refusal of planning application (ref: 24/01023/OUT) for **150 dwellings** in July 2025, JGP promoted the eastern field as a standalone residential development for **49 dwellings**, with the western field being		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						retained to deliver a comprehensive package of biodiversity, habitat and woodland creation, plus new natural and semi natural public open space and woodland management improvements. This aimed to address the reasons for refusal regarding impacts on adjacent Ancient Woodland and the functionality of the Green Wedge, including the former suggesting that housing of both fields would isolate and fragment the woodland from open countryside to the north (and associated semi-natural habitats). Notwithstanding the potential mitigations and enhancements which were set out in the Regulation 18 representations, the Council has not taken the 2.94ha eastern field forward as a residential allocation within the Reg.19 draft Local Plan, with such tied to the measures detailed for the western field. However, as introduced above, JGP considers that there is		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						limited evidence or justification to support the exclusion of the Site. It is clear from the Sustainability Appraisal, which forms a key part of the evidence base, that the Council has undertaken an assessment of the proposed reduced scheme for dwellings on the eastern field only, with such reported in the conclusions as provided in Appendices E and G. Overall, the site is assessed as performing relatively well against the majority of the identified Sustainability Appraisal objectives, largely receiving 'minor positive', 'neutral' or 'minor negative' scores. This is to be expected of residential development sites, where minor negative effects can be taken into account and balanced against other priorities, including the delivery of housing. However, the site is assessed as having a 'Significant Negative'		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						score in relation to SA8: Biodiversity and Natural Capital with the SA stating: *'The site is adjacent to the Chaddesden Wood LNR and a SSSI.* ***The site also contains ancient woodland****. There is potential for negative effects upon biodiversity as a result of construction activity at the site. However, development at the site is required to contribute to enhancing biodiversity resources within the site as biodiversity enhancement should meet minimum standards of 10% for all developments, as set out in Policy EN10.'* [Our emphasis added]		
OR41	Councillor Tim Prosser	Paragraph 185 & Table 2	Object		No	A number of new policy tests and technical standards appear in the document published for Regulation 19 consultation that were not in the agreed draft, including: A new "dwelling losses" allowance incorporated into the Housing Trajectory methodology, stating that the housing supply table now		The allowance for dwelling losses reflects historic trends in the loss of housing stock, as explained in paragraph 189, and is a cautious adjustment that reduces rather than inflates the supply. The Council is satisfied that the Plan has been prepared in

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						factors in an allowance for losses, without setting out the evidence for the rate used. Para 189 and table 2 None of these are corrections of the draft text — each is new policy substance, imposing new obligations on developers or committing the Council to new positions, that a consultee reading only the agreed draft version would not have seen and that were not passed by cabinet or council. It's been explained to me that these changes were made under delegated powers to **"make minor changes for the purposes of presentation, error correction and clarity"** to the document approved by cabinet and council before its publication for Regulation 19 consultation. This objection concerns whether that delegation has been exceeded and the documents contents altered substantially from the regulation 18 consultation and the agreed draft.		accordance with the relevant legal and procedural requirements, which will be set out in its submission documents. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR36	Derby Climate Coalition	Paragraph 187	Object	Yes	No	This para starts "A number of new greenfield sites are allocated to be developed for housing across the city, but the main focus for the development of new homes is within the City Centre...", whereas the equivalent in the S18 draft (para 191) says "A number of new greenfield sites will be allocated to be developed for housing…. This will include further incursions of housing into some of Derby's Green Wedges". This alteration seems to be an attempt to hide an undesirable change in policy.	Revert to the wording in the S18 version of the plan.	Paragraph 187 accurately describes the strategy, under which the main focus for new homes is the City Centre, and the Green Wedge releases are set out openly in the allocation policies, Policy EN6 and the Green Wedge Review (2025). No change required.
OR537	Rob Hoddinott	Paragraph 187	Object	No	No	This policy of using previously developed city centre land is not being applied. City centre previously developed land exists and is not being used for HA16.	Use areas in city centre that remain empty, ie Duckworth Square.	The Gypsy and Traveller Site Provision Topic Paper explains why a Council-owned site able to meet the full need on one site was required, as no sites were promoted for this use. City Centre regeneration sites are allocated for housing-led mixed use under Policies CC4 and CC11

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								to CC14. No change required.
OR104 & C519	George Fletcher*	Paragraph 190	Object	No	No	he city's green infrastructure becomes more crucial as the needs of the population increase and the environmental sustainability of the city becomes increasingly important. Destroying Wilmorton Park is totally opposed to this aim.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR537	Rob Hoddinott	Paragraph 190	Object	No	No	"Derby still needs open spaces, playing pitches, school playing fields, wildlife areas and other green infrastructure to support the existing and increasing population." HA16 is contrary to this claim.	Use brownfield locations.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space. No brownfield or other sites were promoted for Gypsy and Traveller use, as set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
Policy H2: Residential Development – General Criteria								
OR266	Fisher German on	Policy H2: Residential	Object	Yes	No	BHL broadly support elements of Policy H2, particularly the		The need for accessible and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
	behalf of Bloor Homes Ltd	Development – General Criteria				ambition to achieve suitable densities on development sites. Paragraph 130 of the Framework states "where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site". Concern is however raised with other criteria within the Policy, with regards to whether they are justified or consistent with national policy, thus sound. Part E of Policy H2 states "It is demonstrated that the Government's Nationally Described Technical Space Standards are met where applicable". The PPG (Paragraph: 002 Reference ID: 56-002-20160519) states:		adaptable homes is identified in the Local Housing Needs Assessment, and the optional standards and space standards were tested individually and cumulatively in the Residential Viability Assessment (April 2026) and its July 2026 Addendum, as set out in the Viability Topic Paper. In response, the Council reduced the requirement for affordable homes from M4(3)b to M4(3)a. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						"What optional technical housing standards can local planning authorities set? Local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans." [our emphasis] The Plan does not point to any such evidence of need. Paragraph 196 of the Regulation 19 document states that "The NDTSS are what the Government has set out as the minimum satisfactory living environment internal spaces which should be provided in new dwellings. As such they		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						provide guidance which the Government feels must be met in order to provide an acceptable living environment, and the standards will be required through this policy as part of the Council's drive for health and wellbeing outcomes and part of the qualitative housing requirements of the local plan". This is not evidence and this statement alone does not satisfy the clear requirements of the PPG. Should the Government felt it necessary to blanket impose NDSS, then they would have done so. It remains a standard which can be introduced, where local evidence points for a need, for example where there is a high incidence of conversion of non-domestic buildings into residential units in urban areas. The term 'where applicable' is considered overly vague in conflict with Paragraph 16 of the Framework, which requires Plans to "contain policies that are clearly written and unambiguous, so it is evident		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						how a decision maker should react to development proposals". Whilst the Reasoned Justification gives some examples where NDSS would not be required, this is not considered adequately clear and the policy should be clear when the policy is expected to be in force so it is clear to applicants and decision makers. As there is no evidence of need in accordance with the PPG, this criteria should be deleted to ensure the Plan is justified and consistent with national policy. Similarly, when looking at Parts F and G of Policy H2, which place a requirement for 100% of all buildings to meet Part M4(2) and on sites of 25 dwellings or more a requirement for 5% of market houses to be M4(3)a and 10% of affordable housing to meet Part M4(3)a. The PPG (Paragraph: 007 Reference ID: 56-007-20150327) states:		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						"What evidence should local planning authorities use to demonstrate a need to set higher accessibility, adaptability and wheelchair housing standards? Based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including. the likely future need for housing for older and disabled people (including wheelchair user dwellings). size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						sheltered homes or care homes). the accessibility and adaptability of existing housing stock. how needs vary across different housing tenures. the overall impact on viability." Paragraph 200 of the Regulation 19 document states that "evidence in the Council's Local Housing Needs Assessment (LHNA) indicates that a significant proportion of the current and future population will have mobility impairments or frailty", which sets out broadly the Council's justification for this policy intervention. Derby City's Local Housing Needs Assessment Final Report (2023) confirms at Paragraph 8.17 that "the projected change shown in the number of people with disabilities provides clear evidence justifying delivering 'accessible and adaptable' homes as defined in Part M4(2) of Building Regulations, subject		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						to viability and site suitability". Paragraph 8.75 continues "given the evidence, the Councils could consider (as a starting point) requiring all dwellings (in all tenures) to meet the M4(2) standards". It is clear therefore that the LHNA envisaged the Council providing suitable justification given it is not a clear recommendation of the evidence itself, simply a suggestion. Regardless, the evidence of a growing population of those with mobile impairments or frailty, cannot point to a 100% need for such standards, any more than a growing affordable housing need cannot justify 100% affordable housing delivery. BHL accept a proportion of new housing should meet M4(2) standards, but justification for 100% provision has not been justified in evidence as required by the PPG. There is reference at paragraph 8.67 of the LHNA to future changes to the building regulations, but planning policies cannot be		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						justified in that building regulations may change in the future. They need to be specifically justified to be sound in accordance with NPPF Paragraph 36b. Should the amendment to building regulations be made, then there is no requirement for a policy in accordance with NPPF Paragraph 16f. Whilst this Plan is not being examined against the 2026 Framework, it is relevant to note that nationally through that document (specifically H05: Meeting the needs of different groups) the Government considers a minimum of 40% to be acceptable. This gives a far better indication of a suitable minimal threshold, and one for which there would be no conflict post adoption. Given the lack of local justification, a requirement above 40% is not considered justified.		
OR128	Home Builders Federation*	Policy H2: Residential Development –	Object		No	*Policy H2 is not considered to be sound as it is not effective, justified, or consistent with national policy*		The optional standards were tested individually and cumulatively in the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
		General Criteria				For site specific reasons and/or viability there may be occasions where flexibility is needed in relation to compliance with Nationally Described Technical Space Standards, all new buildings complying with Part M4(2) of Building Regulations, and the requirement for 5% of all newly erected market homes and 10% of all newly erected affordable homes should be constructed to Building Regulations Part M4(3)a 'Wheelchair adaptable' dwellings on sites of over 25 dwellings. The policy should allow for flexibility on a case-by-case basis when supported with evidence of the non-deliverability or non-viability of complying with these policy requirements, for example the conversion of a historic building.		Residential Viability Assessment (April 2026) and its July 2026 Addendum, which led the Council to reduce the requirement for affordable homes from M4(3)b to M4(3)a, as set out in the Viability Topic Paper. The need for accessible homes is identified in the Local Housing Needs Assessment. No change required.
OR227	Lichfields on behalf of Derby Station Quarter Board	Policy H2: Residential Development – General Criteria	Object		No	The Derby Station Quarter Board supports the objectives of Policy H2 in seeking to secure high-quality, well-designed residential development, including homes that are accessible and adaptable to the	We therefore suggest that Policy H2 Criterion b) and g) are amended to make clear that the stated proportions of M4(2) and M4(3)(a)	The Residential Viability Assessment (April 2026) tested the Plan's policies individually and cumulatively, including in the City

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						needs of current and future residents. We recognise the evidenced need for wheelchair-adaptable homes identified through the Council's Local Housing Needs Assessment, and we do not dispute the principle of Criterion g). However, the Board seeks to highlight the cumulative effect of Policy H2 when read as a whole, and in particular the interaction between the City Centre density requirement of at least 80 dwellings per hectare (Criterion b), the requirement to meet the Nationally Described Space Standards (Criterion e), and the requirement for 5% of market homes and 10% of affordable homes on qualifying sites to be constructed to Building Regulations Part M4(3)(a) wheelchair-adaptable standard (Criterion g). Each of these requirements appears reasonable when considered individually. However, M4(3)(a) compliant	homes should be provided unless it can be demonstrated, on a case-by-case basis, that this is not feasible having regard to site-specific constraints, including density, plot size and configuration. We consider this modification is necessary to ensure that Policy H2 is effective and deliverable across the full range of site typologies anticipated within the City Centre, without undermining the Council's broader and well-evidenced objective of securing accessible and adaptable homes.	Centre, as set out in the Viability Topic Paper, and the requirement for affordable homes was reduced from M4(3)b to M4(3)a in response. The Council recognises the challenges of City Centre delivery and will consider site-specific constraints when applying the policy to individual schemes. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						dwellings require materially more floorspace and circulation space than standard space-standard-compliant apartments, including turning circles, wider corridors and doorways, and adaptable bathroom layouts. We are concerned that the combined effect of these requirements has not been fully tested for deliverability on smaller, tightly constrained, apartment-led sites within the City Centre such as the Railway Station Quarter, where achieving the required density and the full quantum of wheelchair-adaptable homes together may be difficult to achieve. We note that this type of flexibility is not unusual in adopted policy. Policy DP28 of the Mid Sussex District Plan provides an exception to its accessibility requirements where site-specific factors make full compliance impracticable or unviable. More recently, Policy LP30 of the West Norfolk Local Plan (2021–2040), adopted in		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						March 2025 following examination, provides an explicit exemption from its M4(3) wheelchair-adaptable homes requirement on practicality or viability grounds. We consider a similar approach would ensure Policy H2 remains effective and deliverable in the specific circumstances outlined above.		
OR235	Little Ships Housing CIC	Policy H2: Residential Development – General Criteria	Object	Yes	No	Policy H1 and paragraphs 74 to 77 set the housing requirement at a minimum of 12,500 homes over the plan period and explain that the balance of the housing market area's need will be met through the Amber Valley and South Derbyshire Local Plans. We accept that the requirement is a minimum, not a ceiling, and we support the brownfield and City Centre first approach in paragraph 81 and Objective 5. Our representation concerns how the city's capacity was established, and what the Plan	Modification 2: Policy H2, new criterion. "Proposals for new homes on or above existing or replacement buildings and car parks, including those in the ownership of the Council and other public bodies, will be supported where the existing use is retained or re-provided, and the proposal accords with the design, amenity and heritage policies of this Plan	Policy H1 already supports the re-use of upper floors, and Policy CC3 supports City Centre living, so additional criteria are not needed. The City Centre housing capacity work commissioned by the Council has identified further opportunities on upper floors and infill sites. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						does about the part of the city's land that was not assessed. The Council has described 12,500 homes as the limit of the city's capacity (Council statement, November 2025). The evidence for that limit is the call for sites and the Strategic Housing Land Availability Assessment. Both assess land that owners choose to promote. Land in public ownership is different. The Council and other public bodies own a substantial estate in the city: surface car parks, depots, and the airspace above low-rise civic, health and education buildings and car parks. Whether such land is offered for housing is a landowner decision, taken on grounds wider than planning. The Council's Planning Policy team confirmed to us on 4 September 2026 that Council land has been assessed where it came forward through the call for	and, where relevant, Policy CC6."	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						sites, and that the one estate-wide review of Council-owned sites was carried out for gypsy and traveller provision. There has been no estate-wide assessment of the public estate's capacity for housing. The Plan therefore exports part of the city's need without having tested a source of supply that sits within the city, in single public ownership, on previously developed land, in the most sustainable locations, and which can be developed without displacing the existing use where homes are built above it. In our view this engages three of the tests of soundness: Positively prepared. The strategy should seek to meet the area's needs as a minimum. Capacity within the city was not fully established before part of the need was passed to neighbouring authorities. Justified. The reasonable alternative of intensifying the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						public estate does not appear to have been assessed among the spatial options in the Sustainability Appraisal (we have not found it in Appendix C). Effective. Land in public ownership is among the most deliverable in the city: single ownership, no land assembly and no purchase price. The City Centre figure of around 5,500 homes rests largely on sites outside the Council's control. National policy points the same way. The NPPF asks plans to promote the effective use of land, to support the development of under-utilised land and buildings, especially where land supply is constrained, and to support the use of the airspace above existing premises for new homes (NPPF paragraphs 124 and 125, December 2024 edition). The Plan describes Derby as a constrained		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						authority (paragraph 20).		
OR240	Pegasus Planning on behalf of Catesby Estates*	Policy H2: Residential Development – General Criteria	Object	Yes	No	Policy H2: Residential Development – General Criteria (f) and (g) state: All new build dwellings should be constructed to comply with Part M4(2) 'Accessible and Adaptable dwellings' of the Building Regulations; On sites of over 25 dwellings, 5% of all newly erected market homes and 10% of all newly erected affordable homes should be constructed to Building Regulations Part M4(3)a 'Wheelchair adaptable' dwellings; The requirements for M4(3) standards are not supported. If the Council wishes to adopt these local standards for M4(3) homes, sufficient robust evidence needs to be presented to justify this approach in accordance with the Planning Practice Guidance which outlines the evidence necessary to justify a policy requirement	Policy H2: Residential Development – General Criteria (g) should be deleted as there is insufficient evidence in terms of need, and the requirement is not justified.	The need for wheelchair-adaptable homes is identified in the Local Housing Needs Assessment, and the requirement was tested individually and cumulatively in the Residential Viability Assessment (April 2026) and its July 2026 Addendum, as set out in the Viability Topic Paper. The Plan is being prepared under the December 2024 NPPF, so the accessibility policy in the 2026 Framework does not apply. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						for optional standards. Planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site-specific factors. There is an extra cost in delivering M4(3) which may vary between affordable and open market dwellings. National standards help ensure these costs are minimised through economies of scale. The government, through the new NPPF, has very recently set out their expectations for accessible homes with a national policy for 40% of homes to be M4(2). There is no evidence that this national requirement is not appropriate for Derby City.		
OR256	Pegasus Group on behalf of Miller Homes, William Davis and Miller	Policy H2: Residential Development – General Criteria	Object	Yes	No	Density Policy H2: Residential Development sets a minimum average density of 35 dwellings per hectare for all non-City Centre residential developments, unless there are	Amend Policy H2 and its supporting text to confirm that the 35 dwellings per hectare figure applies to net developable area only and is subject to local character,	Policy H2 already allows a lower density where there are clear environmental reasons, and paragraph 193 confirms that the 35 dwellings per hectare

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
	Gadsby (Heatherton) Ltd*					clear environmental reasons for a lower density. This caveat is welcomed but should be expanded to include reasons related to the character of the neighbouring development and other design considerations. It would be helpful if the supporting text could also set out that this is a net developable area density, for the avoidance of any doubt.	design, environmental constraints and site-specific circumstances.	minimum is a net figure. Character and design are addressed through Policies GD1 and GD2. No change required.
OR256	Pegasus Group on behalf of Miller Homes, William Davis and Miller Gadsby (Heatherton) Ltd*	Policy H2: Residential Development – General Criteria	Object	Yes	No	Accessibility and Adaptability Standards Policy H2 also includes requirements for all new build dwellings to be constructed to comply with the option Building Regulations Part M4(2) 'Accessible and Adaptable Dwelling' standards. On sites over 25 dwellings, the requirement proposed is for 5% of market homes to be at Part M4(3)a 'Wheelchair Adaptable' standard and 10% of affordable homes to be at Part M4(3)b 'Wheelchair Accessible' standard.	Policy H2: Residential Development – General Criteria (g) should be deleted as there is insufficient evidence in terms of need, and the requirement is not justified.	The need for accessible and wheelchair-adaptable homes is identified in the Local Housing Needs Assessment, and the requirements were tested in the Residential Viability Assessment (April 2026) and its July 2026 Addendum, as set out in the Viability Topic Paper. The Plan is being prepared under the December 2024 NPPF, and proposed future changes to the Building Regulations

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Government response to consultation on raising accessibility standards for new homes states that the Government proposes to mandate the current optional Part M4(2) standard as a minimum for all new homes, with Part M4(1) applying in only exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through Building Regulations. Paragraph 16 (f) of the 2024 National Planning Policy Framework (NPPF) advises that Local Plans should avoid unnecessary duplication and, given the Government intends to mandate Part M4(2) of the Building Regulations, Policy H2's reference to Part M4(2) would represent unnecessary duplication of Building Regulations. Furthermore, Annex A, paragraph 2 of the 2026		do not yet make the requirement duplicate national standards. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						NPPF states that development plan policies (or parts of those policies) which are materially inconsistent with national decision-making policies in the Framework should be given very limited weight. The proposal to include further requirements, for a percentage of homes to meet the Part M4(3) optional standard, needs to be supported by sufficient robust evidence to justify this approach, in accordance with the Planning Practice Guidance which outlines the evidence necessary to justify a policy requirement for optional standards. Planning policies for accessible housing need to be based on evidence of need, viability and a consideration of site-specific factors. The recent Charnwood Borough Council Charnwood Local Plan Inspectors' Report (November 2025) removed		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the M4(3) requirement as it was only supported by general evidence in the Housing Needs Assessment similar to that available in the Derby and South Derbyshire Housing Needs Assessment. The Inspectors concluded at paragraph 125 that: 'The M4(3) requirement is not supported by any evidence of specific housing need as required by the PPG and the impact on viability has not been tested. Overall, the M4(3) requirement is not justified and MM107 is necessary to remove it from Policy H2'. It is therefore important that specific housing need evidence is provided to justify the proposals. There is an extra cost in delivering M4(2) ahead of it being mandated and even greater costs of delivering M4(3). This policy must therefore be considered as		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						part of the Local Plan Viability Assessment when it is prepared to ensure that any proposed approach does not compromise viability of development. The proposed requirements in Policy H2 in relation to accessible and adaptable housing are not supported because they are not justified. Additionally, the Government has, through the 2026 NPPF, established a national minimum expectation that at least 40% of new housing delivered over the course of a plan should be provided to M4(2) or M4(3) standards. Policy HO5(1)(b) also makes clear that requirements for M4(2) should reflect locally assessed need. There is no evidence that this national approach is inappropriate for Derby City or that a higher local requirement is justified by evidence of local need.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
Policy H3: House Extensions								
No representations were received for this policy.								
Policy H4: Affordable Housing								
OR260	Carney Sweeney on behalf of Peveril Homes Limited*	Policy H4: Affordable Housing	Support			Policy H4 sets out the level of affordable housing to be sought from major residential developments (of 10 or more dwellings) and seeks varying levels of affordable housing depending on location (City Centre up to 5%, Green Belt up to 40% and sites outside of these areas up to 25%). Policy H4 is noted to allow for negotiation of a lower percentage of affordable housing provision, where a developer can provide 'robust evidence' that providing the maximum policy requirement would be unviable. The principle of this approach is welcomed as it allows for affordable housing provision to be considered on a site-by-site basis. However, the reference to 'robust evidence' is ambiguous – clarity as to what evidence the LPA would expect		Support welcomed. The evidence expected to support a viability case is set out in national planning practice guidance on viability. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						to be submitted should be provided.		
OR36	Derby Climate Coalition	Policy H4: Affordable Housing	Object	Yes	No	This policy is unsound as the supporting text indicates that it is both inadequate and not achievable. The policy for the city centre appears to be to only provide expensive flats for young professionals, which is not the greatest need.	Aim for an increase in the percentage of affordable homes, particularly in the city centre.	The affordable housing requirements reflect the Residential Viability Assessment (April 2026), which found significant viability challenges in the City Centre, and the Viability Topic Paper explains how the Council will seek external funding and work with affordable housing providers to increase delivery there. No change required.
OR266	Fisher German on behalf of Bloor Homes Ltd	Policy H4: Affordable Housing	Support	Yes	Yes	BHL support the approach in relation to affordable housing, particularly a Golden Rules compliant approach to affordable housing in the Green Belt, particularly with regard to Paragraph 67 of the Framework. It is noted that the Residential Viability Scoping Report concludes that 40% affordable housing is appropriate. Noted the Stoney Lane allocation		Support welcomed. Locko Road is not allocated, as explained in SA Appendix G.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						(HA7) allows for viability considerations as the Plan has been updated since Regulation 18 to include "subject to demonstrating that this is achievable". If Locko Road was considered necessary for allocation, a similar caveat should be applied for consistency.		
OR128	Home Builders Federation*	Policy H4: Affordable Housing	Object		No	*Policy H4 is not considered to be sound as it is not effective, justified, or consistent with national policy* With viability is becoming increasingly difficult we have some concerns about the viability of this Plan. Whole Plan viability testing is an important part of the plan-making process. However, as noted in PPG (ID: 10-003-20180724) assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. However, it does require the assumptions used within the whole plan viability testing to be reasonable and for the		The Residential Viability Assessment (April 2026) tested the Plan's policies individually and cumulatively, and Policy H4 already allows a lower contribution to be negotiated where robust evidence shows the full requirement is unviable. The Viability Topic Paper explains the Council's flexible approach to planning obligations. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						viability implications of the full range of policies to be considered. National policy already recognises that some sites will be on the very margins of viability and other sites may already be unviable even without a change of circumstances and as such site specific viability considerations may need to be taken into account. National policy therefore allows for the opportunity for negotiation around policy requirements for site specific reasons. The new NPPF allows for greater debate at the development management stage on viability and HBF believes this needs to be properly reflected in the wording of the Derby Local Plan. It is important for the Council to work with developers to understand the viability challenges that developers face and we endorse the conclusion that the viability and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						deliverability of this Plan has yet to be proven. Although HBF do not comment on individual sites we would encourage the Council to work directly with site promoters and house builders to understand any seek solutions to site specific viability issues. It is no appropriate for the wording of the policy to refer or defer to separate document to the Local Plan which can be updated as necessary within the policy itself. Any such reference should be in the supporting text.		
OR237 & OR35	Johnson Mowat on behalf of Harworth Group*	Policy H4: Affordable Housing	Object		No	The wording of Policy H4 sets a requirement of up to 40% affordable housing for major residential sites on sites proposed to be removed from the Green Belt, up to 5% on City Centre sites and up to 25% on sites outside of the City Centre/ Green Belt. This approach is consistent with Paragraph 67 of the National Planning Policy Framework (2024), which this plan is being	It is suggested that this part of the policy wording is amended as follows: 'Affordable housing should be provided on-site ~~and~~ with up to 80% of these dwellings (capped at 20% of total dwellings) ~~should be~~ made available for social rent unless it	Support for the Green Belt affordable housing requirement is welcomed. Policy H4 sets the level expected on land released from the Green Belt and Policy HA7 applies it to the site, subject to demonstrating that it is achievable, so the two policies operate together; the tenure

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						produced in accordance with. Part (a) of this paragraph requires affordable housing requirement(s) for 'major development involving the provision of housing on land which is proposed to be released from the Green Belt' to be set at a higher level than that which would otherwise apply to land which is not within or proposed to be released from the Green Belt. While Harworth Group is supportive of the draft policy wording and the proposed affordable housing requirement for Green Belt land, it is noted that there is a discrepancy between the wording of Policy H4 and Draft Allocation HA7 with regard to affordable housing requirements. As noted above, Policy H4 sets a requirement of 'up to 40% affordable housing' for major development involving sites proposed to be removed from the Green Belt, whereas Draft Allocation HA7 requires that	can be justified that this is not achievable.'	split will be agreed at application stage under Policy H4. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Land at Stoney Lane, Spondon delivers a 'minimum of 40% affordable housing'. We address this point in our comments on Allocation HA7. Harworth Group expresses concern about the policy requirement for 80% of affordable dwellings to be available for social rent (unless it can be justified that this is not achievable) given that in the case of a Green Belt release site this will be 80% of up to 40%, equating to 32% of the total dwellings, which is disproportionately high relative to the contribution required from other sites e.g. 80% of 25% equates to 20%. Land at Stoney Lane, Spondon has the capacity to deliver circa 450 no. new homes, which means 144 no. dwellings would be required to be available for social rent. In the context and setting of Green Belt release sites the adherence to this policy risks failing to achieve the positive potential of the development in terms of		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						community balance and economic growth. It is therefore suggested that this 80% is applied to affordable housing provision up to 25% only. This would maintain the social rent provision consistent at 20% of total dwellings for all sites meeting the policy requirement outside of the city centre.		
OR227	Lichfields on behalf of Derby Station Quarter Board	Policy H4: Affordable Housing	Support		Yes	The Derby Station Quarter Board continues to support Policy H4, including the city centre-specific affordable housing threshold of up to 5%, and the provision for negotiation, including clawback arrangements, where the full percentage cannot be viably achieved. We consider Policy H4 to be sound and have no further comments to raise. Platform 4 supports the principle of Policy H4 in seeking to deliver affordable housing across the city, recognising the importance of meeting identified needs while maintaining overall housing delivery.		Support welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The inclusion of a city centre-specific threshold of up to 5% is welcomed, as it reflects the need for a flexible approach in highly constrained, brownfield locations where regeneration and viability considerations are critical. The policy's allowance for negotiation where the full percentage is not viable, including the use of clawback agreements, is supported. This ensures that affordable housing requirements do not undermine the deliverability of key city centre sites, including those in the Railway Station Quarter, while still contributing to the city's strategic housing objectives. Platform 4 considers that the policy represents a balanced approach, supporting affordable housing delivery while allowing sufficient flexibility to ensure that sustainable regeneration projects remain deliverable.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR256	Pegasus Group on behalf of Miller Homes, William Davis and Miller Gadsby (Heatherton) Ltd*	Policy H4: Affordable Housing	Support	Yes	Yes	Policy H4: Affordable Housing sets out a flexible approach to delivering affordable housing needs, which is supported. The policy includes different percentages of affordable housing required on Green Belt Land, City Centre Sites and Sites Outside the City Centre / Green Belt. Sites outside the City Centre and Green Belt are required to provide up to 25% affordable housing, on site, with 80% of these homes available for social rent unless it can be justified that this is not achievable. It is noted that the maximum amount of affordable housing required will be expected on sites, but we welcome the inclusion of other factors that will be considered in assessing individual sites including the presence of competing planning objectives, evidence of local need for affordable and other types of specialist housing and viability evidence.		Support welcomed

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR226	The Planning Bureau Limited on behalf of McCarthy & Stone & Churchill	Policy H4: Affordable Housing	Object		No	Policy H4 requires proposals for housing development to deliver a variable amount of affordable housing based on location, with 40% affordable housing being asked for on Green Belt, 5% being asked for on city centre sites and 25% being asked for in all other locations. This includes specialist housing for older people as confirmed via policy H7 Accommodation for Older People and People with Disabilities that states that 'Planning obligations for C3 developments for older persons accommodation, including extra care schemes, will be subject to the planning obligations required as set out in Policy GD9'. GD9 lists a number of infrastructure requirements that includes affordable housing. We note that the consultation has been supported with a number of Viability Assessments and Addendums produced by Avison Young, however, these do not test specialist housing for older		Policies GD9 and H4 allow planning obligations, including affordable housing, to be negotiated where robust evidence shows the full requirement is unviable, which accommodates the particular economics of older persons' housing. The Viability Topic Paper explains the Council's flexible approach to planning obligations. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						people. Because of this, it is difficult to ascertain if any of the options put forward are realistic or deliverable. We responded to the council's early engagement consultation and noted that an up to date viability assessment must be undertaken and that this 'must include a number of typologies that includes older person's housing and if older person's housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing provision and delaying the provision of much needed older persons housing'. This has not been done. We provided a link to the Retirement Housing Consortium paper entitled 'A briefing note on viability prepared for Retirement Housing Group by Three Dragons, May 2013 (updated February 2013 ('RHG Briefing Note') available from https://retirementhous		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						inggroup.com/rhg/wp-content/uploads/2017/01/CIL-viabiilty-appraisal-issues-RHG-February-2016.pdf. The RHG Briefing Note establishes how sheltered housing and extra care development differs from mainstream housing and looks at the key variables and assumptions that can affect the viability of specialist housing for older people. We noted in this consultation response that older persons' housing cannot simply be regarded as standard housing as schemes for older people tend to be based around communal facilities and community living and delivered on smaller site as highlighted in the PPG (Paragraph: 010 Reference ID: 63-010-20190626). The PPG confirms that older person's housing generally has additional facilities such as extensive communal areas, such as space to socialise, a wellbeing centre as well as a care service with 24 hour access to support services and staff, meals are also often		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						available. This enables residents to live much more independently than they would otherwise. However, the facilities do take up floorspace which make the viability of such schemes much more finely balanced. The council will be aware of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002-20190509). Undertaking viability of older person's housing schemes separately accords with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						which states that. “A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period”. If housing for older people is not assessed separately to market housing, the delivery of much needed specialised housing for older people may be significantly delayed with protracted discussion about policy areas such as affordable housing policy requirements which are wholly inappropriate when considering such housing need. The Council should therefore re-run the viability study to ensure that it includes more typologies that includes older person’s housing and if older person’s housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						provision and delaying the provision of much needed older persons housing. We advise that by limiting scrutiny of the Local Plan Viability Assessment to exclude older person's deviates away from national guidance and the plan is therefore not considered be positively prepared, justified, effective and crucially is not consistent with national policy. Review / Clawback mechanism. Para 5 of policy H4 also requires a clawback mechanism or review mechanism when a developer can provide robust evidence that it is not viable to provide the maximum policy requirement. This is a particularly onerous requirement for older persons housing developments given that the council has failed to determine if the affordable housing target is justified for this typology in the first instance.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Paragraph: 010 Reference ID: 10-010-20251216-of the government guidance on Viability states the following: 'Plans should set out circumstances where review mechanisms may be appropriate, as well as clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of the development to ensure policy compliance and optimal public benefits through economic cycles. Policy compliant means development which fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies. In order to introduce such a review mechanism, there must be a clear and specific policy basis for any review mechanism being imposed in line with PPG Viability para 009 Reference ID: 10-009-20190509. A significant number of recent Planning Appeals and case law have reinforced this point. A review		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						mechanism and detail within it that sits within a planning obligation needs to be considered and assessed through the Local Plan process. This should include the consideration of variables such as trigger points, costs, land values, how surplus is split and other definitions. The Local Plan does not achieve this and therefore the requirement at point 5 of the plan is contrary to national policy. In addition, for a large or multi-phase development which will be delivered over a long period it makes sense to check whether the scheme's viability has changed with market movements. However, for a small single phased site, such as an older persons housing scheme that is built in one phase , the Inspectorate have repeatedly noted that review mechanisms are unnecessary. For example, under Appeal decision reference APP/C4235/W/120/3256972 dated 1st April 2021, the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Inspector noted in paragraph 17 that 'as the development would almost certainly be completed in a single phase with an estimated build time of 12-18 months, it is not the sort of large multi-phased scheme where stronger arguments for a review/clawback mechanism may otherwise exist'. This is also becoming the case in local Plans and for example the Local Plan Inspectors report for the East Riding of Yorkshire Local Plan notes the following: 170. The final section of the policy addresses the use of review mechanisms for Section 106 agreements. To provide certainty, and thus the effectiveness of the policy, it is necessary for MM55 to amend the wording so that it clarifies that this relates to larger sites that will come forward over a longer period of time, and not all proposals. This is also the case in for example Amber Valley and Cannock Chase.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Therefore, if a review mechanism is to be introduced the detail within any review mechanism needs be published so it can be fully assessed through the Local Plan process, this must also include an exemption for single phased schemes as repeatedly noted by the planning inspectorate. Possible proposed wording: Single-phased development schemes will not be subject to a review mechanism. Where sites have a construction programme which is proposed to extend beyond 2 years, the planning obligation will provide for the affordable housing component of later phases to be reviewed based on updated viability evidence which may result in an increase of the affordable housing requirement.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
Policy H5: Looked After Children								
OR22 & OR234	Lichfields on behalf of Homes2Inspire Ltd	Policy H5: Looked After Children	Object	Yes	No	The National Planning Policy Framework ('NPPF') is clear that within the context of establishing housing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups are listed under NPPF Policy HO1 and explicitly includes looked after children. As per NPPF Policy HO1 (Part 2f) evidence of need for looked after children can be found in the relevant local authority's Children Social Care Sufficiency Strategy. For DCC, the 'Children in care placements commissioning and sufficiency strategy 2025-2028'[1] ("the Strategy"), sets out how the Council plans to meet it's 'Sufficiency Duty', ensuring that every child and young person in the care of DCC has access to the right support, in the right place and at the right time. As at 31 March 2024, the	Policy H5: Looked After Children The Council will support the change of use of dwellings in residential areas to provide for the care of small groups of looked after children subject to the following: The design ~~and scale~~ of the property ~~is not materially changed or increased and~~ remains within character of the surroundings; The proliferation of any such uses does not adversely affect the character of the area; The number of residents living within the proposed dwelling is proportionate to the size and facilities of the accommodation;	Policy H5 supports the care of small groups of looked after children in residential areas, subject to criteria protecting the character of the area and the amenity of neighbours. The Council considers this approach balances the need for such accommodation with those wider considerations. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Strategy confirms that DCC had 598 children in its care and of these, 382 were placed locally (60.4%) (i.e. within 20 miles of the child's home address). Additionally, the Strategy identifies that 57 children had experienced three or more placement moves. The Strategy identifies the key challenges for DCC including the increasing number of children and young people requiring placements - during the 2023-24 period alone, DCC had 226 new placements - and that there are insufficient residential placements (our underlining emphasis). The Strategy therefore seeks to achieve better outcomes for children in their care through the commissioning intensions listed on p.7, which include, amongst others: *"Reduce high-cost placements through increased local sufficiency by developing a wider range of placements. Place a minimum of 75% of all children within 20-mile radius of*	A clear Management Plan is provided to support the proposals, explaining how the use will operate.<br~~These types of specialist accommodation should be provided in detached housing wherever possible and will not be permitted in terraced housing.~~ Supporting Text 218. Where existing dwellings are proposed to be changed to provide accommodation for small groups of looked after children, the Council will take care to ensure that any adverse impacts of the proposals are minimised. 219. It is expected that the use	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the city centre. Ensure equality of service offers for those outside. *Secure the best possible placement for every child and young person, considering their needs and wishes."* (our underlining emphasis). On the above basis, H2I therefore welcome that the emerging Local Plan for Derby includes draft Policy H5 to ensure that the accommodation needs of looked after children in the district can be met by the planning system. Whilst H2I agree that in principle support is given for the change of use of dwellings in residential areas to provide for the care of small groups of looked after children, they are concerned that the policy tests and supporting text to draft Policy H5 are unsound and risk undermining the commissioning objectives of DCC's Strategy (as outlined above). Specifically:	of dwelling houses in existing communities would only be changed to such uses to accommodate small groups of people who may require professional support or management on site. 220. These developments should generally fit within and be compatible with the existing character and community, meaning that the building is not materially changed such that it becomes out of character with surrounding dwellings. 221. ~~Uses should be restricted to detached dwellings for the care of up to three children wherever possible~~	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Draft criteria a) requires the design and scale of the property to not materially be changed or increased. The policy objective should be underpinned by policy tests that relate to land use considerations only, particularly given that matters related to design and ensuring well designed and high-quality development is controlled by draft Policy GD1 (Placemaking Principles). External changes requiring planning permission may be necessary to ensure that operational matters of a home can be adequately facilitated. For example, the Council recently approved a change of use at 7 Field Lane from a dwelling house to a small-scale children's home, alongside demolition of the lean-to-garage so that sufficient off-street car parking for staff could be accommodated (ref. 26/00436/FUL). The policy constraint to prevent external alterations therefore risks undermining the policy purpose to support accommodation for	~~and resisted in semi-detached or terraced dwellings in order to fully protect the amenity of neighbouring residents.~~	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						looked after children. Draft criteria c) requires the number of residents living within the proposed dwelling to be proportionate to the size and facilities of the accommodation. The supporting text suggests that this should be restricted for the care of up to three children (paragraph 220). We do not consider a proposed cap on the number of children is necessary given draft criteria d requires that a management plan to support the proposal is submitted to protect the amenity of neighbours. It is also not clear from the Council's own evidence base why they consider three children is an appropriate number. To this end, DCC's Strategy explains that demand on placements for looked after children is growing and better outcomes are achieved for children and young people when they are placed in smaller numbers however the Strategy does not define the smaller quantum. On this basis, we therefore do not consider that it is the responsibility of		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						planning policy to cap the number of children at a home and that management plans are an appropriate control to manage the impacts from development in-lieu of limiting the number of children in occupation of a home. This approach would also be consistent with the following decisions approved by the Council where three or more children were in occupation, and a management plan was required: Refer to Annex 1, Table 9 Draft Policy H5 directs accommodation for looked after children to detached housing and will not permit children's homes in terraced or semi-detached dwellings. Given the Council's Strategy identifies an increasing number of children entering care, there is insufficient residential placements and that the Council cannot currently accommodate all of its children locally (shortfall of -14.6%), H2I do not		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						consider it necessary to constrain supply by omitting these dwelling types - particularly as the character of terraced or semi-detached dwellings in use as children's home will still look residential in appearance and the policy requirement for a management plan will ensure no adverse impact upon residential amenity. By limiting the policy unnecessarily to detached dwellings only this clearly risks undermining the commissioning intentions (above) and addressing the key challenges identified in the Strategy. The appropriateness of a dwelling should be considered on a case-by-case basis, ensuring fundamentally it meets the needs of children in the care of the local authority and that any potential impacts to neighbour are appropriately mitigated. *Concluding Remarks* The NPPF requires development plans to account for the accommodation needs of different groups – including		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						looked after children. H2I therefore welcome that draft Policy H5 of the Emerging Local Plan for Derby seeks to meet the needs of looked after children and supports the principle of the change of use of dwellings in residential areas to provide for their care. This notwithstanding, the Council's own 'Children in care placements commissioning and sufficiency strategy 2025-2028' recognises there is an increasing number of children in care, there are insufficient residential places for these children and they are unable to place all children locally. We suggest a number of considerations in this letter to ensure that draft Policy H5 is sound and does not undermine the Council's Strategy. We trust that our representation to DCC's Regulation 19 consultation will be considered carefully by the Council. Should you have any queries on our representation, we would be pleased to discuss any points raised. Please do		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						contact me (Joe Thompson) or Jon Kirby in that regard.		
Policy H6: Communal Living Accommodation								
No representations were received for this policy.								
Policy H7: Accommodation for Older People and People with Disabilities								
OR38	Anchor	Policy H7: Accommodation for Older People and People with Disabilities	Object	Yes	No	Anchor Hanover, England's largest provider of specialist housing and care for older people, supports the inclusion of a specific policy on older persons' housing, given the significant and growing need.	The policy should also include a clear numerical delivery target for older persons' housing to ensure identified needs are met over the plan period. We are concerned that the draft policy prioritises Care Homes and Extra Care housing for older people. All specialist housing types should be supported, to accord with national planning policy. We recommend making specific site allocations for older persons' housing, rather than relying on	Support for the policy is welcomed. Policy H7 supports a diverse range of housing for older people, and the Local Housing Needs Assessment informs the scale of need, so a separate numerical target is not considered necessary. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							M4(2) or M4(3) standards, which are not tailored to, or reserved for, older people. Allocations should consider the minimum viable scale for such housing. In Anchor's experience, this is at least 65 units per development. We recommend that a more flexible approach to housing mix is taken for older persons' housing. Anchor's developments typically comprise single apartment buildings with around 70 high-quality social rent homes for older people, mainly one-bedroom apartments. Mixed tenure buildings (e.g. combining social rent with affordable rent or sale) can create market challenges	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							and affect viability. Two-bedroom homes are also difficult to let due to under-occupancy charges and the prevalence of single-person households. Flexibility in tenure and housing mix is therefore essential to ensure the viability and successful delivery of older persons' housing developments to meet needs. The policy should therefore be amended accordingly.	
OR104 & C519	George Fletcher*	Policy H7: Accommodation for Older People and People with Disabilities	Object	No	No	Specialist housing for older people should be located within walking distance of shops, services, healthcare facilities and accessible green space to reduce isolation and support independent living. Destroying Wilmorton Park is detrimental to the needs of elderly people in the neighbourhood.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process is set out in the Gypsy and Traveller Site

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								Provision Topic Paper. No change required.
OR128	Home Builders Federation*	Policy H7: Accommodation for Older People and People with Disabilities	Object		No	*Policy H7 is not considered to be sound as it is not effective, justified, or consistent with national policy* HBF have concerns about policies on affordable housing applying to specialist accommodation, including homes for older people. The economics and viability of these kinds of development differ for many reasons including the need to provide shared spaces and onsite management and how units are sold and occupied. We therefore have significant concerns about the impact of this policy on both the viability and deliverability of older person's housing.		Policies GD9 and H4 allow planning obligations, including affordable housing, to be negotiated where robust evidence shows the full requirement is unviable, which accommodates the particular economics of older persons' housing. No change required.
OR226	The Planning Bureau Limited on behalf of McCarthy & Stone & Churchill	Policy H7: Accommodation for Older People and People with Disabilities	Object		No	Please see our response to H4 Affordable Housing with respect to the requirement in policy H7 for specialist housing for older people to 'be subject to the planning obligations required as set out in Policy GD9''. Given that the viability of older		Policies GD9 and H4 allow planning obligations, including affordable housing, to be negotiated where robust evidence shows the full requirement is

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						persons housing is more challenging and that the viability assessment has not tested the typology for affordable housing our view is that the Council should therefore re-run the viability study to ensure that it includes more typologies that includes older persons housing and if older persons housing is found to be not viable an exemption must be provided within the plan in order to prevent protracted conversations at the application stage over affordable housing provision and delaying the provision of much needed older persons housing. We advise that by limiting scrutiny of the Local Plan Viability Assessment to exclude older person's deviates away from national guidance and the plan is therefore not considered to not be positively prepared, justified, effective and crucially is not consistent with national policy.		unviable, which accommodates the particular economics of older persons' housing. The Viability Topic Paper explains the Council's flexible approach to planning obligations. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
Policy H8: Proposals Which Would Create a New House in Multiple Occupation								
OR81	Councillor Kirk Kus	Policy H8: Proposals Which Would Create a New House in Multiple Occupation	Object		No	I consider this element of the policy to be unsound because it has not been demonstrated to be justified by proportionate evidence. The specific wording I object to is the restriction of the 10% concentration threshold to properties being used as **"licensed HMOs"**, rather than properties being used as **HMOs**. The distinction is material. Not every property which is an HMO is required to hold an HMO licence. Restricting the calculation to licensed HMOs therefore excludes properties which are genuinely in HMO use but are not subject to mandatory licensing. It may also exclude licensable HMOs which are operating unlawfully without a licence. This differs from the Council's existing published planning approach. The current HMO planning guidance provides that the 10% threshold relates to properties **"being used as**	I request that the word **"licensed"** is deleted so that the relevant criterion refers to: **"…more than 10% of the properties within a 50m radius of the development site being used as HMOs."** This would restore the approach contained within the Council's existing published HMO planning guidance and would allow the Council to continue identifying HMO use using the range of information already available to it, including licensing data, planning records, Council Tax data and, where necessary, further investigation.	Criterion (c) uses licensed HMOs because licensing records provide a clear and verifiable basis for calculating the 10% threshold. It important a reliable data source is used for planning decisions, and outside the Article 4 area homes are free to move in and out of small HMO status without informing the councii. Criteria (a), (b) and (d) continue to guard against harmful concentrations and amenity impacts. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						HMOs". It also explains that the Council's GIS HMO layer identifies HMOs from a range of sources, including HMO licensing data, planning records and Council Tax data, and expressly provides for further investigation where new or updated information regarding HMO use becomes available. There also appears to be an existing evidential history supporting that wider approach. When the Council considered the HMO Article 4 Direction in 2024, the Cabinet report expressly stated that an Article 4 Direction must be based upon robust evidence. The same report then proposed planning guidance containing the 10% within 50 metres concentration test, expressed in terms of properties **"being used as HMOs"**, without restricting this to licensed HMOs. The Article 4 Direction subsequently came into effect on 3 May 2025 and the Council's published planning		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						guidance continues to use this broader approach. I raised the proposed removal of the word “licensed” during the Regulation 18 consultation and subsequently sought to amend the wording at Full Council on 15 July 2026. At Full Council, Members were advised by Legal that: “Planning as a regulatory process is evidence-led” …. “there’s no evidence currently that supports it [the amendment].” Followed by (if the amendment passed); “Therefore there's a fundamental flaw in the draft plan.” I subsequently asked the Council to identify the evidence supporting the decision to include and retain the word “licensed”. The response I received explains the Council's reasoning; however, it appears to provide an administrative rationale for the change rather than an		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						evidential basis. However, **no evidence, study, assessment or comparative analysis** has been identified demonstrating why excluding known but unlicensed HMOs is the appropriate planning approach, or demonstrating that the existing approach of using multiple data sources is incapable of producing sufficiently robust planning decisions. Nor has any evidence been identified demonstrating that the reasonable alternative of continuing to count **all known HMOs** was assessed against the proposed licensed-HMO approach. This distinction is particularly important because the objective of the concentration threshold is to address the planning effects arising from concentrations of HMOs, including impacts upon residential amenity, neighbourhood character and balanced communities. Those effects arise from the **use of a**		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						property as an HMO; they do not depend upon whether that property happens to hold a licence. Indeed, restricting the calculation to licensed HMOs could produce a situation where more than 10% of properties within the relevant radius are actually being used as HMOs, while the policy nevertheless concludes that the 10% HMO concentration threshold has not been reached. I therefore do not consider that the Council's explanation that licensed HMOs are easier to identify is sufficient, by itself, to demonstrate that the narrower policy approach is **justified**. Paragraph 32 of the applicable National Planning Policy Framework requires policies to be underpinned by relevant and up-to-date evidence which is adequate and proportionate and focused on supporting and justifying the policies concerned.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Paragraph 36 provides that a plan is sound only where, amongst other requirements, it is: **"Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence."** While the Council has stated that the change assists the **effectiveness** of the policy, effectiveness and justification are separate elements of the soundness test. An administrative benefit arising from the availability of licensing data does not, in my view, remove the requirement to demonstrate that the substantive policy choice is justified by proportionate evidence and that reasonable alternatives have been properly considered. Other local planning authorities operate HMO concentration policies based on known HMO use rather than solely on licensed HMOs.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I have also sought information concerning the consideration of this issue through the relevant planning working group. I have been informed that there are no minutes recording the discussion, and following discussions with a Councillor who attended the working group, I have not been made aware of any evidence being presented to Members supporting the change to "licensed HMOs". I understand that removal of the word was raised but was not accepted by officers. The Council has subsequently been given a further opportunity to identify the evidential basis for the change through my written correspondence. No specific supporting evidence or assessment has been identified. For these reasons, I consider that the restriction of the 10% threshold to **licensed HMOs has not been demonstrated to be justified by proportionate evidence** and therefore this		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						element of the policy does not presently satisfy the test of soundness.		
Policy H9: Intensification of Existing Houses in Multiple Occupation								
No representations were received for this policy.								
Policy H10: Student Accommodation								
No representations were received for this policy.								
Policy H11: Self-Build, Custom Build and Community Build Homes								
OR266	Fisher German of behalf of Bloor Homes	Policy H11: Self-Build, Custom Build and Community Build Homes	Support	Yes	Yes	BHL support the approach to self-build, creating a positive policy environment for suitable applications, rather than enforcing the provision of plots on sites over a specified size threshold which is an approach regularly adopted elsewhere, despite limited evidence it is effective.		Support welcomed.
Policy H12: Gypsies, Travellers and Travelling Showpeople								
OR161	Derbyshire County Council	Policy H12: Gypsies, Travellers and Travelling Showpeople	Support	Yes	Yes	Firstly, Derbyshire County Council welcomes and supports the fact that the Submission Draft Local Plan's policy approach to the provision of sites to accommodate Gypsies		Support welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and Travellers, has been informed by the recently completed Derby, Derbyshire, Peak District National Park and East Staffordshire Gypsy and Traveller Accommodation Assessment (GTAA). In 2019, Derbyshire County Council commissioned an update to the 2015 GTAA on behalf of all the local authority partners, which included Derby City, the eight district and borough councils in Derbyshire, the Peak District National Park Authority and East Staffordshire District Council. Severe delays to progressing the GTAA by RRR Consultancy Ltd were subsequently experienced due to the on-set of Covid 19 and restrictions on public engagement for the best part of two years. However, the final GTAA was completed in July 2023 and was published in September 2024 and sets out updated pitch requirements for all the local authority areas between 2020 and 2040.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						It is welcomed and supported that the Reg 19 Local Plan has used the findings of the GTAA to inform the proposed pitch requirements for the City over the period 2020 to 2040, which is appropriately referenced in the supporting text to Policy H12, that there is a need for some 14 plots for permanent Gypsy and Traveller accommodation within the city. The methodology and approach used in the GTAA is based on policy and recommendations for carrying out accommodation needs assessments set out in national policy in Planning Policy for Traveller Sites and other best practice. This is considered to provide for a sound and robust basis on which to plan for Traveller pitch provision in the Reg 19 Local Plan. A number of recommendations in the GTAA will also have implications for Derby City, particularly the need to consider the provision of		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						negotiated stopping places for Travellers across the Study area. This issue will be taken forward for further consideration by the Derbyshire Traveller Issues Working Group. It is noted that the policy approach in the Reg 19 Plan includes assessment criteria related to this type of use in the event that a planning application for such use may be submitted. This is considered to be a justified approach and the criteria included in Policy H12 to assess the suitability of any new sites, appear to reflect the recommendations of the GTAA. It is noted that in order to seek to meet the identified need identified in the GTAA, Policy HA17: Gypsy and Traveller Site Allocation Land west of Pride Parkway in Wilmorton is allocated as a Gypsy and Traveller site to provide a minimum of 17 permanent caravan pitches and that planning applications for the development of the site should		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						be consistent with the policy (Policy H12). Whilst not wishing to comment on the specific detail of the proposed site, it does appear to be well located to meet many of the location requirements of Policy H10 and those set out in the GTAA.		
OR104 & C519	George Fletcher*	Policy H12: Gypsies, Travellers and Travelling Showpeople	Object	No	No	minimising the impact on the amenity of nearby residents and the character of the local area, particularly where mixed-use sites are proposed; there is no evidence that the impact on the existing residence of Wilmorton of loosing their park has been assessed at all. Additionally, a so-called consultation was carried out in spring 2026 without their knowledge.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	Details of how the Regulation 18 consultation was carried out are set out in Part 1 of the Consultation Statement, and the Regulation 19 consultation was open to all. Policy HA16 retains the land beyond the fenced pitches as accessible public open space, and amenity will be assessed against Policy H12 at application stage. No change required.
C537	Rob Hoddinott	Policy H12: Gypsies, Travellers and	Object	No	No	"located, designed and landscaped to provide a good level of residential amenity and quality of life for proposed	Move to a less densely packed location.	Policy HA16 retains the land beyond the fenced pitches as accessible public open

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
		Travelling Showpeople				occupiers, whilst minimising the impact on the amenity of nearby residents and the character of the local area, particularly where mixed-use sites are proposed" HA16 is being proposed for the most densely populated area of Derby and will have significant detriment to the local neighbourhood.		space and requires appropriate fencing and planting, and the amenity of nearby residents will be assessed against Policy H12 at application stage. No change required.
C510	Marsha Ramroop Unheard Voice Consultancy Ltd*	Policy H12: Gypsies, Travellers and Travelling Showpeople	Support	Yes	No	I write specifically to support these policies, knowing the consultation arithmetic recorded in the January 2026 Regulation 18 draft (paragraph 171): 226 respondents opposed provision for Gypsy and Traveller sites, 156 supported it. That arithmetic is precisely why this representation matters. The need assessed through the GTAA (paragraph 255) is not subject to majority approval; a plan that meets an objectively assessed need in the face of opposition is the definition of positively prepared, and the measure of an Inclusive City is how it plans for the residents with the least voice, not the loudest. Gypsy, Roma and	Retain Policies H12 and HA16 unamended in substance; reconcile the H10/H11/H12 numbering inconsistency across paragraph 311, Appendix 1 and Appendix 3; and add supporting text referencing the Public Sector Equality Duty as part of the justification, strengthening the policies' position at examination.	Support welcomed. The cross-references in paragraph 311 are noted, and the Council will continue to have regard to its Public Sector Equality Duty as the Plan progresses. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Traveller communities experience some of the poorest health, education and accommodation outcomes of any group in England; the plan's promise at paragraph 48 that everyone will have 'equal life opportunities no matter their background' is tested here first. I commend the transparent approach: allocating a Council-owned site to guarantee deliverability where no private sites came forward, and providing 17 pitches against an assessed need of 14 with headroom to the end of the plan period (paragraph 255). I urge the Council to hold this allocation through examination and adoption, and to resist pressure to trade it away. One editorial correction to assist the Council: the plan is internally inconsistent in how it numbers this policy. Paragraph 311 cross-refers to 'Policy H10', Appendix 3's table of policies lists it as H11, and the Appendix 1 monitoring framework lists it as H12. This should be reconciled before submission so the policy	Ensure the Equalities Impact Assessment addresses the distributional effects of Policies H8 and H9 on HMO residents, not only on settled neighbours.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						is unambiguous at examination. Relatedly, I ask that the plan's Equalities Impact Assessment specifically examine Policies H8 and H9 on Houses in Multiple Occupation. HMO restriction policies are often popular, but the people who live in HMOs, disproportionately migrants, students, young people and residents on low incomes, rarely feature in the consultation responses that shape them. Restricting supply without assessing displacement effects risks harming the very residents with fewest housing options.		
OR104 & C519	George Fletcher*	Paragraph 255	Object	No	No	There is no evidence that the council assessed all the green spaces including 46 other parks before decided that Wilmorton Park was to be sacrificed. Many larger parks are available where the impact of 17 pitches would be less. However, these tend to be in the affluent areas e.g. Darley Park, where obviously a traveller park would be completely unacceptable to the affluent residents.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	The Gypsy and Traveller Site Provision Topic Paper sets out how nearly 90 Council-owned sites were assessed and shortlisted to nine, which were appraised against the same criteria. Policy HA16 retains the land beyond the fenced pitches as accessible public open space. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR104 & C519	George Fletcher*	Paragraph 258	Object	No	No	considering the amenity of existing local residents, there is no evidence that the amenities of the residents of Wilmorton have been considered at all.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	The amenity of existing residents will be assessed against Policy H12 at application stage, and Policy HA16 retains the land beyond the fenced pitches as accessible public open space with further planting. No change required.
C537	Rob Hoddinott	Paragraph 258	Object	No	No	HA16 does the opposite of considering amenity for local residents. The proposal significantly reduces amenity for the current population.		The amenity of existing residents will be assessed against Policy H12 at application stage, and Policy HA16 retains the land beyond the fenced pitches as accessible public open space with further planting. No change required.
Housing Allocations Outside of the City Centre								
OR161	Derbyshire County Council	Paragraph 259	Support	Yes	Yes	It is noted that the Reg 19 Plan proposes the allocation of fifteen housing site allocations (HA1 to HA15) to help meet the City's future housing		Support welcomed. The Council will continue to work with Derbyshire County Council on cross-

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						requirements of 12,500 homes. Whilst not wishing to comment on the detailed merits of each allocation, in general terms, the proposed allocations all appear to be located in sustainable locations either within or adjoining existing residential areas as urban extension and in some cases, utilise previously developed land, which is supported. However, two of the proposed allocations (as below) may raise implications for the County Council in terms of cross boundary infrastructure considerations, including highways impacts and school place provision: Rykneld Road is allocated for a minimum of 800 high quality new homes. This site will form part of a larger cross boundary growth area including the Highfields Farm housing site in South Derbyshire which is now built out; and		boundary highways and school place provision for HA1 and HA7.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Land east of Stoney Lane, Spondon will deliver a minimum of 400 new, high-quality homes forming an eastern urban extension to the suburb of Spondon close to the County Boundary in Erewash borough. This site also has significant implications for impacts on the Green Belt (see further comments below) With regard to both of the above, the County Council would welcome the opportunity to work collaboratively with the City Council to consider the strategic infrastructure requirements of each of the proposed allocated sites, particularly the highways and education provision needs of the sites, and potentially the wider environmental impacts of the proposed sites, particularly landscape and heritage impacts.		
OR257	Marrons on behalf of BDW Trading Ltd (Redrow Homes Midlands)*	Paragraph 259	Object		No	Table 2 of the Submission Draft attributes 2,234 dwellings (net of commitments) to allocations outside the city centre over the plan period. However, the respondent submits that several of the sites proposed for		The deliverability of the allocations is evidenced in SA Appendix G, which records planning permissions, applications or

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						allocation lack sufficient objective evidence of deliverability and developability. Indeed, the PPG[12] makes clear that plan-makers will need to assess the suitability, availability and achievability of sites, including whether the site is economically viable. Together, these factors will provide information on which a judgement can be made as to whether a site can be considered deliverable within the next 5 years, or developable over a longer period. The analysis which follows is intended to convey the respondent's site-specific concerns.		confirmed developer intentions for most sites, and in the trajectory at Appendix 2.Further detail is also provided in the site selection topic paper and city centre position paper. No change required.
Policy HA1: Rykneld Road, Littleover								
OR257	Marrons on behalf of BDW Trading Ltd (Redrow Homes Midlands)*	Policy HA1: Rykneld Road, Littleover	Object		No	Rykneld Road is proposed for allocation within the LPD for residential development comprising the erection of 'a minimum' of 800 dwellings. Appendix 2 of the Submission Draft anticipates all 800 dwellings being completed within the plan period, assuming the first 50		SA Appendix G records that planning applications for around 730 homes have now been submitted on the site, demonstrating clear developer interest in a site whose principle is established in the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						completions in Year 7 (2029/30), followed by a sustained delivery rate of 100 dpa between Years 8 -14 (2030/31 to 2036/37), and the final 50 units in Year 15 (2037/38). However, the site has a protracted planning history. Indeed, it was first identified for allocation under Policy H9 of the City of Derby Local Plan Review ("CDLPR") 2006, where it was earmarked for 980 dwellings. An outline application was submitted to the Council over 18 years ago, in July 2008, under reference 03/08/00445, before ultimately being withdrawn on the 13th November 2008. Its chequered history is reflected in paragraph 260 of the supporting text which concedes that the site 'has been allocated for development for many years'. A subsequent application was submitted in 2011, which sought planning permission for mixed-use development, including the erection of up to		adopted plan. The trajectory at Appendix 2 does not anticipate completions until 2029/30. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						800 dwellings. A resolution to grant was secured, pursuant to 01/11/00023, on the 10th January 2013. However, in more recent commentary provided by Pegasus Group, a formal decision notice was never issued due to the section 106 agreement having never been completed, owing to a 'lack of co-operation between all of the landowners'. For completeness, the particulars of the 2011 application are no longer held on the Council's planning register. The site's allocation was then rolled forward into the Derby City Local Plan Part 1: Core Strategy, where it was identified by Policy AC20. Notwithstanding that it had secured allocation for a second time, from receiving the resolution to grant, there was nearly a decade of inactivity before two separate, standalone applications were submitted; one either side of Rykneld Road. The outline component was submitted first in November		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						2022 by Miller Homes, William Davis and Miller Gadsby under the unique reference 22/01771/OUT. At the time of writing, that application is still pending determination - nearly 4 years after submission. Following submission, the planning register has lain dormant for nearly 3 years, the most recent correspondence being an agreed extension of time, uploaded on the 4th January 2024. Indeed, it is unclear whether the applicants were able to overcome the concerns raised by statutory consultees, for on the 15th May 2023, the Highway Authority advanced three substantive concerns: The number of access points to the development; The public transport provision access from the site; and The lack of coherent cycling infrastructure between the east and western development sites.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The eastern component of the allocation was the subject of a detailed planning application submitted by Persimmon Homes in November 2023. That application was assigned the unique reference 23/01583/FUL and, at the time of writing, is also pending determination - nearly 3 years after submission. Once more, the Highway Authority concluded that there were still matters to be progressed, in relation to sustainable connectivity. Notwithstanding the foregoing issues, the combined quantum of development proposed through the 'live' applications amounts to approximately 729 dwellings. Not only does this fall below the anticipated allocation yield of 800 units within the LPD, but it represents a gradual decline in the realistic capacity of the site, from the 980 units envisaged by Policy H9 of the CDLPR 2006. Furthermore, the site's planning history demonstrates an inability - over a period of two decades		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						- to secure planning permission and deliver housing on the site, despite a long-standing allocation. Turning then to the Council's own evidence, the site is assessed within the Strategic Housing and Land Availability Assessment ("SHLAA'') under Site Reference: DER0001. The SHLAA itself recognises that the 'site has been allocated for many years' and that 'none of the planned new homes have been delivered to date'. The assessment attributes this lack of progress to a combination of factors, including the delivery of a strategic housing site in South Derbyshire (Highfields Farm) which has supposedly absorbed new build market, in addition to problems with fragmented ownership and the need for a new primary school to be delivered in early stages, thereby affecting viability. However, the Council has provided no firm evidence as to the previous issues being		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						overcome, or progress being made towards determination. In January 2008, the Council published the Rykneld Road Development Brief, noting the main constraint as the inability for the site to be directly physically linked and the need, therefore, for the site to be comprehensively developed. What is clear, is that despite the Council's proactive approach in strategic planning and policy support, the site has failed to materialise over a period of two decades, yet its allocation persists. Drawing the above together, the respondent submits that the evidence does not clearly demonstrate that HA1 is deliverable or developable by virtue of its lengthy planning history, the absence of any extant permissions, the lack of meaningful progress as regards the 'live' applications and land ownership complications. At the very least, the anticipated		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						allocation yield is overstated, compared with the quantum of development currently proposed.		
OR256	Pegasus Group on behalf of Miller Homes, William Davis and Miller Gadsby (Heatherton) Ltd*	Policy HA1: Rykneld Road, Littleover	Object	Yes	No	The proposed continued allocation of land at Rykneld Road, Littleover is supported and represents a logical proposal in light of the Council's requirement to deliver housing within its own boundary. The Consortium's land interests cover land west of Rykneld Road, which is subject to a live planning application (ref: 22/01771/OUT). The policy now sees the whole site allocated for a minimum of 800 high quality new homes. This number is considered to be more achievable and recognises the constraints of the site and the infrastructure requirements required that limits the development (e.g. BNG Habitat, Primary School Provision, Noise, Open Space and Drainage requirements). With these considerations identified it is suggested that the Policy is updated for the total dwellings	Amend Policy HA1 to read as a maximum instead of a minimum of 800 high quality homes.	Support for the allocation is welcomed. The figure of 800 homes is expressed as a minimum consistent with the Plan's approach to making efficient use of land, and the final capacity will be determined through the planning applications. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						to read as a maximum instead of a minimum of 800 high quality homes given the two live planning applications (east and west of Rykneld Road) across the allocation total 729 dwellings, and there being scope for approximately a further 60 dwellings on the site of the previously safeguarded employment land, now under the control of William Davis. The approach and the potential dwelling numbers outlined is robust and realistic. The Council have not justified the minimum figure suggested. Policy HA1 does not introduce new policy requirements beyond those already expected by the current Development Plan (Derby City Local Plan – Part 1 Core Strategy, 2017). The live planning application ref: 22/01771/OUT already demonstrates development in accordance with the emerging policy. A summary of how the current development proposals meet the requirements of Policy HA1 is set out below:		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						a) consideration of how the site relates to and connects with the adjacent Highfields Farm site in South Derbyshire, in particular seeking high quality pedestrian and cycle connectivity Criterion a) is not applicable to the west of Rykneld Road proposals, notwithstanding the proposed development seeks to deliver high quality pedestrian and cycle connectivity through and out of the development to provide linkages between the proposed primary school site and the nearby local centre. b) a new Primary School to be provided on site which will be open at an appropriate time in the phasing of the residential development, and financial contributions to the extension of local Secondary Schools A safeguard primary school site is included within the existing development proposals for the site, phasing for the delivery of this is still to be agreed. Financial contribution to the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						extension of local secondary schools will also form part of a S106 Obligations Package which will be agreed between the applicant and the City Council. c) the expansion of Heatherton Local Centre to provide additional shopping facilities and/or community uses within the site and, where possible, improved connectivity between the site and the local centre at Heatherton. Such new uses should be adjacent to the existing Heatherton Local Centre. It is noted that the policy seeks the provision of additional shopping facilities and community uses, it is suggested that this area of the policy is expanded to be more explicit to allow additional housing to be brought forward in this area of the allocation. d) the provision of an improved local bus service to serve the development, such as the extension of the weekday 20 minute 'Harlequin' bus service		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						along Rykneld Road. The provision of pedestrian links between the development and bus stops will also be required in order to ensure that residents are within a reasonable walking distance to public transport opportunities. As part of the development proposals discussions are ongoing as to improvements to bus services in and around the development, a final package will be agreed as part of a S106 agreement. The development has acknowledged that there will be a requirement for future residents to be able to access these stops and have provided pedestrian links from the main access and an emergency access to ensure that these are accessible to future residents by foot. e) applicants to demonstrate that high quality and useable active travel routes are provided within the site and strong links are made between these and existing or proposed routes		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						beyond the site. Development must prioritise high quality walking, wheeling and cycle routes through the site, and establish linkages with adjacent existing and proposed routes to create a sustainable neighbourhood/community. The proposed development has been designed to deliver high quality and useable active travel routes, with linkages provided where possible to the existing pedestrian, cycling and public transport network. f) the provision of off-site road and junction improvements, or alternative active travel schemes to offset the impact of development traffic. A comprehensive Transport Assessment has been submitted detailing appropriate interventions and where necessary has identified off-site road and junction improvements. g) attenuation measures for		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						noise generated by vehicles on the A38 on the western side of the site. The current application identifies and incorporates potential mitigation measures to reduce road traffic noise to acceptable levels, as recommended in BS 8233. The following mitigation measures are available: Plots bounding/closest to the road could be orientated such that any garden areas are protected by the building envelope; Gaps between dwellings fronting the roads could be kept to a minimum to avoid noise creep into the gardens behind; Public open space or nature corridors along boundaries with the noise source could be advantageous as these provide a buffer to the plots; Localised acoustic barriers around the garden areas; and Acoustic barriers along the Site boundary.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The site has been designed to mitigate noise impact from vehicles on the A38. h) appropriate flood mitigation measures to be implemented in accordance with Policy CL1. A comprehensive Flood Risk Assessment and Drainage Strategy has been submitted as part of the application that appropriately mitigates the development from flood risk. The Drainage Strategy outlines an appropriate strategy to deal with surface water on site. i) measures to be taken to enhance the green infrastructure and biodiversity network in line with the Local Nature Recovery Strategy. The application was submitted before the implementation of the statutory 10% Biodiversity Net Gain requirements. Nevertheless, the proposed development has sought to retain existing features of importance, including trees and hedgerows across the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						development. The site will also safeguard and manage an important grassland habitat in the north-eastern corner of the development, which has constrained the upper dwelling threshold. j) public open space to be provided on-site consistent with Policy EN3. The proposed development will deliver public open space on-site in accordance with current open space standards. k) infrastructure contributions in accordance with Policy GD9. The proposed development will deliver an appropriate, necessary and robust package of infrastructure contributions via S106 agreement. The policy as drafted is considered an appropriate means of facilitating the delivery of the Rykneld Road site. It is anticipated that the application will be approved		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						prior to adoption of the Local Plan. Delivery assumptions for the Consortium's land west of Rykneld Road and adjoining the Local Centre are detailed in Table 1. This demonstrates that delivery is expected within the next five years across up to three outlets, thereby boosting the supply of housing in Derby. Table 1 demonstrates that 250 dwellings could be delivered within the first three years of the trajectory and 485 dwellings in total across the period shown, making the Rykneld Road site an important contributor to Derby's housing supply position and to the soundness of the Plan's housing strategy. Refer to Annex 1, Table 7 The Consortium will continue to work positively with the Council to bring forward their element of the allocation ahead of the adoption of the Local Plan.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR255	South Derbyshire District Council	Policy HA1: Rykneld Road, Littleover	Support			SDDC support the allocation of Policy HA1… part of which lies immediately to the south of the proposed allocation on the western side of Rykneld Road.	consider for HA1 that this should also include a requirement to create walking and cycling connections to the STRA2 allocation in SDDC	Support welcomed. Criterion (e) of Policy HA1 already requires strong active travel links to existing and proposed routes beyond the site, which would include the proposed allocation to the south.
Policy HA2: Brook Farm, Chaddesden								
OR80	Councillor J Wright	Policy HA2: Brook Farm, Chaddesden	Object		No	The Council has wrongly stated that this policy on land, designated as 'Green wedge', will not fundamentally alter the character of the land and its neighbouring green belt. Chaddesden is a highly dense residential suburb and the need for 'green wedges' to stop distinct communities coalescing has been part of the city's planning policy since these policies were first introduced and remains part of the Council's planning policy to date. This policy contravenes the green wedge policy and fails to recognise the individual characteristics of Chaddesden		Most of the site is already allocated in the adopted Local Plan (Policy AC25), and SA Appendix G records that the Green Wedge part of the site is proposed as on-site open space. The supporting text of AC25 goes further to acknowledge that residual Green Wedge 'should be removed' in the next phase of plan making as it will no longer fulfil its function as a Green Wedge. The new Plan

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						regarding distinctive communities and protection of the green belt owing to this policy's proximity to other distinctive communities and the small but crucial green belt within the city's boundaries. This policy is not consistent with the Council's 'brownfield and city centre fist policy' , it too fails to take into account the Council's budget amendment for a balancing review of the city' s brownfield sites.		follows a brownfield and City Centre first approach, releasing greenfield land only where needed, as set out in the Housing Requirement and Spatial Strategy Topic Paper. No change required.
OR257	Marrons on behalf of BDW Trading Ltd (Redrow Homes Midlands)*	Policy HA2: Brook Farm, Chaddesden	Object		No	Brook Farm is proposed for allocation within the LPD, for residential development comprising the erection of 'a minimum' of 214 dwellings. Appendix 2 of the Submission Draft anticipates all 214 dwellings being completed within the plan period, assuming the first 20 completions in Year 6 (2028/29), followed by a sustained delivery rate of 40 dpa between Years 7 - 10 (2029/30 to 2032/33), and the final 34 units in Year 11 (2033/34).		SA Appendix G records that the site is now controlled by a major housebuilder, which is purchasing the access land from the Council, preparing an application for around 214 homes and has confirmed its intention to build out within five years. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						However, much like Rykneld Road (above), the site has a protracted planning history. Indeed, it was first identified for allocation under Policy AC25 of the Derby City Local Plan Part 1: Core Strategy, where it was earmarked for 275 dwellings. An outline planning application was submitted to the Council 13 years ago, in November 2013, under reference 11/13/01284. Planning permission was ultimately refused on the 7th February 2014, before being allowed at appeal[13], with planning permission granted on the 12th March 2015. A subsequent application was submitted in September 2014, before the outcome of the appeal was known. That application was granted planning permission in November 2016, pursuant to 09/14/01216. An application for reserved matters was then made in November 2019, under the unique reference 19/01613/RES, comprising the erection of 270 dwellings.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						However, that application was ultimately withdrawn in April 2022 and there has been no planning history in the years since. The agent's email notifying the Council of withdrawal does not elucidate the reasons for that decision. However, the named applicant was Countryside Properties, a firm acquired by Vistry Group in November 2022 - a matter of months after the withdrawal was communicated. It seems that the acquisition may have had some bearing on the site's promotion; the upshot being that Brook Farm benefits from neither an extant permission nor a live application. Turning then to the Council's own evidence, the site is assessed within the Strategic Housing and Land Availability Assessment ("SHLAA'') under Site Reference(s): DER0016 and DER0623 (the latter comprising land within a Green Wedge, which is to be retained). As		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						regards the former, the SHLAA itself recognises that the site 'has a complex planning history' and that 'the option appears to have been through several different companies who have all failed to deliver the permissions and walked away'. In relation to constraints, the SHLAA finds that the topography of the site has proved 'extremely difficult' in achieving an acceptable and viable form of development. The site is long and narrow, with Lees Brook to the south, thereby restricting the developable area. Whilst highway access is expected to be taken from Onslow Road, planning permission was granted with access afforded via Acorn Way to the east. This was deemed by the developer to be unviable and technically problematic to construct. Whilst the SHLAA records that a major housebuilder has shown an interest in bringing the site forward, indicative numbers appear to be lower once more,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						with only 207 dwellings considered achievable. As with Rykneld Road, not only does this fall below the anticipated allocation yield of 214 units within the **LPD,** but it represents a gradual decline in the realistic capacity of the site, from the 275 units envisaged by Policy AC25 of the adopted plan. Furthermore, the site's planning history demonstrates an inability - over a period of at least 13 years - to secure planning permission and deliver housing, despite an allocation. The respondent also notes that Appendix E of the Council's Sustainability Appraisal ("SA") identifies a number of adverse or uncertain effects associated with the allocation, with the site scoring 'minor negative' or 'significant negative' against 8 of the SA Objectives - more than any of the other 'preferred sites'. Indeed, it is one of only two sites that perform negatively against SA15: Transport and Accessibility and the only site which performs		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						negatively against SA4: Employment. Of particular relevance, the SA records that the site is not well located to the sustainable transport network, with public transport options 'far away'. Whilst this does not, in and of itself, preclude the development of the site, it is but another site-specific constraint (amongst many) that must be overcome in order for the Council to demonstrate the site's developability. Drawing the above together, the respondent submits that the evidence does not clearly demonstrate that HA2 is deliverable or developable by virtue of its lengthy planning history, the absence of any extant permissions, the absence of a 'live' application, physical/topographical constraints, uncertainty regarding highways access and poor sustainability credentials. At the very least, the anticipated allocation yield is overstated, compared with the indicative yields provided by the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						'new housebuilder'.		
Policy HA3: East of Moorway Lane, Littleover								
OR230	Marrons on behalf of Ainscough Strategic Land	Policy HA3: East of Moorway Lane, Littleover	Support		No	The Land East of Moorway Lane, Derby, of which our client has an interest, is identified as an emerging housing allocation within the Draft Local Plan under Policy HA3 and a revision to the currently adopted Green Wedge boundary. The allocation policy sets out that the site will deliver a minimum of 335 new, high quality homes and is supported by a number of required criteria (a-k), these include the provision of a children's play area (criterion c), buffer planting to the north of the site (criterion d), improvements to Moorway Lane (criterion f) and the provision of a local centre on site to meet day to day needs of the local area (criterion h). The site is highly sustainable and within walking and cycling distance of several educational facilities, benefits from nearby public transport connections to the city centre and access to		Support for the allocation is welcomed. SA Appendix G confirms that an outline application for up to 350 homes has been submitted and that a viable Green Wedge can be maintained, and the final capacity will be determined through the planning application. The outline application now has a resolution to approve (subject to S106). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						local amenities, including convenience stores and supermarkets, alongside the provision of the Local Centre on-site. The Green Wedge Review (2025) is clear that due to the width of the Green Wedge in this location, partial development of this site may be feasible, provided that Green Wedge principles are embedded into the layout, through the provision of linked undeveloped areas, and enhancing access to remaining undeveloped areas in the south of the Green Wedge. As such, it recognises that the Green Wedge would continue to make a valuable contribution in terms of well-being, recreation and biodiversity benefits which have been a focus of the submitted application and the draft Policy criteria. Our client is supportive of the proposed allocation and Policy HA3. However, the amendments previously		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						requested through the Regulation 18 consultation have only been partially incorporated into the Regulation 19 version of Policy HA3. Therefore, we remain to suggest the following modification is made: Though the wording included in criterion (e) has been generalised, however we request the following amendment is made: "e) improved walking, wheeling and public transport connections. In particular strong walking and cycling connections should be made to the surrounding communities to the east and west of the site, where achievable". An outline planning application for this site was submitted on Friday 10th October 2025 (reference: 25/01544/OUT). The description of the development is as follows: "Erection of up to 350 dwellings (Use Class C3) with a local		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						centre (Use Classes E, F1 and F2) with associated landscaping, open space, drainage infrastructure and associated works (all matters reserved except access from Moorway Lane)." The planning application has progressed positively since its submission and is now approaching determination. Throughout the application process, a constructive and collaborative working relationship has been established with Derby City Council. The positive progress made to date demonstrates that the site is both deliverable and capable of coming forward within the early years of the Plan period. The trajectory for the allocation, contained at Appendix 2 of the Draft Local plan, indicates completions on site from 2028/29. This is considered realistic given the advanced nature of the application		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The application proposals represent a sustainable form of development in an accessible location and will deliver a significant contribution towards Derby's housing needs, together with supporting infrastructure, open space and a local centre. As such, the site is well positioned to support the objectives of the emerging Local Plan and the Council's strategy for housing growth.		
OR160	National Highways	Policy HA3: East of Moorway La ne, Littleover	Object		No	We note that Policy HA3, as submitted, does not reference the Findern Interchange, the A50, or the SRN; its only highways requirement is for improvements to Moorway Lane and associated access, a local road. Given this site was identified at Regulation 18 as likely to affect the SRN, we would welcome clarification of how this impact is proposed to be assessed.		SA Appendix G records that the allocation is subject to resolution of highway matters, including impacts on the A38 Findern junction, and Policy GD9 secures transport mitigation. The Council will continue to work with National Highways on the assessment of impacts on the strategic road network. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
Policy HA4: Royal Hill, Spondon								
No representations were received for this policy.								

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
Policy HA5: The Hollow, Mickleover								

OR236	Caddick Land*	Policy HA5: The Hollow, Mickleover	Object	Yes	No	This allocation lies on the south western edge of the Derby Urban Area and to the south of Mickleover and is stated to deliver a minimum of 150 dwellings in the Derby City Council area as an urban extension to Mickleover adjoining the Draft site STRA2 Land South of Mickleover in the South Derbyshire Plan as confirmed by the below policy wording: The development in this area will form part of a wider cross-boundary strategic housing extension South of Mickleover including a significant amount of mixed-use development within South Derbyshire. Other requirements set out in the policy include open space provision, planting, green links, landscape buffers, pedestrian and cycling connections, appropriate highways access arrangements and contributions to local infrastructure. The supporting text for the allocation states: It is expected that the South Derbyshire element of the		Policy HA5 requires a comprehensive cross-boundary approach because the site forms part of the planned extension South of Mickleover, which the two councils are progressing jointly through a masterplan. SA Appendix G records full planning permission for 96 homes on the eastern parcel, with the western parcels in developer control. No change required.

						location will provide infrastructure in the form a number of facilities to support the wider cross-boundary development, including a business park, schools, a local centre and parkland (paragraph 288). The spatial approach in Policy H1 infects the location and types of proposed sites in the emerging plan. The plan identifies sites on the edge of Derby for development however these sites are predicated on the delivery of sites in South Derbyshire. Draft Derby Local Plan site HA5 is one such site which is reliant on a wider allocation in South Derbyshire being found sound and delivered. However, the parts of the site in Derby are only deliverable if the corresponding allocation in South Derbyshire is delivered. There would be no infrastructure to support the allocation within Derby if the emerging allocation within South Derbyshire was not allocated and brought forward. Undue strain on the schools,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						closest local centre, roads and local employment opportunities would arise if the Derby part of the allocation were brought forward in isolation. Allocating a site on the Derby Local Plan, which is predicated on a site not yet allocated in South Derbyshire, is a premature and unsound approach. The uncertainty of delivery of the site within South Derbyshire seems to be already accepted by the Council as they label it as a 'potential housing allocation'. There are questions over whether this allocation is deliverable and so it should be deleted and housing numbers added to the unmet need to be picked up by neighbouring authorities. Policy HA5 and the associated allocation is unsound.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR260	Carney Sweeney on behalf of Peveril Homes Limited*	Policy HA5: The Hollow, Mickleover	Object		No	Our client's land interest which forms part of proposed allocation Policy HA5: The Hollow, Mickleover provides an opportunity to bring forward sustainable growth on the urban fringe of Derby to meet the housing needs of the city. Appendix A of these representations includes a Site Location Plan identifying our client's land interest.	Part a) of Policy HA5 should be deleted.	Criterion (a) secures the comprehensive, cross-boundary planning of the wider extension South of Mickleover, which is needed for connections and infrastructure, and it will be applied proportionately to parcels that come forward separately. No change required.

						Policy HA5 refers to a "…minimum of 150 high-quality new homes as an urban extension to the suburb of Mickleover…". The proposed allocation includes land (the northern parcel) for which on 11 December 2025, Derby City Council's Planning Committee resolved to permit planning approval for 'Residential development (96 dwellings) habitat creation, open green space, public children's playground and landscape enhancements to the existing public right of way' (reference: 24/00425/FUL), with planning permission subsequently granted on 26 January 2026. The proposed allocation also includes our client's land interest for which a live full planning application is pending determination (reference: 26/00687/FUL) seeking approval for the "Erection of 60 dwellings and associated highway, drainage and landscape infrastructure". Following a subsequent approval, the Site would be deliverable within 5 years.		

						Overall, our client is supportive of their land interests being allocated under proposed allocation Policy HA5: The Hollow, Mickleover but have comments on some of the policy requirements, which we set out below. Policy HA5 of the Draft Local Plan refers to the Council requiring the following, at Part a): "… a) a comprehensive, masterplanned approach to the development of a strategic, cross boundary development. A Development Framework should be established and agreed between the relevant local authorities, landowners and developers, which ensures that the site is sustainable. …" Part a) of Policy HA5 places an emphasis on the relationship between the draft allocation with the proposed strategic allocation STRA2: Land south of Mickleover which forms part of the emerging South Derbyshire Local Plan Part 1 Review. Whilst		

						it is noted that the proposed allocation under Policy HA5 lies to the immediate north/east of the proposed strategic allocation STRA2 in South Derbyshire, the requirement for a comprehensive, master planned approach and development framework to be agreed between the various parties is unsound. The emerging Local Plan for South Derbyshire is at a more advanced stage with the Regulation 19 Consultation for the Part 1 Local Plan review having been completed and the Local Plan due to be submitted for Examination in Summer 2026. As such, the practicality of securing the requirements of Part a) is unrealistic and is also unnecessary in the context that part of the proposed allocation Policy HA5 is already the subject of planning approval (reference: 24/00425/FUL), with our client's land interest subject of a live planning application awaiting determination (reference: 26/00687/FUL), both of which are likely to be brought forward in advance of the development in South Derbyshire.		

						It is noted that the Sustainability Appraisal Regulation 19 Report, Rev 2, dated 27 July 2026 ('the SA') sets out an assessment of Site Allocations in Chapter 7, with the full Site Assessments provided in Appendix E. Within Chapter 7 and Appendix E, an assessment is carried out of Site HA5. Whilst emerging and adopted Local Plans are noted to be a source of 'inter-plan effects' (see Table 8-3 of the SA), the SA does not include any reference to the assessment of Site HA5 having been carried out in combination with STRA2, or its assessment being in any way reliant on STRA2. Derby City Council's Green Wedge Review dated September 2025 (GWR) assesses the Littleover/Mickleover Green Wedge, which proposed allocation Policy HA5 lies within. The GWR assesses the Littleover/Mickleover Green Wedge as having a 'Relatively Weak Contribution' in terms of fulfilling its primary purpose (i.e. in respect of existing Policy CP18 of the Derby City Local Plan – Part 1 Core Strategy, January		

						2017 which deals with the Green Wedge designations). The GWR includes consideration of the relationship between the Littleover/Mickleover Green Wedge with the proposed Strategic Allocation STRA2 in South Derbyshire, stating as follows: "Development of this site could block off the GW and prevent the countryside from flowing into the built area of the city. It would enclose the GW and significantly undermine its function irrevocably, and as a result it is considered to result in high harm to the function of the GW." The overall recommendation in the GWR for the Littleover/Mickleover Green Wedge is as follows: "Consider whether the poor performance of the GW should justify its partial or complete removal from the GW designation." The Council's own evidence base shows that the proposed allocation under Policy HA5 is justified of its own accord. As		

						such, the requirement for Part a) of Policy HA5 is unjustified. Setting aside the lack of evidence to support the master planned approach at Part a) of Policy HA5, such a requirement also fails to take into account the physical and practical considerations which would impact on delivery. Proposed allocation STRA2 in South Derbyshire is proposing a strategic scale growth including requirements for strategic infrastructure and associated considerations and implications, with the anticipated delivery timeframe going beyond the South Derbyshire plan period (2040). In contrast, the proposed allocation under Policy HA5 already benefits (in part) from planning permission and is the subject of a 'live' planning application submitted on our client's land interest, proposing a level of growth which is capable of being delivered within five years and therefore, contributing to the city's five-year housing land supply.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The two proposed allocations are also currently under the jurisdiction of two different Local Planning Authorities. The differing approving authorities mean that a consistent approach cannot be guaranteed or required across the proposed allocations in the decision-taking process. Requiring a Development Framework to be established, and for proposed allocation Policy HA5: The Hollow, Mickleover to be subject to a "comprehensive, masterplanned approach to the development of a strategic, cross boundary development" with proposed strategic allocation STRA2 in South Derbyshire, is not supported by the evidence base. The requirement of Part a) of Policy HA5 will not be effective and is unsound.		
OR260	Carney Sweeney on behalf of Peveril Homes Limited*	Policy HA5: The Hollow, Mickleover	Support			The Green Wedge Review dated September 2025 ('GWR') assesses the functionality of all the Green Wedge designations across the city. As part of this review, the GWR has also		Support for the allocation, informed by the Green Wedge Review (2025), is welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						assessed development sites within each Green Wedge, as well as new development sites located within neighbouring districts, but adjacent to the mouth of a Green Wedge. Sites are noted to be assessed in respect of the level of harm the development would cause to the function of the Green Wedge if taken forward. The scale of contribution assessed in the GWR with regards to functionality is noted to range from 'Strong contribution', through 'relatively strong contribution', 'moderate contribution' and 'relatively weak contribution', to 'weak/no contribution'. Proposed allocation Policy HA5: The Hollow, Mickleover falls in the Littleover/Mickleover Green Wedge. The GWR finds the Littleover/Mickleover Green Wedge as having a 'Relatively Weak Contribution' in terms of fulfilling its primary purpose (i.e. in respect of Policy CP18 of the adopted development plan which deals with the Green		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Wedge designations). The GWR is also noted to consider the relationship between the Littleover/Mickleover Green Wedge with South Derbyshire Local Plan Proposed Allocation STRA2, with the GWR stating as follows: *"Development of this site could block off the GW and prevent the countryside from flowing into the built area of the city. It would enclose the GW and significantly undermine its function irrevocably, and as a result it is considered to result in high harm to the function of the GW."* The overall recommendations in the GWR for the Littleover/Mickleover Green Wedge are noted to be as follows: *"Exclude development on Noctule Lane, Allan Avenue, Pipistrelle Place, Daubenton Way and Natterer Grove* *Northern section of the publicly accessible playing field*		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						associated with Littleover Community School should also be removed. *A consistent approach should be taken to the inclusion or exclusion of the A38 and A516 corridor within the boundary. Consider whether the poor performance of the GW should justify its partial or complete removal from the GW designation."* [underlining is our emphasis] In line with the findings of the GWR, the Policies Map shows the removal of the Littleover/Mickleover Green Wedge, with those elements not proposed for allocation under proposed allocation Policy HA5: The Hollow, Mickleover being re-designated as a 'Green Gap'. We agree with the conclusions of the GWR finding the Littleover/Mickleover Green Wedge as having a 'Relatively Weak Contribution' in terms of fulfilling its primary purpose. The removal of the Green Wedge		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						designation from the land covered by proposed allocation Policy HA5: The Hollow, Mickleover is supported and justified.		
OR260	Carney Sweeney on behalf of Peveril Homes Limited*	Policy HA5: The Hollow, Mickleover				The Five-Year Housing Supply Position sets out the five-year housing land supply calculation as of 1 July 2026. The latest statement reports an annual requirement of 960 dwellings based on the latest Standard Method for Derby City (with the calculation detailed in the Derby Local Housing Needs Assessment Addendum, June 2026). The five-year housing land requirement including a 20% buffer currently comprises 5,760 dwellings, with an annual five-year housing land requirement of 1,152 dwellings, which results in a 2.39 year supply. Our client's site, forming part of the proposed allocation under Policy HA5 is subject of a live planning application, pending determination for 60 units (reference: 26/00687/FUL). Whilst the Site does not		Comments noted. The planning application referred to will be determined on its merits.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						currently meet the definition of 'deliverable', following any subsequent approval the Site would also contribute towards the five-year housing land supply.		
OR266	Fisher German of behalf of Bloor Homes	Policy HA5: The Hollow, Mickleover	Support	Yes	Yes	BHL raise no objection to this proposed allocation, but would draw Inspectors attention to the Council's conclusions raised in relation to the Locko Road proposals and connectivity of the settlement, which are in our view inconsistent. The HA5 site is wholly disconnected from the main urban area of Derby by both the A38 and A516, which are significant physical barriers in this location. Whilst regard is had for the 'potential' allocation in SDDC, there are clear risks in relying on a neighbouring authority's allocation to justify this site, particularly where that allocation may not come forward, as occurred at Brun Lane in Amber Valley. Moreover, it is not clear that that allocation will be developed in a manner which supports immediately adjacent residential development.		Support welcomed. HA5 forms part of a planned cross-boundary extension that the two councils are progressing jointly, whereas the 2025 Green Belt Review found that Locko Road does not meet the definition of grey belt (SA Appendix G).

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR240	Pegasus Planning on behalf of Catesby Estates*	Policy HA5: The Hollow, Mickleover	Object	Yes	No	*Overall Policy Support* The proposed allocation of the land on the western edge of Derby, south of Mickleover at The Hollow is supported as a logical proposal, particularly in response to the emerging South Derbyshire Local Plan. The three parcels of land currently form the Mickleover / Littleover Green Wedge, however the decision by South Derbyshire to allocate the land to the west, south of Mickleover has fundamentally changed the context of this land. The proposed allocations are located between the transport routes of the A38 and A516, the land between these two routes is currently primarily agricultural land with housing on the Old Hospital Site at Merlin Way in South Derbyshire and housing fronting The Hollow in Derby City. The proposed strategic allocation in South Derbyshire will sever the	Policy HA5 should be modified to remove the land which is now a commitment following planning permission for 96 homes east of The Hollow and identify the remaining two parcels as separate allocations. Policy HA5 should be modified to state the allocation has a minimum capacity of 200 dwellings to ensure the policy is consistent with paragraph 124 of the NPPF, making effective use of land in meeting the need for homes and other uses.	Support for the allocation is welcomed. The figure of 150 homes is a minimum, and SA Appendix G records full permission for 96 homes on the eastern parcel with the western parcels in developer control, so the allocation as a whole provides the comprehensive framework needed. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						link between the land in Derby City with the wider countryside, a key function of the Green Wedge, compromising the overall integrity and purpose of the Green Wedge. An updated Derby Green Wedge Review, prepared by LUC and published in September 2025, has informed the Draft Local Plan. This found that the majority of the 13 Green Wedges in Derby remain highly effective in fulfilling their primary purpose of shaping urban structure, separating neighbourhoods, and maintaining visual and physical links with the countryside. Three of the Green Wedges scored less well including Littleover/Mickleover Green Wedge which was found to make a relatively weak contribution, performing weakly due to high levels of private land, structural pinch points, and restricted countryside links. The report concludes that the future of the Green Wedge is		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						significantly influenced by the proposed development beyond the city boundary, within South Derbyshire, which would effectively curtail the Green Wedge by severing its connection to the wider countryside and preventing it from fulfilling its primary function. The assessment highlights that the proposed development in South Derbyshire means the Green Wedge designation would no longer remain justified as the land around the Hollow will become a series of isolated pockets of open space lacking a clear purpose or functional contribution. The decision to allocate this land for housing development, in the context of this assessment and the lack of available land for homes, is fully justified and ensures the plan is positively prepared and in line with national policy. *Development Parcels* The supporting text sets out		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						that this is a strategic growth area which forms part of the South Derbyshire strategic allocation South of Mickleover and which is split into three distinct parcels. This includes our client's land interests west of The Hollow, north of Staker Lane along with the land east of The Hollow and south of Staker Lane. These three sites have different landowners and are being promoted separately. Only two of the parcels, north and south of Staker Lane, have formed part of the wider masterplan for the South Mickleover strategic allocation. Whilst these sites collectively create a strategic growth area, the draft policy should also recognise that these three sites will be delivered individually, on different timelines, by different housebuilders, as part of the wider whole. It would give the Council more certainty and control if these sites were individually allocated. The need to separate out these		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						parcels is highlighted by the recent full planning permission granted for land to the east of the The Hollow to Wheeldon Brothers Limited. On 27th January 2026 this parcel was approved for 96 dwellings, habitat creation, open green space, public children's playground and landscape enhancements to the existing public right of way. The land east of The Hollow is now a commitment which has the potential to deliver sooner within the Local Plan period, it therefore lies within a different part of the Housing Trajectory to the other two parcels and could be shown as a commitment on the Policies Map. Our client is preparing a cross boundary application for the land to the north of Staker Lane to submit in support of the Local Plan. It would help the Council with the determination of this application, and that for the land south of Staker Lane, if the policy is clear these parcels will be delivered individually as part of the wider strategic		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						picture. *Comprehensive Development* This will not prevent the development being comprehensively planned to ensure development is delivered in a coordinated and cohesive manner with the wider South Mickleover strategic allocation. The concept masterplan for our client's site shown in **Appendix C** has been developed taking into account the constraints on site and the relationship with the wider strategic allocation within South Derbyshire. It is considered to represent a deliverable form of development which will form a coherent part of the wider development and meet the proposed policy requirements of Draft HA5. Our client is in regular contact with the promoters of the majority of the remainder of the South Derbyshire STRA2		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						draft allocation and the concept masterplan has been developed as part of a comprehensive approach to green links and vehicular, pedestrian and cycling connectivity. *Scale of Development* Policy HA5 states that Land at The Hollow, Mickleover will deliver a minimum of 150 new homes. The scale of development anticipated significantly underestimates what can be achieved in this location. Planning permission has granted recently east of The Hollow for 96 homes and so this leaves only 54 homes to meet this minimum. Our client's site is capable of delivering a further 85 homes. This capacity figure is based on initial technical work which informed the concept masterplan shown in Appendix C. The reference to 150 dwellings		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						within policy HA5 is not considered to be consistent with paragraph 124 of the NPPF as it does not make effective use of land in meeting the need for homes and other sues.		
OR255	South Derbyshire District Council	Policy HA5: The Hollow, Mickleover	Support			SDDC support the allocation of Policy HA5.		Support welcomed.
Policy HA6: Kingsway Boulevard								
No representations were received for this policy.								
Policy HA7: Stoney Lane, Spondon								
OR44	Anne-Marie Adams	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a local resident to formally object to the proposed allocation of land at Stoney Lane, Spondon for 400 homes under Policy HA7 of the Derby Local Plan. I believe Policy HA7 is unsound, specifically because I do not believe the allocation is justified or consistent with national planning policy. My main concern is that this is active agricultural land which		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						currently forms part of the Green Belt. I do not believe that land of this nature should be reclassified as “Grey Belt” and released for development when there are significant opportunities to provide new housing on previously developed and brownfield sites within Derby. The Local Plan itself identifies substantial capacity at sites including Derby Riverside, Railway Station Quarter, North Castleward and other city-centre locations. I believe these opportunities should be fully prioritised and optimised before active Green Belt farmland on the edge of Spondon is allocated for such a large development. I am also concerned about the cumulative impact that 400 additional homes would have on Spondon. This is not simply a question of providing housing; those homes create additional demand on local roads, drainage, schools, healthcare		up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and other services. Any decision to allocate a development of this scale should demonstrate convincingly that the surrounding infrastructure can accommodate that additional pressure. Development of this site would also extend the built-up area further into currently open agricultural land and contribute to urban sprawl. Once this land is developed, its character and its function as part of the separation between developed areas cannot realistically be restored. For these reasons, I believe Policy HA7 fails the tests of soundness and should be removed from the Local Plan. I ask the Council to deallocate the Stoney Lane site and prioritise the brownfield and regeneration opportunities already identified within the Plan before releasing Green Belt farmland for development.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR45	Janet Allen	Policy HA7: Stoney Lane, Spondon	Objects		No	I should like to make you aware of my serious concerns and objections to the above plan. I believe that the policy is unsound, in that it is not justified and not consistent with national policy. You are classing this land as "grey belt" when it is in fact active agricultural land, and therefore "green belt". Spondon does not have the infrastructure to cope with a further 400 dwelllings. Our village roads are already heavily congested and our schools, doctors and dentists are over subscribed. I believe the Council has other brown field sites and city centre sites that could more easily accommodate these dwellings. I believe that Plan HA7 is unsound as it fails the Justified and Consistent with National Policy tests as it wrongly classifies green belt land as grey belt. The Council should,		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						instead allocate these 400 dwellings to brown field and city centre sites.		where justified. No change required.
OR160	National Highways	Policy HA7: Stoney Lane, Spondon	Objects		No	We note that Policy HA7 requires financial contributions for off-site transport improvements, and that supporting paragraph 307 acknowledges the proposed access to the site "is very close to the A52 strategic road and the impact on the strategic road will need to be carefully considered and mitigated." However, the Policy does not set out the mechanism by which this will be assessed, nor does it require this to be agreed with National Highways or resolved prior to the determination of any planning application on the site. It should be noted that National Highways cannot accept financial contributions, and therefore alternative funding and delivery mechanisms may be necessary if mitigation on the SRN is required. We would therefore welcome that reference to financial contributions be expanded to include other		Policy GD9 already provides for mitigation to be secured through planning conditions or section 278 agreements as well as financial contributions, and paragraph 307 requires impacts on the A52 to be carefully considered and mitigated. The Council is currently undertaking further modelling work to assess HA7 and will continue to work with National Highways on the assessment of the allocation's effects on the strategic road network. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						delivery mechanisms (such as Section 278 agreements).		
OR196	Steve Allen	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to strongly oppose and object to the inclusion of the Stoney Lane site within the Local Plan document. As a local resident, I feel the proposal for 400 homes on this land is wholly inappropriate for a number of reasons: 1. The categorisation of the land as "Grey Belt" is unjustified. My understanding is that national planning policy defines Grey Belt as "previously developed, poor-quality or underperforming Green Belt land". This land is none of those. It has not been previously developed, and it is neither poor-quality nor underperforming given that it is currently being actively farmed and has been for many years. There is numerous photographic and video evidence of crops being farmed and harvested on the land. The Green Belt land also performs a vital role in preventing urban sprawl.	Based on the above reasons, I request that the council reconsider and deallocate Site HA7 (Stoney Lane, Spondon – 400 homes) from the Local Plan. In particular, the allocation should be considered unsuitable as it fails the 'Justified' and 'Consistent with National Policy' tests by misclassifying active Green Belt farmland as 'Grey Belt' and without demonstrating that all reasonable brownfield alternatives have been fully optimised. The Council should reallocate these 400 dwellings into existing brownfield	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Cumulative effects, including with development in Erewash, will be assessed with the Highway Authority and National Highways as paragraph 307 requires, and Policy

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						2. It feels like there has yet to be sufficient consideration and review given to building on existing brownfield sites within the city boundaries before any consideration should be given to targeting any Green Belt land. 3. Derby City Council has repeatedly and vehemently challenged Erewash Borough Council on its selection and approval of the Spondon Wood housing development to the north of Spondon. It challenged the suitability of the location and EBC's own reclassification of the land as Grey Belt. Having objected so strongly to that development, how can DCC justify now including the Stoney Lane site within their own Local Plan when it seems, to me and many others, a very similar proposal. 4. The proposed sole access point earmarked to the new development area on Stoney Lane is very close to a busy	and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plan's stated 'brownfield and City Centre first' strategy (Paragraph 81).	HA7 secures contributions to education and transport infrastructure (criteria h and i). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						junction off the A52. Many vehicles exiting the A52 at this point do so at speed coming off the dual carriageway and then enter a sharp, blind bend onto Stoney Lane. Any small amount of congestion building up at the junction as cars wait to turn off Stoney Lane into the new development site is highly likely to lead to collisions as cars exiting the A52 are presented unexpectedly with a queue of stationary cars in front of them 5. As there is no specific mention of new infrastructure in the Local Plan, it would seem that the expectation is that residents in the new homes would generally be expected to use existing facilities in Spondon. There is no mention of any provision of additional secondary school places (West Park School is already oversubscribed). There is no explanation as to how these additional residents would access GP services when many existing residents already struggle to get an appointment		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						at either of our two local surgeries. There is also no suggestion that anything would be done to mitigate the already heavily congested roads of Spondon, particularly at peak times. I look forward to receiving acknowledgement of my objection and further feedback in due course.		
OR46	Brian Anderson	Policy HA7: Stoney Lane, Spondon	Objects		No	It has come to my attention that Derby City Council are proposing to grant permission to build 400 homes off Stoney Lane, Spondon. I oppose this application on the following grounds that Policy HA7 is UNSOUND: 1. The proposed agricultural land has been redesignated as Grey Belt where it was originally a Green Belt land. This has been redesignated without the council demonstrating that all reasonable brownfield alternatives have been fully considered.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						2. Allocating this active agricultural farmland for house building conflicts and is not in alignment with the principles of the national planning policy. It also appears that this directly contradicts the City Council's own commitment to a 'brownfield and City Centre first' strategy, set out in Paragraph 8.1 of the plan. 3. There are numerous brownfield sites currently available such as: i. Derby Riverside (Policy- C11) - 600 homes ii. Railway Station Quarter (Policy CC13) - 500 homes iii. North Castleward (Policy CC14) - 400 homes iv. City Centre Mixed-Use Sites (Policy CC4) - Over 1400 homes 4. The plan has an absence of detail on the impact on the current infrastructure of Spondon itself. Spondon is a small community on the		HA7 requires noise attenuation from the A52 and contributions to education and transport infrastructure (criteria d, h and i), and Policy EN11 requires major development to be accompanied by an Air Quality Assessment. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						outskirts of Derby city, As such the routes in and out of Spondon towards the city are extremely limited.There is only one road out of Spondon towards the city, namely Willowcroft Road. This road is frequently congested from Sitwell Street to the traffic lights at the junction of Willowcroft road and Nottingham road. The proposed 400 homes will add an estimated (my estimate) 400 additional vehicles (1 per home and possibly more) to the road system. Currently, side roads are used to avoid travelling through the village centre via (mainly) South Avenue. This traffic comes from Stoney Lane and Sandringham Drive area residents (I am one of them). South Avenue is already a 'rat run' and would no doubt become much worse. I have noted that during the morning rush hour that many children cross over South Avenue on their route to school through Spondon village centre. Currently there is no safe crossing point on South Avenue		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						such as a zebra crossing. Increasing the quantity of homes on this side of Spondon will inevitably encourage many of the home owners to use the same South Avenue 'rat run' as a means of trying to exit Spondon more quickly. 5. I see that no consideration or indeed a thorough investigation / report has been made available investigating the negative impact on Spondon as a community, the impact on the road systems within Spondon village centre and on the few roads exiting the village. 6. There is no report on the reduced safety of pedestrians due to the higher volume of traffic on different roads, particularly during peak time. I note that there is no information given on current traffic flows and the proposed increased traffic flow expected due to the 400 new homes. 7. There is no report estimating the negative impact on air quality and noise that would		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						both increase substantially both within a small area of residential properties. . I want it noted that a fully reject and oppose the current proposal, Policy HA7 - Stoney Lane, Spondon - 400 homes		
OR47	Jean Anderson	Policy HA7: Stoney Lane, Spondon	Objects		No	I firmly believe that to use Stoney Lane site is extremely unsafe and totally unjustified. It is not at all consistent with National policy. The site is an active agricultural piece of land and not poor quality or described as grey belt. Spondon known once as a village is being spoilt by all this building of houses. We need the farm. Our infrastructure is now being totally pressured. Schools, doctors, dentists etc will just not cope with all the extra pressure put on them. Spondon roads are now so heavily used by Lorry's and extra cars it's a nightmare at times. I feel Brownfield and Grey Belt land should be thoughly used before Green belt land even considered. I feel the allocation and use of		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Stoney Lane site is UNSOUND as it fails the Justified and Consistent with National Policy tests have misclassifying Green belt as Grey belt. To end my email I have lived in Spondon for 62 years and have gradually seen our once thriving village really go downhill in so many ways. No more building especially Stoney Lane.		improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR48	Jacqueline Annable	Policy HA7: Stoney Lane, Spondon	Objects		No	With regard to the above I would submit that this policy is Unsound because it is Not Justified, Not consistent with National Policy and there are brownfield alternatives already available to Derby City Council already allocated for housing. The land is active agricultural farmland and development would extend urban sprawl and existing infrastructure pressures, including roads, drainage and school and health capacity.	I wish to request this modification: Deallocate Site HA7 (Stoney Lane, Spondon - 400 homes) from the Local Plan. The allocation is UNSOUND as it fails the 'justified' and 'consistent with National Policy' tests by misclassifying active Green Belt farmland as 'Grey Belt' without demonstrating that all reasonable brownfield alternatives have been fully	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							optimised. The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward) in accordance with the Plans stated 'brownfield and City Centre first' strategy (Paragraph 81).	contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.
OR49	Stepanie and Dean Asher	Policy HA7: Stoney Lane, Spondon	Objects		No	Having previously submitted our objection to the draft plans in relation to your policy HA7: Stoney Lane Spondon, and the update to the draft plan for Derby issued recently we wish to register our strong **OBJECTION** to the unsound proposal to build 400 houses on this land.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The eleven points outlined in our response dated 6th March 2026 have not been addressed upon review of the latest update issued via email on 27th July 2026. **In addition**, we now add the following based on our review of the July update: Your update points 302/3 notes the Council has redefined this land from green belt to grey belt, in an attempt to enable the land to be allocated for housing to the east of Spondon. Grey belt land is defined as green belt that is previously developed (brownfield), poor quality or fails to contribute to core green belt purposes. All of these definitions do not apply to the land in policy HA7 and therefore the definition of this as grey belt land is INCORRECT and UNSOUND and should remain as green belt based on: The classification of this land as grey belt is inconsistent with the national policy. The land is		alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Cumulative effects, including with development in Erewash, will be assessed with the Highway Authority and National Highways as paragraph 307 requires, and Policy HA7 secures contributions to education and transport infrastructure (criteria h and i). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						not of poor quality, it is agricultural land that is being actively farmed and has been so this year and for a number of years previously, providing cereal crops to contribute to the UK's food security; It prevents the urban sprawl distinguishing Derby City from the neighbouring Erewash Council area, and is the most easterly part of Derby City thereby performing a core green belt purpose; It has never been developed and therefore is not brownfield either. I do not see any evidence that Derby City Council have considered all other suitable brownfield sites already existing in the city (in addition to policies CC11, CC13, CC14 and CC4) that can be designated for housing, given the council's commitment to a city centre/brownfield sites first policy (as per local plan point 81). All brownfield sites should be given priority ahead of any plans on green belt.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						There remains no solution to the access/egress to the site. Access from the A52 as suggested on the plan is dangerous and totally unsuitable for the additional vehicular demands that 400 houses brings, both in terms of private vehicles and public transport requirements. Having also considered other potential access points via the existing infrastructure in the area, there is no satisfactory access point opportunities that would be considered wide enough to accommodate this amount of additional traffic. How many accidents, injuries or fatalities would need to occur before the Council deemed this development unsafe? A financial contribution towards improving education is noted with no plans in terms of an increase in educational capacity / new schools, and likewise no mention of other contributions in terms of additional doctors or dentists in an area where doctors' appointments or NHS		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						dental services are currently difficult to obtain without the impact of an expanding population. There is no mention of additional leisure facilities in the Spondon area either. The social infrastructure for an additional c.1000 people needs to be planned and documented first before agreeing the plan for policy HA7. It is insufficient to ask for a financial contribution that is neither quantified nor applied to increasing Spondon's current facilities. Given the Spondon Wood development has already increased the population in this area, the additional population increase of policy HA7 is to the detriment of all those currently living in the area. Given our previous points, and the additional ones listed above, HA7: Stoney Lane Spondon **needs to be taken out** of the local plan. In summary; The use of this green belt land is unjustified and inconsistent with the national policy given it		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						is actively in use as farmland for the production of a food crop. The use of brownfield sites elsewhere in the city have not been considered first. The impact on the current infrastructure of Spondon from further expansion will be hard felt by the current residents, and the vehicular impact and access is unsafe both on the existing roads and from the A52 perspective.		
OR50	Anthony Atkins	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to object to the proposed development on Stoney Lane spondon of 400 new homes this is ACTIVE FARMLAND not brown land or grey belt land, not only would you destroy active farm land which would be lost for ever it would have a huge detrimental effect for the local wildlife which I am sure you will agree we cannot afford, as you know this move is not Consistent with National Policy and it even contradicts the Councils very own commitment how can you explain that and		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						justify this move I am sure you are aware there are other areas within derby city that are appropriate for redevelopment if you allow this Development to go ahead then you are putting children`s lives at risk! is that hay you wish do do and all ways be known for and the reason I am saying this is because entrance to this development is on the part of Stoney Lane where you have traffic building up to enter the A52! of course this still a 30 mile zone and I drive on that part of stoney lane quite frequently so I do understand the traffic there so on this entrance you will have traffic entering and leaving this site as well as traffic leaving and entering the A52! guaranteed to have accidents and you will be deliberately be the cause of this, and that is just the start the local schools would be put under huge pressures which is not acceptable to the school and more importantly to the pupils attending the schools if this goes ahead you will be		as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						responsible for the accidents and possibly the deaths of children as that part of the road at school times is very busy, with respect I ask you to stop and think and visualise the road the traffic and more importantly the children and all adults who will have to put there lives at risk because of you decision		
OR51	Lynda Aubin	Policy HA7: Stoney Lane, Spondon	Objects		No	I would like to object most strenuously about the proposed development for 400 houses on Stoney Lane in Spondon. This is for a multitude of reasons, any one of which could impact the legality of the building. HA7 is **unsound** for the following reasons, which must be ac 1. The proposed site is not "Grey" belt, a new term introduced to circumnavigate the laws pertaining to Green Belt. It is active agricultural land. I have been walking the pathways through the lands over the last 5 years and have seen the crops rotate from active use to fallow fields. This		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						is as recent as this year. Other Brown sites and city regenerating **must** be considered before this short-term and **unjustified** classification is enforced.. Enforced being the term I believe, is most accurate. Allocating active farmland for development conflicts with the **National Policy** principles and even moreso, the **council's own commitment** to a "brownfield and City Centre first strategy set out in Paragraph 81 of the plan. With a current Government's disdain for the trust of the public, this would not serve the council well. The council already has at least 4 other brownfield alternatives, at Derby Riverside, Railway Station Quarter, North Castleward, and mixed used sites in the city centre. 2. Spondon has already incorporated a current development of new housing in the woods, and adding further buildingwork, and on such a large scale, is going to		education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						contribute enormously to the urban development and sprawl towards other villages and towns. Where will this end? With all localities connected as one huge urbanisation? Again, this is not inline with the **brownfield and city centre strategy** already promised. 3. Already, there is an enormous burden on local infrastructure. Schools bearing more and more burdens, roads becoming congested as a matter of course, adding to the issue with CO2 emissions, and drainage and other utility capacities at full stretch. The congestion approaching and entering th A52 will be enormous and whenever traffic cannot travel through Spondon village and is sent via Stoney Lane it will be untenable. 4. The previously mentioned alternatives should be fully utilised before agricultural land that **IS** being used is taken away for ever and therefore unable to ever be used again.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						5. Surely in a day and age of the public suffering u-turn after u-turn from a sitting government that has the lowest public approval after taking office, local councils need to set the bar straight at street level, and show the public and voters, the people who pay their wages, it can be trusted by following the **"brownfield and City Centre first"** strategy it promised. There are several legal reasons for this proposed development to be moved to other more prominent, available and less intrusive sites. These must be considered before any high-handed developments leave our country irretrievable and one huge urban sprawl.		
OR52	Tony Aubin	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to request that Site HA7 (Stoney Lane Spondon - 400 homes) is deallocated from the local plan. By misclassifying Green Belt Farmland as Grey Belt, without demonstrating that all reasonable brownfield		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025)

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						alternatives have been fully optimised, the plan fails the 'Justified' and 'Consistent with National Policy' tests. Policy HA7 is therefore UNSOUND. The Stoney Lane site has not been previously developed and is not of poor Quality or underperforming as Green Belt. The farmer has actually begun growing crops on the site over the last three years, it is actually active agricultural land with a busy public footpath, NOT Grey Belt. This misclassification as Grey Belt simply cannot be justified. Furthermore it is inconsistent with Council's own commitment to a 'brownfield and City Centre first' strategy. In addition, Spondon is already going through an extensive phase of building on Dale Road, which will further increase the load on the already busy roads and infrastructure. With only 4 roads exiting Spondon north of A52 it is already a difficult commute for all residents. Spondon is simply not capable		found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires access at the southern end of Stoney Lane, contributions to off-site transport improvements and active travel and bus links (criteria g, h and l), and paragraph 307 requires impacts on the A52 to be carefully assessed and mitigated. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						of supporting the burden of an additional 400 homes, proposed under Policy HA7. The placement of HA7 would also result in a significant increase in the flow of traffic onto the A52, using the SHORT entry slip road. This would require a large flow of slow traffic onto the A52, causing traffic congestion, which seems incredibly counterintuitive considering the recent investments into improving A52 traffic flow. At worst, is represents an increased risk to road safety. With that in mind it is reasonable that the Council should reallocate these 400 dwellings to existing brownfield and city centre regeneration allocations, prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plan's stated 'brownfield' and City		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Centre first' strategy (paragraph 81).		
OR92	Emma Banks	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to submit a **formal objection** to Policy HA7 (Stoney Lane, Spondon) as part of the Regulation 19 consultation on the Derby Local Plan 2023–2043. I believe this allocation is **unsound** because it is **not justified** and **not consistent with national planning policy**. As a resident of Spondon, a parent, and someone who works within wellbeing and special educational needs, I care deeply about creating communities where people can thrive. This proposal is about far more than simply building houses. It is about the irreversible loss of valuable green space, the erosion of the character of our village, and the cumulative impact on the health, wellbeing and quality of life of the people who already live here. The land at Stoney Lane is not derelict or previously	For these reasons, I respectfully request that Site HA7 (Stoney Lane, Spondon) be **removed** from the Local Plan. I ask that the Council instead reallocates these proposed dwellings to existing brownfield and city centre regeneration sites, in line with it's very own Local Plan which clearly states "brownfield and City Centre first" strategy as well as in line with the national planning policy. Please don't take our beautiful green spaces away - the world is burning and we need more trees not tarmac! We also have an aging population and declining birth rate,	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Cumulative effects, including with development in Erewash, will be assessed with the Highway Authority and National Highways as paragraph 307 requires, and Policy

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						developed. It is actively farmed agricultural land. I have personally seen combine harvesters in these fields very recently (see attached image), demonstrating that this is productive farmland that continues to serve an agricultural purpose. It should not be reclassified as "Grey Belt" when it clearly performs an important Green Belt function by preventing urban sprawl and maintaining the separation between neighbouring communities. The Council has stated within its own Local Plan (Paragraph 81) that it will prioritise a "brownfield and City Centre first" strategy. However, this allocation appears to absurdly release actively farmed Green Belt land before existing brownfield opportunities have been fully utilised. This is difficult to reconcile with both the Council's stated strategy and national planning policy.	empty houses everywhere soon! Thank you for considering my representation.	HA7 secures contributions to education and transport infrastructure (criteria h and i). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						There are already significant brownfield allocations capable of delivering substantial numbers of homes, including Derby Riverside, Railway Station Quarter, North Castleward and other city centre regeneration sites. These should be prioritised before productive Green Belt farmland is considered for development. I am also deeply concerned about the cumulative impact on local infrastructure. Spondon has already absorbed substantial housing growth recently, particularly through the large Bloor Homes development at the top of our village. Residents continue to experience increased traffic congestion, delays and disruption associated with that development. Construction has brought prolonged dust and noise, affecting nearby residents' enjoyment of their own homes, while alterations to infrastructure, including changes to the sites elevated levels, have caused significant		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						local concern and actually invade privacy for existing residents - these changes were not approved prior to commencement either! These experiences inevitably raise questions about whether the full impact of further large-scale development has been properly considered. Our village roads are already under considerable pressure. Congestion is commonplace (have you seen Willowcroft road in a morning?!?), and further development will inevitably increase traffic movements, placing additional strain on roads, drainage, and local services. Not to mention that the only entrance way would be right off a 70mile per hour road - it's an accident waiting to happen! It is difficult to see how existing infrastructure can sustainably accommodate another 400 homes without significantly reducing residents' quality of life.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Beyond infrastructure, there is also a wider environmental responsibility. As a mother, I feel a profound responsibility to the next generation. Climate change is no longer a distant concern but an everyday reality, and protecting green spaces has never been more important. Accessible natural environments support physical health, mental wellbeing, biodiversity, flood resilience and climate adaptation. Once these spaces are lost to development, they cannot be replaced. Green spaces are not “empty land waiting to be built on”. They are living landscapes that support wildlife, agriculture, recreation and the wellbeing of local communities. Spondon is a village with its own identity, and the gradual erosion of the green spaces separating neighbouring villages risks creating continuous urban sprawl and permanently changing the character of our community.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR57	Beverley Bardill.	Policy HA7: Stoney Lane, Spondon	Objects		No	I believe that Policy HA7 – Stoney Lane, Spondon is unsound. The Stoney Lane site has been classified as Grey Belt. This is clearly ridiculous as the site is actively farmed agricultural land and is Green Belt. The site is an important Green Belt area as it prevents urban sprawl beyond the existing boundary of housing between Spondon and Ockbrook. Grey Belt designation is not justified without the council demonstrating that all reasonable brownfield sites have been explored and utilised. Further the designation is not consistent with national policy and contradicts the council's own policy of "brownfield and city centre first". The plan for additional housing in Spondon is not sustainable. The roads are already overloaded, local services such schools, doctors, dentists are already struggling to cope. There is minimal	I request that you deallocate Site HA7 (Stoney Lane Spondon – 400 homes) from the Local Plan.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						sustainable transport infrastructure to support additional housing in this location.		where justified. No change required.
OR56	Michael Bardill	Policy HA7: Stoney Lane, Spondon	Objects		No	I believe that Policy HA7 – Stoney Lane, Spondon is unsound. The Stoney Lane site has been classified as Grey Belt. This is clearly ridiculous as the site is actively farmed agricultural land and is Green Belt. The site is an important Green Belt area as it prevents urban sprawl beyond the existing boundary of housing between Spondon and Ockbrook. Grey Belt designation is not justified without the council demonstrating that all reasonable brownfield sites have been explored and utilised. Further the designation is not consistent with national policy and contradicts the council's own policy of "brownfield and city centre first". The plan for additional housing in Spondon is not	I request that you deallocate Site HA7 (Stoney Lane Spondon – 400 homes) from the Local Plan.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						sustainable. The roads are already overloaded, local services such schools, doctors, dentists are already struggling to cope. There is minimal sustainable transport infrastructure to support additional housing in this location.		links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR58	Nathan Bates	Policy HA7: Stoney Lane, Spondon	Objects		No	FORMAL REPRESENTATION – POLICY HA7, STONEY LANE, SPONDON – PROPOSED 400 HOMES I am writing to formally object to the proposed allocation of approximately 400 homes at Stoney Lane, Spondon. I consider Policy HA7 to be unsound and believe it should not be included in the Local Plan in its current form. My objection is based on the following grounds: 1. The site is Green Belt and active agricultural land The Stoney Lane site is Green Belt land and is currently active agricultural farmland. It is not previously developed land, nor is it simply unused or poor-	The Council should first make proper use of suitable brownfield and regeneration opportunities before sacrificing Green Belt agricultural land at Stoney Lane. I respectfully request that this representation is formally recorded against Policy HA7 – Stoney Lane, Spondon – 400 homes and provided to the Planning Inspector as part of the Regulation 19 consultation.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						quality land awaiting redevelopment. I strongly object to the principle of removing this land from the Green Belt and permanently developing productive farmland when there are other potential locations for housing within Derby. Allowing a development of 400 homes in this location would represent a significant expansion of the built-up area of Spondon and would cause a permanent loss of open agricultural land. 2. The allocation is NOT JUSTIFIED I do not believe the Council has provided adequate justification for selecting this site. In particular, I object to the apparent categorisation of the land as “Grey Belt” when it is active agricultural land within the Green Belt. A Grey Belt designation should not be treated as an automatic		transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						justification for releasing land for development. The Council should be required to demonstrate clearly why this specific site is necessary and why reasonable alternatives have not been fully utilised first. There are already significant housing opportunities identified on brownfield, regeneration and city-centre sites elsewhere in Derby, including Derby Riverside, the Railway Station Quarter, North Castleward and other city-centre locations. It is difficult to justify sacrificing active agricultural land at Spondon while substantial opportunities for development on previously developed land remain available. 3. The allocation is NOT CONSISTENT WITH NATIONAL PLANNING POLICY I also consider Policy HA7 to be inconsistent with national planning policy. National planning policy places importance on protecting Green		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Belt land, preventing unnecessary urban sprawl and making effective use of suitable previously developed land. The Council should therefore demonstrate that the release of this Green Belt agricultural land is genuinely necessary and that reasonable alternatives have been properly considered before proceeding with such a significant development. Simply classifying the site as Grey Belt does not, in my view, remove the need for that justification. 4. Serious concerns regarding the impact on Spondon. A development of 400 additional homes would have a substantial impact on the local area. There are already pressures on local roads and infrastructure, and I have serious concerns about the additional demand this development would place on traffic, drainage, schools, healthcare, utilities and other local services.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						These are not minor considerations. A development of this scale would have a lasting effect on Spondon and its surrounding area. I therefore strongly urge the Council to reconsider this allocation rather than treating the development of this site as an acceptable solution simply because housing is required. My position is clear: Policy HA7 is not justified, is not consistent with national planning policy, and should not proceed in its current form.		
OR59	Lisa Battelle	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to object to **Policy HA7 – Stoney Lane, Spondon – proposed allocation of 400 homes**, and consider the policy to be **unsound**, particularly on the grounds that it is **not justified** and **not consistent with national policy**. I fully recognise that Derby, like the rest of the country, needs more housing, and I don't believe that Green Belt land should automatically be considered completely	I would therefore ask that **Policy HA7 is removed from the Local Plan and the proposed 400 homes are accommodated through suitable brownfield, previously developed and regeneration sites before active Green Belt farmland is considered for release.**	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						untouchable where there is a genuine need and no reasonable alternative. However, I find the proposed development of Stoney Lane very difficult to justify when the site is **active agricultural farmland** and there are significant opportunities for housing on brownfield and previously developed land elsewhere in Derby. My particular concern is the continued outward expansion of Spondon. A development of 400 homes on this site would contribute significantly to urban sprawl and further erode the distinction and identity of Spondon as a village. Once active farmland at the edge of the village is developed, that change is permanent, and it inevitably creates further pressure for development beyond it in future. I am also concerned by the classification of this site as “Grey Belt”. This is active		up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. The loss of agricultural land has been weighed in the Sustainability Appraisal, and Policy HA7 requires a high-quality design with landscape and green infrastructure buffers to the countryside and to existing homes (criteria b, c and e). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						farmland which currently provides a clear physical break from further urban expansion. I do not believe a convincing case has been made for why this land should be released before reasonable brownfield and regeneration alternatives have been fully explored and prioritised. The Local Plan itself identifies substantial housing opportunities at Derby Riverside, Railway Station Quarter, North Castleward and other city-centre mixed-use sites. In that context, allocating active farmland at Stoney Lane appears particularly difficult to reconcile with a stated "brownfield and city centre first" approach. This isn't an objection to new housing simply because I don't want houses built near where I live. Derby needs homes and those homes have to go somewhere. My objection is to the choice of **this particular land** when there appear to be		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						numerous alternatives which would provide much-needed housing without contributing to the outward sprawl of Spondon or permanently removing productive agricultural land.		
OR60	Katherine Bambridge	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to specifically comment on the plan (HA7 Stoney Lane) in relation to proposed downgrading of the land adjacent to Stoney Lane in Spondon which is currently Greenbelt and which under the local plan will be redesignated as Greybelt. This land is currently actively farmed land which provides a clear buffer between housing areas. It provides a valuable wildlife corridor beside the very busy A52 corridor between Derby, the M1, and Nottingham. If developed this land would further increase the already congested roads of Spondon, and provide increased pressure on local services such as schools, doctors etc.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Cumulative effects, including with development in Erewash, will be assessed with the Highway Authority

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The access to this development could only be on the current slip road to the A52 which is already very busy. In my view this would be both dangerous and cause considerable congestion on the surrounding roads. Spondon is already providing new housing through the developments at Royal Hill Road (also on Greenbelt) and the Erewash development at Spondon Wood. This proposal would make a third and considerably larger development to be absorbed into infrastructure already under strain.		and National Highways as paragraph 307 requires, and Policy HA7 secures contributions to education and transport infrastructure (criteria h and i). No change required.
OR61	George and Tina Bennett	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a local resident to make a formal representation regarding Policy HA7 of the emerging Derby Local Plan 2023-2043 and the proposed allocation of land at Stoney Lane, Spondon for a minimum of 400 homes. I strongly object to the inclusion of this site in the Local Plan and consider the proposed		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						allocation to be unsound. In particular, I do not consider that the allocation has been sufficiently justified by the evidence currently available, and I have concerns regarding its consistency with national planning policy and the Council's stated approach to brownfield and city-centre development. 1. The justification for releasing this Green Belt land requires further evidence The proposed development would result in the loss of open agricultural land on the eastern edge of Spondon and would represent a significant expansion of the built-up area. The Council's classification of the site as "Grey Belt" should be supported by clear and robust evidence demonstrating that the land meets the relevant national definition and that its contribution to the purposes of the Green Belt has been properly assessed.		alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The fact that land is capable of being developed should not, in itself, be sufficient justification for its release. The Council should clearly demonstrate why this particular site is suitable and necessary for development and why its release represents an appropriate planning strategy for Derby. I therefore consider that the Council has not yet demonstrated sufficiently that the allocation is justified. 2. Reasonable brownfield and regeneration alternatives should be properly demonstrated The Local Plan identifies substantial opportunities for housing on previously developed and regeneration sites elsewhere in Derby, including major city-centre and brownfield locations.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Council should demonstrate clearly why these opportunities cannot make a greater contribution towards meeting the housing requirement before releasing additional open agricultural land around Spondon. I am not suggesting that every brownfield site must be developed before any Green Belt land can ever be considered. However, national policy places significant emphasis on making effective use of suitable previously developed land and other appropriate opportunities. The evidence base should therefore explain why allocating HA7 is necessary when substantial regeneration opportunities remain available. This is particularly important given the Council's stated commitment to a "brownfield and City Centre first" approach.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						3. Cumulative highway and transport impacts on Spondon I have serious concerns about the cumulative effect that this development would have on the local highway network. The issue should not be considered simply as the traffic generated by 400 houses in isolation. The Council should assess the cumulative impact of HA7 alongside other existing, committed and proposed development in and around Spondon and the surrounding area. Particular consideration should be given to the capacity and operation of the A52 and its junctions, Stoney Lane, Dale Road, Derby Road, Lacko Road and the wider surrounding highway network. 1 The Council should also demonstrate that safe and attractive pedestrian and cycle connections, public transport		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						provision and emergency access can be delivered alongside the development. I would ask that the Local Plan Inspector requires the Council to provide clear evidence that the cumulative transport impacts can be satisfactorily mitigated rather than relying solely on measures which may be secured at a later planning application stage. 4. Pressure on local infrastructure and services , A development of at least 400 additional homes would inevitably place additional demand on local services and infrastructure. I am concerned about the capacity of local primary and secondary schools, GP and healthcare services, dental provision, drainage and sewerage infrastructure, public transport, roads, footpaths, recreational facilities and other community infrastructure.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The draft policy itself recognises the need for contributions and improvements relating to education, transport and drainage. The Council should therefore demonstrate that the required infrastructure can be delivered at the appropriate time and will be sufficient to accommodate the additional population. It is not enough for infrastructure requirements to be identified in principle. There should be clear evidence that the necessary infrastructure is deliverable, properly funded and capable of being provided. in step with the occupation of new homes. 5. Impact on the character and setting of Spondon I The proposed allocation would represent a substantial change to the eastern edge of Spondon.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						i The site currently forms part of the open agricultural landscape surrounding the settlement. Developing a minimum of 400 homes would urbanise this area and materially alter the relationship between Spondon and the surrounding countryside. The assessment should properly consider landscape character, visual impact, views towards and from the site, the rural setting of Spondon, recreational routes and the cumulative effect of further development on the identity and character of the settlement. I am concerned that continued expansion around Spondon risks gradually changing the character of the area from a distinct established settlement with a countryside setting into a much larger continuous urbanised area. 6. Loss of productive agricultural land		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The proposed development would result in the permanent loss of agricultural land. The Council should clearly identify the agricultural land classification of the site and explain how the loss of productive agricultural land has been considered in the planning balance. Whilst I recognise that agricultural land is not automatically protected from development, the loss of productive farmland should be properly justified where alternative development opportunities exist elsewhere within the City. 7. Overall soundness of Policy HA? Taking these matters together, I do not consider that the allocation of HA? has been sufficiently justified. The Council should demonstrate, with		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						robust and transparent evidence: • why the site is appropriately classified for release from the Green Belt; • why the site is necessary when reasonable brownfield and regeneration opportunities remain; • how the cumulative transport impacts on Spondon and the surrounding highway network will be addressed; • how education, healthcare, drainage, sewerage, public transport and other infrastructure capacity will be provided; • how the landscape and character of Spondon will be protected; and • why this location represents a more appropriate and sustainable solution than alternative locations.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						8. Requested modification For the reasons set out above, I request that Policy HA? - Stoney Lane, Spondon is deleted from the Local Plan. . iIfthe Council considers that the allocation should remain, I request that the evidence supporting the allocation is substantially strengthened before the plan is submitted for examination, including clear evidence addressing the Grey Belt assessment, reasonable alternatives, cumulative transport impacts, infrastructure capacity, landscape and settlement character, and agricultural land. In my view, the current allocation does not provide sufficient justification for the loss of this open agricultural land and the further expansion of Spondon. Conclusion		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I fully recognise the need for Derby to provide new housing and support the principle of sustainable development in appropriate locations. My objection is not to housing in principle; it is to the selection of, this particular site and whether the evidence demonstrates that it is the right location when the wider needs and opportunities of Derby are considered. I respectfully ask Derby City Council and, if necessary, the appointed Planning Inspector to give careful consideration to the issues raised in this representation and to conclude that Policy HA7 should not form part of the adopted Local Plan.		
OR62	Michael Bennett	Policy HA7: Stoney Lane, Spondon	Objects		No	1 this is UNSOUND as it is unjustified 2 it will put pressure on local infrastructure school roads drainage 3 the allocation of 400 homes is UNSOUND		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025)

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.
OR63	Aaron Betesta	Policy HA7: Stoney Lane, Spondon	Objects		No	HA7 (Stoney Lane) is an unsound housing project. All reasonable brownfield alternati ve sites have not been optimised.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						It is currently active farmland, being used for agriculture, and the use of the term 'grey belt' is being used incorrectly. I believe the council should relocate these 400 houses into brownfield and city centre projects, like Policy CC4, CC11, CC13, CC14, following the brownfield and city centre first policy.		and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. The loss of agricultural land has been weighed in the Sustainability Appraisal, and Policy HA7 requires a high-quality design with landscape and green infrastructure buffers to the countryside and to existing homes (criteria b, c and e). No change required.
OR64	Beth Betesta	Policy HA7: Stoney Lane, Spondon	Objects		No	HA7 (Stoney Lane) is, in my view, an inappropriate and unsustainable housing site. There are reasonable brownfield alternatives available that have not yet been fully explored or optimised.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The site is currently active agricultural land and is in productive use for farming. I therefore believe that describing it as part of the "grey belt" is inappropriate and does not accurately reflect its existing use. The council should instead seek to accommodate the proposed 400 homes through suitable brownfield and city-centre development opportunities, including sites identified under Policies CC4, CC11, CC13 and CC14. This would be more consistent with the principle of a brownfield-first and city-centre-first approach to housing delivery. I therefore believe that the allocation of HA7 (Stoney Lane) should be reconsidered, with greater priority given to the optimisation and delivery of suitable brownfield and city-centre sites before productive agricultural land is released for development.		and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. The loss of agricultural land has been weighed in the Sustainability Appraisal, and Policy HA7 requires a high-quality design with landscape and green infrastructure buffers to the countryside and to existing homes (criteria b, c and e). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR65	Wayne Birch	Policy HA7: Stoney Lane, Spondon	Objects		No	Afternoon I have just received a letter advising of the above plans I part own a house at [redacted] spondon . Im totally against this idea as I fell there is enough houses in the local ares which are stretch to the limit with local services plus I can have a excellent guess who these properties are being bult for and who will be housed there so would like to register a massive no if favour of this project .		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. The loss of agricultural land has been weighed in the Sustainability Appraisal, and Policy HA7 requires a high-quality design with landscape and green infrastructure buffers to the countryside and to existing homes (criteria b, c and e). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR66	Nicole Birtwhistle	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally object to the proposed allocation of land off [redacted], Spondon, under Policy HA7 of the emerging Derby Local Plan for approximately 400 new homes. I am a resident of Spondon, on Stoney Lane and I believe this allocation is unsound and should be removed from the Plan before it is submitted to the Secretary of State for independent examination. My objection relates specifically to Policy HA7 - Stoney Lane, Spondon - 400 homes, and is made on the following grounds. 1. THE POLICY IS NOT JUSTIFIED The Stoney Lane site is a large area of active, productive agricultural land. It has been classified in the Plan as "Green Belt" in name only, on the basis that it is previously developed or poor-quality land. This is not an accurate description of the site. In reality the land is actively farmed, contributes to food production, and performs an important Green Belt	I request that the Local Plan be modified to remove Site HA7 (Stoney Lane, Spondon - 400 homes) from the housing allocations. I consider that this allocation is not justified and is not consistent with national policy, given that reasonable brownfield and city-centre alternatives are available under Policies CC4, CC11, CC13 and CC14, in accordance with the Plan's own stated "brownfield and city centre first" strategy. I further consider that the Plan does not demonstrate that local infrastructure, including GP surgeries, school places, and the road network, has the capacity to support this level of	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Cumulative effects, including with development in Erewash, will be assessed with the Highway Authority and National Highways as paragraph 307 requires, and Policy HA7 secures contributions to

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						function by checking the unrestricted sprawl of Derby and preventing the merging of Spondon with neighbouring settlements. Removing this land from the Green Belt for housing is not justified when the Plan itself identifies substantial alternative capacity on previously developed, brownfield land elsewhere in the city, including: - Derby Riverside (Policy CC11) - around 600 homes - Railway Station Quarter (Policy CC13) - around 500 homes - North Castleward (Policy CC14) - around 400 homes - City Centre Mixed-Use Sites (Policy CC4) - over 1,400 homes Given this level of brownfield capacity already identified within the Plan, releasing active Green Belt farmland at Stoney Lane cannot be considered the most appropriate option when tested against reasonable alternatives, and the evidence base does not demonstrate why	additional development. I would be grateful if this representation could be formally recorded against Policy HA7 as part of the Regulation 19 consultation, and I look forward to confirmation that it has been received.	education and transport infrastructure (criteria h and i). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						greenfield release is necessary ahead of these sites. 2. THE POLICY IS NOT CONSISTENT WITH NATIONAL POLICY National planning policy is clear that Green Belt boundaries should only be altered in exceptional circumstances, and that authorities should give first priority to brownfield and previously developed land, followed by under-used or under-utilised land, before greenfield and Green Belt sites are considered. Allocating active agricultural land for development ahead of the brownfield sites listed above conflicts with this "brownfield and city centre first" approach, which the Plan itself states as an objective (I note this is discussed at Paragraph 81 of the Plan). Allocating Site HA7 therefore appears internally inconsistent with the Council's own stated strategy, as well as with national policy.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						3. IMPACT ON LOCAL INFRASTRUCTURE AND SERVICES Beyond the Green Belt and brownfield-first arguments, I am also very concerned about the impact of 400 additional homes on infrastructure and services in Spondon, which are already under significant pressure: - GP and healthcare capacity: Spondon's GP surgeries are already operating at, or beyond, capacity, with long waits for routine appointments. The Plan does not demonstrate that local primary care provision has the capacity to absorb the additional population this development would bring, nor is there a clear, funded commitment to expand GP capacity in step with new housing. - School places: Local primary and secondary schools serving Spondon are already under pressure for places. An additional 400 homes could reasonably be expected to		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						generate a significant number of school-age children, and I have seen no robust evidence in the Plan that sufficient school capacity exists, or is funded and deliverable, to accommodate this. - Roads, traffic and drainage: Stoney Lane and the surrounding local road network are not designed for the volume of additional traffic this development would generate. There are already existing pressures on local roads, drainage and wider infrastructure. The route onto and from the A52 at the bottom of Stoney Lane are already poorly managed and a high-risk trap. Furthermore, the development that has begun on Dale road leading out of Spondon is underway and similar considerations have not been given for the impact of this development on the local area. This would be significantly impacted and the Plan does not adequately evidence how these would be mitigated.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						- Cumulative impact: These infrastructure pressures should be considered cumulatively alongside other housing growth already planned for Spondon and the surrounding area, rather than assessed in isolation for this site alone. For these reasons, I do not consider the Plan to be "sound" in respect of Site HA7, as it fails the tests of soundness relating to being justified, effective, and consistent with national policy.		
OR55	Claire Blackmore	Policy HA7: Stoney Lane, Spondon	Objects		No	I believe the policy HA7 I'd unsound as the land is green belt not grey belt. It is not justified-The council has incorrectly categorised active agricultural farm land as grey belt, without demonstrating that all reasonable brownfield alternatives have been fully considered. Not constant with national policy - Allocating active agricultural farmland for development conflicts with the	I request this specific modification. Relocate site HA7 Stoney Lane, Spondon -400 homes from the local plan. It is unsound as it fails the 'justified' and 'consistent with national policy' tests by misclassifiying active farmland, from greenbelt to greybelt without demonstrating that alternative	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						principles of national planning policy. It also appears to directly contradict the councils own commitment to a 'brownfield and city centre first' strategy. Set out in paragraph 81 of the plan. There are alternative brownfield sites: These have been identified as: Derby Riverside- CC11 Railway station quarter- CC13 North Castleward - CC14 City centre mixed-use sites - CC4 These allocations demonstrate that there are substantial opportunities for housing on previously developed sites rather than developing active greenbelt land in Spondon. I woukd also like to highlight the following points. This is active farmland. I have been walking there with my dogs for over 3 years and ut has always been used to grow crops. The development will contribute to urban sprawl.	brownfield have been fully explored. The council should relocate These 400 homes to one of the identified brownfield sites listed above in accordance with councils strategy- paragraph 81.	as explained in the Housing Requirement and Spatial Strategy Topic Paper. The loss of agricultural land has been weighed in the Sustainability Appraisal, and Policy HA7 requires a high-quality design with landscape and green infrastructure buffers to the countryside and to existing homes (criteria b, c and e). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						There are already significant pressures on local infrastructure. I have to wait weeks for a gp appointment. I have been on the waiting list for an NHS dentist in Spondon for over 3 years! The council has substantial brownfield sites which should be developed before considering active farmland. The land supports a wealth if wildlife and insects...which are in decline due to loss of habitat. There is already significant development just a little further up on Dale Road. The main road is already very busy and dangerous to cross, without adding more cars!		
OR67	Mr Brian & Mrs Julia Bonner	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally object to Policy HA7 and the proposal to build approximately 400 additional homes on land which was previously designated as Green Belt and is now being considered as “grey belt” land.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025)

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I believe that Policy HA7 is unsound and should be reconsidered, particularly when the cumulative number of homes already planned or under construction across the local area is taken into account. I fully understand the need for appropriate housing provision. However, there must also be consideration of whether the local area has the roads, infrastructure, schools, healthcare services and other facilities necessary to support such a significant increase in population. In my view, the cumulative level of development being proposed is simply too much for the area to absorb. Highway Safety and HGV Traffic The existing roads through our village are already narrow and unsuitable for the level of heavy traffic they are currently experiencing. HGVs are already regularly travelling through our narrow		found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						village streets, creating a significant concern for residents, pedestrians and other road users. A particularly serious incident occurred only around two years ago, when an HGV travelling through the village suffered a tyre blowout. The force of the incident was so severe that two shop windows were blown out. Fortunately, nobody happened to be walking directly in front of the shops at the time. Had there been pedestrians outside the shops, the consequences could have been extremely serious. This incident demonstrates the very real safety issues that already exist on our roads. Adding approximately 400 more homes would inevitably increase vehicle movements and put even greater pressure on an already inadequate road network.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						It is not reasonable to assume that the existing roads can simply absorb this additional traffic without significant consequences for road safety, congestion and the quality of life of local residents. The Cumulative Impact of Housing Development The proposed 400 homes under Policy HA7 cannot be considered in isolation. There are already substantial housing developments either being constructed, planned or allocated within the surrounding area. These include: • Approximately 400 homes at Deer Park, Spondon, which are already being built. • Approximately 600 homes under Policy CC11. • A further approximately 500 homes associated with		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the railway station under Policy CC13. • Approximately 400 homes at North Castleward under Policy CC14. • More than 1,400 homes through city-centre mixed-use sites under Policy CC4. • A further approximately 400 homes proposed under Policy HA7. Taken together, these developments represent thousands of additional homes and therefore thousands of additional residents and vehicle movements. The impact of this cumulative development must be properly considered. It is not sufficient to assess Policy HA7 as though it were the only development taking place in the area. We do not need more housing at the expense of the ability of the existing community to function safely and effectively.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						There must be a point at which the cumulative impact on infrastructure and local services is recognised. Schools Local schools are already under pressure, and there are serious concerns about whether they have the capacity to accommodate the children who would come from these additional developments. The proposed housing numbers cannot be looked at simply as figures on a planning document. Approximately 400 additional homes could mean a substantial number of additional children requiring school places. Where will these children go? If existing schools are already struggling to accommodate demand, the Council must provide clear evidence of where the additional school places will be created and how they will be funded and delivered.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						GP and Dental Services Healthcare services are also already under considerable pressure. Residents can already struggle to obtain GP appointments, and accessing NHS dental services is becoming increasingly difficult. Adding hundreds, and potentially thousands, of additional households across the various developments will inevitably increase demand for these services. Where is the additional capacity going to come from? It is not acceptable to continue adding housing without ensuring that the essential services required by those residents are capable of meeting the increased demand. Infrastructure The same concerns apply to the wider infrastructure of the area. There must be sufficient capacity for:		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						• Roads and highways • Drainage and sewage • Water supply • Electricity • Waste collection • Public transport • Schools • GP and dental services • Emergency services The existing infrastructure is already under pressure. Adding thousands of additional homes across the area will only intensify these problems. Grey Belt Does Not Automatically Mean Suitable for Development The fact that land has now been classified as “grey belt” should not be treated as an automatic justification for development. The question must also be whether the land is actually suitable and sustainable for the level of development being proposed. A site may technically meet a particular land classification		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						while still being unsuitable because of inadequate roads, insufficient school capacity, pressure on healthcare services and a lack of supporting infrastructure. Enough Is Enough There has to be proper consideration of the cumulative impact of all these developments on existing residents. Residents should not have to accept increasingly congested and unsafe roads, inadequate infrastructure, overcrowded schools and already overstretched healthcare services simply because additional land has been identified for housing. With approximately 400 homes already being built at Deer Park, Spondon, alongside the significant number of homes identified under Policies CC11, CC13, CC14 and CC4, adding another 400 homes under Policy HA7 would place an		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						unreasonable additional burden on the area. The figures speak for themselves. We already have substantial housing provision planned and under construction. We do not need more development simply for the sake of meeting further housing numbers when the existing infrastructure is already struggling to cope. Conclusion For all of these reasons, I strongly object to Policy HA7 and believe that it is unsound in its current form. The Council should take a step back and consider the cumulative impact of the thousands of homes already planned across the area before allocating yet more land for development. In particular, I ask that the Council properly investigate and address:		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						1. The existing highway safety problems caused by HGVs using narrow village roads. 2. The serious incident involving an HGV tyre blowout and the resulting damage to two shop windows. 3. The additional traffic that would be generated by another 400 homes. 4. The cumulative impact of the 400 homes proposed under HA7 alongside the approximately 400 homes already being built at Deer Park, Spondon. 5. The additional housing proposed under Policies CC11, CC13, CC14 and CC4. 6. The lack of capacity within local schools. 7. The existing difficulties accessing GP and dental appointments. 8. Whether existing utilities, drainage, sewage and other infrastructure can cope with the cumulative level of development. 9. Whether the proposed development is genuinely sustainable in practical terms,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						rather than simply being considered suitable because the land has been classified as “grey belt”. Our village and surrounding communities already have to cope with significant pressures on roads and services. Adding another 400 homes on top of the extensive development already planned is unreasonable and disproportionate. For these reasons, I respectfully request that Policy HA7 is removed, rejected or substantially reconsidered, and that no further housing allocation is made until the existing infrastructure and cumulative development pressures have been properly addressed. We do not need more. We need the infrastructure and services we already have to be able to cope with the development that has already been approved or planned		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR68	Freya Bradley	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to make an individual representation objecting to the proposed allocation of land off Stoney Lane, Spondon, identified as Policy HA7 - Stoney Lane - 400 homes in the emerging Derby Local Plan. I consider Policy HA7 to be unsound and request that the allocation is reconsidered and removed from the Local Plan. **The allocation is not justified** The proposed development would involve the loss of active agricultural land on the edge of Spondon. I do not consider it adequately demonstrated that the exceptional circumstances necessary to justify the development of this land have been established. The proposed site is not simply an area of previously developed or poor quality land. Its current agricultural use provides an important open space function and contributes to maintaining the separation and character of Spondon. The building of 400 homes would blur the boundary	I therefore request that Policy HA7 is removed from the emerging Local Plan and that the Council reallocates this into existing brownfield and city centre regeneration allocations.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						lines between Spondon and Ockbrook and ruin Spondon's individual character and community. The Council should clearly demonstrate why this particular site is required and why reasonable alternatives cannot meet the housing requirement before allocating this land for 400 homes. **The Green Belt issue** The Green Belt issues requires proper consideration, the consultation material describes the site as "Grey Belt", however, I am concerned that this designation should not automatically be treated as sufficient justification for allocating the site for development. The fact that land may fall within a particular Green Belt category does not remove the need for the Council to properly consider its actual characteristics, its existing agricultural use, its contribution to preventing urban sprawl and the consequences of releasing it for development. The Council		3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						should provide clear evidence to demonstrate why this site is suitable and necessary for housing rather than relying on its categorisation. **Loss of agricultural land is a significant concern** The development of 400 homes would permanently remove agricultural land from productive use. At a time when there are substantial pressures on land, food production and the environment then the Council should consider whether allowing active farmland to be developed is in the best interests of residents and the environment. **Brownfield and regeneration alternatives should be prioritised** I am concerned that the allocation of HA7 is unnecessary given the other housing opportunities identified within the emerging Local Plan. The consultation material itself identifies substantial capacity on previously developed and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						regeneration sites including: Derby Riverside (Policy CC11) - 600 Homes, Railway Station Quarter (Policy CC13) - 500 homes, North Castleward (Policy CC14) - 400 homes and City Centre mixed use sites (Policy CC4) - 1,400 homes. This represents a substantial amount of potential housing capacity without having to release active agricultural land on the edge of Spondon. The Council should demonstrate why these brownfield and regeneration opportunities cannot reasonably be brought forward or accelerated before allocating additional greenfield agricultural land. It appears that there is conflict with the Council's principle of brownfield development first and it is difficult to justify the permanent loss of active farmland unless the Council can demonstrate a clear and compelling need for this allocation. **Impact on Spondon**		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The development of 400 homes would have a significant and detrimental impact on the character and setting of Spondon. The Council should fully assess the cumulative consequences for local roads and traffic, schools and community facilities, GPs and healthcare, drainage and flood risk, landscape character, biodiversity and wildlife and the existing relationship between Spondon and the surrounding countryside. Spondon already has a shortage of significant infrastructure - roads to get in/out of Spondon are highly trafficked, drainage and flooding is an issue (so removing agricultural land would add to this problem), there is a shortage of GPs and schools already and an additional 400 homes with no plans for further local infrastructure would be disastrous and ruin the community. The proposed main access to the site is also from a high speed road and would be dangerous. The agricultural land is home to a high level of		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						wildlife and used by the community to walk their dogs, cross between Spondon and Ockbrook and the Council must justify the impacts on the environment before committing through the Local Plan. For the reasons above, I consider Policy HA7 - Stoney Lane, Spondon to be unsound. In particular, the allocation is not justified because the Council has not demonstrated that the release of active agricultural land is necessary when substantial brownfield and regeneration opportunities are available and is not consistent with national planning policy because the Council should properly demonstrate the need for releasing this land and give appropriate consideration to previously developed and alternative sites before allocating productive agricultural land for development.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR70	Anne and George Brownhill	Policy HA7: Stoney Lane, Spondon	Objects		No	My husband and I have become aware of plans to build 400 homes on the Green Belt land which has mysteriously become Grey Belt land. How can this happen? This land is agricultural land. Does the council have the power to decide changes to land status? It seems that building companies can put in an application to build and “hay presto” the land has gone from one status to another over-night. National policy is being ignored. Council commitment to build on Brownfield alternatives are available. For example, city mixed sites Policy CC4 over 1400 homes, Railway Station Quarter Policy CC13 500 homes, North Castle Ward Policy CC14 400 homes, Derby Riverside Policy CC11 600 homes. What aren’t these being used? Spondon already has problems with schools, dentists, doctors etc. without adding to it unnecessarily.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Please reconsider your decision. The village is already exceedingly more busy with the new development on Dale Road and Spondon is under a lot of strain. PLEASE KEEP OUR GREEN BELT SAFE!!		3 within the site. No change required.
OR72	Daniel Burgess	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to raise an objection to Policy HA7 - building 400 houses near Stoney Lane, Spondon and believe that the site should be deallocated from the Local Plan. Policy HA7 is unsound as it misclassifies the green belt farmland as grey belt. It will also add significant pressures to local infrastructure such as roads and school capacity. The council has substantial brownfield and city centre housing opportunities (such as policies CC4, CC11, CC13 and CC14) which should be prioritised before releasing green belt farmland for development.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.
OR74	Joanne Carr	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a resident of Spondon to formally object to the proposed allocation of land east of Stoney Lane, Spondon, under Policy HA7, for a minimum of 400 homes. I consider the allocation to be UNSOUND, specifically on the grounds that it is not justified and is not consistent with national planning policy. I fully recognise that Derby needs to plan for additional housing and that the Council has a responsibility to identify sufficient land to meet its housing requirements. However, that does not mean that every potential	I therefore respectfully request that the Council deallocate Site HA7 – Stoney Lane, Spondon – from the Local Plan. The minimum 400 dwellings should instead be reconsidered as part of the Council's existing brownfield and regeneration opportunities, including the allocations identified under Policy CC4, Policy CC11, Policy CC13 and Policy	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						development site is appropriate, nor does it remove the requirement for the Council to demonstrate that individual allocations are properly justified, deliverable and consistent with the overall strategy of the Local Plan. In my view, Policy HA7 fails that test. 1. The principle and scale of the allocation The proposal is not for a small, incremental addition to Spondon. It is for a minimum of 400 homes and is explicitly described within Policy HA7 as an “eastern urban extension to the suburb of Spondon.” This would represent a substantial physical expansion of Spondon and would permanently change the character and setting of the eastern side of the village. The existing farmland and open countryside around Stoney Lane provide an important transition between the built-up area and	CC14, where appropriate and subject to their individual capacity and deliverability. If the Council nevertheless intends to retain HA7, I request that the evidence base is strengthened before submission to demonstrate conclusively: 1. why this site is required; 2. why reasonable brownfield alternatives cannot accommodate the proposed housing; 3. the basis for its Grey Belt classification; 4. how existing highway capacity can accommodate the development;	contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the wider countryside. Replacing this landscape with a development of at least 400 homes would constitute a significant change to the settlement and should only be supported where there is compelling evidence that this is the most appropriate and sustainable location for that growth. I do not believe that the Council has demonstrated this sufficiently. 2. The treatment of the site as "Grey Belt" I am particularly concerned by the Council's treatment of this site in relation to the emerging Grey Belt approach. This is active agricultural farmland, rather than previously developed urban land. It is not a brownfield site or an obvious example of land that has become degraded through previous development. The Council should therefore provide a particularly robust	5. how education and healthcare provision will be expanded; 6. how surface-water and drainage risks will be mitigated; and 7. how the development can take place without unacceptable harm to the character, landscape and quality of life of Spondon. This is not an objection to housing in principle. It is an objection to this particular allocation, at this particular scale, in this particular location, where I do not believe the Council has demonstrated that it is the most appropriate or sustainable option available.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						justification for why this land is considered appropriate for release and why development here represents a better planning outcome than retaining the land in its current use. The fact that land may now fall within a revised Green Belt/Grey Belt classification should not, in itself, be treated as justification for development. The underlying planning merits of the location still need to be demonstrated. 3. Failure to demonstrate that reasonable brownfield alternatives have been fully optimised This is one of my principal concerns. The Council's own Local Plan strategy places significant emphasis on directing development towards previously developed land and city-centre regeneration. Yet the Council is simultaneously		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						proposing the release of open agricultural land on the edge of Spondon for a major housing extension. There are already significant brownfield and regeneration opportunities identified within the Local Plan, including: * Policy CC11 – Derby Riverside * Policy CC13 – Railway Station Quarter * Policy CC14 – North Castleward * Policy CC4 – City Centre Mixed-Use Sites These allocations collectively represent substantial housing opportunities. I therefore believe the Council needs to demonstrate much more clearly why the additional 400 homes proposed under HA7 cannot instead be accommodated, wholly or partly, through existing brownfield and regeneration opportunities.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Unless the Council can demonstrate that reasonable previously developed land opportunities have been fully considered and optimised, the selection of HA7 is not adequately justified. 4. Transport and existing congestion The transport implications are particularly concerning. Spondon already experiences significant congestion, particularly during peak periods. Getting through the village and accessing the A52 and wider road network can already be extremely difficult at busy times. This is not a theoretical concern for residents. It is an everyday issue. Adding a minimum of 400 homes will inevitably generate additional vehicle movements, including commuting, school journeys, deliveries and access to local services.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Indeed, Policy HA7 itself requires financial contributions towards transport improvements to mitigate the highway impacts of the development. This demonstrates that the Council itself anticipates material highway impacts arising from the allocation. I am concerned that simply requiring future financial contributions does not establish that the local road network has sufficient capacity to accommodate the development, nor does it demonstrate that the necessary improvements can be delivered effectively and at the appropriate time. The Council should therefore provide clear evidence that the cumulative transport impacts of HA7 have been properly assessed and that suitable infrastructure can be delivered before the development places unacceptable additional		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						pressure on Spondon's road network. 5. Pressure on schools, healthcare and community infrastructure The same concern applies to other local services. Residents already experience significant pressure when accessing local services, including difficulty obtaining timely GP appointments. Schools and other community facilities also have finite capacity. A development of at least 400 homes could result in a substantial increase in the number of residents requiring access to education, healthcare, public transport, recreational facilities and other community services. Again, Policy HA7 itself acknowledges this issue by requiring financial contributions towards improved education infrastructure.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Council therefore needs to demonstrate not merely that contributions can theoretically be collected, but that adequate additional infrastructure will actually be available, funded and delivered alongside the housing. 6. Drainage and surface water I also have concerns regarding drainage and surface water. The proposed development would urbanise a substantial area of currently undeveloped land. Increasing hardstanding and built development inevitably changes surface-water run-off and drainage requirements. It is notable that Policy HA7 specifically requires a "comprehensive surface water drainage solution". This should not simply be treated as a matter to resolve at a later planning application stage. At Local Plan allocation stage, the Council needs to have sufficient evidence to demonstrate that the site can		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						be developed sustainably and without creating unacceptable consequences for existing residents. 7. Loss of open countryside and impact on Spondon's character The land around Stoney Lane is valued by residents for walking, recreation and access to the countryside. These fields are not simply undeveloped land awaiting an alternative use. They contribute to the character and setting of Spondon and provide residents with access to open space and the wider countryside. The Council's own Local Plan consultation material recognises the importance residents place on open spaces, including their contribution to health, wellbeing and nature conservation. The permanent transformation of this landscape into a large residential development should therefore only occur where		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						there is a clear and compelling planning justification. 8. The allocation must be considered against the overall strategy I am not arguing that Derby should not build new homes. My objection is that where those homes are built matters. The Council has identified a strategy that places importance on regeneration, previously developed land and city-centre opportunities. It should therefore be demonstrated that the release of open agricultural land at Stoney Lane is genuinely necessary and represents the most appropriate option when considered against reasonable alternatives. I do not believe the evidence currently demonstrates this sufficiently. 9. Conclusion – Policy HA7 is unsound		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						For the reasons set out above, I consider Policy HA7 – Stoney Lane, Spondon to be UNSOUND. In particular, I consider it: Not Justified, because the Council has not adequately demonstrated that: * the allocation of this particular site is the most appropriate option when reasonable alternatives are considered; * the release of active agricultural land is necessary; * brownfield and city-centre opportunities have been sufficiently optimised before allocating this site; * the significant transport, education, healthcare and drainage implications can be satisfactorily addressed; and * the scale of the proposed eastern urban extension is appropriate for Spondon. I also consider the allocation: Not Consistent with National Planning Policy, particularly given the need to make effective use of previously developed land, promote		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						sustainable patterns of development, protect valued landscapes and ensure that development is supported by the necessary infrastructure.		
OR73	Callan Camp	Policy HA7: Stoney Lane, Spondon	Objects		No	I am emailing you in protest of the proposal of a 400 home development earmarked off Stoney Lane in Spondon, Derby. This is Farm land, crucial and integral to the community of Spondon and in the local biome for the area. You have stated it is Grey Belt land, which is total nonsense! It is a active farm and includes natural corridors for wildlife. To remove this would be an absolute tragedy. Not to mention the carbon capture this area gives in an already high traffic area! Why can this site not be included in the City Centre first strategy for Derby City? There are multiple brownfield sites across the city that are yet to be utilised, why remove what little natural space we have. Can I remind you that Spondon has already had its fair share of development with The Dial site		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. The loss of agricultural land has been weighed in the Sustainability Appraisal, and Policy HA7 requires a high-quality design with landscape and green

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						on Nottingham Road and the site under construction at the top of Dale Road leading to Kirk Hallam. Leave our village alone now!		infrastructure buffers to the countryside and to existing homes (criteria b, c and e). No change required.
OR262	Barbara Cauldwell	Policy HA7: Stoney Lane, Spondon	Objects		No	I write to formally voice concern and register an objection to the proposed development of 400 new homes on active Greenbelt farmland off Stoney Lane, Spondon which in the Derby City Council's emerging Local Plan for Derby identifies as Policy HA7. A concern is Derby City Council's unsound justification to re-classify an area of Green Belt farmland identified in Policy HA7 to "Grey Belt" status even though the farmland is active and productive. As a resident of [redacted] since 1974, I have witnessed the area of farmland outlined in Policy HA7 in use throughout those years as arable farmland growing and harvesting cereal crops, oil seed crops, planting of wild seed mix as well as producing quantities of hay and straw bales. An area of the		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						farmland near the A52 currently supports grazing Livestock. The land between Spondon and Ockbrook has had the protection of Green Belt status for decades with well established protected Public Rights of Way between Spondon and Ockbrook. Policy HA7 should be removed from the Local Plan. The inclusion of this site is **UNSOUND** as it is **not** "Justified and Consistent" with National Policy tests by categorizing active productive Green Belt farmland as "Grey Belt" particularly while there are Brownfield sites across the City of Derby having been identified by Derby City Council for re-generation. The number of homes proposed within Policy HA7 could be re-allocated into the existing Brownfield and City Centre-re-generation sites which are identified under Policy CC4 (City Centre), Policy CC11 (Derby		drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Riverside), Policy CC13 (Railway Station Quarter) and Policy CC14 (North Castleward). It is hoped the City Council's future planning decision will focus on protecting our countryside environment for future generations while making better use of Brownfield sites to re-generate the City of Derby: I wish the following to be considered in support of the objection to Policy HA7: The Regional Mayor's support for the use of Brownfield sites to re-generate the City Centre, recognising the value of existing infrastructure and community connections available by using these sites. The Homes proposed on the active Green Belt farmland in Policy HA7 are in contradiction of Derby City Council's "Brownfield and City Centre First"strategy.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Labour government's recognition of the importance of farmland for the protection of our economy, our society and environment, and farming's importance to Critical National Infrastructure (Defra - Press Release June 2026) There is long-term value in retaining the Green Belt status to cover the whole of the current area between to the East of Spondon and Ockbrook for the well being of Spondon and Ockbrook residents whose lives will be impacted by any development on this land but also to safeguard the landscape, and its environmental importance. I submit this letter as an objection to the inclusion of Policy HA7 under the City Council Lane proposed emerging Local Plan for Derby..		
OR76	Mr Christopher Clarke & Mrs Dorothy Clarke	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to state that Policy HA7- Stoney Lane Spondon -400 Homes is **unsound**	Therefore I wish to request the Council to Deallocate Site HA7 (Stoney Lane, Spondon -400	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The site is active agricultural farmland and cannot be therefore be classed as Grey Belt. There are other brownfield sites which should be considered before releasing actively farmed land to further the expansion of urban sprawl. eg Derby Riverside(Policy CC11) 600 homes Railway Station Quarter (Policy CC13) 500 homes North Castleward (Policy CC14) 400 homes City Centre Mixed-Use Sites (policy CC4) over 1400 homes The provision of an additional 400 homes in Spondon will increase pressures on an infrastructure that is stretched to capacity including roads, schools, parking within the village drainage and medical facilities. The policy is **not justified** because the Council has named actively farmed land	Homes) from the Local Plan as stated in the plan's objective of brown field and City Centre first strategy (para 81)	current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						as Grey Belt when there are other Brown field sites available The policy is **not consistant with National Policy** because the use of active farmland for building purposes is against the aims of the policy The Council has the capacity to remove these 400 homes from the Local Plan and reallocate them to the existing brownfield and city centre site that have previously been identified as suitable for regeneration and therefore to avoid the use of farmland to put even more pressure on the already stretched resources available to Spondon residents		
OR77	Miss Joanne Clay	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to express my concern and disappointment in the proposed housing at Stoney Lane. I have been a resident in Spondon all my life. I believe that the policy HA7 is unsound. It is trying to pigeon hole the land as grey belt when it is clearly green belt and has		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						been for many years. There has been no adequate investigation into alternative sites and this decision is not consistent with national policy on Green Belt. Further there are plenty of other suitable brownfield sites which I understand you have marked for housing so why not exhaust those first? Surely we should be keeping our green belt land for future generations not making derby another concrete city. Please kindly mark my objection to this proposal. Obviously such a housing venture would impact on schools and care facilities and health places such as doctors. Also the roads are already in poor condition so I wonder how they would cope . I do hope you will consider the residents of Spondon unlike with the royal hill road and Dale Road developments.		allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.
OR82	Martin Coleman	Policy HA7: Stoney Lane, Spondon	Objects		No	I object to the allocation of Site HA7 for approximately 400 dwellings and consider that the	Requested modification: Deallocate Site HA7 (Stoney Lane,	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b)

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						allocation should be removed from the Plan. In my view, the proposed allocation has not been adequately justified and is not consistent with national planning policy. In particular, the Council has not demonstrated a sufficiently robust planning case for releasing this site from the Green Belt when considered against the availability of other, more sustainable and appropriate opportunities for housing delivery. The fundamental issue is that HA7 is **active agricultural land**. It should not be treated as an appropriate location for Green Belt release simply by applying a broad "Grey Belt" designation without first demonstrating, transparently and convincingly, that the Plan has exhausted or properly optimised the reasonable alternatives available within the existing urban area.	Spondon) from the Local Plan and redistribute the proposed 400 dwellings to suitable brownfield and city-centre regeneration opportunities.	and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						That distinction matters. The question is not simply whether the site can accommodate housing, but whether its release is necessary and justified in the context of the Plan's overall spatial strategy, its stated development priorities and the availability of alternative sites. **1. The allocation has not been sufficiently justified** The evidence supporting HA7's allocation should demonstrate why the release of this particular area of Green Belt is necessary when there remain significant brownfield and regeneration opportunities elsewhere in the Plan area. If the Council's stated approach is genuinely to pursue a **"brownfield and City Centre first"** strategy, it needs to demonstrate that this strategy has been meaningfully applied before relying upon the release of Green Belt agricultural land. In the absence of that demonstration, the allocation appears premature and insufficiently justified.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						2. HA7 is productive agricultural land, not previously developed land HA7 is active agricultural land and is materially different from previously developed or genuinely poor-quality land. The fact that land may fall within a wider category of land considered capable of being treated as "Grey Belt" should not, in itself, be regarded as establishing that its development is the appropriate planning outcome. The Plan still needs to demonstrate that the proposed release represents the most appropriate strategy when reasonable alternatives are taken into account. The Council should therefore explain, with evidence, why this agricultural site has been selected ahead of available brownfield and regeneration opportunities. **3. The allocation would extend the urban area and increase**		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						pressure arising from urban expansion Development at Stoney Lane would represent a further outward expansion of the built-up area. This raises a legitimate concern about the cumulative effect of continued peripheral development, including the incremental erosion of the separation between existing settlements and the loss of open agricultural land. The justification for accepting that expansion should therefore be particularly compelling. At present, I do not consider that the Plan has demonstrated that need. **4. Infrastructure capacity requires proper consideration** There are also material infrastructure considerations associated with development at HA7, including pressure on: the local highway network and associated transport infrastructure;		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						drainage and surface-water management; local education and school capacity; and other services and infrastructure required to support an additional 400 dwellings. These matters should not be treated as secondary considerations capable of being resolved simply through later planning obligations. The Plan's allocation process should establish that the necessary infrastructure can be delivered in a timely and effective manner and that the development would represent an appropriate and sustainable location for growth. **5. There are more appropriate opportunities within the existing urban area** The Council has identified substantial opportunities for housing delivery through brownfield development and city-centre regeneration.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						In particular, the Plan itself identifies opportunities associated with **Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) and Policy CC14 (North Castleward)**. Those locations should be properly prioritised before resorting to the release of Green Belt agricultural land. This is not an objection to housing growth as such. It is an objection to the **location and sequencing of that growth**. If the Plan can accommodate the required housing through existing brownfield and regeneration opportunities, there is a strong planning reason to pursue those opportunities before releasing an agricultural Green Belt site on the edge of the urban area. **6. The allocation appears internally inconsistent with the Plan's own spatial strategy** There is an apparent tension between the allocation of HA7 and the Plan's stated		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						commitment to a **"brownfield and City Centre first"** approach, including the strategy referred to at Paragraph 81. The Council should be able to demonstrate how the allocation of HA7 accords with that strategy and why the brownfield and city-centre opportunities identified elsewhere in the Plan cannot reasonably accommodate the housing proposed at HA7. Without that evidence, the allocation risks undermining the Plan's own stated spatial priorities. **Conclusion** For these reasons, I consider that Site HA7 should be **deleted from the housing allocations in the Local Plan**. The approximately 400 dwellings attributed to HA7 should instead be redistributed, where deliverable and appropriate, across existing brownfield and city-centre regeneration allocations, with		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						particular consideration given to the opportunities identified under **Policies CC4, CC11, CC13 and CC14**. This approach would better reflect the Plan's stated brownfield and City Centre first strategy, avoid the unnecessary release of active agricultural Green Belt land, reduce the pressure associated with outward urban expansion, and ensure that housing growth is directed towards locations where the Plan has already identified opportunities for regeneration and development. Accordingly, I consider the HA7 allocation to be **unsound unless the Council can provide compelling evidence demonstrating both the necessity of releasing this Green Belt agricultural land and why reasonable brownfield and regeneration alternatives cannot accommodate the proposed housing requirement.**		
OR83	Chris Coleman	Policy HA7: Stoney Lane, Spondon	Objects		No	Policy HA7 states: “Land east of Stoney Lane, Spondon will deliver a minimum	**Modification sought:** Policy HA7 should be deleted	Grey belt is defined in the NPPF by a site's contribution to Green

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						of 400 new, high-quality homes forming an eastern urban extension to the suburb of Spondon." My family and I have lived in Spondon for more than 30 years. During that time, we have seen substantial development and increasing pressure on the area. Based on this long-standing local experience, I do not believe that Spondon or its existing infrastructure can sustainably accommodate another development of this scale. I consider Policy HA7 to be **unsound because it is not justified**. The National Planning Policy Framework states that a justified plan must represent an appropriate strategy, take account of reasonable alternatives and be supported by proportionate evidence. The Council has not adequately demonstrated that allocating this agricultural Green Belt site is necessary when substantial brownfield and city-centre	from the Local Plan. The land east of Stoney Lane should not be allocated for 400 homes and should remain protected from urban development, with housing need addressed by prioritising and maximising brownfield and city-centre opportunities.	Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. The reference to Flood Zone 3 in SA Appendix E is incorrect and will be corrected, as the Water and Flooding Topic Paper confirms that no Flood Zone 3 is recorded within the site, and Policy HA7 requires a comprehensive surface water drainage solution (criterion j). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						housing opportunities remain available. The land east of Stoney Lane is active agricultural land, not derelict, unused or previously developed land. It should not be dismissed as simply "poor-quality" land. Indeed, the Council's own Regulation 19 Sustainability Appraisal identifies the site as greenfield land currently used for agriculture and classifies it as Agricultural Land Classification grades 3 and 4. It concludes that development would result in the loss of agricultural land and records a **significant negative effect** in relation to geology and soils. Once agricultural land has been built upon, that loss is effectively permanent and irreversible. Its present agricultural use, landscape value and role in maintaining separation between Spondon and the countryside should be given proper weight.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The policy expressly describes the proposal as an "eastern urban extension." This confirms that it would contribute to the further outward expansion of Derby into the countryside. Such expansion would fundamentally change the established edge of Spondon and could encourage further development beyond the existing urban boundary in future. A development of at least 400 homes would also place significant additional pressure on local infrastructure, including roads, public transport, schools, GP and healthcare services, drainage and other community facilities. Financial contributions from a developer would not necessarily provide the capacity needed, nor would they prevent existing residents from experiencing increased congestion and greater pressure on essential services. The Council's own Sustainability Appraisal also identifies flood-		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						risk concerns, noting that the site is partly within Flood Zone 3 and that development would increase impermeable surfaces and surface-water runoff. These concerns further undermine the suitability and justification for allocating this site. The Council already has substantial housing opportunities on brownfield and city-centre sites. The emerging plan itself makes provision for at least 5,000 homes in the city centre. These opportunities should be prioritised, maximised and delivered before active agricultural and Green Belt land is released. A brownfield-first approach would support regeneration, make better use of existing infrastructure and reduce unnecessary urban expansion into the countryside. For these reasons, Policy HA7 is not an appropriate or adequately justified strategy. Its environmental and infrastructure consequences		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						have not been outweighed by a demonstrated need to develop this particular site.		
OR84	Lois Coleman	Policy HA7: Stoney Lane, Spondon	Objects		No	I strongly object to Policy HA7 and the proposed allocation of land east of Stoney Lane, Spondon, for 400 homes. I consider Policy HA7 to be **unsound and not justified**. The site is active agricultural greenfield land, not derelict or poor-quality land. The Council's own assessment confirms that it is currently used for agriculture and that development would cause a significant, permanent loss of agricultural land. The proposal would create further urban expansion into the countryside and place substantial additional pressure on Spondon's roads, schools, healthcare, drainage, public transport and other local services. Derby already has significant brownfield and city-centre housing opportunities. These should be prioritised and fully developed before productive	I therefore ask the Council to remove Policy HA7 from the Local Plan and retain the land east of Stoney Lane for agricultural use.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						agricultural land is permanently lost.		the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.
OR82	Martin Coleman	Policy HA7: Stoney Lane, Spondon	Objects		No	I am hereby resubmitting this objection to the allocation of Site HA7 for approximately 400 dwellings with the addition of my address because I have just read that "Planning departments often discard representations that do not include a physical address as they cannot verify you are a real person". In my view, the proposed allocation has not been adequately justified and is not consistent with national planning policy. In particular, the Council has not demonstrated a sufficiently robust planning case for releasing this site from the Green Belt when considered against the availability of other, more sustainable and appropriate opportunities for housing delivery.	Requested modification: Deallocate Site HA7 (Stoney Lane, Spondon) from the Local Plan and redistribute the proposed 400 dwellings to suitable brownfield and city-centre regeneration opportunities.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The fundamental issue is that HA7 is **active agricultural land**. It should not be treated as an appropriate location for Green Belt release simply by applying a broad "Grey Belt" designation without first demonstrating, transparently and convincingly, that the Plan has exhausted or properly optimised the reasonable alternatives available within the existing urban area. That distinction matters. The question is not simply whether the site can accommodate housing, but whether its release is necessary and justified in the context of the Plan's overall spatial strategy, its stated development priorities and the availability of alternative sites. **1. The allocation has not been sufficiently justified** The evidence supporting HA7's allocation should demonstrate why the release of this particular area of Green Belt is necessary when there remain significant brownfield and		drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						regeneration opportunities elsewhere in the Plan area. If the Council's stated approach is genuinely to pursue a **"brownfield and City Centre first"** strategy, it needs to demonstrate that this strategy has been meaningfully applied before relying upon the release of Green Belt agricultural land. In the absence of that demonstration, the allocation appears premature and insufficiently justified. **2. HA7 is productive agricultural land, not previously developed land** HA7 is active agricultural land and is materially different from previously developed or genuinely poor-quality land. The fact that land may fall within a wider category of land considered capable of being treated as "Grey Belt" should not, in itself, be regarded as establishing that its development is the appropriate planning outcome. The Plan still needs to demonstrate that the proposed release represents		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the most appropriate strategy when reasonable alternatives are taken into account. The Council should therefore explain, with evidence, why this agricultural site has been selected ahead of available brownfield and regeneration opportunities. **3. The allocation would extend the urban area and increase pressure arising from urban expansion** Development at Stoney Lane would represent a further outward expansion of the built-up area. This raises a legitimate concern about the cumulative effect of continued peripheral development, including the incremental erosion of the separation between existing settlements and the loss of open agricultural land. The justification for accepting that expansion should therefore be particularly compelling. At present, I do not consider that		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the Plan has demonstrated that need. **4. Infrastructure capacity requires proper consideration** There are also material infrastructure considerations associated with development at HA7, including pressure on: the local highway network and associated transport infrastructure; drainage and surface-water management; local education and school capacity; and other services and infrastructure required to support an additional 400 dwellings. These matters should not be treated as secondary considerations capable of being resolved simply through later planning obligations. The Plan's allocation process should establish that the necessary infrastructure can be delivered in a timely and effective manner and that the development would represent an appropriate		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and sustainable location for growth. **5. There are more appropriate opportunities within the existing urban area** The Council has identified substantial opportunities for housing delivery through brownfield development and city-centre regeneration. In particular, the Plan itself identifies opportunities associated with **Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) and Policy CC14 (North Castleward)**. Those locations should be properly prioritised before resorting to the release of Green Belt agricultural land. This is not an objection to housing growth as such. It is an objection to the **location and sequencing of that growth**. If the Plan can accommodate the required housing through existing brownfield and regeneration opportunities,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						there is a strong planning reason to pursue those opportunities before releasing an agricultural Green Belt site on the edge of the urban area. **6. The allocation appears internally inconsistent with the Plan's own spatial strategy** There is an apparent tension between the allocation of HA7 and the Plan's stated commitment to a **"brownfield and City Centre first"** approach, including the strategy referred to at Paragraph 81. The Council should be able to demonstrate how the allocation of HA7 accords with that strategy and why the brownfield and city-centre opportunities identified elsewhere in the Plan cannot reasonably accommodate the housing proposed at HA7. Without that evidence, the allocation risks undermining the Plan's own stated spatial priorities.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Conclusion For these reasons, I consider that Site HA7 should be **deleted from the housing allocations in the Local Plan**. The approximately 400 dwellings attributed to HA7 should instead be redistributed, where deliverable and appropriate, across existing brownfield and city-centre regeneration allocations, with particular consideration given to the opportunities identified under **Policies CC4, CC11, CC13 and CC14**. This approach would better reflect the Plan's stated brownfield and City Centre first strategy, avoid the unnecessary release of active agricultural Green Belt land, reduce the pressure associated with outward urban expansion, and ensure that housing growth is directed towards locations where the Plan has already identified opportunities for regeneration and development. Accordingly, I consider the HA7 allocation to be **unsound unless**		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the Council can provide compelling evidence demonstrating both the necessity of releasing this Green Belt agricultural land and why reasonable brownfield and regeneration alternatives cannot accommodate the proposed housing requirement.		
OR85	Tracy Coleman	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally object to the proposed allocation of land at Stoney Lane, Spondon for approximately 400 homes under Policy HA7 of the Local Plan. I consider Policy HA7 to be unsound, in particular because I do not believe the allocation has been adequately justified and I do not believe it is consistent with the stated approach of prioritising brownfield and regeneration sites. My main concern is that the Stoney Lane site is active agricultural land within the Green Belt. I do not believe land of this nature should be released for a major housing	I respectfully request that Policy HA7, Stoney Lane, Spondon, be removed from the Local Plan and that the Council instead prioritises appropriate brownfield and city-centre regeneration sites for meeting Derby's housing requirements. Please accept this email as my formal representation in respect of the Local Plan consultation and confirm that it has been received and recorded.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						development unless it has been clearly demonstrated that reasonable alternatives, particularly previously developed and brownfield sites, cannot meet the identified housing need. The Local Plan itself identifies substantial housing opportunities at locations including Derby Riverside, Railway Station Quarter, North Castleward and other city-centre mixed-use sites. I would therefore like the Council to demonstrate clearly why development of Stoney Lane is necessary before these brownfield and regeneration opportunities have been fully utilised. I am also concerned about the cumulative effect that a development of around 400 additional homes would have on Spondon. This includes increased traffic on local roads, pressure on schools and other local services, drainage and infrastructure, as well as the		transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						permanent loss of agricultural and Green Belt land. Spondon has already experienced considerable development, and I do not believe further expansion onto Green Belt farmland should be treated as the preferred solution where substantial brownfield opportunities remain elsewhere within Derby. For these reasons, I consider Policy HA7 to be Not Justified and Not Consistent with National Policy.		
OR86	Julie and Kevin Connolly	Policy HA7: Stoney Lane, Spondon	Objects		No	This planning policy is unsound. It is not justified Not consistent with National Policy. Evidence : The site is active agricultural land, rather than poor quality or previously developed 'Grey Belt' Development would contribute to the further expansion of		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						urban development and urban sprawl. There are significant pressures on local infrastructures, including roads, drainage and school capacity. We have lived in Spondon for over 40 years and have seen a significant difficulty in obtaining appointments at our local doctors surgery. We have had to go to the walk in centre many times, and wait for hours due to lack of appointments at our GP. I have currently been waiting 4 months for an annual review of my medical needs. Parents with young children have to drive to the walk in centre 5 miles away also with sick children. Not acceptable. There are already more homes being built in Spondon, which will have an impact on all these local necessities. The Council has substantial brownfield and city centre housing opportunities. This should be prioritise for use of new homes.		up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The proposed allocation appears inconsistent with the Plans stated 'Brownfield and City Centre first' strategy. Many people in Spondon are fed up of poor local necessary services (GP unavailability, congested roads, MOOR HOUSES ALREADY BEING BUILT , which will impact all the services required for every day living. The local residents of Spondon have had enough. This proposal is unwanted and Unjustified.		
OR87	Sharon Cooper	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to make an individual **Regulation 19 representation** regarding **Policy HA7 – Stoney Lane, Spondon**, which proposes a minimum of 400 new homes on land off Stoney Lane. I am a long-standing resident of [redacted]. Having considered the proposed allocation and the requirements of the Regulation 19	**I request that Policy HA7 – Stoney Lane, Spondon is deleted/deallocated from the Local Plan.** If the Council considers that the 400 homes remain necessary within the overall housing strategy, I ask that it demonstrates through the examination	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						consultation, **I consider Policy HA7 to be unsound**. In particular, I consider the policy to be: **Not Justified** **Not Effective** **Not Consistent with National Planning Policy** I recognise that Derby needs to provide additional housing and I am **not opposed to housing development in principle**. My objection is specifically to the allocation of this particular site and whether the Council has demonstrated that its release from the Green Belt is necessary, justified and deliverable. **1. Grey Belt classification** I ask the Planning Inspector to scrutinise the evidence supporting the Council's classification of HA7 as Grey Belt. I have attached recent photographs of the Stoney Lane land being harvested on August 5th 2026, proving the land is rich agricultural land and	evidence whether those homes can appropriately be accommodated through the optimisation of suitable brownfield, city-centre and regeneration sites, including the opportunities identified under Policies CC4, CC11, CC13 and CC14. I respectfully ask the Planning Inspector to give particular consideration to the **Grey Belt classification, reasonable alternatives, the justification for Green Belt release and the deliverability of 400 homes given the site's highway, A52, drainage, power infrastructure and other constraints.**	up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						has been farmed actively for many years, performing an important Green Belt function. Also the livestock that has been housed there for many years which produce offspring, contributing furthermore to the cycle of farming. I recognise that agricultural land is not automatically excluded from the current NPPF definition of Grey Belt. However, the Council should demonstrate through a **robust, transparent and site-specific assessment** why this particular parcel meets the definition and how it performs against the relevant Green Belt purposes. The Council should not simply rely upon the designation itself. The evidence supporting the conclusion that HA7 qualifies as Grey Belt should be capable of proper examination. **2. Reasonable alternatives and brownfield land** I am particularly concerned that the Council has not adequately demonstrated that **all**	I have attached at the top of the page my **full detailed representation and Appendix 1 – Highway and Access Concerns**, which provide further evidence and detail supporting my objections. I would be grateful if you could confirm receipt of this Regulation 19 representation and ensure that it is formally recorded in relation to **Policy HA7 – Stoney Lane, Spondon**.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						reasonable alternatives have been fully examined and optimised before releasing this Green Belt land. The NPPF requires authorities considering Green Belt release to examine reasonable alternatives, including making as much use as possible of suitable brownfield and underutilised land. The Council's own emerging Local Plan contains substantial opportunities for housing within city-centre and regeneration locations, including: **Policy CC4 – City Centre Mixed-Use Sites** **Policy CC11 – Derby Riverside** **Policy CC13 – Railway Station Quarter** **Policy CC14 – North Castleward** I therefore ask the Inspector to establish whether these and other brownfield and regeneration opportunities have genuinely been optimised before concluding that HA7 is required.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						If the Council considers that the 400 homes cannot be accommodated elsewhere, I ask that it provides clear evidence demonstrating: what reasonable alternatives were considered; their realistic housing capacity; whether densities could be optimised; their anticipated delivery timescales; and why they cannot accommodate some or all of the 400 homes proposed at HA7. **3. Effectiveness and deliverability** I also question whether a minimum of 400 homes at HA7 is genuinely deliverable given the constraints affecting the site. Policy HA7 itself identifies the need for: a single vehicular access onto Stoney Lane; transport improvements; education infrastructure; comprehensive surface-water drainage;		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						public open space; green infrastructure buffers; A52 noise attenuation; pedestrian and rights-of-way connections; and restrictions associated with overhead power lines. I have significant concerns regarding the proposed single access onto Stoney Lane, particularly given its relationship with the A52, existing traffic conditions and the potential increase in traffic generated by at least 400 homes. I also question whether sufficient space remains to accommodate 400 homes once the required highway arrangements, drainage, landscaping, open space, power-line constraints, A52 buffer and other mitigation measures have been properly taken into account. The Council should therefore demonstrate that the stated capacity of **400 homes is genuinely deliverable**, rather		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						than simply an assumed capacity. **4. A52, environmental and residential impacts** The proximity of the A52 is another significant concern. The fact that Policy HA7 itself requires noise attenuation and a buffer to mitigate the effects of the A52 demonstrates that this is a material constraint. I ask the Inspector to consider whether the evidence base adequately demonstrates that both future residents and existing residents can be adequately protected from: road traffic noise; air-quality impacts; increased traffic; visual impact; loss of openness; drainage impacts; and loss of residential amenity. The proposed western green infrastructure buffer behind existing Stoney Lane properties also needs to be properly defined in terms of its width,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						purpose, long-term protection and ability to provide meaningful mitigation. **5. Green Belt release** The NPPF requires Green Belt boundary changes to be fully evidenced and justified. I therefore ask the Inspector to examine whether the Council has demonstrated: why HA7 needs to be released; whether reasonable alternatives have genuinely been exhausted; whether suitable brownfield and underutilised land has been fully considered and optimised; whether the Grey Belt assessment is robust; whether the proposed 400-home capacity is genuinely deliverable; and whether the resulting Green Belt boundary is appropriate and capable of enduring in the long term.		
OR88	Georgie cox	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a resident of Spondon to formally object to the proposal to allocate the Green Belt land off Stoney Lane for the construction of 400 homes. In my view, this policy is	I respectfully ask that the HA7 Stoney Lane site is removed from the Local Plan. The proposal appears unsound and wrongly	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						unsound, as it is neither justified under the relevant tests nor consistent with national planning policy. The land in question is Green Belt and should not be described as grey belt. It remains actively used for agricultural purposes. I have attached a photograph taken approximately one month ago, which shows the fields behind the houses being actively farmed by a tractor. Building 400 homes on this site would lead to further urban expansion and contribute to urban sprawl. Local infrastructure is already under considerable pressure, particularly the road network, drainage systems and local school capacity. Adding a development of this scale would inevitably increase those pressures. There are substantial brownfield sites available within the city that could provide	categorises actively farmed Green Belt land as grey belt, without demonstrating that existing brownfield opportunities have been fully utilised. This is contrary to the Plan's own stated strategy and inconsistent with national policy. The proposed 400 homes should instead be directed towards suitable brownfield opportunities in the city centre, including sites covered by policies CC4, CC11, CC13 and CC14, in line with the Plan's "brownfield and city centre first" approach.	agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						opportunities for housing development and these should be prioritised before Green Belt land is considered. The use of Green Belt farmland should be a last resort. Allocating this site therefore appears to conflict with the Local Plan's stated approach of prioritising a "brownfield and city centre first" strategy.		
OR93	Emma Davis	Policy HA7: Stoney Lane, Spondon	Objects		No	I submitted my objections to the Local Plan for 400 homes being built off Stoney Lane Spondon earlier this year. I have now been informed that the Local Plan for Derby (2023-2043) has now reached its final pre-submission consultation stage (Regulation 19). I would like to submit my representation to the proposed plan which allocates 400 new homes on active farmland off Stoney Lane, Spondon (Policy HA7). I strongly object to the Green Belt land being built on. I own a property on [Redacted] in Spondon and have done since	I would like to request the following modification: Deallocate Site HA7 (Stoney Lane, Spondon - 400 homes) from the Local Plan. The allocation is UNSOUND as it fails the 'Justified' and 'Consistent with National Policy' tests by misclassifying active Green Belt farmland as 'Grey Belt' without demonstrating that all reasonable brownfield	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						2010. The fields behind my house are used by farmers every year. The farmers have been collecting their crop earlier this month. I attach evidence of this. Those fields are clearly Green Belt not Grey Belt. Policy HA7 is Unsound, Not Justified and Not consistent with National Policy. Policy HA7 is UNSOUND because: It is Not Justified • The Council has wrongly categorised active agricultural farmland as Grey Belt, • It has not demonstrated that all reasonable brownfield alternatives have been fully considered. Policy HA7 is Not Consistent with National Policy Allocating working farmland as Grey Belt conflicts with national planning policy. The land behind Sundew Close is definitely Green Belt and working	alternatives have been fully optimised. The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations- prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plan's stated 'brownfield and City Centre first' strategy (Paragraph 81)."	contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						farmland. It should remain this way. The Council's own Local Plan commits to a "brownfield and City Centre first" strategy (Paragraph 81). yet this allocation releases Green Belt farmland before fully utlising brownfield sites. The Council already has major sites allocated for housing, including: . Derby Riverside (Policy CC11) - 600 homes. . Railway Station Quarter (Policy CC13) - 500 homes. North Castleward (Policy CC14)- 400 homes. . City Centre Mixed-Use Sites (Policy CC4)- Over 1,400 homes. Spondon does not have the infrastructure to cope with another 400 homes. Where are those people going to get access to NHS services, where are their children going to go to school? The residents of Spondon are already struggling to get access to NHS services and school places are limited.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The roads in Spondon are already struggling with the amount of traffic that passes through and at peak times getting in and out of Spondon is a nightmare. Those homes will bring with them more vehicles on the roads. 400 hundred homes brings with it more people and vehicles that Spondon simply does not have the infrastructure to cope with.		
OR161	Derbyshire County Council	Policy HA7: Stoney Lane, Spondon	Supports	Yes	Yes	As noted above, the proposed allocation of land east of Stoney Lane, Spondon will deliver a minimum of 400 new, high-quality homes forming an eastern urban extension to the suburb of Spondon. As noted in the supporting text, however, the site is identified as Green Belt land within the current local plan. A number of Green Belt Reviews / Assessments have previously been carried out of the Nottingham-Derby Green Belt, within which the proposed allocation is located. These are:		Support welcomed. The Green Belt Assessment (2025) found the site to be grey belt, and it is the only Green Belt release proposed in the Plan, as set out in the Housing Requirement and Spatial Strategy Topic Paper.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Nottingham – Derby Green Belt Review was undertaken in 2006/2007 as part of the preparation of the East Midlands Regional Plan, to provide the evidence base to inform the growth strategy in the Plan for the Three Cities Sub-Area, comprising Derby, Nottingham and Leicester. The Derby Principal Urban Area Green Belt Review (DPUAGBR), was undertaken jointly by Derbyshire County Council, Amber Valley Borough Council, Derby City Council, Erewash Borough Council and South Derbyshire District Council in 2012 to inform the preparation of each local planning authorities' Core Strategy / Local Plans at that time. The study built on previous work undertaken in the Nottingham – Derby Green Belt Review. The important conclusions of both of these Green Belt Reviews, was that the area of the Nottingham – Derby Green Belt between the two urban areas of Derby and Nottingham		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and covering much of Erewash Borough, was strategically the most important area of the Green Belt in meeting the main Green Belt purposes set out in national policy, particularly its function in constraining the eastward sprawl of Derby City and preventing the coalescence of the cities of Nottingham and Derby with each other and the settlements in Erewash Borough in between. The proposed allocation at Stoney Lane Spondon, is located within this strategically important and sensitive area of Green Belt. In the context of the above, Policy GB3 of the new NPPF sets out policies for the Green Belt as below: GB3: Altering existing Green Belt boundaries 1. Green Belt boundaries should only be altered through the preparation and updating of local plans and where exceptional circumstances are fully evidenced and justified.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						2. Exceptional circumstances in this context include a local planning authority being unable to meet its identified need for development in full, having examined all other reasonable options for doing so. In this regard, it is noted in paragraph 302 and 303 of the Plan state: 302. Land to the east of Stoney Lane was previously in the Green Belt, but analysis carried out in preparing the Plan identified the site as 'grey belt' land and as such it provided an opportunity to extend the edge of the built area of Spondon to the east. 303. As the site was removed from Green Belt to be allocated for housing, it is treated differently to other non-green belt land. The NPPF 'Golden Rules' apply to land removed from the green belt and include that affordable housing should be provided at a		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						minimum of 50% unless this would make development unviable. High level viability indicates that 40% affordable housing should be generally viable in this location. If further detailed viability of site-specific development indicates otherwise, when a specific scheme has been designed, the 40% affordable housing requirement will be revisited based on site specific viability appraisal. In principle, therefore, there appears to be a well justified and robust case set out in the Submission Draft Plan to release land from the Green Belt at Stoney Lane, Spondon to accommodate up to 400 new homes, particularly if the land can be re-classified as 'Grey Belt' land that would be subject to the 'golden rules', which would require 40% of the homes on the site to be provided as affordable homes. Importantly, as noted in the comments above, the City's		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						housing land supply is very constrained and is capacity capped at around 12,500 homes, leaving a significant shortfall against the City's standard methodology housing requirement. Accordingly, it is considered that release of the site from the Green Belt, could be justified in the context of Policy GB3 of the new NPPF, as an exceptional circumstance 'where an authority cannot meet its identified need for homes'. Notwithstanding the above, careful consideration will need to be given to how the visual impacts of the development of the site for 400 new homes can be adequately mitigated to ensure it does not compromise the openness of the wider area of Green Belt to which it relates.		
OR90	Alan Drayton	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to you regarding the proposed development of 400 new homes on the working farmland near Stoney Lane Spondon. This land currently provides a green wedge between Ockbrook and		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Spondon thus helping to prevent urban sprawl, and the footpaths are very well used by the general public. Policy HA7 IS UNSOUND as it has designated the site as Grey Belt yet the farmland is active and therefore this conflicts with the principles of the National Planning Policy. This development would also contradict the Council's own aim of a Brownfield and City Centre First Strategy as laid out in Paragraph 81 of the Plan. The land should remain in the Green Belt as active farmland. The Council could keep the Brownfield strategy intact by considering available alternatives including The Railway Station Area - Policy CC13 Castleward North) Area - Policy CC14. Derby Riverside Policy - Policy CC11 All three of these sites are in close proximity to the city centre and would dovetail nicely with other proposels for		and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the Riverside and the new Railways Headquarters. Being close to the town centre this should improve footfall in the city centre and also help minimise the need to use cars to get into the centre of the city. Consider the same situation at Stoney Lane ie :- The local roads particularly through the centre of Spondon are very busy and this is before the housing near Spondon Wood is built and occupied. The schools are already near capacity, additionally increasing the number of children crossing the A52 footbridge is putting temptation in the way for a shortcut dash across the carriage way. Finally the problems of sewer drains backing up in the centre of the village are well known this project will only make things worse.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The sensible solution is to remove the HA7 Stoney Lane Site from the Local Plan and use the alternative Brownfield sites.		
OR94	Noel and Beverley Eaglesfield	Policy HA7: Stoney Lane, Spondon	Objects		No	The site is and always has been active agricultural land. Development would contribute to the further expansion of urban development in an area where there are already significant pressures on local infrastructure including roads, drainage, medical and dental services and schools. The Council has significant brown field and city centre housing opportunities which should be considered before using Green Belt farm land. The allocation is UNSOUND as it classifies Green Belt farm land as Grey Belt. The Council should reallocate these 400 homes into existing Brown field and City centre regeneration allocations prioritised under Policy CC4, Policy CC11 and Policy CC13/14.	Reallocate site HA7 400 homes from the local plan.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						As lifelong residents of Spondon we are concerned about the loss of this farmland and the impact on the infrastructure of Spondon.		(criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.
OR95	Andrew Elliott	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to raise my objections to the proposed development of land of Stoney lane. Why this policy is unsound and not justified. The council has identified this land as Grey belt removing it from green belt. Grey belt land is land that been previously developed or under performing green belt land. Stoney land is active agricultural land it's has been planted and harvested for as long as I have lived in Spondon, people that have lived here for the last 60 years have said its always been farmland and used to have cows in the fields, it has already been and ploughed ready for planting again. It is still green belt land and performs an important function, it gives green space to local residents, it is a habitat for		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Cumulative effects, including with development in Erewash, will be assessed with the Highway Authority

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						wildlife and defines Spondon from Ockbrook. With this development there will be a total loss of privacy to the houses that back on to this land as most have very small gardens. The disruption to local residents just with noise and dust will go on for a long time, you can hear noise from the Spondon wood development and I'm no where near it. There is no demonstration that all other options of grey field sites have been explored or fully considered, the old Asterdale club site that has been developed is still green belt in local plans how can this be right when it's already developed. This development is not consistent with national policy as it is working farmland, and classifying as grey belt conflicts with national planning policy. The council currently has earmarked for development Royal Hill road, and Locko road near Bluebellsfarm, Spondon		and National Highways as paragraph 307 requires, and Policy HA7 secures contributions to education and transport infrastructure (criteria h and i). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						wood already under construction and you want to add another 400 homes to Stoney lane. I ask that the council reallocate these 400 homes into an existing brownfield and city centre regeneration allocation under policy CC4 CC11 CC13or CC144. I have other concerns about the impact on the local environment the increase in traffic through Spondon. Traffic already backs up through the village at peak times from Willowcroft road to past Stoney lane, this is without the addition of houses at Spondon wood development. The access to the development of Stoney lane just off the turn of from the A52 this is a blind corner as you pull of A52. Cars stopping to turn in to new housing development put drivers at risk as they pull of A52. Parked cars on Stoney lane cause driver's to be on wrong		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						side road to pass the parked cars and increased traffic would cause significantly more congestion in this area. The impact on the local facilities in Spondon school places doctors dentist ect. These are near to full to capacity at this present time. Have other local resources been looked at for the increased population of Derby A&E generally running at 130% capacity, are there plans to increase capacity or for more urgent care facilities. Is the current sewage system able to deal with increased demand Stoney lane fields provided a natural resource to prevent flooding to local housing as water is able to drain into land. If Derby continues to spread and all green areas are developed it will lose its local identity and eventually be joined up to other areas.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Policy HA7 renders the local draft plan unsound under paragraph 36 of the National planning policy framework. There is no robust evidence base or justifiable spatial strategy when reasonable alternatives exist. The release of active green belt farmland to grey belt directly contradicts the council's own stated spatial principles. The national definition of grey belt is, land that has previously been developed (brownfield) or demonstrates weak or limited contribution to the core green belt purpose, and Stoney Lane does not fall into any of the above under the National definition of grey belt.		
OR96	Lynne Elliott	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to raise my objections to the proposed development of land of stoney lane. Why this policy is unsound and not justified The council has identified this land as Grey belt removing it from green belt. Grey belt land is land that been previously		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						developed or under performing green belt land. Stoney land is active agricultural land it's has been planted and harvest this year and plouhged ready for planting again. Is still green belt land and performs an important function,it gives green space to local residents, it is a habitat for wildlife and defines Spondon from Ockbrook. With this development there will be a total loss of privacy to the houses that back on to this land as most have very small gardens. The distribution to local residents with noise and dust you can hear the Spondon wood development. There is no demonstration that all other options of grey field sites have been explored or fully consider the old Asterdale club site that has been developed is still green belt in local plans how ! This developed is not consistent with national policy as Allocated working farmland as grey belt		that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						conflicts with national planning policy I ask that the council reallocate these 400 homes into an existing brownfield and city centre regeneration allocation under policy CC4 CC11 CC13or CC144 I have other concerns about the impact on the local environment the increase in traffic through Spondon. Traffic already backs up through the village at peak times from Willocroft road to past Stoney lane, this is without the addition of houses at Spondon wood development. The access to the development of Stoney lane just off the turn of from the A52 this is a blind corner as you pull of A52. Cars stopping to turn in to new housing development put drives at risk as pull of A52. Parked cars on Stoney lane cause drives to be on wrong side road to pass parked cars increased traffic would cause significant congestion in this area.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The impact on the local facilities in Spondon school places doctors dentist ect. These are near full to capacity at present time. Have other local resources been looked at for the increased population of Derby A&E generally running at 130% capacity are there plans to increase capacity or for more urgent care facilities. Is the current sewage system able to deal with increased demand Stoney lane fields provided a natural resource to prevent flooding to local housing as water is able to drain into land If Derby continues to spread and all green areas are developed it will lose its local identity be called Nottingham soon.		
OR97	George Fayers	Policy HA7: Stoney Lane, Spondon	Objects		No	Please accept this email as my formal representation regarding the Derby Local Plan (2023–2043) Regulation 19 pre-submission consultation. My representation relates	I request the following modification: Deallocate Site HA7 (Stoney Lane, Spondon – 400	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						specifically to Policy HA7 – Stoney Lane, Spondon (400 homes). I wish to state that Policy HA7 is UNSOUND as it is not justified, given that the Council has incorrectly classified active, high-performing agricultural farmland as "Grey Belt" without providing a robust, evidence-based assessment or demonstrating that all reasonable brownfield and urban alternatives have been fully optimised. Furthermore, it is not consistent with national policy because allocating active farmland for development contradicts national planning principles regarding Green Belt protection and the sequential approach to land release, as well as the Council's own commitment to a "brownfield and City Centre first" strategy outlined in Paragraph 81 of the Plan. My objection is heavily supported by the fact that the Stoney Lane site is working agricultural land that actively performs vital Green Belt	homes) from the Local Plan. The allocation is UNSOUND as it fails the "Justified" and "Consistent with National Policy" tests by misclassifying active Green Belt farmland as "Grey Belt" without demonstrating that all reasonable brownfield alternatives have been fully optimised. The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter), or Policy CC14 (North Castleward), in accordance with the Plan's stated	agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						functions—such as preventing urban sprawl and stopping the coalescence of settlements—rather than meeting the definition of underperforming or previously developed "Grey Belt". Additionally, local infrastructure including highways capacity, local drainage systems, and school places is already under severe strain and cannot sustainably absorb a development of this magnitude. The Council has already identified substantial, deliverable brownfield and regeneration opportunities that must be prioritised before releasing Green Belt land, including Derby Riverside (Policy CC11) for 600 homes, Railway Station Quarter (Policy CC13) for 500 homes, North Castleward (Policy CC14) for 400 homes, and City Centre Mixed-Use Sites (Policy CC4) for over 1,400 homes.	"brownfield and City Centre first" strategy (Paragraph 81). Furthermore, the Council should conduct a transparent reassessment of urban capacity to prove that exceptional circumstances exist before considering any release of protected Green Belt land.	
OR98	Jane Fearn	Policy HA7: Stoney Lane, Spondon	Objects		No	Re Policy HA7 - Stoney Lane, Spondon I am writing to object to the proposal of 400 homes being built on the above application.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						This application is UNSOUND, it's not justified and not consistent with national policy, you can't just change what a site is. This land has been misclassified, it is active Green Belt land not Grey Belt. This site is active agricultural land. It has also not been demonstrated that all reasonable Brownfield alternatives have been fully optimised. There are quite a few exiting Brownfield and city centre policies these 400 homes could be built. The other impacts are that Spondon is growing so fast, another big development is already underway. it is getting harder for traffic to move and causing a lot more traffic and pollution, especially as cars queue through the village and out of Locker Road. I am sure you will say from Stoney Lane people will go down the A52 but not if they want to head to Derby. Then there are the doctors where you can't get		current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						appointments now and schools (can't comment on primary as do not know) West Park secondary school is over subscribed, they can't take more. This is going to affect the education children in Spondon get. And what about wildlife, we can't keep taking their homes. This is Green Belt land not Grey Belt land please do not allow homes to be built here. Thank you for you time in reading this objection.		
OR99	Caroline Ferguson	Policy HA7: Stoney Lane, Spondon	Objects		No	Good morning. I am sending this email asa resident of Spondon Village. I have lived in the village all my life and am objecting to the proposal of the planned building of 400.homes on Stoney Lane in Spondon. The site proposed is active agricultural land but the bigger concern is the impact the houses will have on already congested roads in Spondon to get out of the village, the local schools(some of which are already oversubscribed) especially our only Secondary School.in the area, our GP surgeries that are already		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						massively stretched and the impact the houses will have on street parking close to local primary schools. There are already pressures on road maintenance and drainage in Spondon. The housing development will only add to these pressures. I am really concerned about this loss of farmland ,the massive impact on Spondon's infrastructure and the further expansion of development around our community. I do hope you will consider all of these points.		and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR266	Fisher German on behalf of Bloor Homes	Policy HA7: Stoney Lane, Spondon	Objects	Yes	No	It is noted the Stoney Lane allocation (HA7) has a 40% affordable housing requirement (which is uplifted in accordance with Paragraph 67 of the NPPF). However, the Policy now allows for viability considerations as the Plan has been updated since Regulation 18 to include that the delivery of the uplift is "subject to demonstrating that this is achievable". If Locko Road was considered necessary for allocation, a similar caveat should be applied for consistency.		Locko Road is not allocated, as explained in SA Appendix G. The site access and its relationship with the A52 will be assessed with National Highways at application stage, as paragraph 307 requires. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Whilst no objection to the Stoney Lane allocation is provided, evidence will need to be provided confirming that the scheme's access and relationship with the adjoining A52 slip lane (which is substandard) is acceptable ensure the scheme and any mitigation is deliverable and will not receive National Highways objection.		
OR100	Mark Flint	Policy HA7: Stoney Lane, Spondon	Objects		No	The policy to build 400 homes off Stoney Lane, Spondon is UNSOUND. There is no justification for building in this area. The site will place undue pressure on local infrastructure (schools, roads etc). It is agricultural not brownfield, which contravenes the brownfield first policy, as the council already has plenty of sites to utilise within the city without adding to urban sprawl. The site, as stated is active agricultural land not grey belt. There are major concerns on the effect this will have on the		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Stoney Lane/A52 Junction with site traffic and as the only entry/exit point for 400 houses! The plan should be modernised to remove site HA7 from the plan. This allocation of land for housing is UNSOUND and is inconsistent with national policy as all alternatives of brownfield sites have not, as yet, been fully optimised. The council should adhere to its city centre first policy and relocate these houses into policy CC4, CC11 and CC13 areas.		Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR101	Mark Forester	Policy HA7: Stoney Lane, Spondon	Object		No	I am writing to formally object to the proposed allocation of **400 homes on Stoney Lane, Spondon (Policy HA7)** and to ask Derby City Council to remove this site from the Local Plan. Having considered the proposal and the reasons given for allocating this land, I believe that **Policy HA7 is UNSOUND**, particularly because it is **not justified** and is **not consistent with national planning policy**.	I therefore respectfully but strongly request that Derby City Council: **Deallocate Policy HA7 – Stoney Lane, Spondon – from the Local Plan and remove the proposed allocation of 400 homes from this site.** If the Council considers that these 400 homes are still required within the	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						My objection is not simply to the principle of new housing. I recognise that Derby needs additional homes. My concern is that the Council should be putting its housing requirement in the **right locations**, particularly where previously developed land, brownfield sites and city-centre regeneration opportunities are available, rather than sacrificing productive agricultural land on the edge of Spondon. **1. This is active agricultural land** The Stoney Lane site is active agricultural land. I strongly question the decision to classify it as "Grey Belt" in circumstances where the land is not previously developed and is not simply an area of poor-quality or underperforming land. This land currently forms part of the countryside around Spondon and contributes to preventing the further outward expansion of the built-up area.	Plan, I believe the housing should instead be directed towards suitable **brownfield, previously developed and city-centre regeneration opportunities**, including those already identified under Policies CC4, CC11, CC13 and CC14, subject of course to their individual planning and deliverability considerations. I ask that this representation is formally recorded against **Policy HA7 – Stoney Lane, Spondon – 400 homes** and taken into account as part of the Regulation 19 consultation and subsequent independent examination of the Local Plan.	supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Cumulative effects, including with development in Erewash, will be assessed with the Highway Authority and National Highways as paragraph 307 requires, and Policy HA7 secures contributions to education and transport infrastructure (criteria h and i). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Allowing 400 houses to be constructed here would represent a significant and permanent change to the character of the area and would result in the further loss of agricultural land. Once this land is developed, it is lost permanently. **2. The development would contribute to urban sprawl** The proposed development would push the built-up area further into the surrounding countryside. I am particularly concerned about the cumulative effect of development around Spondon. A decision to allocate another 400 homes on the edge of the community should not be considered in isolation. It risks creating further pressure for development in surrounding areas and gradually eroding the separation between existing communities and the countryside.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The purpose of Green Belt and countryside protections should not simply be overridden because housing numbers need to be found. **3. Brownfield and regeneration opportunities should be prioritised** The Council's own Local Plan identifies substantial opportunities for housing on previously developed and regeneration sites. These include: **Derby Riverside – Policy CC11 – approximately 600 homes** **Railway Station Quarter – Policy CC13 – approximately 500 homes** **North Castleward – Policy CC14 – approximately 400 homes** **City Centre Mixed-Use Sites – Policy CC4 – over 1,400 homes** These allocations demonstrate that there are significant opportunities for housing within existing developed areas. It therefore seems fundamentally difficult to justify the release of active agricultural		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						land for another 400 homes when substantial brownfield and city-centre opportunities already exist. The Council should demonstrate clearly why these opportunities cannot accommodate the housing proposed for HA7 before sacrificing farmland. **4. The proposal appears inconsistent with the Council's own strategy** The Local Plan refers to a **"brownfield and City Centre first"** approach. If that is genuinely the Council's strategy, I believe it should be followed consistently. It appears contradictory to promote substantial housing opportunities on brownfield and regeneration sites while simultaneously allocating active agricultural land at Stoney Lane for 400 homes. Before Green Belt farmland is released, the Council should demonstrate that all reasonable previously developed and regeneration opportunities		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						have been fully considered and optimised. **5. Infrastructure concerns** I am also extremely concerned about the additional pressure that 400 new homes would place on existing infrastructure in and around Spondon. This includes: Road capacity and traffic congestion; Junction capacity and highway safety; Drainage and surface-water management; Sewerage infrastructure; Local schools and school places; GP and other local services; Public transport; Pedestrian and cycling infrastructure; and The general capacity of existing community infrastructure to absorb a development of this scale. The impact should not be assessed simply by looking at the proposed development in isolation. The cumulative impact of existing and proposed development in the wider		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Spondon area needs to be properly understood. I would expect the Council to have robust, site-specific evidence demonstrating that the necessary infrastructure can accommodate this development without placing unacceptable additional pressure on existing residents and services. **6. Loss of agricultural land and countryside** There is also a wider principle at stake. Agricultural land is a finite resource. Once 400 houses, roads, gardens, parking areas and associated infrastructure are constructed, the agricultural function and open character of the site cannot simply be restored. At a time when there is increasing recognition of the importance of food security, protecting agricultural land and preventing unnecessary urban expansion, I do not believe this		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						site should be selected when other housing opportunities are available. **7. The allocation is not justified** For the reasons above, I do not believe that Policy HA7 has been adequately justified. In particular, I believe the Council needs to demonstrate why this active agricultural site is required when substantial brownfield and city-centre housing opportunities are already identified within the Local Plan. Simply identifying a site capable of accommodating 400 houses does not, in my view, demonstrate that it is the most appropriate or sustainable location for those homes. **8. The allocation is not consistent with national planning policy** I also consider the allocation to be **not consistent with national planning policy**, particularly in relation to the protection of Green Belt land, the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						appropriate use of previously developed land and the need to make effective use of suitable brownfield and regeneration opportunities before unnecessarily releasing protected countryside. The Council should not rely upon a Grey Belt designation as a justification for development without properly demonstrating that the land meets the relevant criteria and that reasonable alternatives have been properly considered.		
C505	Peter Fox	Policy HA7: Stoney Lane, Spondon	Objects	No	No	I consider this specific allocation to be UNSOUND on the following grounds under paragraph 35 of the National Planning Policy Framework (NPPF): Not Justified: The site selection is not backed by proportionate, robust evidence regarding local transport capacity, environmental impacts, or Green Belt/Green Wedge boundary release. Not Effective: Serious highway capacity, noise, and infrastructure constraints jeopardize the delivery and viability of the site. Not	To make the Local Plan sound, I request the Planning Inspector to consider the following modifications: Delete the allocation for Land East of Stoney Lane, Spondon, from the Local Plan and Policies Map. Reallocate the housing target to alternative, genuinely sustainable brownfield opportunities within	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Consistent with National Policy: The allocation conflicts with national policy regarding Green Belt protection, air quality, noise pollution, and sustainable transport integration. 2. Detailed Grounds of Unsoundness A. Transport & Highways Impact (Unsound: Unjustified & Ineffective) A52 / Brian Clough Way Congestion: The site directly borders the A52, an already severely congested strategic trunk road. Adding vehicle trips from 400+ homes, combined with existing traffic from recent developments, will significantly worsen congestion at key junctions (e.g., Spondon roundabout / Raynesway interchange). Local Road Network Constraints: Local access roads around Stoney Lane are narrow and ill-equipped to safely absorb substantial additional residential traffic, raising severe highway safety concerns for pedestrians and cyclists.	the city centre boundary or through existing cross-boundary agreements with neighbouring authorities. If retained (subject to examination): Amend policy requirements to strictly limit unit numbers, mandate full upfront highways/junction upgrades before phase 1 delivery, and require comprehensive noise/air quality impact assessments demonstrating full compliance with NPPF standards prior to site allocation.	Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires noise attenuation from the A52 and contributions to education and transport infrastructure (criteria d, h and i), and Policy EN11 requires major development to be accompanied by an Air Quality Assessment. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						B. Air Quality, Environmental Health & Liveability (Unsound: Consistent with National Policy) A52 Noise and Air Pollution: Positioning 400 homes immediately adjacent to the high-speed A52 introduces significant air and noise pollution risks. While the plan mentions acoustic buffering, relying heavily on artificial buffers raises doubts about whether acceptable living conditions (NPPF Section 15) can be achieved across the site. Viability Constraints: The cost of extensive mitigation measures (e.g., sound barriers, acoustic glazing, enhanced ventilation systems) undermines site viability, making the high target of 40% affordable housing unrealistic or deliverable (Effective). C. Loss of Green Belt / Green Gap & Ecological Harm (Unsound: Unjustified) Exceptional Circumstances Not Demonstrated: Releasing Green Belt/Green Wedge land at Stoney Lane lacks sufficient		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						justification, particularly when brownfield-first site capacity in the city centre has not been fully optimized. Urban Sprawl: Developing this site weakens the open green boundary of Spondon, reducing the vital buffer separating the suburb from neighbouring settlements and harming local biodiversity. D. Infrastructure & Community Capacity (Unsound: Ineffective) Cumulative Strain: Spondon has absorbed significant residential growth over recent years. The Infrastructure Delivery Plan (IDP) fails to demonstrate how local GP surgeries, primary/secondary school places, and surface water drainage systems will cope with an additional 400 households.		
OR102	Joe Frost	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to formally object to **Policy HA7 – Land East of Stoney Lane, Spondon**, which proposes a minimum of 400 new homes. My objection is not to the need for housing in Derby, but to the **location, scale and justification**	Remove Policy HA7 (Stoney Lane, Spondon – 400 homes) from the Local Plan. The allocation is **UNSOUND**, as it fails the **"Justified"** and **"Consistent with**	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025)

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						of this particular allocation. In my view, Policy HA7 is **unsound** and should be removed from the submitted Local Plan. **1. HA7 is not sufficiently justified** The Council must demonstrate that HA7 is the most appropriate strategy when reasonable alternatives are considered. The Council's own planning strategy places emphasis on a **"brownfield and city centre first"** approach. Derby has significant opportunities for housing through city-centre regeneration, brownfield redevelopment and the reuse of previously developed land. It is therefore difficult to understand why open agricultural land at Spondon should be released for housing before those opportunities have been fully prioritised and utilised.	**National Policy"** tests. The Council has not demonstrated that the release of this active agricultural Green Belt site as "Grey Belt" is necessary, or that reasonable brownfield and urban regeneration alternatives have been fully optimised first. The proposed 400 homes should instead be accommodated through existing **brownfield and city-centre regeneration** opportunities, including those identified under **Policy CC4, Policy C11 (Derby Riverside), Policy CC13 (Railway Station Quarter) and Policy CC14 (North Castleward).**	found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Cumulative effects, including with development in Erewash, will be assessed with the Highway Authority and National Highways as paragraph 307 requires, and Policy HA7 secures contributions to education and transport infrastructure (criteria h and i). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						If HA7 is genuinely necessary to meet housing requirements, the Council should clearly demonstrate why the available brownfield and city-centre opportunities cannot accommodate the required housing. Without that evidence, the allocation is **insufficiently justified and therefore unsound**. **2. This is active agricultural land, not brownfield** The site is **open agricultural land with existing farmland and hedgerows**, rather than previously developed or derelict land. Although the Council has identified the site as grey belt, grey-belt status should not be treated as automatically making development appropriate. There is a fundamental difference between releasing genuinely poor-quality, previously developed or heavily	This would be consistent with the Local Plan's stated **"brownfield and city-centre first**" strategy in **paragraph 81**, while avoiding the unnecessary loss of open agricultural land and further outward expansion of Spondon. The Council should therefore **deallocate HA7 and prioritise existing urban regeneration and brownfield capacity before releasing Green Belt/grey-belt land for development.** If Derby has substantial opportunities to provide housing through regeneration and previously developed land, releasing open agricultural Green Belt/grey-belt land	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						degraded land and building 400 homes on functioning agricultural land at the edge of Spondon. The Council should give proper weight to the loss of agricultural land and should demonstrate why this land needs to be released when substantial urban and brownfield opportunities remain. **3. HA7 would contribute to urban sprawl** The Council itself describes HA7 as an **"eastern urban extension"** to Spondon. That is effectively an outward expansion of the settlement into open countryside. A development of at least 400 homes, together with roads, lighting, parking, drainage and associated infrastructure, would permanently extend the urban footprint of Spondon and fundamentally alter the character of the area.	should be a later option, not a convenient alternative. The Council should not promote a brownfield-first strategy while simultaneously allocating significant areas of open countryside without first demonstrating that the urban opportunities have been properly exhausted.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Landscaping and green buffers may reduce visual impact, but they cannot change the fact that open agricultural land would be replaced by a substantial new residential development. The proposal therefore risks contributing to **urban sprawl rather than sustainable urban regeneration**. **4. Significant pressure on local infrastructure** A development of 400 or more homes would place substantial additional pressure on existing infrastructure. Particular concerns include: traffic and highway capacity; the A52 and surrounding junctions; schools and education provision; GP and healthcare services; public transport; drainage and surface-water management; pedestrian and cycling infrastructure; and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						recreational and community facilities. These pressures must also be considered **cumulatively with other existing and proposed development in and around Spondon**. The proposed HA7 allocation must also be considered in the context of (as well as other proposed developments) the ongoing **Spondon Wood housing development**, where concerns have been raised regarding compliance with planning requirements and the effectiveness of planning oversight and enforcement. It is particularly concerning that development pressure generated by decisions made by **Erewash Borough Council** is already placing additional demands on Spondon and Derby's roads, schools, healthcare and other infrastructure, despite the development being outside Derby City Council's administrative boundary. The		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						subsequent abandonment of Erewash's Core Strategy, following serious concerns from the Planning Inspectorate regarding the soundness of its housing strategy, further highlights the need for Derby to exercise caution before committing to another major development on the edge of Spondon. Financial contributions from a developer do not, by themselves, demonstrate that infrastructure will be adequate or delivered at the necessary time. The Council should provide clear evidence that the cumulative infrastructure impacts can realistically be addressed. For these reasons, I believe **Policy HA7 is unsound**. The allocation would: result in the loss of active agricultural land; extend Spondon into open countryside; contribute to urban sprawl;		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						place significant pressure on local infrastructure; create cumulative impacts for an already pressured community; and appear inconsistent with the Council's stated **brownfield and city-centre first** strategy. Most importantly, the Council has not adequately demonstrated why this open agricultural site should be preferred over reasonable brownfield, regeneration and city-centre alternatives. I therefore respectfully ask Derby City Council to **delete Policy HA7 from the submitted Local Plan**. If the Council is minded to retain the allocation, I ask that it provides compelling evidence demonstrating why the brownfield and city-centre alternatives cannot meet the housing requirement, why this agricultural land is genuinely required, and how the significant cumulative		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						infrastructure impacts will be addressed. In the absence of such evidence, I consider **Policy HA7 to be unjustified, ineffective and unsound**.		
OR103	Lynne Fryer	Policy HA7: Stoney Lane, Spondon	Objects		No	I'm going to get straight and to the point this policy is UNSOUND, The Stoney Lane site is agricultural farmland. It currently contributes to preventing urban sprawl and performs an important Green Belt function, NOT JUSTIFIED the council has incorrectly categorised active agricultural farmland as Grey Belt without demonstration that all reasonable brownfield alternatives have been considered. The council has substantial brownfield and city centre housing opportunities which should be prioritised before releasing Green Belt farmland for development. There are significant pressures on local infrastructure, including roads, drainage, doctors and school capacity.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Council should reallocate these 400 dwelling into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plan's stated 'brownfield and City Centre first' strategy (Paragraph 81).		comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.
OR106	Mervyn Giles	Policy HA7: Stoney Lane, Spondon	Objects		No	The proposal to build 400 new homes on active Green Belt farmland on Stoney Lane Spondon is UNSOUND. It is NOT justified and is NOT consistent with National Policy. This proposed site is active agricultural land and is NOT classed as Grey Belt. The infrastructure that we have for all the homes we have at present in Spondon is under significant pressure including Dental Practices, Doctors surgeries, even significant queues at local supermarkets.400 more homes would increase these pressures substantially. The		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Council already has Brownfield Alternatives available with bigger opportunities for development such as Railway Station Quarter CC13 for 500 homes or Derby Riverside CC11 for 600 homes, just to mention two, and sites for new homes should be looked at firstly in accordance with the plan's stated brownfield and City Centre first strategy. Active land that is farmed regularly and properly, as this land is, provides much needed crops for now and hopefully for the future, and also provides safe haven for wildlife, and therefore should never be turned into yet more concrete.		Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR105	Pralad Ghundoo	Policy HA7: Stoney Lane, Spondon	Objects		No	This policy HA7 is unsound, The council has classified the stoney lane site as grey belt in order to justify its removal from green belt area. National planning policy defines grey belt as land within green belt that is previously developed of poor quality and		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						under performing against the purposes of green belt. The stoney lane site is active agricultural land . It Contributes to preventing urban sprawl and performs an important green belt function. The council has not justified correctly active agricultural farming land as grey belt with out demonstrating that all reasonable brownfields alternative sites have been fully considered. The council is not consistent with national policy, by allocating active agricultural farming land conflicts with the principals of national planning policy . It directly contradicts the councils own commitment to a brownfield and city centre first strategy, set out in Paragraph 81 of the plan. Brownfield alternative areas are available,		alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires access at the southern end of Stoney Lane, contributions to off-site transport improvements and active travel and bus links (criteria g, h and l), and paragraph 307 requires impacts on the A52 to be carefully assessed and mitigated. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The council already has significant brownfields and city centre regeneration opportunities identified as housing including, Derby Riverside (policy CC11)-600 homes. Railway station quarter (policy cc13)-500 homes. North castle ward (policy cc14)-400 homes. City centre mixed use site(cc4)-over 1400 homes. These allocation demonstrate that there are substantial opportunities for housing to be delivered on previously developed and regeneration sites rather than developing active green belt farm land on edge of spondon. Having presented the facts and evidence the council should deallocate site HA7 (Stoney Lane, spondon 400 homes) from the local plan. The allocation is unsound as it fails to justified and consistent with national policy tests by		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						misclassifying active green farmland as grey belt without demonstrating that all reasonable brownfield alternatives have been fully optimised. The impact of increased population and traffic will have a significant negative impact on already congested road and services in the vicinity of this development. There will have to be extensive traffics management specially on Stoney Lane where speed humps would be necessary for slowing down traffic. The slip road junction to A52 would become busier and dangerous. An alternative would be to build a by pass road around spondon.		
OR107	Isaac Goddard	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a local resident to object to the proposed development of 400 homes on Stoney Lane in Spondon. I believe Policy HA7 is unsound, as I do not think the development is justified and I		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						am concerned that it is not consistent with national planning policy. The site is currently agricultural Green Belt land and I don't think land like this should be built on when there are brownfield and previously developed sites within Derby that could be used for new housing instead. I am also concerned about what another 400 homes would mean for Spondon. It would bring significantly more traffic and put additional pressure on local roads, schools, doctors and other services that existing residents already rely on. As a younger resident, I also think it is important that decisions about development consider what Spondon will be like to live in in the future. Once green space and agricultural land has been built on, we cannot simply get it back.		and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						For these reasons, I believe Policy HA7 should be removed from the Local Plan and brownfield and regeneration sites should be prioritised for new housing instead.		
OR108	Tony Gorbert	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a resident of Spondon to formally object to the proposed allocation of land east of Stoney Lane, Spondon, under Policy HA7, for a minimum of 400 homes. I consider the allocation to be UNSOUND, specifically on the grounds that it is not justified and is not consistent with national planning policy. I fully recognise that Derby needs to plan for additional housing and that the Council has a responsibility to identify sufficient land to meet its housing requirements. However, that does not mean that every potential development site is appropriate, nor does it remove the requirement for the Council to demonstrate that individual allocations are properly justified, deliverable and	I therefore respectfully request that the Council deallocate Site HA7 – Stoney Lane, Spondon – from the Local Plan. The minimum 400 dwellings should instead be reconsidered as part of the Council's existing brownfield and regeneration opportunities, including the allocations identified under Policy CC4, Policy CC11, Policy CC13 and Policy CC14, where appropriate and subject to their individual capacity and deliverability.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						consistent with the overall strategy of the Local Plan. In my view, Policy HA7 fails that test. 1. The principle and scale of the allocation The proposal is not for a small, incremental addition to Spondon. It is for a minimum of 400 homes and is explicitly described within Policy HA7 as an “eastern urban extension to the suburb of Spondon.” This would represent a substantial physical expansion of Spondon and would permanently change the character and setting of the eastern side of the village. The existing farmland and open countryside around Stoney Lane provide an important transition between the built-up area and the wider countryside. Replacing this landscape with a development of at least 400 homes would constitute a significant change to the	If the Council nevertheless intends to retain HA7, I request that the evidence base is strengthened before submission to demonstrate conclusively: 1. why this site is required; 2. why reasonable brownfield alternatives cannot accommodate the proposed housing; 3. the basis for its Grey Belt classification; 4. how existing highway capacity can accommodate the development; 5. how education and healthcare provision will be expanded; 6. how surface-water and drainage risks will be mitigated; and 7. how the development can	surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						settlement and should only be supported where there is compelling evidence that this is the most appropriate and sustainable location for that growth. I do not believe that the Council has demonstrated this sufficiently. 2. The treatment of the site as "Grey Belt" I am particularly concerned by the Council's treatment of this site in relation to the emerging Grey Belt approach. This is active agricultural farmland, rather than previously developed urban land. It is not a brownfield site or an obvious example of land that has become degraded through previous development. The Council should therefore provide a particularly robust justification for why this land is considered appropriate for release and why development here represents a better planning outcome than	take place without unacceptable harm to the character, landscape and quality of life of Spondon. This is not an objection to housing in principle. It is an objection to this particular allocation, at this particular scale, in this particular location, where I do not believe the Council has demonstrated that it is the most appropriate or sustainable option available. I ask that this representation is formally recorded against Policy HA7 – Stoney Lane, Spondon, and forwarded to the independent Planning Inspector for consideration as part of the	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						retaining the land in its current use. The fact that land may now fall within a revised Green Belt/Grey Belt classification should not, in itself, be treated as justification for development. The underlying planning merits of the location still need to be demonstrated. 3. Failure to demonstrate that reasonable brownfield alternatives have been fully optimised This is one of my principal concerns. The Council's own Local Plan strategy places significant emphasis on directing development towards previously developed land and city-centre regeneration. Yet the Council is simultaneously proposing the release of open agricultural land on the edge of Spondon for a major housing extension. There are already significant brownfield and regeneration	Regulation 19 examination.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						opportunities identified within the Local Plan, including: * Policy CC11 – Derby Riverside * Policy CC13 – Railway Station Quarter * Policy CC14 – North Castleward * Policy CC4 – City Centre Mixed-Use Sites These allocations collectively represent substantial housing opportunities. I therefore believe the Council needs to demonstrate much more clearly why the additional 400 homes proposed under HA7 cannot instead be accommodated, wholly or partly, through existing brownfield and regeneration opportunities. Unless the Council can demonstrate that reasonable previously developed land opportunities have been fully considered and optimised, the selection of HA7 is not adequately justified.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						4. Transport and existing congestion The transport implications are particularly concerning. Spondon already experiences significant congestion, particularly during peak periods. Getting through the village and accessing the A52 and wider road network can already be extremely difficult at busy times. This is not a theoretical concern for residents. It is an everyday issue. Adding a minimum of 400 homes will inevitably generate additional vehicle movements, including commuting, school journeys, deliveries and access to local services. Indeed, Policy HA7 itself requires financial contributions towards transport improvements to mitigate the highway impacts of the development. This demonstrates that the Council itself anticipates material		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						highway impacts arising from the allocation. I am concerned that simply requiring future financial contributions does not establish that the local road network has sufficient capacity to accommodate the development, nor does it demonstrate that the necessary improvements can be delivered effectively and at the appropriate time. The Council should therefore provide clear evidence that the cumulative transport impacts of HA7 have been properly assessed and that suitable infrastructure can be delivered before the development places unacceptable additional pressure on Spondon's road network. 5. Pressure on schools, healthcare and community infrastructure The same concern applies to other local services.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Residents already experience significant pressure when accessing local services, including difficulty obtaining timely GP appointments. Schools and other community facilities also have finite capacity. A development of at least 400 homes could result in a substantial increase in the number of residents requiring access to education, healthcare, public transport, recreational facilities and other community services. Again, Policy HA7 itself acknowledges this issue by requiring financial contributions towards improved education infrastructure. The Council therefore needs to demonstrate not merely that contributions can theoretically be collected, but that adequate additional infrastructure will actually be available, funded and delivered alongside the housing.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						6. Drainage and surface water I also have concerns regarding drainage and surface water. The proposed development would urbanise a substantial area of currently undeveloped land. Increasing hardstanding and built development inevitably changes surface-water run-off and drainage requirements. It is notable that Policy HA7 specifically requires a "comprehensive surface water drainage solution". This should not simply be treated as a matter to resolve at a later planning application stage. At Local Plan allocation stage, the Council needs to have sufficient evidence to demonstrate that the site can be developed sustainably and without creating unacceptable consequences for existing residents. 7. Loss of open countryside and impact on Spondon's character The land around Stoney Lane is valued by residents for walking,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						recreation and access to the countryside. These fields are not simply undeveloped land awaiting an alternative use. They contribute to the character and setting of Spondon and provide residents with access to open space and the wider countryside. The Council's own Local Plan consultation material recognises the importance residents place on open spaces, including their contribution to health, wellbeing and nature conservation. The permanent transformation of this landscape into a large residential development should therefore only occur where there is a clear and compelling planning justification. 8. The allocation must be considered against the overall strategy I am not arguing that Derby should not build new homes.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						My objection is that where those homes are built matters. The Council has identified a strategy that places importance on regeneration, previously developed land and city-centre opportunities. It should therefore be demonstrated that the release of open agricultural land at Stoney Lane is genuinely necessary and represents the most appropriate option when considered against reasonable alternatives. I do not believe the evidence currently demonstrates this sufficiently. 9. Conclusion – Policy HA7 is unsound For the reasons set out above, I consider Policy HA7 – Stoney Lane, Spondon to be UNSOUND. In particular, I consider it: Not Justified, because the Council has not adequately demonstrated that: * the allocation of this particular site is the most		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						appropriate option when reasonable alternatives are considered; * the release of active agricultural land is necessary; * brownfield and city-centre opportunities have been sufficiently optimised before allocating this site; * the significant transport, education, healthcare and drainage implications can be satisfactorily addressed; and * the scale of the proposed eastern urban extension is appropriate for Spondon. I also consider the allocation: Not Consistent with National Planning Policy, particularly given the need to make effective use of previously developed land, promote sustainable patterns of development, protect valued landscapes and ensure that development is supported by the necessary infrastructure.		
OR109	Richard and Sandra Green	Policy HA7: Stoney Lane, Spondon	Objects		No	I am concerned about the proposed building of 400 homes on Stoney lane.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I always thought this farming land was supposed to be greenbelt, I think we should be giving more encouragement to farmers to grow more and use their land for the benefit of the country to grow more crops to stop importing so much. It is also has popular footpath that many use for recreation and enjoying the county side walk. I would also be concerned about the traffic there is already a problem with getting out of Spondon at rush our, the Schools could not cope with the extra pupils it would bring and with the change it would bring to the village. I also understand there are several brownsites in the city where these 400 houses could be reallocated. Please reconsider the building of these houses, I know a lot of money is made by developers who make promises to councils but consider our country side,		current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR112	Mr C R Hawke	Policy HA7: Stoney Lane, Spondon	Objects		No	I am a local Spondon resident and wish to lodge my formal complaint for the proposed development on farmland off Stoney Lane , Spondon Specifically Policy HA7- Stoney Lane, Spondon - 400 homes The Policy for choosing this site is unsound and not justified ,the site is active agricultural land and not poor-quality or previously developed or grey belt as the council has designated it The development of this land would contribute to further expansion of urban sprawl There are already significant pressures on the local infrastructure,including roads,drainage and school capacity ,plus the impact that would it would have on the medical services that are already stretched and suffering The council has substantial opportunities to develop brownfield and city-centre	I am asking for the deallocation for Site HA7 (stoney Lane- 400 homes) from the local plan because this plan is unsound because it fails the justified and consistent with the national policy tests by misclassifying active green belt farmland as grey belt without demonstrating that all brownfield alternatives have been fully investigated or optimised The council should be reallocating these 400 homes into existing city centre projects in accordance with the plans stated ' brownfield and citycentre first ' strategy	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						housing opportunities which should be prioritised before releasing green belt farmland for development The proposed plan is inconsistent with the plans stated "brownfield and city centre first " strategy		3 within the site. No change required.
OR113	Shaun Hayes	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally object to the proposed allocation of site HA7 at Stoney Lane, Spondon, for approximately 400 homes. In my view, the allocation is **unsound** and does not satisfy the requirements for the plan to be considered **justified or consistent with national planning policy**. My main concerns are as follows: **1. Active agricultural land** The site is currently active agricultural land and should not be treated in the same way as previously developed land or genuinely poor-quality land. Releasing productive green belt	I therefore ask the Council to: **Deallocate site HA7 (Stoney Lane, Spondon) from the Local Plan and reconsider the proposed 400-dwelling allocation.** If additional housing capacity is required, I believe these dwellings should instead be directed towards existing brownfield and city-centre regeneration opportunities, including the allocations identified under **Policy CC4, Policy CC11 (Derby**	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						farmland for housing should only be considered where there is a clear and compelling justification and where reasonable alternatives have been properly exhausted. **2. Further urban expansion and sprawl** Development of approximately 400 homes at Stoney Lane would contribute to the continued outward expansion of the urban area and would further encroach upon the surrounding green belt. This risks creating additional urban sprawl and permanently changing the character of the area. **3. Pressure on existing infrastructure** There are already significant pressures on local infrastructure. A development of this scale would place additional demand on: The local road network and traffic capacity Drainage and surface-water infrastructure	**Riverside), Policy CC13 (Railway Station Quarter) and Policy CC14 (North Cattleward)**, where appropriate. This would be more consistent with the Plan's stated brownfield and city-centre-first strategy and would avoid the unnecessary loss of active agricultural and green belt land. I respectfully ask that this representation is formally recorded and given full consideration as part of the examination and preparation of the Local Plan.	transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Local schools and education provision Other community services and facilities I believe these cumulative impacts need to be properly demonstrated and addressed before such a significant allocation is taken forward. **4. Brownfield and city-centre opportunities** Derby has substantial opportunities for housing delivery through brownfield land, regeneration schemes and city-centre development. These opportunities should be prioritised before releasing green belt agricultural land for development. The proposed allocation therefore appears difficult to reconcile with the Plan's stated **"brownfield and city centre first"**approach. **5. Failure to demonstrate that reasonable alternatives have been fully optimised**		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Before allocating HA7, the Council should demonstrate clearly that existing brownfield and regeneration opportunities have been fully assessed and optimised for housing delivery, and that the proposed 400 homes cannot reasonably be accommodated through those opportunities.		
OR114	Emma Healy	Policy HA7: Stoney Lane, Spondon	Objects		No	I would like to state these objections to Policy HA7 on Stoney Lane in Spondon for the development of 400 homes. This policy is unsound for two main reasons. The first reason is that the classification of the land as grey belt is not justified as the land is active agricultural land and therefore has been incorrectly classified by the council without them demonstrating that other brownfield sites have been considered. The second reason is that the allocation of this land as grey belt is not consistent with national planning policy. In addition, it contradicts the	Therefore, the site HA7 Stoney Lane, Spondon - 400 homes should be deallocated. This allocation is unsound as it fails the justified and consistent with national policy tests. This is because it is on land that has been incorrectly classified as grey belt land without showing other brownfield sites can't be used. The Council should reallocate these 400 dwellings to existing brownfield or City Centre sites as listed above.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						council's own commitment to "brownfield and City Centre first" (paragraph 81 of the Plan) approach to development. Furthermore, there are other significant brownfield and City Centre sites that could be used for housing development such as Policy CC11, Policy CC13, Policy CC14 and Policy CC14 before using active Green Belt farmland in Spondon. Developing on the site proposed in Policy HA7 would contribute to urban sprawl and will add significant pressure to local infrastructure for example school capacity and drainage as well increasing busy roads		education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.
OR115	Mr & Mrs Henley	Policy HA7: Stoney Lane, Spondon	Objects		No	To who it may concern regarding proposed Planning Policy HA7 which is a proposal to build 400 new homes on Stoney Lane Spondon. On what is , and what has, always been Agricultural land . My objections are firstly this has never been, as described in the planning application GREY LAND.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						This is and has to my knowledge of 70 years been Agricultural Green land . Secondly this application is in Contradiction with National Policy, of not allocating Agricultural Land for building purposes . There other sites which Council had identified which is Brownfield and would be better suited. For example, Railway Station Quarter Policy CC13 which would accommodate 500 homes, Derby Riverside Policy CC1 which would accommodate 600 homes. These sites show that previously developed land would be beneficial . Spondon at this time is inundated with Building House projects. Spondon as a village just cannot sustain any more		alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						homes, the infrastructure ie Doctors, Dentists ,Schools are now at capacity which prevents locals now either getting appointments ,or having the right to obtain School placements. Myself like many locals , consider this land a green wedge between Ockbrook and Borrowash. The congestion with Traffic within Spondon which is essentially a Village ,is now at its worst and further traffic will only make the environment detrimental to residents.		
OR116	Ann Hiley	Policy HA7: Stoney Lane, Spondon	Objects		No	There are immense existing pressures on the local infrastructure including traffic through the village /drainage/school GP and dentist limitations as it currently stands. This is to be further impacted due to the current approved planning by Erewash Borough Council for over 250 houses that are currently being built in Spondon (Locko Park) Interestingly , the proposed planning (policy HA7) is on ACTIVE agricultural land rather than "Grey Belt".		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The proposal is UNSOUND as it goes against the NATIONAL POLICY by misclassifying this active green belt land as grey belt. There are other current substantial brownfield alternatives which need to be considered in line with the plans BROWNFIELD & CITY CENTRE FIRST strategy (paragraph 81). Policy CC13 Railway Station Quarter Policy CC14 North Castleward Policy CC11 Derby Riverside If this planning were to go ahead it would have a significant negative impact on the village of Spondon, on what is already a village being put under pressure in respect of GP/Dentist/Schools capacities (not to mention, the current vehicles parking outside the local schools is already a safety issue for our children)		as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The roads are already a genuine concern to residents due to the current volume of traffic, inlcuding HGVs who use it as a thoroughfare to Ilkeston. The new development underway at Locko Park will further exacerbate this. Some 30+ yrs ago the issue of traffic and heavy goods vehicles through Spondon was raised and for some reason did not progress further. The burden of traffic in the village has risen significanty since then. The planning must not obtain approval due to the above concerns. Moreover, this is GREEN BELT land now being missclassified as grey belt.		
OR117	Lauren Hiley	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to object to the above planning. There are already substantial existing pressures on the local infrastructure including traffic through the village /drainage/school GP and dentist limitations as it currently is . This is to be further impacted due to the current recently approved planning by Erewash		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Borough Council for over 250 houses that are currently being built in Spondon (Locko Park) Bizarrely , the proposed planning (policy HA7) is on ACTIVE agricultural land rather than "Grey Belt". The proposal is UNSOUND as it goes against the NATIONAL POLICY by misclassifying this active green belt land as grey belt. There are other current substantial brownfield alternatives which must take priority in line with the plans "BROWNFIELD & CITY CENTRE FIRST" strategy (paragraph 81). These include:- Policy CC13 Railway Station Quarter Policy CC14 North Castleward Policy CC11 Derby Riverside If this planning were to go ahead it would have a significant negative impact on the village of Spondon, on what is already a village being put		allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						under pressure in respect of GP/Dentist/Schools capacities (not to mention, the current amount of vehicles parking outside the local schools which is already a safety issue for our children) The roads are already a genuine concern to local residents due to the current volume of traffic, inlcuding HGVs who use it as a thoroughfare to Ilkeston. The new development underway at Locko Park will further exacerbate this. Some 30+ yrs ago the issue of traffic and heavy goods vehicles through Spondon was raised and for some reason did not progress further. The burden of traffic in the village has risen significantly since then. The planning proposal must not obtain approval due to the above concerns. Moreover, this is GREEN BELT land now being misclassified as grey belt.		
OR118	Patricia Hiley	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to object to the proposed above planning.		Grey belt is defined in the NPPF by a site's contribution to Green

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						There are significant pressures on the local infrastructure including traffic through the village /drainage/school GP and dentist limitations as it currently stands. This is to be further impacted due to the current approved planning by Erewash Borough Council for 250+ houses that are currently being built in Spondon (Locko Park) Interestingly , the proposed planning (policy HA7) is on ACTIVE agricultural land rather than "Grey Belt". The proposal is UNSOUND as it goes against the NATIONAL POLICY by misclassifying this active green belt land as grey belt. There are other current substantial brownfield alternatives which need to be considered in line with the plans BROWNFIELD & CITY CENTRE FIRST strategy (paragraph 81). Policy CC13 Railway Station Quarter		Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Policy CC14 North Castleward Policy CC11 Derby Riverside If this planning were to go ahead it would have a significant negative impact on the village of Spondon, on what is already a village being put under pressure in respect of GP/Dentist/Schools capacities (not to mention, the current vehicles parking outside the local schools is already a safety issue for our children) The roads are already a genuine concern due to the present volume of traffic, inlcuding HGVs who use it as a thoroughfare to Ilkeston. The new development underway at Locko Park will further exacerbate this. The planning must not go ahead due to the above concerns.		
OR119	Tony Hiley	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to object to the proposed above planning. The reasons for this are numerous.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						As well as already significant pressures on the local infrastructure including traffic through the village /drainage/school GP and dentist limitations. This is to be further stretched due to the current approved planning by Erewash Borough Council for 250+ houses that are currently being built on the boundary to Spondon (Locko Park) Furthermore, the proposed planning (policy HA7) is on ACTIVE agricultural land rather than "Grey Belt". The proposal is unsound as it goes against the national policy by misclassifying this active green belt land as grey belt. Cleary there are other current substantial brownfield alternatives which need to be considered in line with the plans BROWNFIELD & CITY CENTRE FIRST strategy (paragraph 81). Policy CC13 Railway Station Quarter		agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Policy CC14 North Castleward Policy CC11 Derby Riverside If this planning were to go ahead it would have a significant negative impact on the village of Spondon, on what is already a village being put under pressure in respect of GP/Dentist/Schools capacities (not to mention the current parking outside the local schools is already a safety issue for our children) The roads are already a genuine concern due to the present volume of traffic, inlcuding HGVs who use it as a thoroughfare to Ilkeston. The new development underway at Locko Park will further exacerbate this. This proposal is simply not justified. that cannot accommodate from a swelling population		
OR120	Christopher Hill	Policy HA7: Stoney Lane, Spondon	Objects		No	My concerns regarding the above proposal is that if this development is passed, Spondon will be reduced to Urban Sprawl. At present there		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						is a development in process at what is known as Spondon Wood. There is a development to go through at Royal Hill Road and, One proposed adjacent the cricket ground. Spondon has been destroyed as a village it will become a town with no green spaces. The public need fresh air and green spaces. To develop Stoney Lane HA7 it would be necessary to change the designated Green Belt to Grey. The Government authorisation to do this is, the land has to be unworkable to use as farm land, and have previously had buildings, on it. This land does not come under this category as it is at present being used as fertile farm land. Also, Spondon has not got the required infrastructure to cope with school places, medical care and sewage system will struggle with the new developments. The roads will not be able to cope with hundreds of extra		current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						vehicles trying to navigate the roads to exit Spondon.		
OR121	Patricia Hill	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to object to the proposed 400 houses to be built as above. I strongly oppose the plan as Spondon has had its fair quota of developments recently, and there are more in the plans. Firstly the infrastructure will not cope ie: Schools, particularly secondary education, doctors, dentists, and the roads will not cope at peak times. There is only one road to get out of Spondon so drivers will have to detour, which will impact on surrounding villages. This development will be such bad news for Spondon residents, we will not have any green space to enjoy, it will be suffocating.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								secures contributions to health facilities where justified. No change required.
OR122	Sheena Hill	Policy HA7: Stoney Lane, Spondon	Objects		No	Policy Is "**UNSOUND**" Not Justified Not Consistent with National Policy Development Of 400 high quality houses- off Stoney Lane. **Questions for the Developers**:- **Will** the high quality homes have 3 or more bedrooms? **Will** some of the high quality homes be over 2 stories high if so how many & how high? **Is it** expected/ predicted 4 or more people in each home? Could it be 6-8 people? How many? **Is it** expected/ predicted each of the 400 homes might, have people visiting them? it might be friends, family, health professionals, council workers, traders, etc.		Noted. Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Is it expected/ predicted that any children will be living in these high quality homes & affordable houses? **Will** there just be one developer for the site, or will there be more than one? If so who are they? **Will** some of the properties be DWELLINGS? **How** many affordable houses/ homes/ dwellings will there be? **Will** the developer actually adhere to this (affordable dwellings)? Have they done in the passed with previous developments or is it just a prediction that never happens? **What** is the track record for the developers to develop infrastructure? **Do** the developers:- Build schools (or allow land for a school)? Build Doctors Surgeries (or allow land for a doctors surgery)?		active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Build community base hubs (or allow land for a community hub)? Bus stops? Are they in the plans? Roads, wide enough for parking on both sides? Even if people have drives – they tend to have visitors! **Will** the developers improve the Road down/alone Stoney Lane, to take into account the increase in traffic? OR- will the council have to put double yellow lines along the road (at the cost of the tax payer) due to the road being too narrow? **Spondon** has one road in & one road out of Spondon Village, which is very narrow, how will the developers, resolve this? Traffic is already, very bad! **What** will the developers do to improve the traffic flow from the A52? *Has a survey been done re traffic flow off the A52 and around Spondon, if so by whom*		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						& when, over what period of time? **How** many, People are expected/ predicted to Live & visit, this site on Stoney Lane? (??? Three or more thousand) **How** long will it take (approximately) to Build the high quality houses & dwellings? On Stoney lane. Have the Developers kept there word on other developments? – how trustworthy are they?, who oversee & hold them to account on this development, on what they do, or don't do? **Council**:- **What** is the Council expected to do after the Developers have developed the land? **<u>I wish to highlight the following</u>**:- **The Deallocated site HA7 Stoney Lane – 400 Homes**		

						The site is active agricultural land**, rather than poor -quality or previously developed "<u>GREY BELT</u>" (Misclassification on the part of the developers or planning).** Development **would contribute to the further expansion** of urban development sprawl**.** **There are significant pressures on local infrastructure, including Roads, Drainage, School capacity, Doctors.** **On this site there is wildlife that inhabit this farmed land, which have been seen & heard such as** Bats, Pheasants, Kestrels, A Bussard and an Owl **etc., as well as a public footpath.** **The council has substantial brownfield and city- centre housing opportunities which should be prioritised before releasing "GREEN BELT" farm land for development.** <u>The proposed allocation appears inconsistent with the Plans stated "brown field and city centre first" strategy (Paragraph 81). Hence this this development for the Proposed</u>		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Allocation of 400 houses off Stone Lane is UNSOUND.		
OR123	John Hinson	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to raise a strong objection in regard to the above policy. I believe that it is unsound based on the grounds that it is not justified and and inconsistent with national policy. **Not Justified** The re-classification of the land from Green Belt to Grey Belt is unjustified because it does not meet the national planning policy definition of Grey Belt as previously developed, poor quality or underperforming land. **Not Consistent with National Policy.** Development on productive agricultural land conflicts with the principles of national planning policy and also appears to be in direct conflict with the stated commitment of the Council. **Evidence**	On the basis of the above, I would request that the following modification be made to the local Plan: . Remove the allocation of 400 homes from Site HA7 (Stoney Lane) from the local Plan. The allocation is **unsound** because it incorrectly reclassifies Green Belt land as Grey Belt without due consideration being given to the maximising of all existing brownfield and city centre options. In this regard it **fails** the **"Justified"** and **"Consistent with National Policy"** tests which should be the prime consideration.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Cumulative effects, including with development in Erewash, will be assessed with the Highway Authority and National Highways as paragraph 307 requires, and Policy

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The land in question is actively managed farmland and has been producing crops for many years. It is entirely incorrect to define it as Grey Belt. This appears to be an arbitrary recategorisation which cynics might suggest has an ulterior motive. It is in conflict with national planning principles to be developing greenfield sites when there are brownfield alternatives readily available. In the light of current climate conditions and concerns regarding food security it does not seem an appropriate or logical decision to destroy productive agricultural land. In addition to the production of crops, this area has considerable amenity value for the local populace. The value of easily accessible green spaces for both mental and physical well-being is by now well proven and it does not make good sense to destroy such spaces unnecessarily when there are other options available.	Follow the Local Plan's stated policy of **"brownfield and City Centre first"** as defined in **Paragraph 81** by reallocating these 400 homes within the existing regeneration allocations:- Policy CC4 City Centre Mixed Use Sites Policy CC11 Derby Riverside Policy CC13 Railway Station Quarter Policy CC14 North Castleward I hope that this and all other representations regarding Policy HA7 are duly acknowledged and receive the attention that they deserve. Having seen past media reports in relation to the following of planning rules and procedures	HA7 secures contributions to education and transport infrastructure (criteria h and i). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Over recent years, Spondon has received more than it's fair share of local developments and also the external development of Spondon Wood by Erewash Borough Council which have created considerable pressure on the local infrastructure. This plan adds considerably more demands with no attempt at alleviation of the problems which already exist. The Council has already identified significant potential for future housing on both brownfield and city centre sites and these should be the priority for development. Not only is the plan in conflict with national policy, it is also in direct contradiction to the Council's stated commitment to a "brownfield and City Centre first" strategy as laid out in Paragraph 81 of the Plan.	in Derby, that seems doubtful, but one can only hope for improvement in such matters.	
OR124	Simon Hodge	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to submit an individual representation opposing the proposed land allocation off Stoney Lane, Spondon, designated as Policy HA7 –	I therefore request that Policy HA7 be removed from the emerging Local Plan and that the land be	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Stoney Lane – 400 homes in the emerging Derby Local Plan. I believe Policy HA7 to be unsound and request that this allocation be reconsidered and removed from the Local Plan. The allocation is not justified The proposed development would result in the loss of active agricultural land on the outskirts of Spondon. It has not been adequately demonstrated that the exceptional circumstances required to justify developing this land have been established. The site is not merely previously developed or of poor quality; its current agricultural use provides valuable open space and helps maintain the separation and character of Spondon. Constructing 400 homes would erode the boundary between Spondon and Ockbrook, undermining Spondon's unique character and community. The Council should clearly justify why this specific site is	reallocated to existing brownfield and city centre regeneration sites.	current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						necessary and why reasonable alternatives cannot meet the housing needs before allocating this land for development. Concerns regarding Green Belt designation The Green Belt issues warrant proper consideration. Although the consultation documents refer to the site as "Grey Belt," I am concerned that this designation should not automatically justify its allocation for development. The categorization of land within the Green Belt does not negate the need for the Council to thoroughly assess its actual characteristics, current agricultural use, contribution to preventing urban sprawl, and the implications of releasing it for development. The Council should provide clear evidence explaining why this site is suitable and essential for housing, rather than relying solely on its Green Belt classification. Loss of agricultural land is a significant concern		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Developing 400 homes would permanently remove productive agricultural land. In light of current pressures on land use, food production, and environmental sustainability, the Council should consider whether permitting active farmland to be developed aligns with the best interests of residents and the environment. Brownfield and regeneration sites should be prioritized I am concerned that the allocation of HA7 is unnecessary given the other housing opportunities identified in the emerging Local Plan. The consultation documents highlight significant capacity on brownfield and regeneration sites, including: Derby Riverside (Policy CC11) – 600 homes, Railway Station Quarter (Policy CC13) – 500 homes, North Castleward (Policy CC14) – 400 homes, and city centre mixed-use sites (Policy CC4) – 1,400 homes. This represents considerable potential housing capacity		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						without encroaching on active agricultural land on Spondon's edge. The Council should demonstrate why these brownfield and regeneration options cannot be brought forward or accelerated before releasing greenfield agricultural land. The principle of prioritizing brownfield development appears to conflict with the proposed allocation, and the permanent loss of active farmland cannot be justified unless the Council can demonstrate a compelling need. Impact on Spondon Developing 400 homes would significantly and adversely affect Spondon's character and setting. The Council should conduct a comprehensive assessment of cumulative impacts on local roads, traffic, schools, community facilities, healthcare, drainage, flood risk, landscape, biodiversity, and wildlife, as well as the relationship between Spondon and the surrounding countryside. Spondon already		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						faces infrastructure challenges—traffic congestion, drainage and flooding issues, shortages of GPs and schools—and adding 400 homes without plans for additional infrastructure would be detrimental. Furthermore, the main access point from a high-speed road poses safety concerns. The agricultural land also supports local wildlife and is used by the community for walking and crossing between Spondon and Ockbrook. The Council must justify the environmental impacts before proceeding with this allocation. For these reasons, I consider Policy HA7 – Stoney Lane, Spondon – to be unsound. The allocation is unjustified because the Council has not demonstrated that releasing active agricultural land is necessary when sufficient brownfield and regeneration sites are available. It also conflicts with national planning		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						policies, which require the Council to thoroughly assess the need for land release and prioritize previously developed sites before allocating productive agricultural land.		
OR125	Steven Hogg	Policy HA7: Stoney Lane, Spondon	Objects		No	Please deallocate Site HA7 (Stoney Lane, Spondon-400 homes) from the Local Plan. I believe the allocation to be UNSOUND as it fails the 'Justified' and 'Consistent with National Policy' tests. Specifically, it: misclassifies active agricultural Green Belt land as 'Grey Belt' does not prioritise the reasonable use of brownfield alternatives, which is in conflict with the Plan's stated strategy. I am concerned about the additional pressures that 400 homes at this location would place on local infrastructure, and in particular the implications for the safety and congestion of roads. For years I have enjoyed pleasant walks through these fields and would		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						be greatly saddened if this local access to nature and open space was destroyed. The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plan's stated "brownfield and City Centre first' strategy (Paragraph 81)."		of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR127	Paul Hurst	Policy HA7: Stoney Lane, Spondon	Objects		No	As you should be aware traffic issues are a major concern in Spondon with some big housing developments already in progress in Spondon adding further strain to the traffic situation with no plans to improve the situation. If a bypass around Spondon was built the land proposed for building 400 homes on Stoney Lane would be needed to join the A52. With such an increase in population in Spondon this will		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						impact dramatically to already stretched services in the area Schools, Doctors and other local services. With the amount of brown belt areas you have at your disposal within the city boundary I find it criminal to take good green belt land for house building.		as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR129	Ms Wanda Iskrzak	Policy HA7: Stoney Lane, Spondon	Objects		No	I want to raise my objection to the above proposed development. You have incorrectly designated this land as grey belt, when it is actually green belt, in order for your proposal to be passed through. I also would like to highlight that this is inconsistent with National policy and contradicts the councils commitment to a,	I strongly request that the HA7 site is deallocated. The area as been has been misclasified as grey belt when it is green belt. The council should reallocate these 400 homes into existing brownfield and city centre regeneration allocations prioritised	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						'brownfield and city first strategy' The proposal is unsound, the site is agricultural land and further expansion will add to the urban sprawl and Spondon,s infrastructure can not support this housing estate, especially when there are brownfield and city housing opportunities that should be prioritised.	under CC4, policy CC11,policy CC13 or policy CC14 in accordance with the plans stated brownfield and city centre first strategy (paragraph 81)	Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR130	Angela Johnston	Policy HA7: Stoney Lane, Spondon	Objects		No	I strongly object to the proposed development of 400 new homes off Stoney Lane, Spondon. Policy HA7 is unsound. The reasons for this are as follows: The site is active agricultural land, rather than poor-quality or previously developed “Grey	I am requesting that site HA7 (Stoney Lane, Spondon – 400 homes) be deallocated from the Local Plan. As stated previously, the allocation is unsound . It fails the ‘Justified’ and ‘Consistent with	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Belt" The site currently performs an important Green Belt function. Development would contribute to the further expansion of urban development and urban sprawl. There are significant pressures on local infrastructure, including roads, drainage and school capacity. The Council has substantial brownfield and city-centre housing opportunities which should be prioritised before releasing Green Belt farmland for development. The proposed allocation appears inconsistent with the Plan's stated "brownfield and City Centre first" strategy.	National Policy' tests by misclassifying active Green Belt farmland as 'Grey Belt' without demonstrating that all reasonable brownfield alternatives have been fully optimised. The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plan's stated 'brownfield and City Centre first' strategy (Paragraph 81).	alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR35 & OR237	Johnson Mowat on behalf of Harworth Group*	Policy HA7: Stoney Lane, Spondon	Object		No	As set out in earlier Regulation 18 stage representations, Harworth Group is supportive of the provisions of Allocation HA7 and is committed to delivering sustainable development where people want to live. The site presents a significant opportunity to deliver a high quality residential development in a highly sustainable location to assist in meeting Derby's identified housing need. The site is capable of delivering circa 450 no. new dwellings, including affordable dwellings, as part of an attractive landscaped setting with new public open space. Harworth Group has a number of comments which it kindly requests the Inspector takes into consideration. For ease of reference, the policy wording is provided in italics with Harworth Group's comments below.	**Land east of Stoney Lane, Spondon will deliver a minimum of 400 new, high-quality homes forming an eastern urban extension to the suburb of Spondon.** Harworth Group is supportive of this requirement and has demonstrated through previous representations that the site has the capacity to deliver circa 450 no. dwellings. It is therefore agreed that the yield of the site should be expressed as a minimum. Harworth Group does, however, kindly request that the wording of this sentence is amended as follows to reflect the relatively modest scale of the	Support for the allocation is welcomed. The policy wording is considered clear, and no change is required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							development and the origin on Spondon as a village: *'Land east of Stoney Lane, Spondon will deliver a minimum of 400 new, high-quality homes forming an ~~eastern~~ ~~urban~~ extension to the ~~suburb~~ eastern part of Spondon.'*	
OR35 & OR237	Johnson Mowat on behalf of Harworth Group*	Policy HA7: Stoney Lane, Spondon	Object		No	The Council will require: **a)** ***that the site delivers a minimum of 40% affordable housing subject to demonstrating that this is achievable;*** Harworth Group is committed to delivering sustainable development and recognise the important role affordable housing provision plays in this. However, it is noted that the affordable housing requirement for Allocation HA7 is expressed differently to the requirements set out in Policy HA4, which requires 'up to 40%' affordable housing on Green	Harworth Group therefore, kindly request that the wording of this requirement is amended as follows to ensure consistency: *'that the site delivers ~~a minimum of~~ up to 40% affordable housing subject to demonstrating that this is achievable'.*	Policy H4 sets the level of affordable housing expected on land released from the Green Belt and Policy HA7 applies it to the site, subject to demonstrating that it is achievable, so the two policies operate together. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Belt sites, as opposed to a 'minimum of 40%'. It is considered critical that site specific requirements and affordable housing policy requirements are consistent for the same type of development.		
OR35 & OR237	Johnson Mowat on behalf of Harworth Group*	Policy HA7: Stoney Lane, Spondon	Support		Yes	h) financial contributions for transport improvements off-site to be paid to the Council to mitigate for the highway impacts of the development; Harworth Group is committed to delivering accessible, sustainable development and, subject to viability, will deliver or fund the necessary upgrades to transport infrastructure to achieve this commensurate to the scale and impact of the development.		Support welcomed.
OR35 & OR237	Johnson Mowat on behalf of Harworth Group*	Policy HA7: Stoney Lane, Spondon	Support		Yes	*i)* financial contributions towards the provision of improved education infrastructure to mitigate the impacts of development; Harworth Group is committed to delivering socially sustainable development and, subject to		Support welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						viability, will fund the necessary improvements to education infrastructure to achieve this commensurate to the scale and impact of the development.		
OR35 & OR237	Johnson Mowat on behalf of Harworth Group*	Policy HA7: Stoney Lane, Spondon	Support		Yes	Harworth Group is supportive of site specific requirements b), c), d), e), f), g), j), k) and l) and has no further comments to make in relation to these.		Support welcomed.
OR201	Sarah Juniper	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to object to the proposed allocation of land at Stoney Lane, Spondon under Policy HA7 for approximately 400 homes. In my view, this allocation is unsound because it is **not justified** and is **not consistent with national planning policy**. The decision to allocate this site has not, in my opinion, properly demonstrated that this is the most appropriate location for such a substantial amount of new housing, particularly when there are other opportunities within the existing urban area that should be considered first.	I therefore request that the Council **delete Policy HA7 and remove the Stoney Lane, Spondon site from the Local Plan as a housing allocation**. The 400 homes proposed for HA7 should instead be redistributed through suitable existing brownfield, city-centre and regeneration opportunities. In particular, the Council should investigate whether the housing	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The site is active agricultural land The land at Stoney Lane is not previously developed land. It is active agricultural farmland and should not simply be treated as an expendable area of land on the edge of the city. The fact that the land was harvested only weeks ago is a clear indication that this remains working agricultural land. It is therefore difficult to understand the justification for describing or treating the site as a form of lower-value "grey belt" land when it is actively used for agriculture. Once this land is developed, its agricultural use and open character will be permanently lost. **Further urban expansion and sprawl** The proposed development would extend the built-up area of Spondon further into open countryside. A development of 400 homes is not a minor rounding-off of the existing	requirement can be accommodated through the regeneration and development opportunities identified under its city-centre policies, including **Policy CC4, Policy CC11, Policy CC13 and Policy CC14**, where appropriate and where those sites are capable of being delivered. This would provide a much more consistent approach with the Council's stated brownfield and city-centre-first strategy, while avoiding the unnecessary loss of productive agricultural land and limiting further urban sprawl. In summary, I believe HA7 should be removed because the	contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						settlement; it represents a significant urban extension. This would contribute to the continued outward expansion of Derby and increase the pressure for further development around the edge of the city. There is a real concern that, once this area of open land is developed, the boundary of the urban area will simply move further into the surrounding countryside. The Council should be very careful about allowing a pattern of development that gradually erodes the distinction between the existing urban area and the countryside. **Existing infrastructure is already under pressure** There are also significant concerns about whether the local infrastructure can properly accommodate a development of this scale. Particular concerns include: pressure on the local road network and junctions;	allocation is **unsound: it is not justified and it is not consistent with national policy**. The Council should make better use of its existing urban land and regeneration opportunities before resorting to the development of active farmland on the edge of Spondon. I respectfully ask the Council and the Planning Inspector to consider this objection and the requested modification when assessing the soundness of the Local Plan.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the ability of the existing drainage system to cope with additional development and surface-water runoff; pressure on local schools and education provision; and the wider effect of adding hundreds of additional households to existing local services. These are not minor matters that can simply be dealt with through contributions at a later stage. The starting point should be whether the location is genuinely suitable for 400 homes in the first place. It is particularly notable that Policy HA7 itself requires financial contributions towards transport and education infrastructure and a comprehensive surface-water drainage solution. This demonstrates that the Council is already aware that development at this location would place additional demands on infrastructure.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The proposed access is a serious concern I am also concerned about the proposed access arrangements. The proposed single vehicular access onto Stoney Lane would serve a development of around 400 homes. In my view, this raises serious questions about highway capacity, congestion and the safety of people using Stoney Lane, including pedestrians, cyclists and existing residents. The Council should not rely on financial contributions or future highway works to overcome fundamental problems with the suitability of the access. If the proposed entry arrangement creates significant health and safety risks, that is a fundamental reason to reconsider whether the site should be allocated at all. **Brownfield and city-centre opportunities should come first** Derby has substantial opportunities for housing		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						through the redevelopment of brownfield land, regeneration areas and underused sites within the existing urban area. Those opportunities should be prioritised before releasing productive agricultural land on the edge of the city for development. The proposed allocation therefore appears difficult to reconcile with the Council's stated **"brownfield and city centre first"** approach. If the Council's strategy is genuinely to make best use of previously developed land and regeneration opportunities before expanding onto greenfield land, then it needs to demonstrate much more clearly why those opportunities cannot accommodate the housing proposed for HA7. It is not enough simply to identify Stoney Lane as capable of accommodating 400 homes. The Council should demonstrate that reasonable brownfield and city-centre opportunities have		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						been properly assessed and optimised before deciding that active agricultural land should be released. **The allocation is not justified** For these reasons, I do not consider Policy HA7 to be justified. The allocation would result in the permanent loss of active agricultural land, further extend the urban area of Spondon, place additional pressure on already constrained infrastructure and create significant concerns regarding highway access and safety. At the same time, the Council has opportunities to direct housing towards brownfield and regeneration sites within the existing urban area. The evidence therefore does not demonstrate that allocating this particular site for 400 homes is the most appropriate strategy when reasonable alternatives exist.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The allocation is not consistent with national policy I also consider Policy HA7 to be inconsistent with national planning policy because it would involve the release of greenfield agricultural land without sufficient justification for why development cannot be directed towards suitable previously developed and urban sites first. The Council should adopt a plan that makes effective use of suitable brownfield land, supports regeneration and avoids unnecessary outward expansion where more sustainable alternatives are available.		
OR206	Simon juniper	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to you to raise my objections with the proposed policy HA7 stoney lane spondon 400 homes. Development. As a local resident and business owner of Ormskirk rise Spondon. I believe, along with many others that the proposal is unsound, for many reasons. Having lived next to the farm land for 15 years I can tell you		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						that it has been farmed consistently and is most definitely viable not of poor quality. How this fits into being re-classified as grey belt is beyond me, it should remain as green belt as I don't believe it is justified and consistent with national policy, green belt is there to protect urban sprawl and this is exactly what is needed here. There are many other viable site that should be considered within derbys ample brown field and city centre first strategy. Spondon has recently seen a mass of new housing developments and the area is more than struggling to cope. with serious concerns to school places. Access to doctors surgery is nigh on impossible and there is no chance of getting a dentist. With regards to access to the site. I have some serious concerns around the road infrastructure as the proposed junction is already dangerous with drivers constantly crashing		allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						at the junction, with a massive increase in traffic this will only increase the serious risk of accidents and injuries. So in conclusion The green belt farmland has been misclasified as rebels. The plan is inconsistent with local housing strategy for brownfield and city centre first strategy Local infrastructure is under significant pressure This is the last green belt land east of the city and as such should be prioritised to protect urban sprawl		
OR131	Miss Mia Danielle Keeton	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a local Spondon resident to express my serious concerns regarding the proposed development of approximately 400 new homes off Stoney Lane, Spondon, Derby, identified in the Local Plan for Derby (2023–2043) as Policy HA7. I am not normally someone who feels compelled to make my views heard through public consultations; however, I		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						believe the proposed allocation is unsuitable and that its wider and cumulative impacts on Spondon and the surrounding area have not been adequately considered. The land identified has been classified as 'Grey Belt'; however, I strongly question whether this classification appropriately reflects the nature and function of the site. The land has not previously been developed, is actively used for farming and agricultural purposes, and remains completely open and undeveloped in character. Development of this scale would result in the permanent loss of this open landscape and fundamentally alter the character of this part of Spondon. I am also concerned that brownfield land and other possible alternatives have not been fully optimised before land such as this is considered for development. Derby City		Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Cumulative effects, including with development in Erewash, will be assessed with the Highway Authority and National Highways as paragraph 307 requires, and Policy HA7 secures contributions to education and transport infrastructure (criteria h and i). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Council has identified numerous brownfield areas through its 'brownfield and City Centre first' approach (Paragraph 81). These sites should be prioritised wherever possible to regenerate underused areas, improve the city and protect established communities and remaining areas of open land. As a Spondon resident with a young family who has lived in the area for the past five years, I have already witnessed the pressures created by substantial developments that have been approved locally, including the Royal Hill Road site and the Bloor Homes development off Dale Road. These developments have contributed to the continued expansion of urban sprawl and increased pressure on local infrastructure, including schools, GP services, dentists, roads and drainage, alongside environmental and ecological pressures on local wildlife and habitats. The proposed HA7 development should therefore		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						not be considered in isolation. The cumulative impact of existing, approved and proposed developments in and around Spondon must be properly assessed when determining whether the area can sustainably accommodate approximately 400 additional homes. Spondon may sit within the city boundary, but much of its infrastructure and road network continues to reflect its historic village character. Many roads are narrow and already experience significant traffic. I have serious concerns about whether the existing road network could safely and effectively accommodate the additional traffic generated by hundreds of new households, particularly alongside increased construction traffic and HGV movements during a development of this scale. The existing Bloor Homes development off Dale Road should also be considered when assessing the cumulative		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						highways impact of further development in this area, as residents have already experienced increased traffic and disruption associated with development at this site. The impact of existing development provides an important indication of the pressures that further large-scale housing development could place on Spondon's road network. Development of the land off Stoney Lane would also affect an area valued by existing residents, including myself and my family, for access to the countryside, nature and walking routes. These routes provide connections towards neighbouring communities such as Ockbrook and Borrowash, allowing residents to enjoy the local countryside and access businesses and amenities in neighbouring villages on foot. Further development would also risk additional disturbance to wildlife and habitats that have already been affected by housing development		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						elsewhere in the local area, including the development off Dale Road. My concerns extend to the people who would ultimately purchase and live in these proposed homes. Housing development must be accompanied by adequate infrastructure. Adding hundreds of households to an area without sufficient capacity within schools, healthcare services, roads, drainage and other essential infrastructure risks negatively affecting both existing residents and the future residents of the development itself. New housing should contribute towards creating sustainable communities rather than placing further pressure on infrastructure that is already under strain. I fully understand and support the need for appropriate housing, economic development and growth within Derby. However, this should not come at the expense of		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						sustainable planning or the character and wellbeing of established communities. Brownfield and previously developed land should be properly exhausted and optimised, and the cumulative impact of development already taking place around Spondon should be fully understood before further large-scale expansion onto open agricultural land is pursued. These concerns are not mine alone. Through conversations with numerous local residents, I have encountered considerable concern about the proposed allocation and its potential impact on the future of Spondon. There is a genuine fear that continued development of this scale, without corresponding improvements to infrastructure and services, will permanently alter the character of the area and diminish the quality of life of both existing and future residents.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I therefore respectfully ask Derby City Council to reconsider the inclusion of this land under Policy HA7 and to fully assess the suitability of alternative and brownfield sites before allocating this area for approximately 400 new homes. At a minimum, I believe the Council must be able to demonstrate that the proposed development can be accommodated without unacceptable impacts on local infrastructure, highways, the environment, wildlife, access to open countryside and the established character of Spondon.		
OR132	Neil Kellogg	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to formally register my objection to the inclusion of the **'Policy HA7 - Stoney Lane Site'** in the Local Plan for Derby (2023-2043) submission before it goes to the Planning Inspector. The land is and has been for as long as local people can remember greenbelt, a well used productive area of farmland and the inclusion is		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						therefore completely unjustified. Never can it be considered to meet the requirements of being a ‘greybelt’ land category. ‘Greybelt' requires the land to be 'failing’ farmland and there is a lack of evidence in this respect which brings the conclusion that this site is clearly not consistent with National Planning Policy and should remain undeveloped ‘greenbelt'. Surely as an active Local Planning Authority you must have to demonstrate that the use of all ‘brownfield’ sites for future residential development have been fully investigated and dismissed before turning to develop agricultural ‘greenbelt’ land under the guise that it is ‘greybelt'. It is my understanding that this is not the case. I understand that there are still many areas of ‘brownfield land’		brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						within the City still to be re-developed - please exhaust these sites before taking away productive farmland which if developed will be gone forever as a producer of food. This area of land has always been regarded as part of the 'green-wedge' separating Derby City and Erewash Borough Administrative Districts and should remain so. The land in its entirety needs to remain 'green-wedge' separating the long standing settlements of Spondon and Ockbrook, rather than dragging Ockbrook into the Derby City sprawl. You need to further encourage the re-development of the City core, increasing footfall to reinforce the financial strength of hospitality and City businesses before stretching housing out more thinly into the suburbs. Your adopted policy of 'City Centre First' included in the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Plan seems to have been overlooked in this instance. Please keep me informed on progress of the Planning submission.		
OR133	Ruth Kellogg	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally object to the proposed allocation of Site HA7 at Stoney Lane, Spondon, for approximately 400 homes. I believe the proposed allocation is unsound and should be reconsidered for the following reasons. 1. The site is active agricultural land The land at Stoney Lane is active agricultural farmland and should not simply be treated as an appropriate development opportunity without properly demonstrating why this land needs to be released for housing. Developing this site would result in the permanent loss of productive agricultural land and would extend the built-up area of Spondon further into the surrounding countryside.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I am particularly concerned that agricultural Green Belt land is being considered for development when there appear to be significant opportunities for housing on previously developed and regeneration sites elsewhere within Derby. 2. Brownfield alternatives should be prioritised The Council already has substantial brownfield and city-centre regeneration opportunities identified for housing. These include: ● Derby Riverside (Policy CC11) – approximately 600 homes ● Railway Station Quarter (Policy CC13) – approximately 500 homes ● North Castleward (Policy CC14) – approximately 400 homes ● City Centre mixed-use sites (Policy CC4) – over 1,400 homes These allocations represent a significant number of potential homes on previously developed or regeneration sites.		drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I therefore question why the Council needs to release an additional 400 homes-worth of active agricultural land on the edge of Spondon when substantial brownfield and city-centre opportunities already exist. The Council should demonstrate clearly that these alternatives have been fully considered and that they cannot reasonably provide the housing capacity required before allocating agricultural Green Belt land for development. 3. The proposal appears inconsistent with the Council's own strategy The proposed allocation also appears difficult to reconcile with the Council's stated "brownfield and City Centre first" approach, referred to in Paragraph 81 of the Plan. If the Council has identified substantial opportunities for housing on brownfield and regeneration sites, these should		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						be properly prioritised before releasing valuable agricultural land on the edge of existing communities. Allocating HA7 while these alternatives remain available appears inconsistent with the stated strategy. 4. Impact of further urban expansion Developing 400 homes at Stoney Lane would contribute to the further expansion of the urban area of Spondon. This is not simply a matter of adding another housing development. It would represent a significant change to the character and landscape of the area and would result in the loss of open agricultural land. I am also concerned about the cumulative impact of additional development on local infrastructure, particularly roads, drainage and school capacity.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Council should demonstrate that the necessary infrastructure can accommodate the proposed development without placing unacceptable additional pressure on existing services and the surrounding community. 5. The allocation should be reconsidered For these reasons, I believe the proposed allocation of HA7 is not justified and is not consistent with the Council's stated approach to prioritising brownfield and City Centre development. I ask the Council to reconsider the allocation of Site HA7 and, where possible, meet housing requirements through existing brownfield and regeneration opportunities before releasing active agricultural Green Belt land. I therefore formally object to the allocation of Site HA7, Stoney Lane, Spondon, for 400		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						homes and ask that the site be removed from the Local Plan, or that its allocation is at least reconsidered following a proper assessment of all reasonable brownfield alternatives.		
OR134	Thomas Kellogg	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to register my objection to the proposed allocation of Site HA7 at Stoney Lane, Spondon, for the development of approximately 400 homes. I have concerns about both the principle of developing this particular site and whether the Council has demonstrated that it is necessary when there are other potential locations for housing within Derby. Loss of agricultural land and expansion of Spondon The proposed site is currently agricultural land and forms part of the open countryside surrounding Spondon. Developing it would result in the permanent loss of agricultural land and would		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						push the built-up area further into the countryside. I do not believe this should happen unless the Council can demonstrate a clear need for this particular site and show that other reasonable alternatives have been properly considered first. Brownfield sites should be used before agricultural land There appear to be substantial opportunities for additional housing on brownfield and regeneration sites within Derby. The Local Plan itself identifies sites including: ● Derby Riverside (Policy CC11) – approximately 600 homes ● Railway Station Quarter (Policy CC13) – approximately 500 homes ● North Castleward (Policy CC14) – approximately 400 homes ● City Centre mixed-use sites (Policy CC4) – over 1,400 homes		surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						These sites have the potential to provide a significant number of homes without the need to develop active agricultural land on the edge of Spondon. The Council should therefore provide convincing evidence that these brownfield and regeneration opportunities cannot accommodate the required housing before agricultural land is released for development. Inconsistency with the Council's stated approach I am also concerned that the allocation of HA7 appears inconsistent with the Council's stated "brownfield and City Centre first" strategy referred to in Paragraph 81 of the Plan. If the Council has identified substantial housing capacity within existing urban and previously developed areas, I believe those opportunities should be prioritised before extending the urban boundary into agricultural land.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Pressure on local infrastructure A development of around 400 additional homes would inevitably increase pressure on the local area. There are already concerns about the capacity of local roads, drainage systems and schools, and the Council should demonstrate that the infrastructure required to support this development is available or can realistically be provided. The impact should also be considered alongside other existing and proposed developments in and around Spondon, rather than looking at HA7 in isolation. Request for the site to be reconsidered Taking these concerns together, I do not believe the case for allocating HA7 has been adequately demonstrated. In particular, I believe the Council needs to properly establish why active agricultural		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						land should be released when significant brownfield and city-centre housing opportunities have already been identified. I therefore formally object to the proposed allocation of Site HA7, Stoney Lane, Spondon, for approximately 400 homes. I ask the Council to remove HA7 from the proposed Local Plan allocation, or at the very least to reconsider the site following a thorough assessment of all reasonable brownfield and regeneration alternatives.		
OR135	Chris Kemp	Policy HA7: Stoney Lane, Spondon	Objects		No	The council has classified the Stoney Lane site as “Grey belt” to justify moving it from Green belt. However, national planning policy defines grey belt as previously developed, poor quality or under performing greenbelt land. Stoney Lane site is an active agricultural farmland that helps prevent urban sprawl and performs an important Green Belt function. This policy is unsound, not justified and not consistent		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						with national policy and I wish to Challenge this proposal and register my objection. It is not justified- * The council has wrongly categorised active agriculture farmland as Grey belt * It has not demonstrated that all reasonable brownfield alternatives have been fully considered It is not consistent with National Policy- * Allocating working farmland as Grey Belt conflicts with national planning policy * The Council's own Local Plan commits to a "brownfield and City Centre first" strategy (paragraph 8.1), yet this allocation releases Green Belt farmland before fully utilising Brownfield sites. * Brownfield alternatives already available- The council already has major Brownfield sites allocated for housing, including- * Derby Riverside bracket (policy CC11) – 600 homes		up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. The loss of agricultural land has been weighed in the Sustainability Appraisal, and Policy HA7 requires a high-quality design with landscape and green infrastructure buffers to the countryside and to existing homes (criteria b, c and e). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						* Railway station Quarter (policy CC13) – 500 homes * North Castlewood (policy CC14) – 400 homes * City Centre mixed use sites (policy CC4) – over 1400 homes		
OR136	Derek Kemp	Policy HA7: Stoney Lane, Spondon	Objects		No	Regarding the subject of development- proposed 400 new homes on active farmland off Stoney Lane, Spondon. The council has classified the Stoney Lane site as “Grey belt” to justify moving it from Green belt. However, national planning policy defines grey belt as previously developed, poor quality or under performing greenbelt land. Stoney Lane site is an active agricultural farmland that helps prevent urban sprawl and performs an important Green Belt function. This policy is unsound, not justified and not consistent with national policy and I wish to Challenge this proposal and register my objection. It is not justified-		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						* The council has wrongly categorised active agriculture farmland as Grey belt * It has not demonstrated that all reasonable brownfield alternatives have been fully considered It is not consistent with National Policy- * Allocating working farmland as Grey Belt conflicts with national planning policy * The Council's own Local Plan commits to a "brownfield and City Centre first" strategy (paragraph 8.1), yet this allocation releases Green Belt farmland before fully utilising Brownfield sites. * Brownfield alternatives already available- The council already has major Brownfield sites allocated for housing, including- * Derby Riverside bracket (policy CC11) – 600 homes * Railway station Quarter (policy CC13) – 500 homes * North Castlewood (policy CC14) – 400 homes		of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						* City Centre mixed use sites (policy CC4) – over 1400 homes. The proposal takes no regard to the continuing issues of increased traffic, lack of increase in educational needs, doctors surgeries etc. The term "greybelt" is now an excuse to designate areas that would never be considered for development. Greenbelt is essential for all our health and wellbeing that is why we have it!		
OR137	Brian Kennedy	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to express my concern regarding the unsound reclassification of the Stoney Lane, Spondon site (HA7) from Green Belt to Grey Belt. This is active agricultural farmland and the reclassification is therefore contrary to national planning policy, particularly with several alternative brownfield sites available within the Derby area. Current residents of Spondon are already well-aware of the traffic constraints on leaving the area. Willowcroft Road and Nottingham Road are routinely		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						at a standstill during peak periods, and they remain the only practical routes towards Derby. Frequent roadworks only worsen the situation. Locko Road has its own congestion problems and, for many, would involve a significant increase in mileage, fuel use and travel time simply to exit Spondon. Doctors' surgeries, schools, and local infrastructure are already under increasing strain with residents of what was once a quiet village environment now being steadily absorbed into the expanding Derby urban sprawl. Another 400 homes on top of the ongoing Dale Road development is not realistic or sustainable. The proposal is wholly inappropriate and should be halted without delay.		Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR138	Lisa Kenny	Policy HA7: Stoney Lane, Spondon	Objects		No	Policy Is "**UNSOUND**" Not Justified Not Consistent with National Policy		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Development Of 400 high quality houses- off Stoney Lane. **Questions for the Developers**:- **Will** the high quality homes have 3 or more bedrooms? **Will** some of the high quality homes be over 2 stories high if so how many & how high? **Is it** expected/ predicted 4 or more people in each home? Could it be 6-8 people? How many? **Is it** expected/ predicted each of the 400 homes might, have people visiting them? it might be friends, family, health professionals, council workers, traders, etc. **Is it** expected/ predicted that any children will be living in these high quality homes & affordable houses? **Will** there just be one developer for the site, or will there be more than one? If so who are they? **Will** some of the properties be DWELLINGS?		and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						How many affordable houses/ homes/ dwellings will there be? **Will** the developer actually adhere to this (affordable dwellings)? Have they done in the passed with previous developments or is it just a prediction that never happens? **What** is the track record for the developers to develop infrastructure? **Do** the developers:- Build schools (or allow land for a school)? Build Doctors Surgeries (or allow land for a doctors surgery)? Build community base hubs (or allow land for a community hub)? Bus stops? Are they in the plans? Roads, wide enough for parking on both sides? Even if people have drives – they tend to have visitors! **Will** the developers improve the Road down/alone Stoney Lane, to take into account the increase in traffic? OR- will the council have to put double		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						yellow lines along the road (at the cost of the tax payer) due to the road being too narrow? **Spondon** has one road in & one road out of Spondon Village, which is very narrow, how will the developers, resolve this? Traffic is already, very bad! **What** will the developers do to improve the traffic flow from the A52? *Has a survey been done re traffic flow off the A52 and around Spondon, if so by whom & when, over what period of time?* **How** many, People are expected/ predicted to Live & visit, this site on Stoney Lane? (??? Three or more thousand) **How** long will it take (approximately) to Build the high quality houses & dwellings? On Stoney lane. Have the Developers kept their word on other developments? – how trustworthy are they?, who oversees & holds them to account on this development, on what they do, or don't do?		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Council:- **What** is the Council expected to do after the Developers have developed the land? **I wish to highlight the following**:- The Deallocated site HA7 Stoney Lane – 400 Homes The site is **active agricultural land,** rather than poor -quality or previously developed "GREY BELT" **(Misclassification on the part of the developers or planning).** Development would contribute to the further expansion of urban development sprawl. **There are significant pressures on local infrastructure,** including Roads, Drainage, School capacity, Doctors. The council has substantial brownfield and city- centre housing opportunities which should be prioritised before releasing "**GREEN BELT"** farm land for development.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The proposed allocation appears inconsistent with the Plans stated <u>"brown field and city centre first"</u> strategy (Paragraph 81)**.** Hence this this development for the Proposed Allocation of 400 houses off Stone Lane is **<u>UNSOUND.</u>**		
OR139	Vincent Kenny	Policy HA7: Stoney Lane, Spondon	Objects		No	Policy Is "**<u>UNSOUND</u>**" Not Justified Not Consistent with National Policy The area is not suitable, due to lack of infrastructure of amenities, poor roads, location, risk of further flooding. This is farmed green belt land with wild life living in it! **I strongly object to Policy HA7.** **<u>The proposed allocation appears inconsistent with the Plans stated "brown field and city centre first" strategy (Paragraph 81). Hence this this development for the Proposed Allocation of 400 houses off Stone Lane is UNSOUND.</u>**		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.
OR140	Lindsay Kerry	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a resident of Spondon to formally object to the proposed allocation of land east of Stoney Lane, Spondon, under Policy HA7, for a minimum of 400 homes. I consider the allocation to be UNSOUND, specifically on the grounds that it is not justified and is not consistent with national planning policy. I fully recognise that Derby needs to plan for additional housing and that the Council has a responsibility to identify sufficient land to meet its housing requirements. However, that does not mean that every potential development site is	Requested modification I therefore respectfully request that the Council deallocate Site HA7 – Stoney Lane, Spondon – from the Local Plan. The minimum 400 dwellings should instead be reconsidered as part of the Council's existing brownfield and regeneration opportunities, including the allocations identified under Policy CC4, Policy CC11, Policy CC13 and Policy	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						appropriate, nor does it remove the requirement for the Council to demonstrate that individual allocations are properly justified, deliverable and consistent with the overall strategy of the Local Plan. In my view, Policy HA7 fails that test. 1. The principle and scale of the allocation The proposal is not for a small, incremental addition to Spondon. It is for a minimum of 400 homes and is explicitly described within Policy HA7 as an "eastern urban extension to the suburb of Spondon." This would represent a substantial physical expansion of Spondon and would permanently change the character and setting of the eastern side of the village. The existing farmland and open countryside around Stoney Lane provide an important transition between the built-up area and the wider countryside.	CC14, where appropriate and subject to their individual capacity and deliverability. If the Council nevertheless intends to retain HA7, I request that the evidence base is strengthened before submission to demonstrate conclusively: 1. why this site is required; 2. why reasonable brownfield alternatives cannot accommodate the proposed housing; 3. the basis for its Grey Belt classification; 4. how existing highway capacity can accommodate the development;	education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Replacing this landscape with a development of at least 400 homes would constitute a significant change to the settlement and should only be supported where there is compelling evidence that this is the most appropriate and sustainable location for that growth. I do not believe that the Council has demonstrated this sufficiently. 2. The treatment of the site as "Grey Belt" I am particularly concerned by the Council's treatment of this site in relation to the emerging Grey Belt approach. This is active agricultural farmland, rather than previously developed urban land. It is not a brownfield site or an obvious example of land that has become degraded through previous development. The Council should therefore provide a particularly robust justification for why this land is considered appropriate for	5. how education and healthcare provision will be expanded; 6. how surface-water and drainage risks will be mitigated; and 7. how the development can take place without unacceptable harm to the character, landscape and quality of life of Spondon. This is not an objection to housing in principle. It is an objection to this particular allocation, at this particular scale, in this particular location, where I do not believe the Council has demonstrated that it is the most appropriate or sustainable option available. I ask that this representation is	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						release and why development here represents a better planning outcome than retaining the land in its current use. The fact that land may now fall within a revised Green Belt/Grey Belt classification should not, in itself, be treated as justification for development. The underlying planning merits of the location still need to be demonstrated. 3. Failure to demonstrate that reasonable brownfield alternatives have been fully optimised This is one of my principal concerns. The Council's own Local Plan strategy places significant emphasis on directing development towards previously developed land and city-centre regeneration. Yet the Council is simultaneously proposing the release of open agricultural land on the edge of	formally recorded against Policy HA7 – Stoney Lane, Spondon, and forwarded to the independent Planning Inspector for consideration as part of the Regulation 19 examination.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Spondon for a major housing extension. There are already significant brownfield and regeneration opportunities identified within the Local Plan, including: * Policy CC11 – Derby Riverside * Policy CC13 – Railway Station Quarter * Policy CC14 – North Castleward * Policy CC4 – City Centre Mixed-Use Sites These allocations collectively represent substantial housing opportunities. I therefore believe the Council needs to demonstrate much more clearly why the additional 400 homes proposed under HA7 cannot instead be accommodated, wholly or partly, through existing brownfield and regeneration opportunities. Unless the Council can demonstrate that reasonable previously developed land		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						opportunities have been fully considered and optimised, the selection of HA7 is not adequately justified. 4. Transport and existing congestion The transport implications are particularly concerning. Spondon already experiences significant congestion, particularly during peak periods. Getting through the village and accessing the A52 and wider road network can already be extremely difficult at busy times. This is not a theoretical concern for residents. It is an everyday issue. Adding a minimum of 400 homes will inevitably generate additional vehicle movements, including commuting, school journeys, deliveries and access to local services. Indeed, Policy HA7 itself requires financial contributions		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						towards transport improvements to mitigate the highway impacts of the development. This demonstrates that the Council itself anticipates material highway impacts arising from the allocation. I am concerned that simply requiring future financial contributions does not establish that the local road network has sufficient capacity to accommodate the development, nor does it demonstrate that the necessary improvements can be delivered effectively and at the appropriate time. The Council should therefore provide clear evidence that the cumulative transport impacts of HA7 have been properly assessed and that suitable infrastructure can be delivered before the development places unacceptable additional pressure on Spondon's road network.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						5. Pressure on schools, healthcare and community infrastructure The same concern applies to other local services. Residents already experience significant pressure when accessing local services, including difficulty obtaining timely GP appointments. Schools and other community facilities also have finite capacity. A development of at least 400 homes could result in a substantial increase in the number of residents requiring access to education, healthcare, public transport, recreational facilities and other community services. Again, Policy HA7 itself acknowledges this issue by requiring financial contributions towards improved education infrastructure. The Council therefore needs to demonstrate not merely that		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						contributions can theoretically be collected, but that adequate additional infrastructure will actually be available, funded and delivered alongside the housing. 6. Drainage and surface water I also have concerns regarding drainage and surface water. The proposed development would urbanise a substantial area of currently undeveloped land. Increasing hardstanding and built development inevitably changes surface-water run-off and drainage requirements. It is notable that Policy HA7 specifically requires a "comprehensive surface water drainage solution". This should not simply be treated as a matter to resolve at a later planning application stage. At Local Plan allocation stage, the Council needs to have sufficient evidence to demonstrate that the site can be developed sustainably and without creating unacceptable		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						consequences for existing residents. 7. Loss of open countryside and impact on Spondon's character The land around Stoney Lane is valued by residents for walking, recreation and access to the countryside. These fields are not simply undeveloped land awaiting an alternative use. They contribute to the character and setting of Spondon and provide residents with access to open space and the wider countryside. The Council's own Local Plan consultation material recognises the importance residents place on open spaces, including their contribution to health, wellbeing and nature conservation. The permanent transformation of this landscape into a large residential development should therefore only occur where there is a clear and compelling planning justification.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						8. The allocation must be considered against the overall strategy I am not arguing that Derby should not build new homes. My objection is that where those homes are built matters. The Council has identified a strategy that places importance on regeneration, previously developed land and city-centre opportunities. It should therefore be demonstrated that the release of open agricultural land at Stoney Lane is genuinely necessary and represents the most appropriate option when considered against reasonable alternatives. I do not believe the evidence currently demonstrates this sufficiently. 9. Conclusion – Policy HA7 is unsound For the reasons set out above, I consider Policy HA7 – Stoney Lane, Spondon to be UNSOUND. In particular, I consider it:		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Not Justified, because the Council has not adequately demonstrated that: * the allocation of this particular site is the most appropriate option when reasonable alternatives are considered; * the release of active agricultural land is necessary; * brownfield and city-centre opportunities have been sufficiently optimised before allocating this site; * the significant transport, education, healthcare and drainage implications can be satisfactorily addressed; and * the scale of the proposed eastern urban extension is appropriate for Spondon. I also consider the allocation: Not Consistent with National Planning Policy, particularly given the need to make effective use of previously developed land, promote sustainable patterns of development, protect valued landscapes and ensure that		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						development is supported by the necessary infrastructure.		
OR141	Mrs Margaret Key	Policy HA7: Stoney Lane, Spondon	Objects		No	This policy is unsound in as much as it is not justified and is not consistent with National Policy. The site is active agricultural land not poor quality or previously developed 'grey belt'. Development would contribute to the further expansion of urban development and urban sprawl. There are significant pressures on local infrastructure including roads, drainage, medical and school capacity. The council has substantial Brownfield and city Centre housing opportunities which should be prioritised before releasing Greenbelt farmland for development. The proposed allocation appears inconsistent with the plan stated to "Brownfield and city centre first" strategy.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						de allocate site HA7 bracket stony Lane, pond – 400 homes closed brackets from the local plan. Green belt farmland has been misclassified as grey belt without demonstrating that all reasonable Brownfield alternatives have been fully optimised, making this allocation unsound as it fails the "justified" and "consistent with national policy" tests. Existing Brownfield and city centre regeneration allocations prioritised on the policy CC4, policy C11 (Derby Riverside) policy C13 (railway station Quarter) or policy C14 (North Castlewood) should have the reallocation of the 400 dwellings in accordance with the plan stated " brownfield and city centre first" strategy (paragraph 81). Spondon is already overpopulated with roads jammed with too much traffic, schools overcrowded and doctors inaccessible.		secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR142	Michael Kightly	Policy HA7: Stoney Lane, Spondon	Objects		No	Regarding above policy, doe`s any one even realise that we are well over loaded with traffic,Got insufficient Doctors,Dentists,Schools and Congestion. Already i believe other homes are being planned or in progress around Spondon. This is a working farm and this goes against National Policy. It is NOT a sound proposal and prevents urban sprawl. There is plenty of brown field areas including DerbyRiverside, North Castleward, Around the station currently around 3,000 homes., Apartments etc etc . I cant see how you could justify this proposal going through. The village is small, narrow roads to which with even more traffic could be an accident to happen. Please listen to village residents and dont pass this rediculous plan.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								where justified. No change required.
OR143	Brajan King	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to object to Policy HA7 – Stoney Lane, Spondon as part of the Regulation 19 consultation. I understand Derby needs more housing, including affordable housing, and I'm not against development in Spondon in principle. My concern is whether this particular site has been sufficiently justified for a minimum of 400 homes. One concern is the loss of agricultural land. The Council's Sustainability Appraisal identifies HA7 as Grade 3 and 4 agricultural land and gives the impact on soils a Significant Negative rating. I contacted the Council about this and have been told that no agricultural land survey or reclassification has been carried out for HA7. The Natural England regional map I was directed to specifically says it does not distinguish between	I would like HA7 to be reconsidered, or for the Council to provide clearer evidence before progressing the allocation, particularly the completed HA7 transport modelling, cumulative impact of surrounding developments and a detailed Agricultural Land Classification assessment.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Cumulative effects, including with development in Erewash, will be assessed with the Highway Authority and National Highways as paragraph 307 requires, and Policy

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Grade 3a and 3b, which normally requires more detailed survey work. This means we currently don't know whether some of the Grade 3 land is Grade 3a and therefore considered Best and Most Versatile agricultural land. Given that this farmland will be permanently lost, I think this should be established. My bigger concern is transport and the cumulative pressure on Spondon. The Council has confirmed to me that further modelling specifically looking at HA7's transport impacts and the required mitigation is still being undertaken. It therefore seems strange that residents are being asked whether the plan is sound before this work is available. This is particularly relevant as the Transport Assessment for the much smaller Royal Hill Road development already identifies the Willowcroft Road/Nottingham Road junction		HA7 secures contributions to education and transport infrastructure (criteria h and i). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						as operating over capacity, with limited scope for physical improvements. I also question how sustainable HA7 will be in practice. Even from the closest existing houses to the proposed site, Spondon station is around a mile and 25 minutes' walk away, with no station car park. The Council's Sustainability Appraisal refers to walking/cycling connections and possible bus access, but the detailed transport work showing how this will actually operate has not been done. There also needs to be proper consideration of the cumulative development around Spondon. Fawndale Rise may technically be in Erewash, but it is effectively joined onto Spondon and its residents will use many of the same roads, schools, shops and other services. Royal Hill Road and other nearby development also need to be considered alongside HA7. For these reasons, I consider Policy HA7 to be unsound as it		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						has not been sufficiently justified.		
OR144	Ian Lakin	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to voice my opposition to the proposal, identified as Policy HA7, to build 400 new homes on active farmland off Stoney Lane, Spondon, Derby. I find it difficult to believe that The Council has classified this site as “Grey Belt” bearing in mind it provides a beautiful walking route to Victoria Avenue, Ockbrook with the footpath flanked by hedgerows and fields before crossing a secluded stream over a pretty footbridge. Over the course of this long hot Summer it has been a consistent pleasure, particularly in the evening, to walk along this path. The fields between Spondon and Ockbrook are an important and popular stretch of the countryside that add a great deal to the residents’ quality of life and sense of well being. Furthermore this proposal appears to contradict The Council’s own commitment to a “brownfield and City Centre first” strategy, with sites such as		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Derby Riverside, Railway Station Quarter, North Castleward and City Centre Mixed Use Sites available as brownfield sites. Policy HA7 would also increase significant pressures on local infrastructure, including roads, drainage and school capacity. I therefore believe that Policy HA7 is unsound.		Flooding Topic Paper records no Flood Zone 3 within the site. No change required.
OR145	David Lewis	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to voice my concern with regard to the proposed allocation of 400 houses off Stoney Lane Spondon. This policy HA7 is UNSOUND. Not Justified and Not consistent with National Policy. There are significant pressures on local infrastructure eg local shops, Doctors. Drainage, When we have significant rainfall water drains from the lower end of Stoney Lane on to the A52. These 400 houses should be re-allocated to existing brownfield and City Centre regeneration allocations.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						In line with the Plan's stated "brownfield and city centre" first strategy.		HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR146	Kate Licence	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to confirm that I believe that the policy above is unsound as it fails the justified and consistent with national policy , there are alternatives that can be looked at such as Derby riverside why allocate active agricultural farmland. The development would contribute to further expansion of urban development and urban sprawl! There is already significant pressure to the infrastructure including roads drainage and school capacity.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.
OR147	Joanne Lovett	Policy HA7: Stoney Lane, Spondon	Objects		No	I consider the proposed allocation of land at Stoney Lane, Spondon (Policy HA7 - 400 homes) to be UNSOUND on the following grounds: • Not Justified • Not Consistent with National Policy Reasons and Evidence The proposed allocation raises significant concerns about the justification for releasing this land for housing.	I therefore request that the Council **deallocates Policy HA7 (Stoney Lane, Spondon - 400 homes)** from the Local Plan. The 400-home requirement should instead be reviewed against the capacity available within existing brownfield and city-centre regeneration	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The site comprises active agricultural land and should not, in my view, be treated as an appropriate form of "Grey Belt" land simply to facilitate further expansion of the urban area. The loss of productive agricultural land to development requires particularly strong justification, especially where there are other opportunities for accommodating housing within existing urban areas. Development at Stoney Lane would also represent a further outward expansion of development around Spondon, contributing to urban sprawl and the continued erosion of the Green Belt. The cumulative effect of such allocations should be considered alongside the individual merits of the site. Once this agricultural land is developed, its contribution to the openness and separation of settlements cannot readily be recovered.	locations, with priority given to opportunities identified through **Policies CC4, CC11, CC13 and CC14,** or other suitable previously developed land. This would provide a more coherent approach with the Plan's stated **brownfield and city-centre-first strategy,** while avoiding the unnecessary loss of active agricultural Green Belt land and reducing the contribution of the allocation to further urban sprawl. Accordingly, Policy HA7 should be removed because its allocation is **UNSOUND: Not Justified and Not Consistent with**	supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						There are also concerns about whether the necessary infrastructure can adequately support a development of approximately 400 homes. Existing pressures on the local road network, drainage infrastructure and school capacity need to be properly assessed and addressed before such an allocation is confirmed. Infrastructure improvements should not simply be assumed to follow development where there is uncertainty about whether existing networks have sufficient capacity. More fundamentally, the Council should demonstrate that its available brownfield, urban and city-centre opportunities have been fully and realistically explored and optimised before releasing Green Belt agricultural land for housing. There appears to be a tension between the allocation of HA7 and the Plan's stated approach of prioritising brownfield land and city-centre opportunities.	**National Policy.** As a resident of Stoney Lane, I am so shocked that you are planning to have the entrance to the site on an already dangerous and busy part of the road, which is also a main walkway for not only junior aged children but also a busy nursery! This is an accident waiting to happen and I would like to know if there is plans to build an extra Doctors in the area too?	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						In particular, the Plan should demonstrate why the required housing capacity cannot instead be accommodated, wholly or partly, through existing or enhanced regeneration opportunities, including the areas identified under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) and Policy CC14 (North Castleward). The justification for HA7 therefore appears insufficient when considered against the availability of alternative locations within the existing urban area. Allocating agricultural Green Belt land while substantial brownfield and regeneration opportunities remain is difficult to reconcile with a genuine "brownfield and City Centre first" approach. For these reasons, I consider that the allocation has not been adequately justified and does not demonstrate sufficient		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						consistency with the relevant national planning approach to Green Belt release, particularly where reasonable alternatives within the existing built-up area have not been shown to have been fully optimised.		
OR149	Audrey & Rob Mann	Policy HA7: Stoney Lane, Spondon	Objects		No	The proposed site is agricultural land, rather than poor-quality. The council has substantial brownfield and city-centre housing opportunities which should be prioritised before releasing Green Belt farmland for development. This appears inconsistent with **the Plan's stated "brownfield and City Centre first"** strategy. Development would put more pressure on: - local school capacity - access to Doctors and Dentist - water management i.e. drainage etc - roads - entry and exit to the site is extremely close to the A52, I'm worried that queues could be backed up onto a very busy road (and that myself could be in one of these queues).		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Council should relocate these 400 dwellings to existing brownfield and city centre regeneration that I believe are live within the Derby City Centre		at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR527	Paula Maples	Policy HA7: Stoney Lane, Spondon	Objects	No	No	Not justified and not consistent with National policy . The site is active agricultural land, not poor quality "grey belt". There are significant pressure already on schools, doctors and roads with heavy queues to leave the village every day.	The allocation is unsound as it fails the justified and consistent national policy test by misclassifying the land as Greg Belt. The "Deallocation of site HA7" is required from the local plan. The 400 dwellings need to be reallocated to existing brownfield and city centre regeneration allocations prioritised under Policy CC11, CC13 or CC14.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR257	Marrons on behalf of BDW Trading Ltd (Redrow Homes Midlands)*	Policy HA7: Stoney Lane, Spondon	Objects		No	Stoney Lane is proposed for allocation within the LPD, for residential development comprising the erection of 'a minimum' of 400 dwellings. Appendix 2 of the Submission Draft anticipates all 400 dwellings being completed within the plan period, assuming the first 60 completions in Year 6 (2028/29), followed by a sustained delivery rate of 60 dpa between Years 7 - 11 (2029/30 to 2033/34), and the final 40 units in Year 12 (2034/35). Notwithstanding the Council's delivery assumptions, recording completions as early		The Green Belt Assessment (LUC, 2025) was prepared by independent specialists and found that the site does not make a strong contribution to Green Belt purposes (a), (b) or (d), so it meets the definition of grey belt. Further information on this site is given in the Site Selection Topic Paper. SA Appendix G records that the site is promoted by developers controlling the majority of the land for around 400

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						as Year 6, there is no planning history associated with the site. Furthermore, it appears that the land is under fragmented ownership, with the central parcel under promotion by Harworth Estates. It is unclear, at this juncture, whether the site is being marketed to housebuilders, though it is recognised that embarking upon such an exercise will take considerable time. Turning then to the Council's own evidence, the site is assessed within the Strategic Housing and Land Availability Assessment (''SHLAA'') under Site Reference: DER0368. As regards the planning history and site delivery progress, the SHLAA records that the land is designated as Green Belt in the adopted local plan. It forms part of the wider Nottingham/Derby Green Belt, the primary purpose of which is to maintain separation and prevent coalescence of the two cities. Further, the Green		homes, and the trajectory at Appendix 2 does not anticipate completions until 2028/29. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Belt in this location also provides separation between the built extent of Derby City and the settlement of Ockbrook in Erewash. Alongside the Submission Draft, the Council has published a Derby Green Belt Assessment ("GBA") (September 2025). Paragraph 5.2 of the GBA records that the site (identified as parcel DY10) makes only a 'moderate' contribution to Green Belt purposes (a) and (c), and as a result is identified as grey belt. Plainly, the GBA has misdirected itself. For, Annex B of the 2026 Framework defines grey belt land as that which does not contribute strongly to any of purposes (a), (b) or (d). It does not require an examination of the site's contribution to purpose (c). Annex E which relates exclusively to Green Belt assessments, directs that assessments should identify areas of grey belt land, by evaluating the contribution		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						each area makes to Green Belt purposes (a), (b) and (d). Notwithstanding its flawed assessment, it is not possible to reconcile the GBA's findings with the situation on the ground, insofar as purpose (a) is concerned. Indeed, the drafting of Annex B is deliberate, in that a broad area/site will be ineligible for grey belt status where it makes a *strong* contribution to any of the three Green Belt purposes; purpose (a) being to check the unrestricted sprawl of large built-up areas. The PPG[14] provides illustrative features for each classification (strong, moderate and weak/none). For a site which performs strongly against purpose (a), the PPG (and Annex E of the Framework) set out that these are likely to be free of existing development and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						likely to include all of the following features: Be adjacent or near to a large built-up area; and If developed, result in an incongruous pattern of development (such as extended 'finger' of development into the Green Belt). In the present case, it is unarguable that the site, whether taken as a whole, or viewed as its component parts, is free from built form. As regards containment, the wider site adjoins built form to the west and the A52 to the south. However, there are no such permanent and defensible boundaries to the north and east. There are also no physical features in reasonable proximity that could restrict and contain development. The development of some 400 dwellings, bolted onto the eastern edge of Spondon would, inevitably, result in an incongruous pattern of development, in precisely the manner envisaged by the PPG.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						It is, therefore, unclear how the GBA has arrived at the conclusions that the site makes only a moderate contribution to purpose (a). Aside from Green Belt considerations, the SHLAA records that the promoters propose an access at the southern end of Stoney Lane and that, whilst this appears achievable, there are strategic traffic and transport concerns in that Stoney Lane only facilitates access onto the eastbound carriageway of the A52. A convoluted route, with known traffic problems would be required through Spondon in order to access the city centre. Furthermore, there is a lack of public transport in the area and, thus, the site would be reliant on the use of private motor vehicles. This raises concerns as to the site's overarching sustainability credentials, given that there are no proposed facilities on site. The highways and transportation impacts are echoed within Appendix G of		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the Council's Sustainability Appraisal ("SA'') which makes clear that National Highways requires impacts to be understood and mitigated. The constraints identified by the SHLAA align with those raised by local action groups which vehemently oppose the site's development, and which have garnered national media attention[15]. More significantly, the SHLAA concludes that, owing to the Green Belt designation and uncertainty regarding highway and transport matters, the site is not considered to be developable. It is superfluous for the respondent to provide any further commentary when the Council's indictment of the site is sufficient to undermine its allocation. Simply, in the instant case, the allocation appears to be predicated upon an expectation that the identified constraints *can* be overcome, rather than objective evidence		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						demonstrating that they *will* be. Given the scale of development proposed, the absence of any planning application, the site's physical constraints, and the Council's own conclusions regarding developability, the respondent considers that the contribution anticipated from Policy HA? is insufficiently evidenced.		
OR150	Bernard Marsh	Policy HA7: Stoney Lane, Spondon	Objects		No	I am a resident of Spondon [redacted] and I am concerned about the number of new houses proposed in the HA7- Stoney Lane, Spondon. My objections are as follows 1. The site is used as agricultural land NOT BROWN SITE 2. We had in the recent past RAW SURAGE RUNNING DOWN Sandringham drive,the sewage plant would not be able to cope. 3. The surgery would not be able to cope 4. The traffic is bad through Spondon now with HGV going through we need a 7.5 ton limit. 5. The school run parking will get worse.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I may well think of other obections later		contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR151	Nicholas Maxwell	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally object to the proposed allocation of 400 homes on Stoney Lane, Spondon, and to ask that Policy HA7 is reconsidered as part of the current Local Plan consultation. My main concern is that the proposed development would result in the loss of active agricultural land and would represent a further expansion of development around Spondon. I do not believe this is an appropriate location for such a substantial housing allocation when other previously developed and regeneration		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						sites are available elsewhere in Derby. The Stoney Lane site is productive agricultural land and should not, in my view, simply be treated as a “Grey Belt” site without properly demonstrating why reasonable alternatives have been exhausted. The loss of farmland is particularly concerning given the long-term and irreversible nature of development. I am also concerned about the impact the development would have on bees, pollinating insects and other wildlife. Agricultural land, hedgerows, field margins and surrounding habitats can provide important food, shelter and nesting areas for bees, birds, mammals and other species. Building 400 homes could lead to habitat loss, disturbance, increased traffic, light pollution and the fragmentation of wildlife corridors. This could have a lasting effect on local biodiversity, particularly at a		Topic Paper. Policy HA7 requires trees and hedgerows to be retained where possible, green infrastructure buffers, on-site open space and links to the rights of way network and Dale Road Park (criteria c, e, f, k and l), and biodiversity net gain will be required under Policy EN10. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						time when bee populations and other pollinating insects are already under pressure. Any assessment should properly consider these impacts and demonstrate how they would be avoided, reduced or adequately mitigated. I am also concerned about the additional pressure 400 homes would place on local infrastructure, including roads, drainage, schools and other services. Spondon already experiences pressures associated with traffic and local infrastructure, and I would like these matters to be properly addressed before any decision is made to allocate this site. I note that the Local Plan identifies significant opportunities for housing on brownfield and city-centre sites, including Derby Riverside, the Railway Station Quarter, North Castleward and other city-centre mixed-use sites. These opportunities should, in my opinion, be fully prioritised		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						before releasing active agricultural land and wildlife habitat for development. I therefore ask the Council to consider the following: - That Policy HA7 is regarded as unsound, specifically on the grounds that it is not justified and not consistent with national planning policy, where applicable. - That the Council properly assesses whether sufficient brownfield and regeneration opportunities are available before allocating this site. - That the Stoney Lane allocation is reconsidered in light of the loss of agricultural land, the potential harm to bees and wildlife, the impact on Spondon's infrastructure and the Council's stated approach of prioritising brownfield and city-centre development. - That the proposed 400-home allocation is removed or appropriately modified if the evidence does not demonstrate that the site is necessary,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						justified and suitable. - That a thorough ecological assessment is carried out, including consideration of bees, pollinators, wildlife habitats, hedgerows and wildlife corridors, before any allocation is progressed. Please treat this email as my individual representation regarding Policy HA7 – Stoney Lane, Spondon – 400 homes.		
OR152	David & Sarah McArdle	Policy HA7: Stoney Lane, Spondon	Objects		No	Even before I present my reasons why this proposed development goes ahead, I would like to point out the land is an active farm, not a grey belt area. What should be done is a Public Enquiry into who and how this was reclassified from historic Green Belt to Grey belt. What process was undertaken, why did the residents in the area not get notification or opportunity to offer opinion or objections to the reclassification. Who benefits from this, an individual, individuals, councils or organisation?		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The proposed grey belt plot fails to be classed as grey belt, for the following reasons: 1. Previously Developed Land (PDL). This land has never had any previous development upon it, dating back to before the spread of Derby to include Spondon 2. Low-Contributing Green Belt Land (The Purposes Test). Only this week the farmer was out muck spreading the field, making it ready for crops to be sown, either late Autumn or early Spring. If the field was low contributing the farmer would not use time and limited resources on it. Pictures have been attached. Also, under NPPF (Footnote 7) the argument is that the site has ancient public footpaths and bridleways. Labour stated in their election campaign the following, when referring to grey belt.		Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						poor quality land, car parks and wastelands poor quality scrubland, mothballed on the outskirts of town a car park or similar land which does not affect the beauty of the countryside a disused petrol stations The proposed site fails to meet any of those criteria, thus is not consistent with National Policy. The Council has failed to exhaust all of the available brownfield sites, across various parts of Derby, which in moderate estimates would yield 3000 homes, which currently have existing networks of utilities, roadways and bus routes already there, and access to larger schools, and / or the capability of building new ones. Spondon does not have that, unless you dig up more working farm fields. This renders the council failing to adhere to the principle of 'brown field and City Centre first'.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I am not sure if any laws have been broken, or if any laws cover the act of randomly changing land from green to grey, to develop housing, where 3000 much easier and more sensible and cost effective solutions exist, however someone needs to be investigated as to why perfectly good farmland was targeted.		
OR154	Roger W Meggison	Policy HA7: Stoney Lane, Spondon	Objects		No	In my opinion the Policy HA7 is unsound. There is already significant pressure on the local infrastructure including roads and schools around Spondon. This proposal seems not to be consistent with the "brownfield and City Centre first" strategy. I also believe the land has been missclasified and the Council should reallocate the 400 homes into available brownfield sites and the city centre regeneration allocations.	This HA7 proposal for 400 homes should be removed from the Local Plan because of the above points and missclassification of the farmland as "Grey Belt" when alternative brownfield sites have not been fully explored.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						This proposal would cause additional expansion of urban development and sprawl.		HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR155	David Miller	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to register my objection to the above policy as I believe it to be Unsound as it is Unjustified and is not consistent with national policy. The reasons for this are as follows: a. The site is, and always has been , active agricultural land. It is not Grey Belt. b. The site is an effective limit on the urban sprawl of Spondon which is already under great pressure for services. There is		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						mounting pressure on schools and G.P services.The roads in the village are also severely congested. c. There are several brownfield and urban regeneration sites within Derby which would deliver housing in the city and provide urban renewal.		and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR157	Gordon Mills	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to lodge my objection to the proposed housing development of 400 homes at **Stoney Lane, Spondon (Policy HA7)** and to request it is de-allocated from the Local Plan. There are several reasons for my objection:- The site has been mis-classified as "Grey Belt" when it is actually active Green Belt farmland.	Please de-allocate Policy HA7 from the Local plan before more money and effort is wasted in promoting a development which is unsound and at odds with Local and National policies.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						More appropriate Brown Belt sites exist in Derby for such a development. Spondon was already at "full capacity" before 2 other developments were recently approved and are underway. As such, a further development of this scale (400 dwellings) will impose an unrealistic additional burden on the infrastructure of Spondon. The proximity to the busy A52 by-pass road makes it unsuitable for housing due to noise and air pollution from traffic. The development appears to be taking the "easy option" of developing Green Belt rather than better utilising City centre space. This further reduction of farmland impacts the need to improve food security and self sufficiency for the UK as a whole. Neglecting City centre Brown Belt opportunities extends urban sprawl with significant negative environmental effects.		as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires noise attenuation from the A52 and contributions to education and transport infrastructure (criteria d, h and i), and Policy EN11 requires major development to be accompanied by an Air Quality Assessment. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Policy HA7 is not consistent with the "brownfield and City Centre first" strategy.		
OR156	Patricia Mills	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to express my concerns about the proposed housing development **Policy HA7** planned for the bottom od **Stoney Lane Spondon Derby** **My main concerns are;** The site chosen is not "Grey Belt" as classified by Derby Council but is in fact "Green Belt" ; it is active farmland. I pass this site everyday and in fact used to live nearby. There are several "Brownfield" alternative sites in Derby which could be used. This plan is not consistent with National Policy where brownfield sites should be used where available. Brownfield sites in Derby include The Railway Station Quarter, Derby Riverside, and North Castleward.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Spondon is already undergoing 3 very large housing developments which will lead to increased traffic and will overstretch services such as local schools, doctors and dentists. The proposed Stoney Lane housing development borders the very busy A52 road to Nottingham and would result in future residents suffering from polluted air and constant noise. Hardly ideal living conditions. **In Summary Policy HA7 is;** Not Justified Not Cosistent with National Policy Therefore the Policy is **UNSOUND** and I therefore ask you to reject it for all the reasons given.		links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR263	Hazel Milwain	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to object to the proposed development of 400 new homes off Stoney Lane, Spondon, for the following reasons:		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Policy HA7 is unsound, I feel that the council has wrongly classified the active agricultural farmland as Grey Belt. This farmland currently contributes to preventing urban sprawl and and performs an important Green Belt function. We have recently lost a large piece of land off Dale road, to housing development, reducing the green belt between Spondon and Ockbrook. There are already huge pressures on local infrastructure, including roads, drainage and school capacity. It's already extremely difficult to get a doctors appointment. When looking for an NHS dentist I had to go to a dentist in Risley. This proposed development will just add to the existing pressures on Spondon's infrastructure. This allocation is unsound as it fails the 'Justified' and 'Consistent with National Policy' tests by misclassifying active Green Belt farmland as 'Grey Belt' without being able to show that all reasonable brownfield alternatives have been fully		current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						optimised. I believe that the Council should reallocate these 400 houses into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter), or Policy CC14 (North Castleward), in accordance with the Plan's stated 'brownfield and city centre first" strategy (Paragraph 81). This proposed development is not justified and is also not consistent with National Policy. The Brown Field sites allocated demonstrate that there are substantial opportunities for housing to be delivered on previously developed and regeneration sites. It just isn't viable to develop this Green Belt site in Spondon, when the infrastructure isn't there, negatively affecting the lives of the people who already live in Spondon.		
OR159	Paul Neal	Policy HA7: Stoney Lane, Spondon	Objects		No	Living in the immediate area of this proposal, I would like to register my objection for the		Grey belt is defined in the NPPF by a site's contribution to Green

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						proposed site of possible 400 homes on the development. The proposed allocation of this site is considered "Unsound", **(1) Not Justified**, and is **(2) Not Consistent with National Policy**. For the following reasons: **Not Justified** Declassifying the land from "Green Belt" to "Grey Belt" to enable building has been incorrectly categorised, as this land has been, for many years, and still is, currently used for Agriculture/crop growth. There are other areas in Derby that are classified as "Brownfield/Grey Belt" and should be utilised before destroying green spaces, that are currently being enjoyed both by residents to walk and for farming. I have major concerns regarding safety as traffic leaving the A52 onto Stoney Lane as the exit lane from the A52, is short, along with the proposed location of the road to the proposed site would cause an		Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						accident hot spot, additional traffic leaving the proposed site road entering the A52 would cause traffic problems on Stoney Lane. The area is already struggling to provide services for residents already housed namely; doctors, dentists, schools and a limited bus service shared with Chaddesden. **<u>Not Consistent with National Policy</u>** The Council should reconsider the allocation of actively used agricultural land which conflicts with the principles of the national planning policy and directly contradicts the councils own commitment to use alternative areas first. For the proposed 400 homes should therefore be shared out between the " Brownfield/Grey Belt" and "City Regeneration" allocations, and not declassify Green Belt areas as in accordance with Paragraph 81 of the plan.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR163	Robert and Karen Norton	Policy HA7: Stoney Lane, Spondon	Objects		No	My wife and I wish to state our objections to the proposed construction of 400 new homes adjacent to Stoney Lane, Spondon - Policy HA7. We believe this Policy is unsound. It is inconsistent with national housing policy and not justifiable as a project. Our reasons are as follows: The proposal to build on this site contradicts the Local Plan for Derby's own housing strategy, which states that brownfield and city centre sites should be considered before those in the outer suburbs (see Paragraph 81 of the Plan). There are both brownfield and city centre alternatives. These are located at Derby Riverside, North Castleward, the Railway Station Quarter and various other mixed-use city centre sites. Collectively, these have a capacity for some 2,900 homes. Therefore, the Council should be locating any new housing at these sites first before considering the development at Stoney Lane. Because of their		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						central location these sites would afford new residents much better access to schools, transport facilities, hospitals and other medical services, and other community facilities than would an estate on the outskirts of Spondon. Our understanding is that the only local secondary school in the Spondon area, West Park, has no capacity for providing additional school places at all. Both the local GP surgeries struggle to offer appointments to their existing patients so will inevitably struggle if there is pressure to take on new ones. We understand the land earmarked for the new housing is liable to flooding, which surely makes it unsuitable for housebuilding. Further, Spondon already has a significant problem with traffic, and the addition of 400 new houses will only make things worse. I understand that the Council has redesignated the Stoney		where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Lane site as Grey Belt, thus overturning its original status as Green belt. National Planning Policy states that Green belt land may be redefined as Grey belt if it has been developed already; is of poor quality; or is underused as Green belt land. This land is productive agricultural land so doesn't appear to fit into any of these three categories. It acts as a buffer between Spondon and the neighbouring villages of Ockbrook and Borrowash thus helping to prevent urban sprawl, which, as you will be aware, is what Green belt was intended to do. For these reasons designating the land as grey belt isn't justified and isn't consistent with National Policy. Policy HA7 is therefore unsound. We understand that the exit road from the new estate would emerge right on top of the junction where Stoney Lane meets the A52. This is already a poor junction. It has an inadequate slip road for traffic		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						leaving the A52 and the driver's view of what is ahead when they make their exit is poor due to vegetation and a tight bend. Traffic may struggle to avoid cars emerging right on top of them from the side road, even at 30mph. In short, it will make using the A52 exit road quite dangerous - there have been serious accidents here already. Spondon is already a large village, but up until now has managed to maintain a good community atmosphere. There is decent social cohesion, and many Spondon residents are active in their community because they cherish it. If it becomes yet another characterless, ugly urban sprawl then this community spirit and social cohesion could easily be lost. We urge you to reconsider Policy HA7 and build elsewhere. Thank you for considering our objections.		
OR164	Alison Nunn	Policy HA7: Stoney Lane, Spondon	Objects		No	I am emailing to object to this planning application for the following reasons:		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b)

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						This is "unsound" as the land has been incorrectly classified as Grey belt when it is in fact a very active, productive farmland and therefore is agricultural land-green belt. This land is not poor quality and has sheep and other livestock grazing on it. The council has not ensured that all brownfield sites have been taken into consideration first. The local plan is not compliant with National Policy of "brownfield and city centre first". There are many alternative brownfiled sites including ; Derby Riverside(policy CC11);Railway Station Quarter(CC13);North Castleward(CC14);City centre Mixed -use sites (CC4). This development would put increasing pressure on roads, drainage, local facilities like doctors and schools. The housing already underway on Dale Road will increase all these		and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						pressures. Spondon cannot survive with more housing.		
OR165	Laura Nuttall	Policy HA7: Stoney Lane, Spondon	Objects		No	This representation relate specifically to policy HA7 Stoney Lane Spondon regarding the proposal to build 400 homes. I believe that the policy is unsound. It is not justified as the council has incorrectly categories active agricultural farmland as grey belt without demonstrating that all reasonable Brownfield alternatives have been fully considered. It is not consistent with national policy as allocating active agricultural farmland for development conflicts with the principles of national planning policy. Further or more it appears to directly contradict the councils and commitment to a Brown field and city centre 1st strategy which is set out in paragraph 81 of the plan. I would like to highlight the following points.	In conclusion, please deallocate site HA7 from the Local plan. The allocation is unsound and inconsistent with national policy. The proposed 400 dwellings should be prioritised under policy CC4, Policy CC 11, Policy CC 13, or policy CC 14. This would align with the plans stated Brownfield and city centre first strategy of paragraph 81.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The land is not poor quality or previously developed. It is active healthy agricultural land. The proposed development would further contribute to the expansion of unappealing urban development and sprawl in the area. There are already significant pressures on local infrastructure, including Our roads drainage School capacities dental surgeries Doctors and pharmacies. There is no proposal to increase any of these services to the area and therefore it's not suitable for a further 400 homes. The council already has substantial Brownfield and city Centre housing opportunities which should be prior authorised before releasing our Greenbelt farmland for development. The plan contradicts the strategy of Brownfield and City Centre first please leave our village area alone.		Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR170	Mr J.m and Mrs Ja Oldershaw	Policy HA7: Stoney Lane, Spondon	Objects		No	Dear Sirs,re the above proposed development foe 400 homes,this policy is deemed to be UNSOUND.This site is NOT GREY BELT,It. is active agricultural GREEN land. There are multiple BROWN field site able to accommodate such developments. Furthermore Doctors,dentists,schools are already over stretched!!roads are also congested in Spondon.The above reasons are therefore in our opinion contra to any further development.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								where justified. No change required.
OR171	Josh Ong	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to you regarding Policy HA7 - Stoney Lane Spondon. The policy is unsound for the following reasons: 1. The site is active agricultural land, rather than poor quality or previously developed “Grey Belts”. 2. The council has substantial brownfield and city centre housing opportunities which should be prioritised before releasing Green Belt farmland for development. The council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castlewood), in accordance with the Plan’s stated ‘brownfield and city centre first’ strategy (Paragraph 81).		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. The loss of agricultural land has been weighed in the Sustainability Appraisal, and Policy HA7 requires a high-quality design with landscape and green infrastructure buffers to the countryside and to existing homes

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								(criteria b, c and e). No change required.
OR172	Kevin Palmer*	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to object to policy HA7 in the Plan which allocates good and active farmland off Stoney Lane, Spondon, currently identified as Green Belt, for residential development of some 400 homes. Background: The land has always been agricultural and as a pupil more than 60 years ago at Asterdale Primary School on the other side of what was then known as the Borrowash by-pass we used to be taken across to the fields for nature walks. During the Covid pandemic many people used to go across this land for walks across the fields for exercise and fresh air, sometimes taking very popular routes into Ockbrook and back. The land is in the Green Belt - including on the current Local Plan - and this was designed to keep the communities of Spondon in Derby and Ockbrook in Erewash apart and separate rather than joining	For these reasons I opposed the policy HA7 and ask that it be removed from the Local Plan, with the council looking for alternate sites to make up the housing allocation required.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Cumulative effects, including with development in Erewash, will be assessed with the Highway Authority and National Highways as paragraph 307 requires, and Policy

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						together and producing an enlarged conurbation linking the cities of Derby and Nottingham..This was demonstrated before the last Derby and Derbyshire County Structure Plan around the turn of the century when there were very strong objections by people from Spondon and Ockbrook and Borrowash about the idea of developing housing on that land which Derby City Council opposed for the reasons stated.. The result was that the inspector who conducted the public inquiry agreed and dismissed the idea of building on that land, much to great relief of local people. This land, which is in regular farmland use, is the only farmland left in the green belt on the eastern side of the city and continues into Ockbrook parish. Yet the council has now jumped on the bandwagon of suddenly declaring the land as grey belt to justify its removal from Green Belt status to allow homes to be built there. This		HA7 secures contributions to education and transport infrastructure (criteria h and i). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						follows on from Erewash Borough Council declaring agricultural land on Dale Road near Spondon Wood that had Green Belt status for decades as grey belt to allow more than 250 homes to be built adjacent to Derby City Council's eastern boundary. There is no need to build new homes on this site to satisfy local need. For many months the number of homes for sale in Spondon on the Rightmove website has been around 90 – equivalent to the number that Miller Homes have planning permission to build on Royal Hill Road in the green wedge between the village and Chaddesden. This and the Dale Road site were strongly opposed by local residents , not just because of their designated status but because of concerns about infrastructure, particularly road issues, schools, and sewage disposal as well as the effect on already-crowded facilities. But now that number has increased by around one		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						third to 124. It is thought that some of these may be long-standing residents who do not want the hassle of new home builds, thus weakening community cohesion and spirit. Plus there are proposals from a company to build more homes in the green wedge off Derby Road/Acorn Way where previous plans have been repeatedly refused by the council, a decision backed when applicants have appealed. So, I would submit, this policy HA7 is unsound, not justified and does not conform to national policy guidelines. Allocating working farmland in Green Belt is not consistent with the national planning framework. The council's Local Plan paragraph 81 commits the authority to a brownfield and city centre first strategy, but HA7 releases Green Belt agricultural land before utilising brownfield sites in the city. The village of Spondon, which apart from industry to the south is		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						surrounded by Green Belt or green wedge cannot be classed in any way as part of the city centre. There are brownfield sites allocated for housing at Derby Riverside (policy CC11) – 600 homes; the Railway Station Quarter (CC13) - 500 homes;, North Castleward (CC14) – 400 homes, and more than 1,400 homes on mixed use sites in the city city. I believe there are more brownfield sites available using old industrial and commercial premises that could offer more homes. Finally, any idea of constructing an access or egress to and from any housing on this site from Stoney Lane is a ridiculous non-starter. Stoney Lane is one of the few main arteries to and from Spondon village. It is busy with vehicles coming off the A52 at speed and vehicles going on to the A52. There would be a conflict of traffic interests which would be a major safety issue.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						This policy HA7 does nothing to address or alleviate the traffic problems – particularly the large number of heavy goods vehicles going through the crowded and narrow streets in the busy centre of the village – and another 800 cars, let alone other vehicles, will only add to them.		
OR173	Lesley Parkinson	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to express my concern, that the planning policy HA7 is unsound. The land is currently used as agriculture land and as a farmer's daughter I understand the value of productive farmland. There are plenty of brown filed sites where housing can be put - which are not suitable for agriculture. The current traffic situation in Spondon is horrendous and will be worse once the Erewash newbuild site is completed. It is impossible to see a GP in Spondon and there is no NHS dentist available unless you are on benefits.	In view of the above I request that Site HA7 Spondon is be deallocated from the local plan as it is unsound.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR174	Barbara & Kevin Peach	Policy HA7: Stoney Lane, Spondon	Objects		No	We believe that **Policy HA7 is UNSOUND**. Our objections to the above proposed development are listed below:- **Loss of Green Belt**. - We believe that the Council is wrong in the re-classifying of this land as Grey belt. - The land is active agricultural farmland and the development of this land is therefore conflicting with national planning policy. - It provides a valuable buffer between distinct villages. - Losing Green Belt land increases carbon emissions by destroying natural carbon sinks and also releases stored carbon	Deallocate Site HA7 (Stoney Lane, Spondon) from the Local Plan	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						back into the atmosphere during the construction period. - Increased impact on Mental Health. During Covid, it was found that people's mental health suffered adversely in urban surroundings compared to those that could access Green Belt fields, woods etc. - **Derby has considerable Brownfield alternatives** for housing as opposed to the loss of this Green Belt agricultural land including:- - Derby Riverside (600 homes - Policy CC11) - Railway Station Quarter (500 homes - Policy CC13) - North Castleward (400 homes - Policy CC14) - Other City Centre Sites (1,400 homes - Policy CC4) **Traffic** - Construction - the use of Heavy plant, material production and new infrastructure adds large amounts of greenhouse gases.		HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						- This development would create car dependent urban sprawl Roads cannot cope. - The access point off Stoney Lane is inadequate for 400 homes (potentially 500+ vehicles on the development) - Potential hazard of traffic backing up & slowing traffic off A52 from Derby due to right-turning traffic into development. Slowing A52 traffic form Derby at Lodge Lane junction is already a problem at peak times as is the Ockbrook/Borrowash junction and lowering the speed limit to 50mph on this section would not alleviate this problem - Increase 'rat-runs' over narrow streets eg Stoney Lane, Ladybower Road, Gravel Pit Lane, South Avenue to avoid already considerable traffic problems through Spondon Village for access to Derby. - Potential increase in response time for Emergency services through bottlenecks in Spondon village preventing crucial help.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Local Infrastructure - Increased burden on Doctors, Dentists etc - Already virtually impossible to get to see a Doctor in Spondon. - Increased burden on Schooling especially Senior school - Inadequate public transport		
OR197	Stephen Peat	Policy HA7: Stoney Lane, Spondon	Objects		No	RE: The objection to the Local Plan for Derby for period between (2023-2043) regulation 19 submission Draft Plan. This includes the objection to the HA7 Stoney Lane including the development of 400 Dwellings within the Stoney Lane Site. In the previous Consultation on HA7 site I listed my factors why I believe the HA7 Stoney Lane site is not suitable including why the Stoney Lane site is not suitable for development because the land is not classed has Grey Belt when you examine the classification in my letter dated 17/02/2026 and 31/01/2026 document Local Plan HA7 Stoney Lane	Required Modification to make the Plan Sound? When you examine regulation 19 of the local plan of the (NPPF). I believe this local plan including Stoney Lane should be investigated by the planning inspector to make the following modification to the Local Plan to ensure soundness. The Type of Modification needed? Please deallocate HA7 Policy Stoney	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Cumulative effects, including with development in Erewash, will be

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						These letters covered the URBANIST ARCHIECTURE, which examined the Grey Belt policy a term passed in Parliament in December 2024, (NPPF) that identified the meaning of the Grey and Green Belt. I have explained how A, B, or C in Paragraph 143 of the (NPPF), and Paragraph 155 of Section 13 is an important point of my objection. Why Paragraph 155 Matters for my Objections For Spondon and Derby, this paragraph is crucial because: When you examine these two letters that I submitted in my previous correspondence it highlighted major concerns with this development at different angles showing this Stoney Lane Location is not a suitable site for development. When you examine the paragraph 36 of the National Policy Framework (NPPF) this site is unsound for development and my Letter sent on and 31/01/2026 document Local	Lane- 400 dwellings from the entirely from the Derby and the new South Derbyshire local Plan. The 400-houses allocated for Stoney Lane should be located to other brownfield regeneration sites include the building of more apartments and flats that are in the City Centre and surrounding areas of Derby include car parks and old industrial land. This is mentioned in policies (CC4, CC11, CC13 OR CC14). For example, many European Countries include the Ukraine often have higher density urban housing in like with NPPF paragraph 81(brownfield and City Centre is the	assessed with the Highway Authority and National Highways as paragraph 307 requires, and Policy HA7 secures contributions to education and transport infrastructure (criteria h and i). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Plan HA7 Stoney Lane and letter dated 17/02/2026. This Stoney Lane is not justified because the proposed allocation is not based on appropriate or robust evidence base mentioned in my previous letters that this development goes against the spatial strategy when alternatives already exist. For example, in the Local Plan HA7 Stoney Plan it highlighted new sites are available including the building of more apartments, and building properties upwards. Local Plan HA7 Stoney Plan explains that this site is not **Consistent with National Policy.** In the classification and release of active Green Belt Land Farm Land as 'Grey belt' directly misinterprets National Planning Rules, definitions and contradicts Derby City Council own spatial principles. In the first half of my document covered the Stoney Lane site is farmland, and was once owned	First priority in a local Plan. For example, when you look at the land east of Stoney Lane should be fully reinstated to protect the Derby to Nottingham Green Belt Policy EN5. I believe since both Ockbrook, Borrowash and Spondon do not have future burial ground because Spondon has reached capacity, Ockbrook and Borrowash has reached capacity but have space for shared family graves but no future graves for new and existing population. Many people in Spondon and Borrowash including Ockbrook believe we need a new cemetery to cater for a least 450 burials east of	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						by my relatives who farmed the area until the 1950s. The land was sold due to high tax death duties during the 1950s. I am also aware the Stoney Lane site does contain both domestic and farm animal burials including cats and dogs. The land was sold to another farmer in late 1960. This land was never was classed as a Grey Belt because it was formed over 300 years ago when farm boundaries were created across the UK and between Ockbrook and Spondon. **There is a Misclassification of Active Farmland as "Grey Belt (Inconsistency with National Policy)** When you examine paragraph 302 of the draft plan states that the Stoney Lane land was classed as Green Belt for since the 1950s but Derby City Council now class this land as **Grey Belt** to support Urban extension of Spondon.	Derby including double body burials. When you look at my previous correspondence on the Stoney Lane Issue the only new Cemetery is based on the other site of Mickleover than needs three buses to visit the site but this will be full if 1200+ new homes approved on land east and south of Mickleover will take up the spaces quickly. Since Dale Road Park is located North of Stoney Lane with connections to Stoney Lane should be doubled in size with connections to the new cemetery with a Linear Park to the bottom of Stoney Lane. A 400-house development is not	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						In my previous letters I mention the faults of the Green and Grey Belt within the National Planning policy that I have examined and written in my policy document 31/01/2026 document Local Plan HA7. This examined both Grey and Green Belt within the document.. The policy document did define grey belt within the URBANIST ARCHIECTURE who examined the definition of the Gery belt compared with the Green Belt. This is listed below. What is a grey Belt in planning terms? Grey Belt in planning refers to land within the Green Belt that is previously developed or contributes only weakly to core purposes. These areas typically offer limited value in preventing urban sprawl, keeping settlements separate or preserving the character of historic towns, and may be considered suitable for sustainable development. Grey belt definition is defined in Annexe 2, that land within the	suitable for Stoney Lane knowing Highway England believe the Stoney Lane Junction is not safe due to being close to the entrance of the development, that would cause traffic to backup on to the A52 leading to accidents.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Green Belt comprising previously developed land, and/or any land that, in either case, does not strongly contribute to any purpose of A, B, or C in paragraph 143. This excludes land where the application of polices relating to the area or assets in footnote 7, other than Green Belt, would provide a strong reason for refusing or restricting development. Grey Belt land includes obvious candidates like disused petrol stations, surface carparks, and edge-of-town scrubland, which covers any Green Belt land that plays a weaker role in fulfilling its core purpose. In Paragraph 155 of Section 13, which establishes four tests to determine whether Grey Belt development is not inappropriate in the Green Belt. Pass all four tests, and your development bypasses the need for very special circumstances entirely.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Why paragraph 155 matters in my objection especially for Spondon, Erewash, Derby and the enlarged Derby City Council. Why Paragraph 155 Matters for my Objections For Spondon and Derby, this paragraph is crucial because: Can Developers must **prove** unmet need, sustainability, and compliance with the Golden Rules I believe Not? The Council must assess whether the site's release would **undermine the wider Green Belt**, not just the parcel itself. This would affect other parts of the Green Belt next to the site after Derby City Council expands into Erewash and South Derbyshire. I believe paragraph 155 shows the land at Stoney Lane has failed this test, this means the **remains inappropriate** and should be refused. **What makes land a Grey Belt?** Prevent Urban Sprawl: The land does not act as a critical buffer		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						against uncontrolled expansion. It may already be surrounded by development, enclosed infrastructure, or lack the openness typically associated with the Countryside. **Stopping neighbouring towns and villages from merging**? The site does not play a significant role in preventing towns and villages from merging. It may be on the periphery of an urban area, or its development would not erode meaningful gaps between distinct settlements. **Preserving the Character of historic settlement:** The land does not contribute to the setting, identity or architectural significance or a historic town or village. It is not a defining landscape feature or an area that enhances local heritage. The Grey Belt does not include land that benefits from strong environmental protection or planning restrictions, where national polices provide a clear		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						reason for restricting development. **Habitat sites, areas of Natural Beauty, National Parks, Flood risk Zones, World Heritage Sites, Registered Parks and gardens, Ancient Woodland, and a Nature Reserve.** **A Grey Belt Status doesn't mean guaranteed development** Each proposal has a range of factors to determine whether the development is appropriate. **Grey Belt** development must address a housing shortfall and align with the local plan. **Employment, Commercial or industrial Grey Belt requires market studies, and a lack of suitable space.** **Community facility Grey Belt development needs a strategic assessment showing demand for schools, healthcare, or public services.**		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Mixed-use Grey Belt development must justify the balance of residential, employment, and community use. The HA7: Stoney Lane, Spondon would breach the Grey Belt development term within the Green Belt, and would affect infrastructure capacity and sustainability: Housing Grey Belt development must have access to Schools, healthcare, public transport, and local amenities to ensure it supports sustainable living but Spondon Schools, healthcare and amenities have reached over capacity to take this 400-home new development. Community facility Grey Belt development must be located where sufficient transport links and utilities can support public access and long-term viability. **All Grey Belt development should be in a sustainable location with good transport infrastructure and amenities,**		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						ensuring minimal strain on local services with sustainable polices. Community and environmental Impact: All Grey belt development must preserve local character, biodiversity and heritage assets. Large-scale Grey Belt development may require mitigation for air quality, flood risk, or ecological impact. Housing Grey Belt development should provide green spaces. Commercial Grey Belt development must mitigate traffic and noise. Community Grey Belt development should enhance social infrastructure without disrupting neighbourhoods. **The question asks when you examine the grey belt policy at HA7 Stoney Lane, Spondon, on page 74 of the Derby City Council Local Plan.** **When you examine the grey belt in the National Planning Policy Framework, in unveiling the Grey Belt, the Stoney Lane**		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						site for 400 houses is not suitable, and does not fit the Grey Belt entitlement for sustainable development. Please see 31/01/2026 document Local Plan HA7 Stoney Lane of Community and Environmental Impact. **The Performance of Site HA7 Stoney Lane:** remain active Open agricultural field that performs to provide food from cereals to beans, and provides Green Belt Functions. The Stoney Lane site maintains visual openness, safeguards the Countryside from Urban encroachment, prevents outwards urban sprawl of the Spondon Urban boundary towards neighbouring rural establishments like Ockbrook and Borrowash. The Stoney Lane Green belt also helps regulate temperature of the environment from heat generated from the A52 because the trees and grasses provide shading from the heat of vehicles that would be lost if		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						bult with 400 houses on the site. For example, when you measure the temperature near the A52 the air temperature is 10 degrees higher compared with Stoney Lane Site. The site will cause higher temperature affecting residents with higher temperatures from the surrounding areas. I also believe there is an Absence of Degradation. This means HA7 Site is not disused, degraded or a brownfield infill. The Reclassification high-performance farm “Green belt Land as “Grey Belt” sets out od and unsound precedent that undermines national Green Belt protection listed and set out in the National Planning Policy Framework. **Why is Derby City Council Local plan being a failure to optimise Brown Field alternatives, i.e., (Unjustified Strategy)** **The question what makes the strategy Justified?**		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						To make this Local Plan justified. The strategy should be appropriate; this includes looking at reasonable alternatives location and checking the evidence before deciding HA7 for development. For example, when you examine paragraph 81 of the draft plan it commits Derby City to use Brownfield and the City Centre first in the policy of spatial strategy. Placing and construction 400 homes on Green Belt farmland within the Stoney Lane area before looking at high value brownfield capacity within Urban core areas, that directly contradicts Policy HA1 and Paragraph 81: The Local plan the fail to address **Unallocated City Centre Capacity:** For example, The Council should use the substantial brownfield and regeneration locations in the City Centre capable of absorbing the growth of residents.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The locations in the City could be used **if Policy C11 Derby Riverside** could allocate 600 homes, and **Policy CC13 Railway Station Quarter** could build 500 homes direct to major railway routes. Policy CC14 and Policy CC4 at North Castleward and mixed-use allocations could contain 400 urban regeneration land matching Stoney Lane building capacity, and the CC4 site could contain 1400 homes across central brownfield areas. A site on the opposite site of the River Derwent in the photo below can take 200 properties A footbridge could connect people to this site across the river into the site. The site could provide around 200-250 houses and apartments. A site access leads to Station Road Borrowash. The site contains the storage of HGV trailers on a ¼ of the land. The rest of this grey belt land could contain housing and flats within this site		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						saving the Stoney Lane Green Belt land. The site has will have less environmental effects compared with Stoney Lane, not located near a busy A52, it has an entrance to Station Road with cycle paths to Borrowash. There are also land near Mansfield Road include disused Industrial Land that could house two or three bedrooms, and apartments. There are also 1200 homes planned for Mickleover or near the border which will add to the hosing numbers in both this present Council and the new Council from early 2027. The Sequential Approach has failed; this is due to the allocation of Greenfield/Greenbelt land on the outer administrative periphery while brownfields regeneration sites inside the Ring Road remain available. This demonstrates that Derby City Council has failed to prove		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						that the release of Site HA7 is necessary or justified. **Stoney Lane Cemetery Closure.** **I have written to** Councillor Ndukwe Ndukwe cabinet member for Street Pride on the concerns that Stoney Lane Cemetery is now full. The people of Spondon do not want to travel to the other side of Mickleover to visit their relatives in the Cemetery. I have spoken to several people living in Spondon, Ockbrook and Borrowash say they need a new Cemetery. They have informed me that there are no burial spaces left for new people knowing since the new Pope have discouraged cremation and future Catholics promote greater use of Burial. **The new PM Andy Burnham** is a Catholic, and would support the building of more Cemeteries due to his religious believes.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The am aware the Highway Agency do not like the development of 400 houses being close to the Stoney Lane A52 junction but welcome if the Land was used for a larger park, and a cemetery because traffic flows would be low compared with traffic with 400 homes having over 2000 cars backing up on the A52 increasing Accident risks or deaths. An accident near the Stoney Lane Junction has occurred on Monday 27th of July involved three cars with one driver had serious injuries with other passengers and drivers being injured in the accident. **Why Spondon may need new burial provision in the future:** Even though Spondon Cemetery is close to full today, several factors point toward future need: 1 Population growth Spondon's population is rising Proposed 400-home developments will increase demand		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						More residents = longer-term burial pressure 2️⃣ Landlocked cemetery No realistic expansion area Once full, it cannot grow 3️⃣ Derby's east side has limited burial space Other nearby cemeteries (Nottingham Road, Borrowash, Chaddesden) also have finite capacity This creates regional pressure 4️⃣ Demographic shift Derby's ageing population means burial demand will rise over the next 20 years **What a "new cemetery" would mean?** If Spondon *did* need new burial provision, it would likely take one of these forms: Option A — A new cemetery on the edge of Spondon Requires 3–10 acres Must avoid flood zones Must avoid green belt unless exceptional circumstances Would face strong planning scrutiny		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Option B — Expansion of an existing cemetery nearby Borrowash or Chaddesden could expand if land becomes available Less controversial than building a new one Option C — A multi-parish cemetery serving Spondon + Ockbrook + Borrowash Shared cost Shared land More realistic politically **New Prime Minister Andy Burnham Greenbelt Policy Update** The new Prime Minister Andy Burnham on PMQ on the 2nd September 2026 speaking in the commons want to a conservative MP on the Green Belt stated that the Prime Minister favours using Brown Field sites, including building upwards in a more balance approach to development. The Greenbelt is needed for housing but with a larger reduction in the building of large estates that has no public transport access facilities like Schools,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Doctors and Dentist. The Prime Minister also believes you cannot overwhelm an area with new housing that will cause greater pressure on the local community with higher population number using oversubscribed facilities and NHS services that are under pressure with no new places to cater for the new population without affecting the present existing population and residents in a particular area. When you examine these answers on the Local Plan HA7 shows HA7 should not be in the Derby Local Plan because of the existing pressures of Spondon is overwhelming on present services like GP and Dental Services, and School places are oversubscribed including West Park School. At present West Park School is over 100 students oversubscribed, but with new houses means millions of pounds are needed for Schools, a brand-new Doctors and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Dental Surgery, and a new cemetery. The other pressure that the Spondon Road network has only one entry out of the Suburb of Spondon, and the road is called Willowcroft Road, and this road has hundreds of vehicles travelling through the Spondon District Centre. For example, traffic congestion in Spondon often reaches near Dale Road Shops taking vehicles up to 10 minutes to leave Spondon, and longer if accidents occur on the A52. The other issue planners failed to address about the high volumes of traffic pollution Spondon faces with having one entry out of Spondon, and this was addressed in the House of parliament on the 1st of September 2026. When an MP mentioned over 500 houses are planned to be built on a B road that is highly congested. The PM answered planners need to go back to the drawing board because the development would be not suitable for a		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						single road area that highly congested. He mentioned some developer's plans were turned down because of the lack of suitable road space to take the traffic volume from the new development, and the lack of public transport accessing the site failed to active and green travel plan polices cited in the Manchester Mayor development policies. I think in this conclusion we need to reexamine the local plan because Spondon is highly developed with a poor highway network, services are highly under pressure with no space to create a new medical and dental surgery to cover an expanding population. The local plan has no plans to create a new access on the A52 with a new cross roads junction on the A52 near Stoney Lane Junction to take traffic away from Willowcroft Road, and this type of road scheme would cost over £25 million to construct including hours of delays on the A52.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						In the letter I mentioned that under the (CBA) the true costs of this development would exceed over £54 million when you add up the cost for a larger population on the community of Spondon you will see that building 400+ houses will affect other sections of the local community with limited access to healthcare, schools and increased pollution risk with increased volumes of traffic accessing one access out of Spondon affecting the health of local residents who live along this route. I hope the planners would examine this HA7 plans again because the costs exceed the benefits on the community of Spondon in their physical, mental and wellbeing's including not forgetting the dead who want a space for rest after death.		
OR177	Mrs Claire R Pegg	Policy HA7: Stoney Lane, Spondon	Objects		No	I write, with dismay, to protest about the housing policy HA7 for Stoney Lane.	I understand there is a need for housing, and that there are other ways of going about it. I therefore	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The council is absolutely wrong in identifying the land as "grey belt", which it very clearly is not; it is agricultural farmland in active use. National Planning Policy, to which the council must adhere, defines grey belt land as poor quality green belt - the area identified on Stoney Lane clearly does not fall into that category. Randomly picking a piece of green belt, declassifying it as grey belt in an attempt to justify building on it, and ignoring looking at brownfield sites elsewhere does not equate with National Policy. There is also the very serious implications of building further housing around Spondon. No consideration has been given, no provision provided, and no plan presented, for the pressures extra housing entails, namely the needs of those new residents for doctor's surgeries, dentists, schools, nurseries etc. All these facilities within the Spondon area are already overstretched and cannot reasonably be expected to accommodate more. At the	join with others in stating the following request: "Deallocate Site HA7 (Stoney Lane, Spondon - 400 homes) from the Local Plan. The allocation is UNSOUND as it fails the 'Justified' and 'Consistent with National Policy' tests by misclassifying active Green Belt farmland as "Grey Belt" without demonstrating that all reasonable brownfield alternatives have been fully optimised. The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby	current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						very least any new proposed house building complex, anywhere, should include surgeries and a nursery/school, clearly marked up on any plans submitted before any consideration at all could be given - along with an un-negotiable agreement that such buildings would actually be built, should the plan be agreed. Extra housing also brings extra vehicles onto narrow roads not suitable for increased traffic (many more than one car per house would be expected these days), and this has not been considered at all.	Riverside), Policy CC13 (Railway Station Quarter) and Policy CC14 (North Castleward), in accordance with the Plan's stated 'brownfield and City Centre first' strategy (paragraph 81). I trust the council will see sense, as well as practicality, and re-think the whole matter with serious consideration of all these issues.	
OR178	Sheila and Geoff Pendrick	Policy HA7: Stoney Lane, Spondon	Objects		No	Please consider reallocating the building of 400 homes currently being planned for Stoney Lane in Spondon to current brownfield sites and City Centre regeneration. Policy HA7 is unsound as Green Belt agricultural farmland has been wrongly classified as Grey Belt. This is not justified when there are brownfield		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						alternatives and conflicts with the principles of national planning policy. The Green Belt status was put in place to avoid urban sprawl which sadly, is gradually taking place in our area with the resultant pressures on local infrastructure. In this area of Spondon we are currently concerned about the effect of the house building at Spondon Woods which already causes noise and traffic holdups and on completion will put pressure on all of our services. Please reconsider this unsound policy.		alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR179	Sophie Pickles	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally object to **Policy HA7 – Stoney Lane, Spondon**, which proposes the allocation of approximately 400 homes on the existing agricultural land. I strongly object to the inclusion of this site within the Local Plan and believe that Policy HA7	I respectfully request that **Policy HA7 – Stoney Lane, Spondon – is removed/deallocated from the Local Plan**. I believe the 400-home allocation	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						should be considered **unsound**, as the proposed allocation is not justified and is not consistent with national planning policy. My concerns are as follows: **1. Loss of active agricultural land and Green Belt** The land at Stoney Lane is currently active agricultural land and provides an important open and undeveloped area on the edge of Spondon. I do not believe that this land should be released for housing when there are significant opportunities to make better use of previously developed and brownfield land elsewhere within Derby. Developing this site would result in the permanent loss of productive agricultural land and would contribute to the further expansion of the urban area into open countryside. **2. Increased urban sprawl** The proposed development would substantially extend the built-up area of Spondon and	should instead be met, where appropriate, through the better utilisation of suitable brownfield, previously developed and regeneration sites, in accordance with the Plan's stated brownfield and City Centre first strategy. For the purposes of the Regulation 19 consultation, I therefore consider Policy HA7 to be **UNSOUND**, specifically because it is: **Not Justified**; and **Not Consistent with National Planning Policy.** I ask that this objection is formally recorded as part of the Regulation 19 consultation and passed to the Planning Inspector	that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Cumulative effects, including with development in Erewash, will be assessed with the Highway Authority and National Highways as paragraph 307 requires, and Policy HA7 secures contributions to education and transport infrastructure (criteria h and i). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						would contribute to urban sprawl. The cumulative impact of further development around the village needs to be properly considered, rather than looking at this allocation in isolation. Spondon already has a substantial amount of housing and development pressure. Adding a further 400 homes would change the character of this part of the community and place additional pressure on existing infrastructure and services. **3. Pressure on local roads and transport infrastructure** I have serious concerns about the additional traffic that 400 new homes would generate. Stoney Lane and the surrounding road network already experience traffic pressures, and I am concerned that the existing infrastructure is not capable of accommodating the additional vehicles associated with a development of this scale	for consideration as part of the independent examination of the Local Plan.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						without significant improvements. The impact on congestion, road safety, pedestrian routes and access to and from Spondon should be fully assessed before this land is allocated for development. **4. Pressure on local infrastructure and services** A development of 400 homes would inevitably place additional pressure on local schools, healthcare services, drainage, sewerage, public transport and other community infrastructure. I am concerned that the existing capacity of these services has not been adequately demonstrated to support a development of this scale and that the wider cumulative impact of development in and around Spondon needs to be properly considered. **5. Brownfield land should be prioritised**		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I believe the Council should make full use of suitable brownfield and previously developed land before releasing active agricultural land for housing. The Local Plan already identifies significant opportunities for housing on sites such as Derby Riverside, the Railway Station Quarter, North Castleward and city-centre mixed-use sites. Where there are opportunities to deliver housing through regeneration and redevelopment of previously developed land, these should be prioritised rather than sacrificing productive agricultural land on the edge of Spondon. **6. Conflict with the Council's brownfield and City Centre first approach** The allocation of HA7 appears inconsistent with the Plan's stated commitment to a **"brownfield and City Centre first"** approach.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I therefore believe the Council needs to demonstrate why this particular greenfield agricultural site is necessary when other identified opportunities for housing remain available. **7. The allocation is not justified** For the reasons above, I do not believe that the proposed allocation of 400 homes at Stoney Lane has been sufficiently justified. In particular, I believe that the Council should demonstrate that all reasonable brownfield and previously developed alternatives have been properly considered and optimised before allocating active agricultural land for development.		
OR180	Stuart Pickles	Policy HA7: Stoney Lane, Spondon	Objects		No	I would like to submit an individual response to the proposed allocation of 400 homes off Stoney Lane Spondon (Policy HA7) I believe that the policy is not justified. The council has prematurely designated active		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025)

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						agricultural land as Grey Belt. This fails to meet the sequential testing requirements, as they have not demonstrated that all reasonable & available Brownfield alternatives have been fully considered. I also submit video & photo evidence of the proposed land being furrowed recently, which I believe is normally done to improve soil condition & optimize crop growth. The policy is also not consistent with National Policy. As my photographic & video evidence will prove, the land in question is active agricultural land & not poor quality or Grey Belt that's been developed. The proposed development would contribute to unsustainable urban expansion that threatens the distinctive character of Spondon. An issue that Spondon has already disproportionately absorbed. Further residential homes will place an unmanageable burden		found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						on overstretched local services & infrastructure. Specifically local schools, GP surgeries, roads & drainage systems. The council already possesses a large supply of brownfield & city centre opportunities, which in line with National Policy should be prioritised for further development. The proposal is not consistent with Derby's plan to use Brownfield & City centre first strategy, rather than develop active greenbelt land farmland within Spondon. All of the reasons behind my objection to this plan, should verify legitimate reasons for this proposal to be declined.		
OR181 & C287	Stephen Plant	Policy HA7: Stoney Lane, Spondon	Objects		No	I am a resident of Spondon and live next to Stoney Lane, I have lived in Spondon most of my life and am very concerned that the proposed building site for 400 new homes is active agricultural farmland and performs an important Green Belt function.	I request that the Council amends the Local Plan by deallocating Site HA7 (Stoney Lane, 400 homes).	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The site is active agricultural land rather than poor quality or previously developed 'Grey Belt.' Spondon as an urban development is currently experiencing a significant building of new homes next to Dale Road, the Stoney Lane development would contribute to further expansion and urban sprawl. Spondon already has significant pressures on local infrastructure, including roads, drainage, school capacity, dentists and doctors. The proposed development has been identified as Policy HA7 in the Local Plan for Derby. The policy HA7 is unsound as it is not justified and not consistent with national policy. The Council has incorrectly categorized the active agricultural farmland as grey belt without demonstrating that all reasonable brownfield alternatives have been fully considered. Allocating active agricultural farmland for development conflicts with the principles of national planning policy. I also refer to paragraph		Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						81 of the Plan which states a commitment to a “brownfield and City Centre first” strategy, this proposal directly contradicts this statement. The Council has substantial brownfield and city center housing opportunities which should be prioritized before releasing green belt farmland for development. The policy HA7 is unsound as it is not justified and not consistent with national policy test by misclassifying active green belt agricultural farmland as grey belt without demonstrating that all reasonable brownfield alternatives have been fully considered. The Council should reallocate the 400 proposed dwellings into existing brownfield and city center regeneration allocations as listed below: - City Centre mixed use sites – Policy CC4 Derby Riverside – Policy CC11 Railway Station Quarter – Policy CC14		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						North Castleward – Policy CC4		
OR182	Richard Preedy	Policy HA7: Stoney Lane, Spondon	Objects		No	There is no way this can be classed as “Grey Belt” land. As it is actively farmed. The site would contribute to a greater expansion of Urban Development. There is already great pressures on local infrastructure, including roads, draining and school capacity. There is at the Councils disposal, substantial brown field and City centre opportunities, which should be used before using Green Belt farm land for development. The Council’s Plan states that "Brown Field and City Centre first”, should be used before any other allocation. I would like therefore, to remove site HA7, Stoney Lane, Spondon, from the local plan. The plan is unsound as it fails National Policy tests, misclassifying active Green Belt farm land as Grey Belt. The		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Council need to demonstrate that all possible Brown Field alternativies has been fully investigated. The Council should reallocate these 400 dwellings into City Centre, Brown Field regeneration allocations. Access to and from the Stoney Lane site would be dangerous with its proximity to the A52. The main route out of Spondon is via Willowcroft Road which already gets very congested and a site with 400 homes would generate a minimum of 400 cars and more than likely at least 600 cars on Spondons already overcrowded roads. More than anything it would mean a loss of valuable active farmland. <u>Please do not allow Policy HA7 to go ahead.</u>		to health facilities where justified. No change required.
OR183	Janet Pullen	Policy HA7: Stoney Lane, Spondon	Objects		No	Policy HA7-Stoney lane Spondon. Unsound the village is becoming to big not enough doctors ,schools or roads in and out of the village		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR186	H E Radford	Policy HA7: Stoney Lane, Spondon	Objects		No	Thank you for your update on building on Green Land (agriculture) 4. Would like to say, there was a law that building was banned		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						within 200 meters of POWER LINES. There are power lines going directly over proposed sites on Stoney Lane, Spondon. What are these laws for if they can be changed Willy Nilly. i.e. GREEN BELT, POWER LINES Myself strongly agree with your sumerisation. 1 HA7 2 UNSOUND 3 MY EVIDENCE 4 MY REQUEST SPECIFIC MODIFICATION (AS ABOVE NUMBER 4)		current use, and the Green Belt Assessment (2025) found this site meets that definition. National Grid has confirmed that none of the Plan's residential allocations is affected by its 132kV overhead lines, and any other lines crossing the site will be addressed in the layout at application stage. No change required.
OR187	Nick Raycraft	Policy HA7: Stoney Lane, Spondon	Objects		No	I believe that the policy is unsound and is not justified and is not consistent with National Policy. The site is an active agricultural land and is not poor quality land and is not previously developed grey belt land . A retro grade step reminiscent of the 1950s and 1960s. The development with add to the further expansion of urban development and urban sprawl.	I request a modification The HA7 site ie Stoney Lane Spondon should be removed as it is unsound and fails the justified and consistent National Policy tests by wrongly classifying Green Belt farm land as grey land and it has not shown that all the reasonable brown field lands	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						There is significant pressure on local infrastructure including roads drainage schools capacity and medical facilities The Council has substantial brown field and city centre housing opportunities which should be prioritised before releasing green belt farm land for development. The proposed allocation appears to be inconsistent with the Plan's stated brownfield and city centre first strategy. The land should remain as agricultural to help increase food security for the UK	have been fully optimised. The Council should reallocate these 400 houses into existing brownfield and city centre re generation allocations that were prioritised under PolicyCC4 Policy CC22 (Derby Riverside) Policy CC13 Railway Station Quarter or Policy CC14 North Castle ward in accordance with the plans stated brownfield and City centre strategy para 81	up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.
OR188	Amber Read	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a resident of Spondon to formally object to the proposed allocation of land east of Stoney Lane, Spondon, under Policy HA7, for a minimum of 400 homes. I consider the allocation to be UNSOUND, specifically on the grounds that it is not justified and is not consistent with national planning policy.	I therefore respectfully request that the Council deallocate Site HA7 – Stoney Lane, Spondon – from the Local Plan. The minimum 400 dwellings should instead be reconsidered as part	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I fully recognise that Derby needs to plan for additional housing and that the Council has a responsibility to identify sufficient land to meet its housing requirements. However, that does not mean that every potential development site is appropriate, nor does it remove the requirement for the Council to demonstrate that individual allocations are properly justified, deliverable and consistent with the overall strategy of the Local Plan. In my view, Policy HA7 fails that test. 1. The principle and scale of the allocation The proposal is not for a small, incremental addition to Spondon. It is for a minimum of 400 homes and is explicitly described within Policy HA7 as an “eastern urban extension to the suburb of Spondon.” This would represent a substantial physical expansion	of the Council’s existing brownfield and regeneration opportunities, including the allocations identified under Policy CC4, Policy CC11, Policy CC13 and Policy CC14, where appropriate and subject to their individual capacity and deliverability. If the Council nevertheless intends to retain HA7, I request that the evidence base is strengthened before submission to demonstrate conclusively: 1. why this site is required; 2. why reasonable brownfield alternatives cannot accommodate the proposed housing; 3. the basis for its Grey Belt classification; 4.	alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						of Spondon and would permanently change the character and setting of the eastern side of the village. The existing farmland and open countryside around Stoney Lane provide an important transition between the built-up area and the wider countryside. Replacing this landscape with a development of at least 400 homes would constitute a significant change to the settlement and should only be supported where there is compelling evidence that this is the most appropriate and sustainable location for that growth. I do not believe that the Council has demonstrated this sufficiently. 2. The treatment of the site as "Grey Belt" I am particularly concerned by the Council's treatment of this site in relation to the emerging Grey Belt approach.	how existing highway capacity can accommodate the development; 5. how education and healthcare provision will be expanded; 6. how surface-water and drainage risks will be mitigated; and 7. how the development can take place without unacceptable harm to the character, landscape and quality of life of Spondon. This is not an objection to housing in principle. It is an objection to this particular allocation, at this particular scale, in this particular location, where I do not believe the Council has demonstrated that it is the most appropriate or sustainable option available.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						This is active agricultural farmland, rather than previously developed urban land. It is not a brownfield site or an obvious example of land that has become degraded through previous development. The Council should therefore provide a particularly robust justification for why this land is considered appropriate for release and why development here represents a better planning outcome than retaining the land in its current use. The fact that land may now fall within a revised Green Belt/Grey Belt classification should not, in itself, be treated as justification for development. The underlying planning merits of the location still need to be demonstrated. 3. Failure to demonstrate that reasonable brownfield alternatives have been fully optimised	I ask that this representation is formally recorded against Policy HA7 – Stoney Lane, Spondon, and forwarded to the independent Planning Inspector for consideration as part of the Regulation 19 examination.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						This is one of my principal concerns. The Council's own Local Plan strategy places significant emphasis on directing development towards previously developed land and city-centre regeneration. Yet the Council is simultaneously proposing the release of open agricultural land on the edge of Spondon for a major housing extension. There are already significant brownfield and regeneration opportunities identified within the Local Plan, including: * Policy CC11 – Derby Riverside * Policy CC13 – Railway Station Quarter * Policy CC14 – North Castleward * Policy CC4 – City Centre Mixed-Use Sites These allocations collectively represent substantial housing opportunities.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I therefore believe the Council needs to demonstrate much more clearly why the additional 400 homes proposed under HA7 cannot instead be accommodated, wholly or partly, through existing brownfield and regeneration opportunities. Unless the Council can demonstrate that reasonable previously developed land opportunities have been fully considered and optimised, the selection of HA7 is not adequately justified. 4. Transport and existing congestion The transport implications are particularly concerning. Spondon already experiences significant congestion, particularly during peak periods. Getting through the village and accessing the A52 and wider road network can already be extremely difficult at busy times.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						This is not a theoretical concern for residents. It is an everyday issue. Adding a minimum of 400 homes will inevitably generate additional vehicle movements, including commuting, school journeys, deliveries and access to local services. Indeed, Policy HA7 itself requires financial contributions towards transport improvements to mitigate the highway impacts of the development. This demonstrates that the Council itself anticipates material highway impacts arising from the allocation. I am concerned that simply requiring future financial contributions does not establish that the local road network has sufficient capacity to accommodate the development, nor does it demonstrate that the necessary improvements can be delivered		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						effectively and at the appropriate time. The Council should therefore provide clear evidence that the cumulative transport impacts of HA7 have been properly assessed and that suitable infrastructure can be delivered before the development places unacceptable additional pressure on Spondon's road network. 5. Pressure on schools, healthcare and community infrastructure The same concern applies to other local services. Residents already experience significant pressure when accessing local services, including difficulty obtaining timely GP appointments. Schools and other community facilities also have finite capacity. A development of at least 400 homes could result in a substantial increase in the number of residents requiring		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						access to education, healthcare, public transport, recreational facilities and other community services. Again, Policy HA7 itself acknowledges this issue by requiring financial contributions towards improved education infrastructure. The Council therefore needs to demonstrate not merely that contributions can theoretically be collected, but that adequate additional infrastructure will actually be available, funded and delivered alongside the housing. 6. Drainage and surface water I also have concerns regarding drainage and surface water. The proposed development would urbanise a substantial area of currently undeveloped land. Increasing hardstanding and built development inevitably changes surface-water run-off and drainage requirements.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						It is notable that Policy HA7 specifically requires a "comprehensive surface water drainage solution". This should not simply be treated as a matter to resolve at a later planning application stage. At Local Plan allocation stage, the Council needs to have sufficient evidence to demonstrate that the site can be developed sustainably and without creating unacceptable consequences for existing residents. 7. Loss of open countryside and impact on Spondon's character The land around Stoney Lane is valued by residents for walking, recreation and access to the countryside. These fields are not simply undeveloped land awaiting an alternative use. They contribute to the character and setting of Spondon and provide residents with access to open space and the wider countryside.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Council's own Local Plan consultation material recognises the importance residents place on open spaces, including their contribution to health, wellbeing and nature conservation. The permanent transformation of this landscape into a large residential development should therefore only occur where there is a clear and compelling planning justification. 8. The allocation must be considered against the overall strategy I am not arguing that Derby should not build new homes. My objection is that where those homes are built matters. The Council has identified a strategy that places importance on regeneration, previously developed land and city-centre opportunities. It should therefore be demonstrated that the release of open agricultural land at Stoney Lane is genuinely necessary and represents the most appropriate option when		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						considered against reasonable alternatives. I do not believe the evidence currently demonstrates this sufficiently. 9. Conclusion – Policy HA7 is unsound For the reasons set out above, I consider Policy HA7 – Stoney Lane, Spondon to be UNSOUND. In particular, I consider it: Not Justified, because the Council has not adequately demonstrated that: * the allocation of this particular site is the most appropriate option when reasonable alternatives are considered; * the release of active agricultural land is necessary; * brownfield and city-centre opportunities have been sufficiently optimised before allocating this site; * the significant transport, education, healthcare and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						drainage implications can be satisfactorily addressed; and * the scale of the proposed eastern urban extension is appropriate for Spondon. I also consider the allocation: Not Consistent with National Planning Policy, particularly given the need to make effective use of previously developed land, promote sustainable patterns of development, protect valued landscapes and ensure that development is supported by the necessary infrastructure.		
OR190	Byron William Read	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a resident of Spondon to formally object to the proposed allocation of land east of Stoney Lane, Spondon, under Policy HA7, for a minimum of 400 homes. I consider the allocation to be UNSOUND, specifically on the grounds that it is not justified and is not consistent with national planning policy. I fully recognise that Derby needs to plan for additional housing and that the Council	I therefore respectfully request that the Council deallocate Site HA7 – Stoney Lane, Spondon – from the Local Plan. The minimum 400 dwellings should instead be reconsidered as part of the Council's existing brownfield and regeneration opportunities,	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						has a responsibility to identify sufficient land to meet its housing requirements. However, that does not mean that every potential development site is appropriate, nor does it remove the requirement for the Council to demonstrate that individual allocations are properly justified, deliverable and consistent with the overall strategy of the Local Plan. In my view, Policy HA7 fails that test. 1. The principle and scale of the allocation The proposal is not for a small, incremental addition to Spondon. It is for a minimum of 400 homes and is explicitly described within Policy HA7 as an “eastern urban extension to the suburb of Spondon.” This would represent a substantial physical expansion of Spondon and would permanently change the	including the allocations identified under Policy CC4, Policy CC11, Policy CC13 and Policy CC14, where appropriate and subject to their individual capacity and deliverability. If the Council nevertheless intends to retain HA7, I request that the evidence base is strengthened before submission to demonstrate conclusively: 1. why this site is required; 2. why reasonable brownfield alternatives cannot accommodate the proposed housing; 3. the basis for its Grey Belt classification; 4. how existing	as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						character and setting of the eastern side of the village. The existing farmland and open countryside around Stoney Lane provide an important transition between the built-up area and the wider countryside. Replacing this landscape with a development of at least 400 homes would constitute a significant change to the settlement and should only be supported where there is compelling evidence that this is the most appropriate and sustainable location for that growth. I do not believe that the Council has demonstrated this sufficiently. 2. The treatment of the site as "Grey Belt" I am particularly concerned by the Council's treatment of this site in relation to the emerging Grey Belt approach. This is active agricultural	highway capacity can accommodate the development; 5. how education and healthcare provision will be expanded; 6. how surface-water and drainage risks will be mitigated; and 7. how the development can take place without unacceptable harm to the character, landscape and quality of life of Spondon. This is not an objection to housing in principle. It is an objection to this particular allocation, at this particular scale, in this particular location, where I do not believe the Council has demonstrated that it is the most appropriate or sustainable option available.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						farmland, rather than previously developed urban land. It is not a brownfield site or an obvious example of land that has become degraded through previous development. The Council should therefore provide a particularly robust justification for why this land is considered appropriate for release and why development here represents a better planning outcome than retaining the land in its current use. The fact that land may now fall within a revised Green Belt/Grey Belt classification should not, in itself, be treated as justification for development. The underlying planning merits of the location still need to be demonstrated. 3. Failure to demonstrate that reasonable brownfield alternatives have been fully optimised This is one of my principal	I ask that this representation is formally recorded against Policy HA7 – Stoney Lane, Spondon, and forwarded to the independent Planning Inspector for consideration as part of the Regulation 19 examination.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						concerns. The Council's own Local Plan strategy places significant emphasis on directing development towards previously developed land and city-centre regeneration. Yet the Council is simultaneously proposing the release of open agricultural land on the edge of Spondon for a major housing extension. There are already significant brownfield and regeneration opportunities identified within the Local Plan, including: * Policy CC11 – Derby Riverside * Policy CC13 – Railway Station Quarter * Policy CC14 – North Castleward * Policy CC4 – City Centre Mixed-Use Sites These allocations collectively represent substantial housing opportunities. I therefore believe the Council		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						needs to demonstrate much more clearly why the additional 400 homes proposed under HA7 cannot instead be accommodated, wholly or partly, through existing brownfield and regeneration opportunities. Unless the Council can demonstrate that reasonable previously developed land opportunities have been fully considered and optimised, the selection of HA7 is not adequately justified. 4. Transport and existing congestion The transport implications are particularly concerning. Spondon already experiences significant congestion, particularly during peak periods. Getting through the village and accessing the A52 and wider road network can already be extremely difficult at busy times.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						This is not a theoretical concern for residents. It is an everyday issue. Adding a minimum of 400 homes will inevitably generate additional vehicle movements, including commuting, school journeys, deliveries and access to local services. Indeed, Policy HA7 itself requires financial contributions towards transport improvements to mitigate the highway impacts of the development. This demonstrates that the Council itself anticipates material highway impacts arising from the allocation. I am concerned that simply requiring future financial contributions does not establish that the local road network has sufficient capacity to accommodate the development, nor does it demonstrate that the necessary improvements can be delivered effectively and at the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						appropriate time. The Council should therefore provide clear evidence that the cumulative transport impacts of HA7 have been properly assessed and that suitable infrastructure can be delivered before the development places unacceptable additional pressure on Spondon's road network. 5. Pressure on schools, healthcare and community infrastructure The same concern applies to other local services. Residents already experience significant pressure when accessing local services, including difficulty obtaining timely GP appointments. Schools and other community facilities also have finite capacity. A development of at least 400 homes could result in a substantial increase in the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						number of residents requiring access to education, healthcare, public transport, recreational facilities and other community services. Again, Policy HA7 itself acknowledges this issue by requiring financial contributions towards improved education infrastructure. The Council therefore needs to demonstrate not merely that contributions can theoretically be collected, but that adequate additional infrastructure will actually be available, funded and delivered alongside the housing. 6. Drainage and surface water I also have concerns regarding drainage and surface water. The proposed development would urbanise a substantial area of currently undeveloped land. Increasing hardstanding and built development inevitably changes surface-		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						water run-off and drainage requirements. It is notable that Policy HA7 specifically requires a "comprehensive surface water drainage solution". This should not simply be treated as a matter to resolve at a later planning application stage. At Local Plan allocation stage, the Council needs to have sufficient evidence to demonstrate that the site can be developed sustainably and without creating unacceptable consequences for existing residents. 7. Loss of open countryside and impact on Spondon's character The land around Stoney Lane is valued by residents for walking, recreation and access to the countryside. These fields are not simply undeveloped land awaiting an alternative use. They contribute to the character and setting of		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Spondon and provide residents with access to open space and the wider countryside. The Council's own Local Plan consultation material recognises the importance residents place on open spaces, including their contribution to health, wellbeing and nature conservation. The permanent transformation of this landscape into a large residential development should therefore only occur where there is a clear and compelling planning justification. 8. The allocation must be considered against the overall strategy I am not arguing that Derby should not build new homes. My objection is that where those homes are built matters. The Council has identified a strategy that places importance on regeneration, previously		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						developed land and city-centre opportunities. It should therefore be demonstrated that the release of open agricultural land at Stoney Lane is genuinely necessary and represents the most appropriate option when considered against reasonable alternatives. I do not believe the evidence currently demonstrates this sufficiently. 9. Conclusion – Policy HA7 is unsound For the reasons set out above, I consider Policy HA7 – Stoney Lane, Spondon to be UNSOUND. In particular, I consider it: Not Justified, because the Council has not adequately demonstrated that: * the allocation of this particular site is the most appropriate option when reasonable alternatives are considered;		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						* the release of active agricultural land is necessary; * brownfield and city-centre opportunities have been sufficiently optimised before allocating this site; * the significant transport, education, healthcare and drainage implications can be satisfactorily addressed; and * the scale of the proposed eastern urban extension is appropriate for Spondon. I also consider the allocation: Not Consistent with National Planning Policy, particularly given the need to make effective use of previously developed land, promote sustainable patterns of development, protect valued landscapes and ensure that development is supported by the necessary infrastructure.		
OR189	Luke Read	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a resident of Spondon to formally object to the proposed allocation of land east of Stoney Lane, Spondon, under **Policy HA7**, for a minimum of 400 homes.	**Requested modification** I therefore respectfully request that the Council **deallocate**	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I consider the allocation to be **UNSOUND**, specifically on the grounds that it is **not justified** and is **not consistent with national planning policy**. I fully recognise that Derby needs to plan for additional housing and that the Council has a responsibility to identify sufficient land to meet its housing requirements. However, that does not mean that every potential development site is appropriate, nor does it remove the requirement for the Council to demonstrate that individual allocations are properly justified, deliverable and consistent with the overall strategy of the Local Plan. In my view, Policy HA7 fails that test. **1. The principle and scale of the allocation** The proposal is not for a small, incremental addition to Spondon. It is for a **minimum of**	**Site HA7 – Stoney Lane, Spondon – from the Local Plan**. The minimum 400 dwellings should instead be reconsidered as part of the Council's existing brownfield and regeneration opportunities, including the allocations identified under **Policy CC4, Policy CC11, Policy CC13 and Policy CC14**, where appropriate and subject to their individual capacity and deliverability. If the Council nevertheless intends to retain HA7, I request that the evidence base is strengthened before submission to demonstrate conclusively:	agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						400 homesand is explicitly described within Policy HA7 as an **"eastern urban extension to the suburb of Spondon."** This would represent a substantial physical expansion of Spondon and would permanently change the character and setting of the eastern side of the village. The existing farmland and open countryside around Stoney Lane provide an important transition between the built-up area and the wider countryside. Replacing this landscape with a development of at least 400 homes would constitute a significant change to the settlement and should only be supported where there is compelling evidence that this is the most appropriate and sustainable location for that growth. I do not believe that the Council has demonstrated this sufficiently.	why this site is required; why reasonable brownfield alternatives cannot accommodate the proposed housing; the basis for its Grey Belt classification; how existing highway capacity can accommodate the development; how education and healthcare provision will be expanded; how surface-water and drainage risks will be mitigated; and how the development can take place without unacceptable harm to the character, landscape and quality of life of Spondon. This is not an objection to housing in principle. It is an objection to **this particular allocation,**	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						2. The treatment of the site as "Grey Belt" I am particularly concerned by the Council's treatment of this site in relation to the emerging Grey Belt approach. This is **active agricultural farmland**, rather than previously developed urban land. It is not a brownfield site or an obvious example of land that has become degraded through previous development. The Council should therefore provide a particularly robust justification for why this land is considered appropriate for release and why development here represents a better planning outcome than retaining the land in its current use. The fact that land may now fall within a revised Green Belt/Grey Belt classification should not, in itself, be treated as justification for development. The underlying planning merits of the location still need to be demonstrated.	**at this particular scale, in this particular location**, where I do not believe the Council has demonstrated that it is the most appropriate or sustainable option available. I ask that this representation is formally recorded against **Policy HA7 – Stoney Lane, Spondon**, and forwarded to the independent Planning Inspector for consideration as part of the Regulation 19 examination.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						3. Failure to demonstrate that reasonable brownfield alternatives have been fully optimised This is one of my principal concerns. The Council's own Local Plan strategy places significant emphasis on directing development towards previously developed land and city-centre regeneration. Yet the Council is simultaneously proposing the release of open agricultural land on the edge of Spondon for a major housing extension. There are already significant brownfield and regeneration opportunities identified within the Local Plan, including: **Policy CC11 – Derby Riverside** **Policy CC13 – Railway Station Quarter** **Policy CC14 – North Castleward** **Policy CC4 – City Centre Mixed-Use Sites**		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						These allocations collectively represent substantial housing opportunities. I therefore believe the Council needs to demonstrate much more clearly why the additional 400 homes proposed under HA7 cannot instead be accommodated, wholly or partly, through existing brownfield and regeneration opportunities. Unless the Council can demonstrate that reasonable previously developed land opportunities have been fully considered and optimised, the selection of HA7 is not adequately justified. **4. Transport and existing congestion** The transport implications are particularly concerning. Spondon already experiences significant congestion, particularly during peak periods. Getting through the village and accessing the A52 and wider road network can		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						already be extremely difficult at busy times. This is not a theoretical concern for residents. It is an everyday issue. Adding a minimum of 400 homes will inevitably generate additional vehicle movements, including commuting, school journeys, deliveries and access to local services. Indeed, Policy HA7 itself requires **financial contributions towards transport improvements to mitigate the highway impacts of the development**. This demonstrates that the Council itself anticipates material highway impacts arising from the allocation. I am concerned that simply requiring future financial contributions does not establish that the local road network has sufficient capacity to accommodate the development, nor does it demonstrate that the necessary		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						improvements can be delivered effectively and at the appropriate time. The Council should therefore provide clear evidence that the cumulative transport impacts of HA7 have been properly assessed and that suitable infrastructure can be delivered before the development places unacceptable additional pressure on Spondon's road network. **5. Pressure on schools, healthcare and community infrastructure** The same concern applies to other local services. Residents already experience significant pressure when accessing local services, including difficulty obtaining timely GP appointments. Schools and other community facilities also have finite capacity. A development of at least 400 homes could result in a substantial increase in the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						number of residents requiring access to education, healthcare, public transport, recreational facilities and other community services. Again, Policy HA7 itself acknowledges this issue by requiring **financial contributions towards improved education infrastructure**. The Council therefore needs to demonstrate not merely that contributions can theoretically be collected, but that adequate additional infrastructure will actually be available, funded and delivered alongside the housing. **6. Drainage and surface water** I also have concerns regarding drainage and surface water. The proposed development would urbanise a substantial area of currently undeveloped land. Increasing hardstanding and built development inevitably changes surface-water run-off and drainage requirements.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						It is notable that Policy HA7 specifically requires a **"comprehensive surface water drainage solution"**. This should not simply be treated as a matter to resolve at a later planning application stage. At Local Plan allocation stage, the Council needs to have sufficient evidence to demonstrate that the site can be developed sustainably and without creating unacceptable consequences for existing residents. **7. Loss of open countryside and impact on Spondon's character** The land around Stoney Lane is valued by residents for walking, recreation and access to the countryside. These fields are not simply undeveloped land awaiting an alternative use. They contribute to the character and setting of Spondon and provide residents with access to open space and the wider countryside.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Council's own Local Plan consultation material recognises the importance residents place on open spaces, including their contribution to health, wellbeing and nature conservation. The permanent transformation of this landscape into a large residential development should therefore only occur where there is a clear and compelling planning justification. **8. The allocation must be considered against the overall strategy** I am not arguing that Derby should not build new homes. My objection is that **where those homes are built matters**. The Council has identified a strategy that places importance on regeneration, previously developed land and city-centre opportunities. It should therefore be demonstrated that the release of open agricultural land at Stoney Lane is genuinely necessary and represents the most appropriate option when		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						considered against reasonable alternatives. I do not believe the evidence currently demonstrates this sufficiently. **9. Conclusion – Policy HA7 is unsound** For the reasons set out above, I consider **Policy HA7 – Stoney Lane, Spondon to be UNSOUND**. In particular, I consider it: **Not Justified**, because the Council has not adequately demonstrated that: the allocation of this particular site is the most appropriate option when reasonable alternatives are considered; the release of active agricultural land is necessary; brownfield and city-centre opportunities have been sufficiently optimised before allocating this site; the significant transport, education, healthcare and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						drainage implications can be satisfactorily addressed; and the scale of the proposed eastern urban extension is appropriate for Spondon. I also consider the allocation: **Not Consistent with National Planning Policy**, particularly given the need to make effective use of previously developed land, promote sustainable patterns of development, protect valued landscapes and ensure that development is supported by the necessary infrastructure.		
OR191	David Reece	Policy HA7: Stoney Lane, Spondon	Objects		No	There are to many houses being built in spondon there is a housing estate being built Built on dale road spondon you can't get in to see a doctor now there are not enough facilities and with reservoirs now at there lowest your building more houses with out even a thought		Noted. Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR192	Michelle Richardson	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to make known my objection to this planned development which is Unsound. Spondon is a village with a strong community and we wish to retain this with the green belt land that has gradually been whittled away by poor planning decisions allowing land		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						used for agriculture purpose to be developed. We have schools over subscribed, Doctor surgeries that struggle with their current patients, roads that have regular traffic congestion with one main exit via Willowcroft Road if heading towards Derby. The heavy traffic that has to use the village to reach Ilkeston also impacts on the safety of pedestrians. Policy HA7 is Unsound for the following reasons: Stoney Lane is farming agricultural land not as suggested by the Council as land that is developed, poor-quality or underperforming. The Council by its categorisation of this active agricultural farming land has done so without demonstrating all reasonable brownfield alternatives have been fully considered. This active agricultural farmland selected for		allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						development is in conflict and inconsistent with National Planning Policy. In addition Council owns commitment to a "brownfield and City Centre first" strategy as set out in Paragraph 81 of the Plan. The Council has significant alternative brownfield sites which would meet with city-centre regeneration already identified for housing, including: - Derby Riverside (Policy CC11 - 600 homes - Railway Station Quarter (Policy CC13) - 500 homes - North Castleward (Policy CC14) - 400 homes - City Centre Mixed-Use Sites (Policy CC4) - Over 1,400 homes This shows there is significant alternative brownfield sites available to the Council to meet its housing objectives, support the City regeneration and does not impact on a village that has in recent years had significant development eroding our agricultural farmland, our green-space and risks our		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						becoming joined to local suburbs Chaddesden and villages, Borrowash and Ockbrook. Please refuse this application		
OR193	Ken Roberts	Policy HA7: Stoney Lane, Spondon	Objects		No	Please note my strong objection to this scheme. Its inclusion in the Local plan is unsound. The land is not Grey belt. It is Green belt agricultural land. Misclassitying this land is wrong and fails the Local plan "Brownfield and City centre first " and " Consistent with National Policy2 tests. Spondon infrastructure can not cope . The 400 homes should be reallocated to existing Brownfield sites	Policy HA7 needs to be deallocated.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR194	Audrey Rothwell	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a resident of Spondon to formally object to the proposed allocation of land east of Stoney Lane, Spondon, under Policy HA7, for a minimum of 400 homes. I consider the allocation to be UNSOUND, specifically on the grounds that it is not justified and is not consistent with national planning policy. I fully recognise that Derby needs to plan for additional housing and that the Council has a responsibility to identify sufficient land to meet its housing requirements. However, that does not mean that every potential development site is appropriate, nor does it remove the requirement for the Council to demonstrate that individual allocations are properly	Requested modification I therefore respectfully request that the Council deallocate Site HA7 – Stoney Lane, Spondon – from the Local Plan. The minimum 400 dwellings should instead be reconsidered as part of the Council's existing brownfield and regeneration opportunities, including the allocations identified under Policy CC4, Policy CC11, Policy CC13 and Policy CC14, where appropriate and subject to their	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						justified, deliverable and consistent with the overall strategy of the Local Plan. In my view, Policy HA7 fails that test. 1. The principle and scale of the allocation The proposal is not for a small, incremental addition to Spondon. It is for a minimum of 400 homes and is explicitly described within Policy HA7 as an “eastern urban extension to the suburb of Spondon.” This would represent a substantial physical expansion of Spondon and would permanently change the character and setting of the eastern side of the village. The existing farmland and open countryside around Stoney Lane provide an important transition between the built-up area and the wider countryside. Replacing this landscape with a development of at least 400 homes would constitute a significant change to the	individual capacity and deliverability. If the Council nevertheless intends to retain HA7, I request that the evidence base is strengthened before submission to demonstrate conclusively: 1. why this site is required; 2. why reasonable brownfield alternatives cannot accommodate the proposed housing; 3. the basis for its Grey Belt classification; 4. how existing highway capacity can accommodate the development; 5. how education and healthcare provision will be expanded; 6. how surface-water and drainage risks will be mitigated; and	comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						settlement and should only be supported where there is compelling evidence that this is the most appropriate and sustainable location for that growth. I do not believe that the Council has demonstrated this sufficiently. 2. The treatment of the site as "Grey Belt" I am particularly concerned by the Council's treatment of this site in relation to the emerging Grey Belt approach. This is active agricultural farmland, rather than previously developed urban land. It is not a brownfield site or an obvious example of land that has become degraded through previous development. The Council should therefore provide a particularly robust justification for why this land is considered appropriate for release and why development here represents a better planning outcome than	7. how the development can take place without unacceptable harm to the character, landscape and quality of life of Spondon. This is not an objection to housing in principle. It is an objection to this particular allocation, at this particular scale, in this particular location, where I do not believe the Council has demonstrated that it is the most appropriate or sustainable option available. I ask that this representation is formally recorded against Policy HA7 – Stoney Lane, Spondon, and forwarded to the independent Planning Inspector for consideration as	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						retaining the land in its current use. The fact that land may now fall within a revised Green Belt/Grey Belt classification should not, in itself, be treated as justification for development. The underlying planning merits of the location still need to be demonstrated. 3. Failure to demonstrate that reasonable brownfield alternatives have been fully optimised This is one of my principal concerns. The Council's own Local Plan strategy places significant emphasis on directing development towards previously developed land and city-centre regeneration. Yet the Council is simultaneously proposing the release of open agricultural land on the edge of Spondon for a major housing extension.	part of the Regulation 19 examination.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						There are already significant brownfield and regeneration opportunities identified within the Local Plan, including: * Policy CC11 – Derby Riverside * Policy CC13 – Railway Station Quarter * Policy CC14 – North Castleward * Policy CC4 – City Centre Mixed-Use Sites These allocations collectively represent substantial housing opportunities. I therefore believe the Council needs to demonstrate much more clearly why the additional 400 homes proposed under HA7 cannot instead be accommodated, wholly or partly, through existing brownfield and regeneration opportunities. Unless the Council can demonstrate that reasonable previously developed land opportunities have been fully considered and optimised, the selection of HA7 is not adequately justified.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						4. Transport and existing congestion The transport implications are particularly concerning. Spondon already experiences significant congestion, particularly during peak periods. Getting through the village and accessing the A52 and wider road network can already be extremely difficult at busy times. This is not a theoretical concern for residents. It is an everyday issue. Adding a minimum of 400 homes will inevitably generate additional vehicle movements, including commuting, school journeys, deliveries and access to local services. Indeed, Policy HA7 itself requires financial contributions towards transport improvements to mitigate the highway impacts of the development. This demonstrates that the Council		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						itself anticipates material highway impacts arising from the allocation. I am concerned that simply requiring future financial contributions does not establish that the local road network has sufficient capacity to accommodate the development, nor does it demonstrate that the necessary improvements can be delivered effectively and at the appropriate time. The Council should therefore provide clear evidence that the cumulative transport impacts of HA7 have been properly assessed and that suitable infrastructure can be delivered before the development places unacceptable additional pressure on Spondon's road network. 5. Pressure on schools, healthcare and community infrastructure The same concern applies to other local services.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Residents already experience significant pressure when accessing local services, including difficulty obtaining timely GP appointments. Schools and other community facilities also have finite capacity. A development of at least 400 homes could result in a substantial increase in the number of residents requiring access to education, healthcare, public transport, recreational facilities and other community services. Again, Policy HA7 itself acknowledges this issue by requiring financial contributions towards improved education infrastructure. The Council therefore needs to demonstrate not merely that contributions can theoretically be collected, but that adequate additional infrastructure will actually be available, funded and delivered alongside the housing.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						6. Drainage and surface water I also have concerns regarding drainage and surface water. The proposed development would urbanise a substantial area of currently undeveloped land. Increasing hardstanding and built development inevitably changes surface-water run-off and drainage requirements. It is notable that Policy HA7 specifically requires a "comprehensive surface water drainage solution". This should not simply be treated as a matter to resolve at a later planning application stage. At Local Plan allocation stage, the Council needs to have sufficient evidence to demonstrate that the site can be developed sustainably and without creating unacceptable consequences for existing residents. 7. Loss of open countryside and impact on Spondon's character The land around Stoney Lane is valued by residents for walking,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						recreation and access to the countryside. These fields are not simply undeveloped land awaiting an alternative use. They contribute to the character and setting of Spondon and provide residents with access to open space and the wider countryside. The Council's own Local Plan consultation material recognises the importance residents place on open spaces, including their contribution to health, wellbeing and nature conservation. The permanent transformation of this landscape into a large residential development should therefore only occur where there is a clear and compelling planning justification. 8. The allocation must be considered against the overall strategy I am not arguing that Derby should not build new homes.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						My objection is that where those homes are built matters. The Council has identified a strategy that places importance on regeneration, previously developed land and city-centre opportunities. It should therefore be demonstrated that the release of open agricultural land at Stoney Lane is genuinely necessary and represents the most appropriate option when considered against reasonable alternatives. I do not believe the evidence currently demonstrates this sufficiently. 9. Conclusion – Policy HA7 is unsound For the reasons set out above, I consider Policy HA7 – Stoney Lane, Spondon to be UNSOUND. In particular, I consider it: Not Justified, because the Council has not adequately demonstrated that: * the allocation of this particular site is the most		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						appropriate option when reasonable alternatives are considered; * the release of active agricultural land is necessary; * brownfield and city-centre opportunities have been sufficiently optimised before allocating this site; * the significant transport, education, healthcare and drainage implications can be satisfactorily addressed; and * the scale of the proposed eastern urban extension is appropriate for Spondon. I also consider the allocation: Not Consistent with National Planning Policy, particularly given the need to make effective use of previously developed land, promote sustainable patterns of development, protect valued landscapes and ensure that development is supported by the necessary infrastructure.		
OR195	Matt Rothwell	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a resident of Spondon to formally object to the proposed allocation of land east of Stoney Lane, Spondon,		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b)

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						under Policy HA7, for a minimum of 400 homes. I consider the allocation to be UNSOUND, specifically on the grounds that it is not justified and is not consistent with national planning policy. I fully recognise that Derby needs to plan for additional housing and that the Council has a responsibility to identify sufficient land to meet its housing requirements. However, that does not mean that every potential development site is appropriate, nor does it remove the requirement for the Council to demonstrate that individual allocations are properly justified, deliverable and consistent with the overall strategy of the Local Plan. In my view, Policy HA7 fails that test. 1. The principle and scale of the allocation The proposal is not for a small, incremental addition to Spondon. It is for a minimum of		and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						400 homes and is explicitly described within Policy HA7 as an “eastern urban extension to the suburb of Spondon.” This would represent a substantial physical expansion of Spondon and would permanently change the character and setting of the eastern side of the village. The existing farmland and open countryside around Stoney Lane provide an important transition between the built-up area and the wider countryside. Replacing this landscape with a development of at least 400 homes would constitute a significant change to the settlement and should only be supported where there is compelling evidence that this is the most appropriate and sustainable location for that growth. I do not believe that the Council has demonstrated this sufficiently.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						2. The treatment of the site as "Grey Belt" I am particularly concerned by the Council's treatment of this site in relation to the emerging Grey Belt approach. This is active agricultural farmland, rather than previously developed urban land. It is not a brownfield site or an obvious example of land that has become degraded through previous development. The Council should therefore provide a particularly robust justification for why this land is considered appropriate for release and why development here represents a better planning outcome than retaining the land in its current use. The fact that land may now fall within a revised Green Belt/Grey Belt classification should not, in itself, be treated as justification for development. The underlying planning merits of the location still need to be demonstrated.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						3. Failure to demonstrate that reasonable brownfield alternatives have been fully optimised This is one of my principal concerns. The Council's own Local Plan strategy places significant emphasis on directing development towards previously developed land and city-centre regeneration. Yet the Council is simultaneously proposing the release of open agricultural land on the edge of Spondon for a major housing extension. There are already significant brownfield and regeneration opportunities identified within the Local Plan, including: * Policy CC11 – Derby Riverside * Policy CC13 – Railway Station Quarter * Policy CC14 – North Castleward * Policy CC4 – City Centre Mixed-Use Sites		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						These allocations collectively represent substantial housing opportunities. I therefore believe the Council needs to demonstrate much more clearly why the additional 400 homes proposed under HA7 cannot instead be accommodated, wholly or partly, through existing brownfield and regeneration opportunities. Unless the Council can demonstrate that reasonable previously developed land opportunities have been fully considered and optimised, the selection of HA7 is not adequately justified. 4. Transport and existing congestion The transport implications are particularly concerning. Spondon already experiences significant congestion, particularly during peak periods. Getting through the village and accessing the A52 and wider road network can		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						already be extremely difficult at busy times. This is not a theoretical concern for residents. It is an everyday issue. Adding a minimum of 400 homes will inevitably generate additional vehicle movements, including commuting, school journeys, deliveries and access to local services. Indeed, Policy HA7 itself requires financial contributions towards transport improvements to mitigate the highway impacts of the development. This demonstrates that the Council itself anticipates material highway impacts arising from the allocation. I am concerned that simply requiring future financial contributions does not establish that the local road network has sufficient capacity to accommodate the development, nor does it demonstrate that the necessary		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						improvements can be delivered effectively and at the appropriate time. The Council should therefore provide clear evidence that the cumulative transport impacts of HA7 have been properly assessed and that suitable infrastructure can be delivered before the development places unacceptable additional pressure on Spondon's road network. 5. Pressure on schools, healthcare and community infrastructure The same concern applies to other local services. Residents already experience significant pressure when accessing local services, including difficulty obtaining timely GP appointments. Schools and other community facilities also have finite capacity. A development of at least 400 homes could result in a substantial increase in the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						number of residents requiring access to education, healthcare, public transport, recreational facilities and other community services. Again, Policy HA7 itself acknowledges this issue by requiring financial contributions towards improved education infrastructure. The Council therefore needs to demonstrate not merely that contributions can theoretically be collected, but that adequate additional infrastructure will actually be available, funded and delivered alongside the housing. 6. Drainage and surface water I also have concerns regarding drainage and surface water. The proposed development would urbanise a substantial area of currently undeveloped land. Increasing hardstanding and built development inevitably changes surface-water run-off and drainage requirements.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						It is notable that Policy HA7 specifically requires a "comprehensive surface water drainage solution". This should not simply be treated as a matter to resolve at a later planning application stage. At Local Plan allocation stage, the Council needs to have sufficient evidence to demonstrate that the site can be developed sustainably and without creating unacceptable consequences for existing residents. 7. Loss of open countryside and impact on Spondon's character The land around Stoney Lane is valued by residents for walking, recreation and access to the countryside. These fields are not simply undeveloped land awaiting an alternative use. They contribute to the character and setting of Spondon and provide residents with access to open space and the wider countryside. The Council's own Local Plan consultation material recognises		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the importance residents place on open spaces, including their contribution to health, wellbeing and nature conservation. The permanent transformation of this landscape into a large residential development should therefore only occur where there is a clear and compelling planning justification. 8. The allocation must be considered against the overall strategy I am not arguing that Derby should not build new homes. My objection is that where those homes are built matters. The Council has identified a strategy that places importance on regeneration, previously developed land and city-centre opportunities. It should therefore be demonstrated that the release of open agricultural land at Stoney Lane is genuinely necessary and represents the most appropriate option when considered against reasonable alternatives.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I do not believe the evidence currently demonstrates this sufficiently. 9. Conclusion – Policy HA7 is unsound For the reasons set out above, I consider Policy HA7 – Stoney Lane, Spondon to be UNSOUND.		
OR199	Stella Salt	Policy HA7: Stoney Lane, Spondon	Objects		No	I am formally making representation to the proposed development of 400 new homes on active farmland off Stoney Lane, Spondon, which is identified as Policy HA7 in the Local Plan for Derby. Policy HA 7 is unsound on the following grounds: It is not justified & not consistent with the principles of the National Policy in that the Council has incorrectly categorised the Stoney Lane site as Grey belt. The Stoney Lane site is active agricultural farmland & is, therefore, quite clearly, green belt. Additionally, it should be noted that the land (currently active agricultural land) contributes to preventing urban sprawl & performs an	In conclusion, I am requesting that Site HA 7 should be de-allocated from the Local Plan & the proposed 400 new houses should be allocated to & between other existing brownfield & city centre regeneration allocations prioritised under Policy CC4, Policy CC11, Policy CC13 & Policy CC14, in accordance with the Plan's stated "brownfield & city centre first " strategy (Para.81).	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						important green belt function in this regard. Brownfield alternative sites are available within the area covered by Derby City Council &, as such, these should be thoroughly explored & utilised for the purposes of additional new houses. In addition to the Stoney Lane site being valuable & active green belt land, any further additional houses within & around the village of Spondon would add a significant impact on a village whose infrastructure (roads, drainage, GP practices, school capacity) is already creaking. It is well documented that, during rush hour especially, Spondon very easily & quickly becomes gridlocked. Building an additional 400 homes would add to these already significant pressures.		transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.
OR200	Janice Sanders	Policy HA7: Stoney Lane, Spondon	Objects		No	The above Policy is not justified and unsound.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b)

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I have lived in Spondon for 54 years and the land has always been active agricultural land and classed as green belt. I think it's wrong to classify it as grey belt. The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations in accordance with the Plan's stated brownfield and City Centre strategy. There are substantial opportunities to build houses on previously developed and regeneration sites rather than on green belt farmland on the edge of Spondon. There are already significant pressures on local infrastructure, including drainage, school capacity, doctors and roads. We already have far too many big lorries going through Spondon Village. Building 400 more houses will cause even more traffic congestion and make the village unsafe.		and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I hope all the points I have raised will be considered as I am sure all Spondon residents feel the same way.		
OR158	Nicky Scire	Policy HA7: Stoney Lane, Spondon	Objects		No	I believe that Policy HA7 is unsound for several reasons: The Policy is not justified because the land has been wrongly categorised as Grey Belt when it is agricultural farmland and the council has not demonstrated that all reasonable brownfield sites have been considered It is in conflict with the National Planning Policy of not allocating working farmland as Grey Belt The council's own Policy commits to a "Brownfield and city centre first" strategy (paragraph 8) yet this allocation releases Green Belt farmland before utilising available Brown Field sites The council has major Brown Field sites already allocated for housing, including:	I request the following modification: Deallocate Site HA7 (Stoney Lane Spondon - 400 homes) from the local plan. The allocation is Unsound as it fails the "Justified" & "Consistent with National Policy" tests by misclassifying active Green Belt Farmland as Grey Belt without showing that all reasonable Brown Field sites have been fully utilised. The council should re-allocate these 400 homes into existing policies, e.g. CC11, CC13, CC14, CC4.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Derby Riverside (Policy CC11) - 600 homes Railway Station Quarter (Policy CC13) - 500 homes North Castleward (Policy CC14) - 400 homes City Ctr Mixed-Use sites (Policy CC4) - 1,400 homes The land is active agricultural farmland and development of this would extend the urban sprawl where there is already existing pressure on roads, drainage, school capacity and local services.		(criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.
OR202	Mr M.J. SHAW	Policy HA7: Stoney Lane, Spondon	Objects		No	Please accept my objection to the above proposed building development for the following reasons. The land has always been Green Belt. It is agricultural farmland and is actively used as such. I understand the Council has now classified it as Grey Belt. I also believe this is not in line with the national planning policy which defines the classification of Grey belt land as land in a Green Belt that is		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						underperforming, of poor quality or previously developed. I believe that the land in question is none of these. Policy HA7 is in my opinion unsound, Not justified as the land been incorrectly categorised because not all alternative Brownfield sites have not been fully considered. This conflicts with the principles of the National Policy also appears to go against the Councils own commitment to a brownfield and City Centre first strategy. Ref Paragraph 81 of the plan. To Conclude, The roads, school capacity, Doctors, Dentists and drainage are struggling to cope without extra pressure brought about by extra housing. We already have a large house building project off Dale Road Spondon that will add to already struggling infrastructure. The roads around Spondon are regularly		as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						flooded during consistent rain as the drainage can't cope. This development would contribute to urban sprawl and development. The site is not poor quality or previously built on. It is well maintained and regularly used agricultural farm land. Not Grey Belt. Their are substantial city centre housing opportunities and brownfield sites available before using Green Belt farming land. The plan to use this land for development seems to go against the Plans stated brownfield and City Centre first.		
OR198	Samantha Shaw	Policy HA7: Stoney Lane, Spondon	Objects		No	I have a few concerns and questions. 1) How can this be classed as grey belt? Every single year this land is farmed. Crops are grown here yearly without fail. Please see pictures attached. Only 2 weeks ago the farmer was here		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025)

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						on the combine harvester. Every year everyone in this area people know not to leave washing out during this time. When reading up on what is classed as grey belt, I'm struggling to understand how this land has fell in this category? 2) The entry to HA7. This is just off the a52. A 70mph road, with a tight and small slip road to join stoney lane. I couldn't tell you the amount of times the crash barrier has been replaced due to be being a tight corner as it is, never mind coming round the corner and there being ques of cars attempting to turn into HA7. It's also right next to the bridge, a vital bridge for children to walk to Asterdale school. 3) Schools and doctors. West park is the only secondary school in Spondon. How can this school accommodate 400+ houses worth of pupils? They have already refused prior payouts when asked to take on		found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						more pupils from other housing developments, why do you think they will accept HA7? I don't need to comment on GP practices, it's clear. This is not about me not accepting houses need to be built, they are so needed. However I feel cheated by this. The planning and ideas are poor. Adding houses is adding stress on resources such as schools and GPs. If time and thought went into this more people would not be so upset. Where are the schools, the dr's, the children's centres? There is nothing. I've lived in Spondon all my life, my son will also grow up here too. I have no desire to move. But things like this push working hard people away. Everyone deserves a home; but think for the future. Would you move here? Probably not.		
OR203	Tracey Shaw	Policy HA7: Stoney Lane, Spondon	Objects		No	I would like to register my concern about the above development due to it being not justified and is not consistent with national policy.	I request that the Site HA7 - Stoney Lane Spondon - 400 homes should be deallocated from the	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The site is active agricultural land, rather than poor quality or previously developed "grey belt". I live very close to this land and can see that the farmer regularly plants in the land and tractors etc are seen often. Development would contribute to the further expansion of urban development and urban sprawl. There are significant pressures on local infrastructure, including roads, drainage and school capacity. The Council has substantial brownfield and city-centre housing opportunities which should be prioritised before releasing Green Belt farmland for development. The proposed allocation appears inconsistent with the Plan's stated "brownfield and City Centre first" strategy.	local plan. There are other projects going on in Derby which are existing brownfield and city centre regeneration allocations priorities under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 Railway Station Quarter and Policy CC14 North Castleward in accordance with the City Centre first strategy in Paragraph 81. This plan is unsound and does not meet the Justified and consistent with national policy tests as the land has been misclassified as it is Green Belt land and not Grey Belt. It needs to be proven that reasonable brownfield sites have been optimised.	current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR204	Helen Shepherd	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing as a resident of Spondon to formally object to the proposed allocation of land east of Stoney Lane, Spondon, under Policy HA7, for a minimum of 400 homes. I consider the allocation to be UNSOUND, specifically on the grounds that it is not justified and is not consistent with national planning policy. I fully recognise that Derby needs to plan for additional housing and that the Council has a responsibility to identify sufficient land to meet its housing requirements. However, that does not mean that every potential development site is appropriate, nor does it remove the requirement for the Council to demonstrate that individual allocations are properly justified, deliverable and consistent with the overall strategy of the Local Plan. In my view, Policy HA7 fails that test.	I therefore respectfully request that the Council deallocate Site HA7 – Stoney Lane, Spondon – from the Local Plan. The minimum 400 dwellings should instead be reconsidered as part of the Council's existing brownfield and regeneration opportunities, including the allocations identified under Policy CC4, Policy CC11, Policy CC13 and Policy CC14, where appropriate and subject to their individual capacity and deliverability. If the Council nevertheless intends to retain HA7, I request that the evidence base is strengthened before submission to	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						1. The principle and scale of the allocation The proposal is not for a small, incremental addition to Spondon. It is for a minimum of 400 homes and is explicitly described within Policy HA7 as an "eastern urban extension to the suburb of Spondon." This would represent a substantial physical expansion of Spondon and would permanently change the character and setting of the eastern side of the village. The existing farmland and open countryside around Stoney Lane provide an important transition between the built-up area and the wider countryside. Replacing this landscape with a development of at least 400 homes would constitute a significant change to the settlement and should only be supported where there is compelling evidence that this is the most appropriate and sustainable location for that growth.	demonstrate conclusively: 1. why this site is required; 2. why reasonable brownfield alternatives cannot accommodate the proposed housing; 3. the basis for its Grey Belt classification; 4. how existing highway capacity can accommodate the development; 5. how education and healthcare provision will be expanded; 6. how surface-water and drainage risks will be mitigated; and 7. how the development can take place without unacceptable harm to the character, landscape and quality of life of Spondon. This is not an objection to housing in principle. It is an objection to this	3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I do not believe that the Council has demonstrated this sufficiently. 2. The treatment of the site as "Grey Belt" I am particularly concerned by the Council's treatment of this site in relation to the emerging Grey Belt approach. This is active agricultural farmland, rather than previously developed urban land. It is not a brownfield site or an obvious example of land that has become degraded through previous development. The Council should therefore provide a particularly robust justification for why this land is considered appropriate for release and why development here represents a better planning outcome than retaining the land in its current use. The fact that land may now fall within a revised Green	particular allocation, at this particular scale, in this particular location, where I do not believe the Council has demonstrated that it is the most appropriate or sustainable option available.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Belt/Grey Belt classification should not, in itself, be treated as justification for development. The underlying planning merits of the location still need to be demonstrated. 3. Failure to demonstrate that reasonable brownfield alternatives have been fully optimised This is one of my principal concerns. The Council's own Local Plan strategy places significant emphasis on directing development towards previously developed land and city-centre regeneration. Yet the Council is simultaneously proposing the release of open agricultural land on the edge of Spondon for a major housing extension. There are already significant brownfield and regeneration opportunities identified within the Local Plan, including: * Policy CC11 – Derby Riverside		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						* Policy CC13 – Railway Station Quarter * Policy CC14 – North Castleward * Policy CC4 – City Centre Mixed-Use Sites These allocations collectively represent substantial housing opportunities. I therefore believe the Council needs to demonstrate much more clearly why the additional 400 homes proposed under HA7 cannot instead be accommodated, wholly or partly, through existing brownfield and regeneration opportunities. Unless the Council can demonstrate that reasonable previously developed land opportunities have been fully considered and optimised, the selection of HA7 is not adequately justified. 4. Transport and existing congestion		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The transport implications are particularly concerning. Spondon already experiences significant congestion, particularly during peak periods. Getting through the village and accessing the A52 and wider road network can already be extremely difficult at busy times. This is not a theoretical concern for residents. It is an everyday issue. Adding a minimum of 400 homes will inevitably generate additional vehicle movements, including commuting, school journeys, deliveries and access to local services. Indeed, Policy HA7 itself requires financial contributions towards transport improvements to mitigate the highway impacts of the development. This demonstrates that the Council itself anticipates material highway impacts arising from the allocation.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I am concerned that simply requiring future financial contributions does not establish that the local road network has sufficient capacity to accommodate the development, nor does it demonstrate that the necessary improvements can be delivered effectively and at the appropriate time. The Council should therefore provide clear evidence that the cumulative transport impacts of HA7 have been properly assessed and that suitable infrastructure can be delivered before the development places unacceptable additional pressure on Spondon's road network. 5. Pressure on schools, healthcare and community infrastructure The same concern applies to other local services. Residents already experience significant pressure when accessing local services, including difficulty obtaining		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						timely GP appointments. Schools and other community facilities also have finite capacity. A development of at least 400 homes could result in a substantial increase in the number of residents requiring access to education, healthcare, public transport, recreational facilities and other community services. Again, Policy HA7 itself acknowledges this issue by requiring financial contributions towards improved education infrastructure. The Council therefore needs to demonstrate not merely that contributions can theoretically be collected, but that adequate additional infrastructure will actually be available, funded and delivered alongside the housing. 6. Drainage and surface water I also have concerns regarding drainage and surface water.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The proposed development would urbanise a substantial area of currently undeveloped land. Increasing hardstanding and built development inevitably changes surface-water run-off and drainage requirements. It is notable that Policy HA7 specifically requires a "comprehensive surface water drainage solution". This should not simply be treated as a matter to resolve at a later planning application stage. At Local Plan allocation stage, the Council needs to have sufficient evidence to demonstrate that the site can be developed sustainably and without creating unacceptable consequences for existing residents. 7. Loss of open countryside and impact on Spondon's character The land around Stoney Lane is valued by residents for walking,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						recreation and access to the countryside. These fields are not simply undeveloped land awaiting an alternative use. They contribute to the character and setting of Spondon and provide residents with access to open space and the wider countryside. The Council's own Local Plan consultation material recognises the importance residents place on open spaces, including their contribution to health, wellbeing and nature conservation. The permanent transformation of this landscape into a large residential development should therefore only occur where there is a clear and compelling planning justification. 8. The allocation must be considered against the overall strategy I am not arguing that Derby should not build new homes.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						My objection is that where those homes are built matters. The Council has identified a strategy that places importance on regeneration, previously developed land and city-centre opportunities. It should therefore be demonstrated that the release of open agricultural land at Stoney Lane is genuinely necessary and represents the most appropriate option when considered against reasonable alternatives. I do not believe the evidence currently demonstrates this sufficiently. 9. Conclusion – Policy HA7 is unsound For the reasons set out above, I consider Policy HA7 – Stoney Lane, Spondon to be UNSOUND. In particular, I consider it: Not Justified, because the Council has not adequately demonstrated that: * the allocation of this particular site is the most appropriate option when		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						reasonable alternatives are considered; * the release of active agricultural land is necessary; * brownfield and city-centre opportunities have been sufficiently optimised before allocating this site; * the significant transport, education, healthcare and drainage implications can be satisfactorily addressed; and * the scale of the proposed eastern urban extension is appropriate for Spondon. I also consider the allocation: Not Consistent with National Planning Policy, particularly given the need to make effective use of previously developed land, promote sustainable patterns of development, protect valued landscapes and ensure that development is supported by the necessary infrastructure.		
OR205	Keith Shiers	Policy HA7: Stoney Lane, Spondon	Objects		No	I want to make you aware of a number of objections that I have regarding the proposed development of 400 new homes on active farmland off Stoney		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Lane, Spondon, identified as Policy HA7 in the emerging plan for Derby. The Policy HA7 is **UNSOUND**. I have lived in Spondon for over 60 years and the land identified in the policy has always been AGRICULTURAL LAND. I have regularly walked the footpaths in the area and consider it an important green belt function between my property, the A52 and Ockbrook. The Policy HA7 is **NOT JUSTIFIED**. In my long association with Spondon and regularly using the footpaths, it is apparent that the Council has INCORRECTLY categorised this active agricultural farmland as Grey Belt. There are **BROWNFIELD ALTERNATIVES**. The Council has already identified significant brownfield and city-centre regeneration opportunities (Policy CC4, CC11, CC13 and CC14) These allocations demonstrate that there are		current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						substantial opportunities for housing to be delivered on previously developed and regeneration sites rather than developing active Greenbelt Farmland on the edge of Spondon. Development would therefore be against the 'brownfield and City Centre first' strategy and also conflicts with the principles of the national planning principles. <u>Infrastructure and Amenities</u>. Spondon has seen some significant development over recent years to the extent that Spondon is now saturated. This proposed development and location would put increased pressure on already strained resources and amenities of Spondon, particularly schools and medical access, which this development will only exacerbate <u>Transport</u> The development would significantly increase traffic through Spondon and present further problems on traffic flow in the area. The area		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						cannot cope with any more traffic. Current bus services are erratic and generally overcrowded at peak times. The proposed development would not help the situation. I therefore strongly object to Policy HA7 - Stoney Lane - 400 homes as aforementioned:		
OR185	Rhianne Shrimpton	Policy HA7: Stoney Lane, Spondon	Objects		No	The proposal is unsound as the land in question has been incorrectly categorised as greybelt land. The land is active farmland and therefore greenbelt; vital in helping to prevent urban sprawl and support wildlife and biodiversity. The footpaths on the land are a much needed area for local people to exercise, walk their dogs and enjoy a breather from city life. The fields are used to farm crops to feed our nation. It is an important area in a constantly expanding city and therefore categorising it as greybelt is totally unjustified. The proposal is not consistent with national planning policy		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires trees and hedgerows to be

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						when categorising land. Further more, in accordance with the the plan's stated 'brownfield and city centre first' strategy (paragraph 81) the council commits to using brownfield and city centre land first, therefore allocating green belt active farmland for house building makes no sense. The council already has major brownfield sites allocated for housing, these include: -Derby Riverside -Railway station quarter -North castleward -Mixed sites in the city centre which should be optimised for use before even considering greybelt let alone greenbelt land. A new housing estate in Spondon will put pressure on our already stretched services such as schools, doctors and dentists, not to mention the increase in traffic in our village. As I'm sure you're aware, Bloor homes have begun building houses near Dale road and the		retained where possible, green infrastructure buffers, on-site open space and links to the rights of way network and Dale Road Park (criteria c, e, f, k and l), and biodiversity net gain will be required under Policy EN10. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						local residents of Spondon are already feeling the effects of noise and dust pollution, not to mention the impact that an influx of people moving to our village will have once the homes are complete. We simply cannot have any more homes built in our village. I understand people need somewhere to live but using any land other than brownbelt to build on is unsound. Thank you for taking my objection into consideration.		
OR208	Amanda & Robert Simpson	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing this email with regards to Policy HA7 -Stoney Lane,Spondon - 400 Homes I just wanted to say “Really “ I mean we just had how many homes on Spondon Wood, where the hell are they all going to go to school , doctors, …… It’s also Not justified in the fact that you are not being “ Consistent with National Policy as just to suit you have made Green belt into “Grey Belt” just		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						to suit can here the pennies jiggling already , that land is still contributing to prevention of Urban sprawl and is still performing as an important Green Belt Function, can't you change the rules to suit, not to be trusted with any policies are you…… Evidently what about Roads drainage and capacity with regards to doctors,schools etc THIS SHOULD NOT BE ALLOWED OR APPROVED		up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.
OR209	Ashley Sims	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to formally object to Policy HA7 – Stoney Lane, Spondon, which proposes the development of a minimum of 400 homes on land to the east of Stoney Lane. I consider the allocation to be unsound because it is not justified by the evidence presented and is not consistent with national planning policy. *The allocation is not justified*	The Council should therefore remove Policy HA7 and deallocate the Stoney Lane site from the Plan. If the Council considers that these 400 homes are still required to meet its housing requirement, those homes should first be directed	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The proposed development would constitute a substantial urban extension onto land which is currently active agricultural land. The Council has not, in my view, demonstrated sufficiently why this particular site needs to be released for development when there are other opportunities for housing within the existing urban area. This is particularly important given the requirements of the National Planning Policy Framework. National policy requires plan-making authorities, before relying upon Green Belt land to meet development needs, to demonstrate that they have fully examined other reasonable options. This includes making as much use as possible of suitable brownfield sites and under-utilised land. The Council should therefore provide clear evidence demonstrating:	towards suitable brownfield, previously developed and City Centre sites, including the opportunities identified under Policies CC11, CC13 and CC14, before relying upon the development of active agricultural land on the edge of Spondon. I therefore respectfully request that the Inspector finds Policy HA7 unsound and recommends its deletion or appropriate modification unless the Council can provide clear and proportionate evidence demonstrating that the allocation is justified, that reasonable	brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						what suitable brownfield and previously developed sites have been assessed; what capacity those sites have to accommodate additional housing; whether opportunities for greater density within existing urban areas have been fully explored; and why those alternatives are insufficient before allocating active agricultural land at Stoney Lane. Without this evidence, the allocation of HA7 cannot reasonably be regarded as a properly justified planning strategy. *The Grey Belt classification requires proper justification* I also object to the classification of the site as Grey Belt. The NPPF defines Grey Belt as Green Belt land comprising previously developed land and/or other land which does not strongly contribute to specified Green Belt purposes.	alternatives have been fully considered, and that the allocation is consistent with national planning policy.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Council therefore needs to provide a clear and transparent assessment of the Stoney Lane site against the national definition rather than simply treating its classification as Grey Belt as sufficient justification for development. In particular, the fact that land may be capable of being classified as Grey Belt does not in itself remove the need to demonstrate that development is justified or that the wider requirements of national planning policy have been satisfied. The NPPF specifically requires authorities to examine other reasonable options for meeting development needs and, where Green Belt land needs to be released, gives priority to previously developed land before Grey Belt land which is not previously developed. The Council therefore needs to demonstrate why the proposed development of this agricultural site is necessary when other		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						brownfield and City Centre opportunities remain available. *Conflict with the Council's own development strategy* The allocation also appears difficult to reconcile with the Council's stated "brownfield and City Centre first" approach to development. There are other sites within the Plan, including Policies CC11, CC13 and CC14, which provide opportunities for development within the existing urban area. It is difficult to see how the allocation of 400 homes on agricultural land on the edge of Spondon represents a genuine brownfield-first approach unless the Council can demonstrate that the reasonable capacity of these existing urban opportunities has been fully exhausted. The Council should therefore provide a clear explanation of why these sites cannot accommodate a greater		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						proportion of the housing requirement before land at Stoney Lane is released. *Urban sprawl and Green Belt purposes* The proposed development would create a significant eastern extension to Spondon. The Council's own policy wording describes HA7 as an "eastern urban extension to the suburb of Spondon." This raises legitimate concerns regarding the impact of the development on the openness and permanence of the Green Belt and the potential for further outward expansion of the urban area. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, while one of the purposes of the Green Belt is to safeguard the countryside from encroachment. The Council should therefore demonstrate clearly why this		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						particular urban extension represents an appropriate and sustainable pattern of development and how its impacts on the Green Belt have been properly assessed. *Infrastructure and sustainability concerns* There are also significant concerns regarding the ability of existing infrastructure to accommodate a development of this scale. The proposed allocation itself acknowledges the need for: transport improvements; additional education infrastructure; a comprehensive surface-water drainage solution; green infrastructure; open space; and other infrastructure contributions. The fact that these requirements are specifically identified within Policy HA7 demonstrates that the development would create		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						significant additional demands on local infrastructure. There are particular concerns regarding school capacity, surface-water drainage and the local highway network, including the impact of additional traffic on Stoney Lane and the surrounding roads. These impacts need to be properly evidenced and assessed as part of the plan-making process rather than being left to be addressed at a later planning application stage. *Conclusion* For the reasons above, I consider Policy HA7 to be unsound. The allocation is not justified, because the Council has not adequately demonstrated why 400 homes need to be allocated on active agricultural land at Stoney Lane when other brownfield, previously developed and City Centre opportunities exist.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I also consider the allocation to be inconsistent with national planning policy, particularly the requirement to fully examine reasonable alternatives, maximise the use of suitable brownfield and under-utilised land, and apply the national approach to Green Belt and Grey Belt land.		
OR210	Kendal Skivington	Policy HA7: Stoney Lane, Spondon	Objects		No	I'm writing to you with my objection's to the above Policy HA7 Stoney lane, to build 400 new homes on the land behind Stoney lane in Spondon. I appreciate your value time in reading this email, as sure you are going to receive many regarding this. It is my consideration that this policy is UNSOUND under Paragraph 36 of the National Planning Framework. The land you are proposing should be classed as GREEN BELT, this land has been farmed for many many years and is still farmed every year by local farmers. This is precious agricultural land, which our country so desperately needs to		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						keep, while I do also understand the need for more housing, other BROWNFIELD sites with Derby City, which you have already highlighted could easily take these extra house. I'm sure you are only to aware of all the usual NIMBY arguments there are against new home being built, and the impact on local infrastructure: Schools Doctors Dentists Transport These are all valid arguments, my objections still include these points, however I have other serious concerns with the number of houses proposed along with the entrance and exit of the site. The impact this will have on the community and it local enviroment will be far reaching and devastating to the local community. **Safety concerns of the entrance? exit** My understanding is that will only be ONE entrance/exit to		education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the site, this being on Stoney lane. this is right ontop of a very busy slip road off the A52. Which even in its current state is not fit for purpose. tghe volume and speed of traffic that uses and passes this junction is at time frightening. In the last two weeks thetre has been two very serious accidents on which involved the Air Ambulance landing on the A52. The site entrance to too closure to this alfeady dangerous junction. Stoney lane is a walkway to and from Asterdale Primary school for many children and their families. To have a building site that would have heavy plant vechiles continually using it during school drop off doesnt even bare thinking about what dangers the small children will face. Along with thjis after the site is completed with 400 homes, thats the potential for 800+ cars leaving the site at school run times, it will only be a matter of time before a child is hurt ior even worse.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						There is also a Primary school on Sandrigham drive, which is one of the main routes in and out of Spondon. I suspect any traffic that leaves the site would turn on to the A52 to head towards Nottingham, or if they go to Derby they would still head towards the Ocbrook/Borrowash exit, then go back on A52 to head towards Derby. This will cause massive tailbacks during peak times at both these junction. Or the traffic would just head through Spondon village, which even now cant cope with the gtraffic during peak times, as ther is only one road out of the small village. **Impact on local enviroment** This land as I have already mentioned is farmed by local farmers planting wheat and barley every year. This is vital and much need agricultural land that forms a GREEN wedge between Spondon/Ockbrook/Borrowash. It is used by hundreds of loacls		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						for walking. dog walking and enjoyiong the green space. In an age where we are trying to keep children off electronic devices and out into the frsh air and country side, PLEASE keep this valuable open space that locals can walk to with their families and not have to use cars to get close to nature. I have spotted red kites in the last two years flying in the fields on this site, we need to keep this land as GREEN BELT it is farmed, and our children need to see this. If this site goes ahead along with the Bloor and Miller home site, Spondon area will increase by 25%, without any new Primary schools, Doctors, Dentists ETC. I hope you do read this email and its not just filed away, my concerns for the entrance and ext of this site are extremly worrying as I have already mentioned the junction in its current state is not fit for		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						purpose, God help us if 400 home get built. Spondon has already seen the major issues that have been caused by the dale road site and they are only weeks in to the devlopment. Also will the council compensate the houses that back onto this development for the devaluation of their propery due to the homes being bulit in their backyard. I cant even begin to imgine the dust and noise this site will produce. Kind Regards A very worried Spondon resident		
OR211	Alison Slater	Policy HA7: Stoney Lane, Spondon	Objects		No	I would like to register my objection to the proposed development on the Stoney Lane site. I believe Policy HA7 (Stoney Lane, Spondon - 400 homes) is UNSOUND, not justified and not consistent with National Policy. **NOT JUSTIFIED and NOT CONSISTENT WITH NATIONALPOLICY**	I request that Site HA7 (Stoney Lane, Spondon- 400 home) should be removed from the local Plan. I consider the allocation of this site to be Un-justified, Unsound and In-Consistent with National Policy. The council should reallocate the 400	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The site is currently active agricultural farmland, it has been classified as 'GREY BELT' to justify its removal from the Green Belt, the national planning policy defines Grey Belt as land within the Green Belt that is poor quality, or underperforming or has been previously developed. I watched the crops being harvested from these fields a few weeks ago. The land has been incorrectly defined as Grey Belt without any justification why other sites that are brownfield or city-centre regeneration are not being considered for this development. There are many sites that should be considered before removing active farmland from the greenbelt. Developing this site would contribute to the urban sprawl, Spondon is a great community and further development would dilute the pride and care that makes this a great village. I feel very strongly that Spondon doesn't have the	dwellings into existing brownfield and city-centre regeneration allocations. (Policies CC4, CC11,CC13 and CC14).	brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						infrastructure to support 400 properties on this site, including roads, drains, school capacity and health care. As a resident of Stoney Lane I see traffic every day heading to the A52, the junction onto the A52 already struggles to cope with the volume of vehicles, there is a very short slip road to leave or join the road and adding the access road to the new development so close to this junction I feel will be very dangerous and will cause congestion and increased accidents. I have also experienced the traffic going through the village, again the roads are already insufficient for the current traffic and that is before the new developments already in progress are completed.		
OR212	Ian Slater	Policy HA7: Stoney Lane, Spondon	Objects		No	I I would like to register my objection to the proposed development on the Stoney Lane site. I believe Policy HA7 (Stoney Lane, Spondon - 400 homes) is unsound, not justified	The Site HA7 (Stoney Lane - 400 Homes) is UNSOUND as it does not comply with the "Justified" and "Consistent with National Policy"	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and not consistent with National Policy. Not Justified - Classifying as Grey Belt. It is active agricultural farmland and should not have been reclassified without demonstrating that all brownfield sites had been fully considered. Not Consistent with National Policy - Allocating Active Agricultural Farmland for development conflicts with National Planning Policy and the Council's own strategy of "Brownfield and City Centre First". Development of this site would add to further expansion of Urban Sprawl. It would place significant extra demands on local infrastructure such as roads, school capacity and other amenities. Highway access/egress at Stoney Lane is very close to the strategic road A52 junction which would add further risk to commuters and pedestrians at this	tests by misclassifying active Green Belt Land as Gray Belt and therefore should be deallocated from the Local Plan. The 400 dwellings should be, in accordance with the Plan's stated "Brownfield and City Centre First" strategy, be reallocated into existing brownfield and city centre regeneration allocations prioritised under Policy CC4 (City Centre Mixed- Use Sites), Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter), CC14 (North Castleward).	and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						already inadequate intersection. The Council has already identified other brownfield development opportunities (CC4, CC11, CC13, CC14) which should be delivered before developing active Green Belt Land.		
OR79	Councillor Smale*	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing in my official capacity as Local Ward Councillor for Spondon to submit a formal representation regarding the *Local Plan for Derby 2023 to 2043 Regulation 19 Submission Draft Plan*. Having thoroughly reviewed the pre-submission draft documents, supporting evidence, and the *Test of Soundness Guidance Note*, I wish to state in the strongest possible terms my objection to **Policy HA7 (Land East of Stoney Lane, Spondon)** . It is my considered representation that the inclusion of Policy HA7 renders the draft Local Plan **UNSOUND** under Paragraph 36 of the National Planning Policy	**Deallocate Policy HA7 (Stoney Lane, Spondon - 400 dwellings) in its entirety from the Local Plan.** The 400-dwelling allocation should be redistributed to allocated brownfield regeneration sites within the City Centre (under Policies CC4, CC11, CC13, or CC14), optimising higher density urban housing in line with Paragraph 81 ("brownfield and City Centre first"). The land east of Stoney Lane should be fully	The Green Belt Assessment (LUC, 2025) found that the site does not make a strong contribution to Green Belt purposes (a), (b) or (d), so it meets the NPPF definition of grey belt, which does not require land to be previously developed or degraded. The City Centre allocations, including CC4, CC11, CC13 and CC14, are already relied on at their expected capacities within the 12,500 homes, so HA7 is needed in addition to them, as set out in the Housing Requirement and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Framework (NPPF) on two specific grounds: **1. Not Justified:** The proposed allocation is not based on an appropriate or robust evidence base, nor does it reflect a justifiable spatial strategy when reasonable alternatives exist. **2. Not Consistent with National Policy:** The classification and release of active Green Belt farmland as "Grey Belt" directly misinterprets national planning definitions and contradicts the Council's own stated spatial principles. Below, I set out the detailed grounds for this objection. **1. Misclassification of Active Farmland as "Grey Belt" (Inconsistency with National Policy)** Paragraph 302 of the draft Plan states that land east of Stoney Lane was previously in the	reinstated as protected Nottingham-Derby Green Belt under Policy EN5.	Spatial Strategy Topic Paper and SA Appendix G. Further information on this site is given in the Site Selection Topic Paper. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Green Belt, but was identified through Council analysis as "grey belt" land to facilitate an eastern urban extension of Spondon. This determination represents a fundamental flaw in the evidence base and conflicts with National Planning Policy: **National Definition of "Grey Belt":** National planning guidance explicitly defines "Grey Belt" as land within the Green Belt that is previously developed (brownfield) or makes a demonstrably weak or limited contribution to core Green Belt purposes. • **Performance of Site HA7:** The land allocated under Policy HA7 is an active, open agricultural field that performs vital Green Belt functions. Specifically, it maintains visual openness, safeguards the countryside from urban encroachment, and prevents the outward sprawl of the Spondon urban boundary		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						toward neighbouring rural parishes. • **Absence of Degradation:** Site HA7 is not disused, degraded, or brownfield infill. Reclassifying high-performing agricultural Green Belt as "Grey Belt" sets an unsound precedent that undermines national Green Belt protections set out in the NPPF. Failure to Optimise Reasonable Brownfield Alternatives (Unjustified Strategy) For a plan to be **Justified**, it must represent an appropriate strategy, considering reasonable alternatives, based on proportionate evidence. Furthermore, Paragraph 81 of the draft Plan explicitly commits Derby City Council to a **"brownfield, and City Centre first"** spatial strategy. Releasing 400 dwellings on Green Belt farmland at Stoney Lane before fully exhausting high-priority brownfield		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						capacity within the urban core directly contradicts Policy HA1 and Paragraph 81: • **Unallocated City Centre Capacity:** The draft Local Plan identifies substantial brownfield and regeneration allocations within the City Centre capable of absorbing significant residential growth. Key examples include: ○ **Policy CC11 (Derby Riverside):** Allocated for a minimum of 600 homes on brownfield waterfront land. ○ **Policy CC13 (Railway Station Quarter):** Allocated for a minimum of 500 homes on underutilised transport-adjacent sites. ○ **Policy CC14 (North Castleward):** Allocated for 400 homes on urban regeneration land— matching the Stoney Lane yield precisely. ○ **Policy CC4 (Mixed-Use Allocations):** Identifies capacity		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						for over 1,400 homes across central brownfield opportunity sites. • **Failure of the Sequential Approach:** Allocating greenfield/Green Belt land on the outer administrative periphery while brownfield regeneration sites inside the Ring Road remain available demonstrates that the Council has failed to prove that the release of Site HA7 is necessary or justified. Infrastructure Constraints and Local Impacts The allocation of 400 homes under Policy HA7 introduces severe cumulative impacts on local infrastructure and community services that have not been adequately resolved within the policy criteria: • **Highways & Strategic Road Access:** Primary vehicular access is proposed onto Stoney Lane at its southern end, immediately adjacent to the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						A52 trunk road junction. Stoney Lane is already subject to severe peak-time congestion. Injecting traffic from 400 additional households at this restricted bottleneck poses serious highway safety and network capacity issues that cannot be mitigated by minor off-site financial contributions. • **Educational Capacity:** Policy HA7(i) relies on financial contributions toward off-site education infrastructure rather than delivering on-site provision. Secondary catchment schools are already operating at full capacity. • **Environmental & Topographical Buffering:** The site forms a prominent gateway into Derby from the east. Developing built structures of this density on open agricultural land permanently harms the visual landscape and setting of the city's eastern boundary, failing the placemaking requirements set out in Policy GD1 and Policy GD2.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR207	Betty Smith	Policy HA7: Stoney Lane, Spondon	Objects		No	I would like to register my objections to the above planning policy number HA7 Stoney Lane Spondon. I think the policy is unsound, not justified and inconsitent with National Policy. The land is active agricultural land, rather than poor quality or previously developed 'grey belt' The development would cause more stress to the already stressed out services that we have in Spondon, ie doctors, dentists, bus services, roads, schools. The substantial brownfield and city centre housing opportunities should be prioritised before releasing Green Belt farmland for development. The proposed allocation appears inconsistent with the Plan's stated 'brown field and city centre first' strategy.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I have lived on [redacted] since 1958 and have enjoyed having the fields, being considered for housing, as a special place to walk my dogs, take my children , grandchildren and now my great grandchildren for walks. It upsets me greatly that any housing plans should be considered for this area, when there are many more suitable places that aren't green belt. The facilities in Spondon are stretched now without having all this extra strain on them. PLEASE reconsider this planning application for the sake of all the people of Spondon.		where justified. No change required.
C48	Marcus Smith	Policy HA7: Stoney Lane, Spondon	Objects	No	No	It is my considered representation that the inclusion of Policy HA7 renders the draft Local Plan fundamentally UNSOUND under the provisions of Paragraph 35 and 36 of the NPPF, failing specifically on the statutory tests of being Justified and Consistent with National Policy. 1. Misclassification of High-Performing Green Belt as "Grey Belt" (Inconsistency with	6. I request that the site is deallocated from the local plan. The allocation is unsound as it fails the justified and consistent with national policy tests by misclassify an active green belt farmland as grey belt without demonstrating or	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						National Policy) Paragraph 302 of the draft Plan asserts that land east of Stoney Lane constitutes "grey belt" land capable of facilitating an eastern urban extension to Spondon. This determination represents a fundamental flaw in the Council's supporting evidence base and directly conflicts with national planning policy. • Contradiction of Statutory Definitions: National planning guidance restricts the definition of "Grey Belt" to land within the Green Belt that is previously developed (brownfield) or makes a demonstrably weak or limited contribution to core Green Belt purposes. Site HA7 fits neither criterion. • Demonstrated Green Belt Performance: Site HA7 comprises highly active, contiguous agricultural fields that rigorously fulfill multiple statutory Green Belt purposes under NPPF Paragraph 143. Specifically, it maintains	giving evidence that that brownfield site alternatives have been fully optimised and tested for reuse. 7. The council must reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter), or Policy CC14 (North Castleward) in accordance with the Plan's stated brownfield and city first strategy. The fact that this hasn't been considered is a massive oversight by planners and officials and they must be held to account.	brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						absolute visual and spatial openness, safeguards the countryside from urban encroachment, and prevents the outward sprawl of the Spondon urban boundary into neighbouring rural parishes. • Unsound Precedent: The site exhibits an absolute absence of degradation, contamination, or brownfield infill characteristics. Reclassifying a pristine, high-performing agricultural parcel as "Grey Belt" undermines national Green Belt protections, rendering the plan inconsistent with national policy. 2. Failure to Fulfill the Sequential Approach & Optimise Brownfield Alternatives (Unjustified Strategy) To satisfy the test of soundness, a spatial allocation must be Justified, representing an appropriate strategy when evaluated against reasonable alternatives, backed by proportionate evidence. The draft Plan completely fails this threshold by violating its own stated development hierarchy.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						• Breach of Core Spatial Strategy: Paragraph 81 of the draft Plan commits Derby City Council to a mandatory "brownfield and City Centre first" spatial strategy. The release of 400 greenfield dwellings at Stoney Lane before fully exhausting high-priority brownfield capacity within the urban core directly breaches Policy HA1. Sufficient Sustainable Alternatives Available: The draft Local Plan explicitly identifies substantial, viable brownfield and regeneration allocations within the City Centre capable of absorbing this exact quantum of residential growth. Key examples include: • Policy CC11 (Derby Riverside): Minimum of 600 homes on brownfield waterfront land. • Policy CC13 (Railway Station Quarter): Minimum of 500 homes on underutilised transport-adjacent sites. • Policy CC14 (North Castleward): 400 homes on urban regeneration land—		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						matching the Stoney Lane yield precisely. • Policy CC4 (Mixed-Use Allocations): Capacity for over 1,400 homes across central brownfield opportunity sites. • Failure of the Spatial Hierarchy: Allocating greenfield/Green Belt land on the outer administrative periphery while highly sustainable brownfield regeneration sites inside the Ring Road remain unexhausted proves that the allocation of Site HA7 is neither necessary nor justified. 3. Severe Infrastructure Constraints and Lack of Deliverability (Ineffective Policy) The allocation of 400 homes under Policy HA7 introduces severe cumulative impacts on local infrastructure and community services that cannot be resolved under the current policy criteria, rendering the allocation Ineffective. • Severe Highway Safety and Capacity Issues: Primary		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						vehicular access is proposed onto Stoney Lane at its southern terminus, immediately adjacent to the strategic A52 trunk road junction. Stoney Lane is an over-capacity local corridor subject to critical peak-time gridlock. Injecting a projected 1,000+ daily vehicle movements from 400 additional households into this highly restricted bottleneck creates severe highway safety hazards and compromises network capacity. These impacts cannot be mitigated by minor off-site Section 106 financial contributions. • Failure of Educational Infrastructure Provision: Policy HA7(i) relies heavily on financial contributions toward off-site education infrastructure rather than delivering on-site provision. Secondary catchment schools serving Spondon are verified to be operating at full capacity. The plan fails to demonstrate how or where physical school expansions can legally and structurally occur.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						• Irreparable Harm to Landscape Character and Gateway Settings: The site forms a prominent visual gateway into the Derby urban area from the east. Developing built structures of this density on open agricultural land permanently erases the rural setting of the city's eastern boundary, failing the statutory placemaking and character requirements set out in Policy GD1 and Policy GD2.		
OR213	Mark Smith	Policy HA7: Stoney Lane, Spondon	Objects		No	My main concern is It appears that the council has erroneously reclassified the area as Grey Belt when there is no evidence that it is anything other than Green Belt. As a resident of Spondon for 57 years, this area has always been actively farmed is not poor quality, nor has it been previously developed. I would like to see the sound justification for changing the classification as I suspect it will be weak and tenuous at best. This area is important for preventing further urban sprawl		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						when there are other brownfield sites that could be used instead. Accepting that they would not be as profitable or easy to build on, they should be the first place to build upon. Suggested Brownfield sites that have already been reviewed with substantial opportunity, should be built upon first are, but not limited to as follows. City Centre 1,400 homes Policy CC4. Derby Riverside 600 Homes Policy CC11. Castleward Policy CC14. Railway Quarter Policy CC13. Also, of significant concern is the effect on the already highly pressured services in the area (to be exasperated by the current development at Spondon Wood) Doctors and Dentists availability are currently deteriorating with waiting lists getting longer than they ever have been and will only be made worse at the expense of general public health.		Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						West Park School has recently expanded to what the headmaster called beyond the ideal size so would probably need further expansion to meet needs. Roads in and out of Spondon ave always been pressured with more homes creating further traffic delays and would be a source of stress and pollution. This area is also used as a popular walking area where people can destress without being forced to interact with numerous members of the public as would become the case when people will only be able to walk in the fewer remaining ever smaller green areas. I would like to suggest that this area should not be considered until the aforementioned developments have been utilised and even then there should be reservations about the relentless sprawl heading towards Ockbrook.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR231	Martin Smith	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally object to the inclusion of **Policy HA7 – Stoney Lane, Spondon** in the proposed Local Plan for Derby 2023–2043. The policy proposes a **minimum of 400 new homes** on land east of Stoney Lane, currently comprising active agricultural farmland and open Green Belt land. I live very close to the fields proposed for development and am therefore directly affected by the proposed allocation. I am also aware of the considerable concern amongst local residents about the cumulative effect of further development on Spondon's roads, schools, healthcare, drainage, amenities and wider infrastructure. I consider Policy HA7 to be **UNSOUND**, specifically because it is: **Not Justified**; and **Not Consistent with National Policy**. I strongly request that Policy HA7 is **deleted from the Local**	**Requested modification** For all of the reasons set out above, I request the following modification to the Local Plan: **DELETE POLICY HA7 – STONEY LANE, SPONDON, INCLUDING THE PROPOSED ALLOCATION OF A MINIMUM OF 400 DWELLINGS.** The Council should instead seek to accommodate these 400 dwellings through suitable existing urban, brownfield, previously developed, underutilised and city-centre regeneration opportunities, including the substantial housing capacity identified	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Cumulative effects, including with development in Erewash, will be assessed with the Highway Authority and National Highways as paragraph 307 requires, and Policy HA7 secures contributions to

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Plan and that the proposed 400 dwellings are instead accommodated through appropriate brownfield, previously developed, underutilised and city-centre regeneration opportunities. **1. The release of this Green Belt land has not been adequately justified** The proposed HA7 site is active agricultural farmland forming part of the open countryside adjoining Spondon. Its development would result in the permanent loss of open agricultural land and would extend the built-up area of Spondon into the countryside. The NPPF places significant importance on protecting the Green Belt and identifies purposes including checking unrestricted sprawl and preventing the merging of towns. I recognise that the current NPPF allows certain Green Belt land to fall within the definition of **grey belt**. However, this does	within the Plan's city-centre allocations. In particular, the Council should demonstrate that the capacity identified through **Policy CC4, Policy CC12 (Derby Riverside), Policy CC14 (Railway Station Quarter) and Policy CC15 (North Castleward)** has been fully considered and optimised before releasing additional open agricultural Green Belt land. **18. Information I request the Council and Planning Inspector to consider** Before the Plan proceeds to examination, I ask that the Council provides clear evidence addressing:	education and transport infrastructure (criteria h and i). No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						not mean that a site is suitable for development merely because it has been identified or classified as grey belt. The Council must demonstrate, with robust site-specific evidence, why this particular site meets the current grey-belt definition, how it performs against the relevant Green Belt purposes and why its release is justified. The Council must also demonstrate that it has **fully examined all reasonable alternatives for meeting its development needs**, including making as much use as possible of suitable brownfield and underutilised land. I do not consider that the case for releasing HA7 has been sufficiently demonstrated. **2. The Council must demonstrate that the site genuinely represents an appropriate grey-belt release** The fact that land may be considered grey belt does not	precisely why the Stoney Lane site qualifies as grey belt; the site's contribution to each relevant Green Belt purpose; what reasonable brownfield, previously developed and underutilised alternatives have been considered; why those alternatives cannot accommodate the proposed 400 homes; how the Council has assessed the cumulative impact of HA7 together with the 259 homes at Dale Road and up to 90 homes at Royal Hill Road; how additional traffic will affect the A52, its slip roads, junctions and the road network through Spondon;	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						remove the requirement for proper planning judgement. The current NPPF requires that, where Green Belt land needs to be released for development, priority is given to **previously developed land**, followed by grey belt land which is not previously developed, before other Green Belt locations. The NPPF also makes clear that the overall strategy must be based upon making as much use as possible of suitable brownfield sites and underutilised land and must promote sustainable patterns of development. The Council should therefore provide clear evidence demonstrating: precisely why HA7 qualifies as grey belt; the site's contribution to the relevant Green Belt purposes; why the release of this particular agricultural site is necessary; what suitable brownfield and previously developed	how peak-time congestion will be affected; how education capacity will accommodate the combined increase in population; how healthcare and other community infrastructure will accommodate that growth; how surface-water drainage and sewerage infrastructure will cope with the cumulative development; what cross-boundary discussions have taken place with Erewash Borough Council and relevant transport authorities; how the Council has assessed the cumulative landscape and visual impact of development around Spondon; and	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						alternatives have been considered; whether those alternatives have been fully optimised; why those alternatives cannot accommodate the proposed housing; and why HA7 represents a more sustainable location than the reasonable alternatives. Simply labelling the site grey belt is not sufficient justification for allocating it for 400 homes. **3. The allocation conflicts with the Council's brownfield and city-centre-first approach** The proposed release of open agricultural Green Belt land is particularly difficult to justify when the Council's own Local Plan strategy identifies substantial opportunities for housing within the existing urban area and city centre. The current Plan identifies significant capacity within the City Centre, including: **Derby Riverside – minimum 600 homes (Policy CC12);**	why, given the substantial development already committed around Spondon and the availability of urban and city-centre opportunities elsewhere, a further 400 homes at Stoney Lane represents a sustainable and proportionate strategy. **Conclusion** I strongly object to the inclusion of **Policy HA7 – Stoney Lane, Spondon** in the proposed Local Plan. This is not simply an objection to new housing or a desire to prevent change. It is an objection based on **Green Belt policy, the loss of active agricultural land, urban sprawl, the availability of**	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Railway Station Quarter – minimum 500 homes (Policy CC14); **North Castleward – minimum 400 homes (Policy CC15); and at least 1,400 additional homes through mixed-use regeneration allocations identified in Policy CC4.** The Council's own draft Plan therefore identifies thousands of potential homes in highly sustainable city-centre and regeneration locations. This raises a fundamental question: **why is it necessary to release open agricultural Green Belt land at Stoney Lane when such substantial urban and regeneration opportunities already exist?** I am not objecting to the principle of Derby providing new homes. The issue is **where those homes should be located**. The NPPF expressly requires plans to make as much use as possible of suitable brownfield	**alternative urban and brownfield opportunities, cumulative development, highway capacity, A52 traffic, congestion, infrastructure capacity, education, healthcare, drainage, landscape impact and the sustainability of the proposed location**. The cumulative development already approved around Spondon must be taken into account. The Council cannot reasonably consider another 400 homes in isolation when residents are already facing the consequences of significant additional development in the area.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						sites and underutilised land and, where Green Belt release is necessary, to give priority to previously developed land. The Council must therefore demonstrate that its brownfield and city-centre opportunities have been genuinely and realistically optimised before resorting to the release of agricultural Green Belt land. **4. HA7 would cause further urban sprawl** The development would create a substantial eastern urban extension to Spondon. The Council's own proposed wording for HA7 describes it as an **"eastern urban extension"** and requires an eastern landscaping buffer specifically to soften the visual impact of development from the Green Belt and open countryside beyond. This demonstrates the scale of the change proposed.	The Local Plan is the appropriate stage at which to consider the **combined and long-term consequences of development**, rather than waiting until individual developments have been built and infrastructure pressure has become unavoidable. The Council's own HA7 policy recognises the need for transport mitigation, education contributions, drainage infrastructure, landscaping and other measures. This reinforces the need for a thorough assessment of whether the site is genuinely capable of accommodating development of this scale without unacceptable	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The existing fields provide a clear open countryside setting and contribute to the separation between the built-up area and the countryside. Replacing this landscape with at least 400 dwellings, roads, lighting, gardens, driveways and associated infrastructure would represent a significant and permanent urbanising effect. A landscaping buffer may reduce some visual effects, but it cannot recreate the existing open agricultural landscape or reverse the fundamental change from countryside to urban development. The allocation therefore risks contributing to precisely the outward urban expansion and sprawl which Green Belt policy seeks to prevent. **5. The cumulative impact of development around Spondon has not been properly addressed**	cumulative consequences. The NPPF requires the Council to make as much use as possible of suitable brownfield and underutilised land and to prioritise previously developed land where Green Belt release is necessary. I therefore respectfully request that the Planning Inspector finds **Policy HA7 UNSOUND** on the grounds that it is **NOT JUSTIFIED** and **NOT CONSISTENT WITH NATIONAL POLICY**, and that the allocation is removed from the Local Plan. **The requested modification is: Deallocate Site HA7 (Stoney Lane, Spondon – minimum**	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						My strongest concern is that HA7 is being considered against a background of **substantial development already approved or under construction around Spondon**. This cannot reasonably be treated as a standalone 400-home allocation. A development of **259 dwellings on land west of Dale Road**, within Erewash Borough, has already been approved. In addition, planning permission has been granted following appeal for **up to 90 dwellings at Royal Hill Road, Spondon**. That represents approximately **349 additional dwellings already committed in the immediate area**, before the proposed 400 homes at Stoney Lane are considered. If HA7 is added, these three developments together represent approximately **749 additional dwellings**. This is a substantial increase in population and activity and will	**400 homes) from the Local Plan. The allocation is UNSOUND because it has not been demonstrated to be justified or consistent with national planning policy, particularly in relation to the release of Green Belt land, the prioritisation of brownfield and previously developed land, sustainable patterns of development and the cumulative impacts of development on transport and infrastructure.** The Council should instead seek to accommodate the proposed housing through suitable existing brownfield, previously	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						inevitably place additional pressure on local transport, schools, healthcare, drainage, public services and community facilities. The Council must assess this cumulative position rather than considering HA7 in isolation. **6. Traffic from the A52 and the cumulative effect on Spondon's road network** I live close to the proposed site and am particularly concerned about the impact of additional traffic entering and travelling through Spondon. The A52 is an important route serving the area and traffic entering and leaving Spondon is already required to use a relatively constrained local highway network. The proposed HA7 development would generate substantial additional vehicle movements. Those movements would be added to traffic generated by	developed, underutilised and city-centre regeneration opportunities, including the housing capacity identified through **Policy CC4, Policy CC12 (Derby Riverside), Policy CC14 (Railway Station Quarter) and Policy CC15 (North Castleward)**. I ask that this representation is given full consideration during the examination of the Local Plan and is made available to the appointed Planning Inspector.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the already-approved Dale Road and Royal Hill Road developments. The Council must therefore assess the **cumulative highway impact**, including: the existing traffic situation; the 259 homes approved at Dale Road; the up to 90 homes approved at Royal Hill Road; the proposed 400 homes at Stoney Lane; traffic entering Spondon from the A52; the A52 and its slip roads and junctions; congestion at peak times; junction capacity; highway safety; pedestrian and cycle movements; public transport capacity and reliability; air quality; and the cumulative effects of other committed or planned development in the surrounding area. The fact that the Dale Road development itself requires		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						significant highway mitigation, including contributions towards improvements to the **A52 westbound off-slip**, is highly relevant. It demonstrates that the transport impacts associated with additional housing in this area are already significant enough to require mitigation. It would therefore be inadequate to assess HA7 on the assumption that the road network can accommodate 400 homes without properly modelling the **combined effect of all committed and proposed development**. **7. Cross-boundary impacts with Erewash Borough Council must be considered** The Dale Road development is within Erewash Borough rather than Derby City. However, residents do not experience traffic, congestion or infrastructure according to administrative boundaries.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Traffic generated by a development in Erewash can enter Spondon, use Derby's roads, affect Derby's junctions and add pressure to services used by Derby residents. The Council should therefore demonstrate that it has properly considered the **cross-boundary cumulative effects** of the Dale Road development when assessing HA7. It should also demonstrate appropriate engagement with Erewash Borough Council and relevant highways and transport authorities. The administrative boundary between the two councils cannot reasonably be used to compartmentalise the impacts of development. **8. Spondon's infrastructure is already under pressure** Spondon is already experiencing significant development pressure.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The addition of a further 400 homes would increase demand for: school places; GP and healthcare services; roads and junctions; public transport; drainage and sewerage; waste and other local services; recreational facilities; open space; and other community infrastructure. The Council's own HA7 policy recognises the need for contributions towards **transport improvements, education infrastructure and other infrastructure**, together with a comprehensive surface-water drainage solution. These requirements are not incidental. They demonstrate that the Council itself recognises that development of this scale will have material impacts requiring mitigation. However, developer contributions should not be treated as a blanket solution to cumulative infrastructure problems.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Council must demonstrate that the infrastructure required can be **delivered at the time it is needed**, at a scale sufficient to deal with the combined effects of development, rather than relying upon contributions whose eventual effectiveness remains uncertain. **9. Education capacity must be properly assessed cumulatively** The Council's own HA7 policy requires financial contributions towards improved education infrastructure to mitigate the impacts of the development. This is particularly important given the additional housing already approved around Spondon. The Council should therefore demonstrate that sufficient school capacity will be available to serve the combined population arising from: existing development; the Dale Road development;		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the Royal Hill Road development; and the proposed HA7 development. The capacity of local schools should not be assessed on the basis of HA7 alone. **10. Drainage and surface-water management** The development would replace a substantial area of currently undeveloped agricultural land with housing, roads and other hard surfaces. This has the potential to materially alter surface-water runoff and increase pressure on local drainage infrastructure. The Council's own HA7 policy acknowledges the need for a **comprehensive surface-water drainage solution**. The Council should provide robust evidence that the development can be accommodated without increasing flood risk or causing unacceptable drainage		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						consequences for existing residents and properties. The assessment should consider climate change, cumulative development and the long-term effectiveness and maintenance of any sustainable drainage system. **11. Loss of active agricultural land** The allocation would permanently remove active agricultural land from agricultural use. Agricultural land is a finite resource and its loss should not be treated as insignificant when there are potential alternative locations for housing. The Council should therefore demonstrate that the agricultural value of the site has been properly assessed and that the permanent loss of this land is justified when reasonable alternatives are available.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						12. Landscape, visual impact and the character of Spondon The fields proposed for HA7 contribute significantly to the character and setting of Spondon. I live close to this land and am concerned about the permanent change that would result from replacing open farmland with a substantial residential estate. The resulting development would introduce housing, roads, lighting, vehicles and associated infrastructure into an area which is currently open countryside. This would materially change the landscape character and visual relationship between Spondon and the countryside beyond. The Council should therefore attach significant weight to the permanent loss of this open landscape.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						13. The scale of development is becoming disproportionate for Spondon The issue is not whether Spondon should accommodate any development. The issue is whether **another 400 homes can reasonably be added to a settlement which is already facing substantial additional development and infrastructure pressure**. With 259 homes approved at Dale Road and up to 90 homes approved at Royal Hill Road, adding another 400 homes would bring approximately 749 additional dwellings across these schemes. The Council must consider whether this cumulative level of development is proportionate to Spondon's existing infrastructure and whether the resulting pressure on roads, schools, healthcare and other services can realistically be accommodated.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Spondon needs infrastructure that keeps pace with development — **not development that continually places additional strain on infrastructure that is already under pressure**. **14. HA7 is not the only way of meeting Derby's housing requirement** I recognise the importance of providing sufficient housing and do not suggest that Derby's housing requirement should simply be ignored. However, the existence of a housing requirement does not automatically make every potential housing site appropriate. The proper planning question is whether HA7 represents an appropriate, sustainable and justified location when compared with reasonable alternatives. The NPPF requires the Council to make as much use as possible of suitable brownfield		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						sites and underutilised land, and where Green Belt release is necessary to give priority to previously developed land before non-previously-developed grey belt land. Given the substantial housing opportunities identified within the city centre and existing urban area, the Council must provide compelling evidence as to why open agricultural Green Belt land at Stoney Lane needs to be released at this stage. **15. Policy HA7 fails the Test of Soundness – NOT JUSTIFIED** I consider Policy HA7 to be **NOT JUSTIFIED** because the Council has not demonstrated that: the release of this agricultural Green Belt site is necessary; the site is the most appropriate location for the proposed housing; all reasonable brownfield, previously developed and underutilised alternatives have been fully considered and optimised;		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the proposed development represents a sustainable pattern of development; the cumulative transport effects of existing and committed development have been properly assessed; sufficient infrastructure can be delivered alongside the development; and the permanent loss of open agricultural land and the resulting urban expansion are justified. **16. Policy HA7 fails the Test of Soundness – NOT CONSISTENT WITH NATIONAL POLICY** I also consider Policy HA7 to be **NOT CONSISTENT WITH NATIONAL POLICY**. The allocation has not been adequately demonstrated to accord with the NPPF's approach to: Green Belt protection and release; grey-belt assessment; prioritisation of previously developed land;		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						making effective use of suitable brownfield and underutilised land; sustainable patterns of development; transport capacity and congestion; cumulative transport impacts; and the provision of infrastructure necessary to support sustainable development.		
OR214	Mike B Smith	Policy HA7: Stoney Lane, Spondon	Objects		No	THE ABOVE POLICY IS UNSOUND It is Not Justified and Is not consistent with National Policy I write this as a local resident of Spondon (of some 40+ years) residing at [redacted] therefore with some knowledge of the village and justification for my views. The reasons that the above Policy HA7 is Unsound are as follows:- 1 - The site is active agricultural land, rather than poor quality or previously developed “Grey	I request that the Local Plan for Derby be modified by :- Deallocating Site HA7 (Stoney Lane, Spondon - 400 homes) from the Local Plan, because The allocation is Unsound as it fails the ‘Justified’ and ‘Consistent with National Policy’ tests by Misclassifying active Green Belt farmland as ‘Grey Belt’ without any demonstration that all reasonable	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Belt" (It being used extensively for the growing of crops in the current year of 2026 and thus certainly active) 2 - Development would contribute to the further expansion of urban development and urban sprawl. 3 - There are already significant pressures on local infrastructure, including roads, drainage and school capacity. 4 - The Council has substantial brownfield and city-centre housing opportunities which should be prioritised before releasing Green Belt farmland for development. 5 - The proposed allocation appears inconsistent with the Plan's stated "Brownfield and City-Centre first" strategy.	brownfield alternatives have been fully optimised. The Council should actively look to reallocate the 400 homes identified as site HA7 (Stoney Lane, Spondon) into existing brownfield and city-centre regeneration allocations prioritised under :- Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castle Ward), All in accordance with the Plan's stated 'brownfield and City-Centre first' strategy (Ref Paragraph 81). I trust that you will consider this representation for the deallocation of Site HA7 (Stoney	Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							Lane, Spondon - 400 homes)	
OR216	Mr M & Mrs DJ Stacey	Policy HA7: Stoney Lane, Spondon	Objects		No	We have lived in Spondon for 50 years and this Green Belt land has been agricultural land all of this time. We cannot understand how this can now be reclassified as Grey Belt suddenly when nothing has changed. The hedgerows are abundant in bird life not seen elsewhere close by as well as small mammals in the fields themselves. This really does appear to contradict the Councils own directive to utilise all brownfield and City Centre Sites before reclassifying active agricultural land. Currently you have identified 4 areas of brownfield / city centre sites totalling close to 3,000 homes which should be activated prior to looking at any green belt areas. Roads in Spondon and surrounding villages are insufficient to allow exit and return at peak times. The increases in traffic expected from the Spondon Wood &		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Royal Hill Road will only exacerbate this and the entrance to Stoney Lane site is so near to A52 is simply an accident waiting to happen. Spondon residents already have problems accessing Doctors surgeries & dental practices without the additional pressure from these extra homes. In conclusion we cannot see how this can be justified and does not adhere to national policy; therefore we feel strongly that HA7 (Stoney Lane, Spondon – 400 homes) should be deallocated from your local plan.		secures contributions to health facilities where justified. No change required.
OR217	Alison Doyle -Stevenson	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to make a formal representation regarding **Policy HA7 – Stoney Lane, Spondon**, which proposes the allocation of land east of Stoney Lane for a minimum of 400 new homes. I wish to state clearly that I consider **Policy HA7 to be UNSOUND** and I object to the proposed allocation.	I therefore request that **Policy HA7 and the proposed allocation of Stoney Lane for 400 homes be removed from the Local Plan**. If the Council is not prepared to remove the allocation, I request that Policy HA7 is substantially	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I recognise the need for new housing, including affordable housing, and I am not opposed to appropriate development in principle. However, I do not believe that allocating this particular site for at least 400 homes represents a justified, effective or sustainable approach to meeting Derby's housing needs. **Policy HA7** Policy HA7 states that: "Land east of Stoney Lane, Spondon will deliver a minimum of 400 new, high-quality homes forming an eastern urban extension to the suburb of Spondon." The policy also requires, amongst other matters, 40% affordable housing, landscaping and green infrastructure buffers, a single vehicular access onto Stoney Lane, financial contributions towards transport and education infrastructure, a comprehensive surface-water drainage solution, retention of trees and hedgerows where	reconsidered and that no allocation proceeds unless robust evidence demonstrates that: the development is genuinely necessary after reasonable brownfield and regeneration alternatives have been exhausted; the highway network can safely accommodate the cumulative additional traffic; sufficient school and community infrastructure can be delivered alongside the development; surface-water drainage can be satisfactorily addressed without increasing flood risk; the impact of the loss of agricultural and formerly Green Belt land has been fully assessed; and	alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						possible, and pedestrian connections. In my view, the inclusion of these mitigation requirements itself demonstrates the scale of the constraints associated with developing this site. I do not believe that the evidence presented provides sufficient confidence that development of at least 400 homes can be accommodated without unacceptable consequences for Spondon and the surrounding area. **1. Loss of active agricultural land and the Green Belt** The site is active agricultural farmland rather than previously developed or poor-quality land. I am particularly concerned about the decision to remove this land from the Green Belt and classify it as “Grey Belt”. The fact that land may meet the technical definition of Grey Belt does not mean that development of the land is automatically the most	the scale and density of development can be accommodated without unacceptable harm to the character and infrastructure of Spondon. I also request that this representation is submitted for consideration as part of the independent examination of the Local Plan.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						appropriate or sustainable planning option. The land currently performs an important open and agricultural function at the eastern edge of Spondon. Development would represent a substantial physical expansion of the urban area into countryside. Once agricultural and open land is developed for housing, that loss is effectively permanent. I therefore question whether sufficient weight has been given to the long-term value of retaining this land and whether all reasonable alternatives have genuinely been exhausted before allocating it for development. **2. Brownfield and city-centre alternatives** I am concerned that the Council has not demonstrated sufficiently why development of this farmland is necessary when significant brownfield and regeneration opportunities exist elsewhere.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Council's strategy already identifies substantial opportunities for housing within the city centre and on previously developed sites. I believe the Council should prioritise brownfield land, regeneration sites and higher-density development within the existing urban area before releasing agricultural land on the edge of Spondon. This would support regeneration while reducing unnecessary pressure on undeveloped land. **3. Highways and traffic impact** Policy HA7 proposes a **single point of vehicular access onto Stoney Lane at the southern end of the site**. This is a significant concern. A development of at least 400 homes would generate a substantial number of additional vehicle movements. Those movements would not exist in isolation; they would be added to existing local traffic		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and other planned development. The consequences for Stoney Lane and the surrounding highway network therefore need to be demonstrated robustly rather than assumed capable of being mitigated through financial contributions. I am particularly concerned about additional pressure on local roads, congestion, road safety and the cumulative impact of development. The policy's requirement for financial contributions towards off-site transport improvements does not, by itself, demonstrate that suitable improvements are physically achievable or that the impacts of the development can actually be satisfactorily mitigated. **4. Pressure on schools and other infrastructure** At least 400 additional homes will create additional demand for education and other community infrastructure.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Policy HA7 acknowledges this by requiring financial contributions towards improved education infrastructure. However, a financial contribution is not the same as demonstrating that sufficient school capacity can actually be provided in the right place and at the right time. The Council should demonstrate clearly what additional capacity will be required, where that capacity will be provided and whether it can realistically be delivered before or alongside the proposed housing. The same principle should apply to other essential infrastructure and local services. Existing residents should not experience a deterioration in services because housing development has been permitted before the necessary infrastructure is available. **5. Drainage and surface water**		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Policy HA7 specifically requires a comprehensive surface-water drainage solution. Before allocating the site, I believe the Council should be satisfied through robust evidence that the development will not create or worsen drainage or flooding problems either within the development itself or for existing properties and land nearby. This should not simply be deferred until a future planning application. For an allocation of this scale, the Local Plan should demonstrate that a technically feasible and deliverable drainage solution exists. **6. Urban sprawl and the character of Spondon** The development would extend Spondon's built-up area significantly eastwards. Regardless of the technical classification applied to the land, replacing open agricultural		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						land with an estate of at least 400 homes would fundamentally alter the character of this edge of Spondon. Landscaping buffers may soften views of development, but they cannot replicate the openness and character of agricultural countryside. I therefore believe insufficient weight has been given to the permanent change in the settlement edge and the cumulative effect of continued outward expansion. **7. The allocation is not sufficiently justified** I recognise that Derby needs additional housing and that the Council must prepare a Local Plan capable of meeting identified needs. However, identifying a housing requirement does not mean that every proposed allocation is automatically sound.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Each allocation should be supported by proportionate evidence demonstrating that it is the most appropriate strategy when considered against reasonable alternatives and that the development proposed can realistically be delivered without unacceptable impacts. In the case of Policy HA7, I do not believe that case has been demonstrated sufficiently. The site involves the loss of agricultural land, removal from the Green Belt, significant outward expansion of Spondon, additional traffic movements and additional pressure on schools, drainage and other infrastructure. These are substantial planning considerations and should not be treated merely as matters capable of being dealt with through future mitigation. **Conclusion – Policy HA7 is unsound**		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						For the reasons above, I consider **Policy HA7 – Stoney Lane, Spondon to be UNSOUND**. In particular, I do not consider that sufficient evidence has been presented to demonstrate that allocating this site for a minimum of 400 homes represents the most appropriate and sustainable strategy when reasonable alternatives, including brownfield development, city-centre regeneration and other previously developed sites, are considered.		
OR215	David Southgate	Policy HA7: Stoney Lane, Spondon	Objects		No	It is of some concern that the above parcel ,which is a long-established and valued public-park and scarce city green space ,can be put into the same new 'Grey Belt Land' category ,with the same 'weakness' awards, as the adjoining parcel DY10 which is open arable farmland in a clearly different setting and landscape scale. Does this suggest an error ,or the scale of assessment/guidance is not detailed enough ?		The Green Belt Assessment (2025) assessed each parcel against the Green Belt purposes, and the only Green Belt land the Plan proposes for development is the site allocated by Policy HA7. A parcel's identification as grey belt does not of itself make it available for development, and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								public parks remain protected by Policy EN3. No change required.
OR218	Charles Swanson	Policy HA7: Stoney Lane, Spondon	Objects		No	I would like to present my views about the above proposal. The above proposal relates to a site that is active agricultural land, and is not of poor quality. It is therefore not a grey belt. The development would contribute to what is referred to as urban sprawl. There are significant pressures on local infrastructure , including GP and dental services, roads and drainage, school capacity, and, of course, police and other blue light services. There is sufficient brown belt capacity in the Greater Derby area which should be used first. It is inconsistent with the plan known as the Brown Field and City First strategy. Derby City Council must listen to, and take into consideration		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the thoughts and views of households involved in this plan.		(criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.
OR219	Elaine Swanson	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally object to the plan to build 400 new homes off Stoney Lane, Spondon (Policy HA7). The application is UNSOUND and UNJUSTIFIED. My objections are based on the following considerations: Grey belt: The land has been misclassified as such is unjustified. It should retain green belt status. National planning policy defines Grey Belt as previously developed, poor-quality or underperforming Green Belt land. The land proposed, off Stoney Lane, is active agricultural farmland. Allocating this land as Grey Belt conflicts with national planning policy. This land is also helping to prevent urban sprawl and performs an important Green Belt function. It is of huge	Deallocate Site HA7 (Stoney Lane, Spondon – 400 homes) from the Local Plan. The allocation is UNSOUND as it fails the 'Justified' and 'Consistent with National Policy' tests by misclassifying active Green Belt farmland as 'Grey Belt' without demonstrating that all reasonable brownfield alternatives have been fully optimised.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires trees and hedgerows to be retained where possible, green infrastructure buffers, on-site open space

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						benefit to local people who walk the footpaths, from both a physical and mental wellbeing perspective. It is also a valuable space for wildlife. The Council's own Local Plan commits to a "brownfield and City Centre first" strategy. Allowing development off Stoney Land undermines this regeneration objective by discouraging the recycling of derelict and other urban land**.** Investment should be channeled toward brownfield sites within existing urban areas of Derby. There are already designated sites for development: Derby Riverside (Policy CC11), Railway Station Quarter (Policy CC13), North Castleward (Policy CC14), City Centre Mixed-Use Sites (Policy CC4). The proposed 400 homes should be reallocated to such areas so they may be fully optimised in accordance with Derby's stated "brownfield and City Centre first" strategy.		and links to the rights of way network and Dale Road Park (criteria c, e, f, k and l), and biodiversity net gain will be required under Policy EN10. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						My other objections relate to existing infrastructure pressures. Spondon is a thriving and very busy community. Building 400 homes off Stoney Lane will have negative consequences for roads and transportation; drainage; and capacity of amenities such as schools, doctors and dentists.		
OR220	Thomas Sweeney	Policy HA7: Stoney Lane, Spondon	Objects		No	As a resident in Spondon, I am emailing to oppose the proposal of 400 homes being built on the GREEN BELT land off of Stoney Lane in Spondon. The policy is unsound. Under the relevant tests it is not justified and not consistent with national policy. The site is green belt, not grey belt - it is actively used for farming - see photo attached taken from our house at 19 Burnside Drive, showing the fields behind the houses on the opposite side of the road with a tractor actively farming the land, taken only a month ago. It is clear that development would contribute to the further expansion of urban	Please remove this HA7 Stoney Lane site from the Local Plan as the proposal is unsound and clearly mislabels Green belt farmland as grey belt without any evidence that all brownfield sites have been optimised which fails the Plan's own strategy and is inconsistent with national policy. The proposed 400 homes should be reallocated to the brownfield sites in the city centre under policy CC4, CC11, CC13 or CC14 as per the	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						development and urban sprawl. Currently, there are significant pressures on local infrastructure, including roads, drainage and school capacity and this development would only make matters worse. The council has substantial brownfield sites to use for housing developments as an alternative to this green belt land proposal and should be utilised first. Green belt farmland should be last resort. The proposed allocation appears inconsistent with the Plan's stated "brownfield and city centre first" strategy.	plan's 'brownfield and city centre first' strategy.	education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.
OR221	Janis Szczekala	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally log my objection to the proposed housing allocation under Policy HA7 (Stoney Lane, Spondon) in the draft Derby Plan. I strongly oppose this allocation based on the following material planning considerations. 1. Loss of Privacy and Overlooking: My property at [redacted] sits directly on the boundary line of	For these reasons i urge the Council to remove Policy HA7 from the Local Plan and protect the boundary of Spondon's established residential communities.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the proposed HA7 site and currently benefits from facing open Green Belt land. Developing this site will lead to a severe loss of privacy, as my rear garden and windows will be directly overlooked by a high-density housing estate. Building houses immediately behind my rear fence line will completely overpower my home, with an unacceptable loss of privacy, pollution and a total destruction of my residential amenity. 2. Critical Risk of Surface Water, Flooding and Drainage Overcapacity: The agricultural fields directly behind my home act as vital natural drainage, During periods of sustained or heavy rainfall, these fields are already highly saturated. Replacing this green space with hundreds of roofs, tarmac roads, and concrete driveways will entirely eliminate this natural absorption capacity. This creates an immediate risk of displaced surface water flooding		Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						directly into my rear garden and home.Furthermore, Spondon's existing sewer and highway drainage networks are notorious for being severely strained. Localized escape of water and blown drain covers are frequent issues on surrounding streets like Sandringham Drive, Dale Road, Sitwell Street. Forcing surface water runoff from a minimum of 400 new homes into this vulnerable network is dangerous and unsustainable. 3. Traffic, Noise and Air Pollution on Stoney Lane: The junction of Hampton Close and Stoney Lane is already difficult to navigate safely during peak hours due to existing traffic speeds and volumes. Funnelling traffic from hundreds of new homes onto Stoney Lane will cause severe gridlock, increase commuter delays, and significantly elevate noise and air pollution right outside our homes.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						4. Construction Disruption and Safety Risks: Given our immediate proximity to the fields, residents on Hampton Close will face years of intense construction disruption, including heavy goods vehicle (HGV) movements, excessive dust, vibrations and noise. Stoney Lane is narrow and entirely unsuitable for sustained construction traffic, posing a direct safety risk to local pedestrians and children. 5. Unsupportable strain on Spondon's infrastructure: Our local services are already at maximum capacity. It is incredibly difficult to secure timely appointments at Spondon GP surgeries or dental practices, and local schools are oversubscribed. Adding a development of this scale without a massive, pre-funded expansion of these services is completelu unsustainable. 6. Destruction of Local Ecology and Green Belt Barrier:		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The open space behind Hampton Close serves as a crucial natural barrier preventing urban sprawl towards the A52 and provides an established habitat for local wildlife. Because these active fields and mature hedgerows have remained undisturbed for many generations they host a rich variety of native British wildlife. Bats: Common Pipistrelle and Noctule bats (I regularly observe bats foraging and hunting directly over my rear garden and the adjacent field margins). Badgers and Foxes Hedgehogs and Small Rodents Birds of Prey (Barn Owls, Kestrels and Buzzards) Songbirds and Hedgerow Birds Frogs, Newts and Toads Bumblebees, Hoverflies and native Butterflies Replacing this green space with concrete will permanently damage local biodiversity.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR222	Robert Szczekala	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to submit my formal objection to Policy HA7, which allocates a minimum of 400 new homes on land east of Stoney Lane and adjacent to Hampton Close, Spondon. I contend that Policy HA7 is UNSOUND as it fails the National Planning Policy Framework tests of being Justified, Consistent with National Policy, and effective. The Council's allocation relies heavily on classifying the Stoney Lane and Hampton Close site as 'Grey Belt' to circumvent established Green Belt protections. This designation is factually incorrect. The land spanning east of Stoney Lane and wrapping around Hampton Close consists of active, working agricultural fields currently in use for farming. It does not meet the national Planning definition of 'Grey Belt' which explicitly targets previously developed or severely underperformed land. Because this entire parcel is open, active countryside, developing it fails a	I request that the independent Planning Inspectorate remove Policy HA7 from the final Local Plan. The associated housing numbers should instead be redistributed to underutilised urban brownfield and city centre regeneration sites.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						primary purpose of the Green Belt: safeguarding the countryside from urban encroachment and preventing urban sprawl. The Policy is NOT Consistent with National Policy or the Council's Own Strategy. including Policy HA7 directly contradicts the Council's own commitment to a "brownfield and City Centre first" growth strategy. National policy requires that sustainable brownfield alternatives be fully exhausted before releasing open Green Belt space. Feasible, highly sustainable brownfield sites - such as Derby Riverside (Policy CC11), the Railway Station Quarter (Policy CC13), and North Castleward (Policy CC14) already possess significant housing capacity and must take precedence over active Spondon farmland. The Policy is NOT Effective (Severe infrastructure Constraints)		where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The allocation fails to demonstrate how local infrastructure can sustainably handle 400 additional homes. Spondon's local networks are already overcapacity, and this development would cause unmitigated harm to: Highway Safety: introducing hundreds of daily car journeys will exacerbate severe traffic congestion and safety hazards at the constrained Stoney Lane junctions, surrounding residential access points like Hampton Close, and the A52 Brian Clough Way. Health care Access: Local GP surgeries and dental practices are already heavily oversubscribed, and residents face extreme delays securing appointments. Education: Local primary and secondary schools lack the physical capacity to handle the influx of children from a development of this scale.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Because the allocation of Stoney Lane and Hampton Close is based on flawed land categorisation, violates the brownfield-first approach, and lacks viable infrastructure solutions, Policy HA7 is fundamentally unsound.		
OR223	Anne Taranto	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to object to policy HA7 (Stoney Lane, Spondon) on the basis that it is unsound as it is not justified and not consistent with National Policy. My objections are based on the following facts: The policy is not justified as the Council has wrongly categorised active agricultural farmland as Grey Belt. This land has been under successful cultivation for, at least, the last 50 years and continues to be so. In addition, allocating working farmland as Grey Belt conflicts with national planning policy. Development at this site extends already sprawling urban development and will almost certainly overwhelm existing infrastructure: both main roads through Spondon already suffer from traffic jams extending	Deallocate Site HA7 (Stoney Lane, Spondon - 400 homes) from the local plan. The allocation is unsound as it fails the 'Justified' and 'Consistent with National Policy tests by misclassifying active Green Belt farmland as 'Grey Belt' without demonstrating that all reasonable brownfield alternatives have been fully optimised. The Council should reallocate these 400 dwellings into existing brownfield and city centre	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						throughout Willowcroft Road, South Avenue, Moor Street and Sitwell Street every working day morning. Local community health care and educational facilities will also be unable to cope with this level of increased population in a small area. The policy is not justified as the Council has not demonstrated that all reasonable brownfield alternatives have been fully considered. The Council's own Local Plan commits to a "brownfield and City Centre first" strategy (Paragraph 81), yet this allocation releases Green Belt farmland before fully utilising brownfield sites. There are a number of alternative, available, brownfield sites already allocated by the council, including: Derby Riverside (Policy CC11) - 600 homes; Railway Station Quarter (Policy CC13) - 500 homes; North Castleward (Policy CC14) - 400 homes;	regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside). Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plan's slated "brownfield and City Centre first" strategy (Paragraph 61).	improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						City Centre Mixed-Use Sites (Policy CC4) - Over 1,400 homes.		
OR224	Gerald Stanley Taranto	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to object to policy HA7 (Stoney Lane, Spondon) on the basis that it is unsound as it is not justified and not consistent with National Policy. My objections are based on the following facts: The policy is not justified as the Council has wrongly categorised active agricultural farmland as Grey Belt. This land has been under successful cultivation for, at least, the last 50 years and continues to be so. In addition, allocating working farmland as Grey Belt conflicts with national planning policy. Development at this site extends already sprawling urban development and will almost certainly overwhelm existing infrastructure: both main roads through Spondon already suffer from traffic jams extending throughout Willowcroft Road, South Avenue, Moor Street and Sitwell Street every working day morning. Medical and educational facilities will also be	Deallocate Site HA7 (Stoney Lane, Spondon - 400 homes) from the local plan. The allocation is unsound as it fails the 'Justified' and 'Consistent with National Policy' tests by misclassifying active Green Belt farmland as 'Grey Belt' without demonstrating that all reasonable brownfield alternatives have been fully optimised. The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside). Policy	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						unable to cope with this level of increased population in a small area. The policy is not justified as the Council has not demonstrated that all reasonable brownfield alternatives have been fully considered. The Council's own Local Plan commits to a "brownfield and City Centre first" strategy (Paragraph 81), yet this allocation releases Green Belt farmland before fully utilising brownfield sites. There are a number of alternative, available, brownfield sites already allocated by the council, including: Derby Riverside (Policy CC11) - 600 homes; Railway Station Quarter (Policy CC13) - 500 homes; North Castleward (Policy CC14) - 400 homes; City Centre Mixed-Use Sites (Policy CC4) - Over 1,400 homes.	CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plan's slated "brownfield and City Centre first" strategy (Paragraph 61).	and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR241	Richard Tatlow	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to object to the proposed development of the the above grey belt land. The policy is unsound based on the	I would like to request the following modification.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b)

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						following tests, it is not consistent with national policy and not justified. The site is active agriculture land and NOT poor quality or previously developed “grey belt “ land. Development would contribute to further expansion of urban developments and urban sprawl. There are already pressures on local infrastructure, including roads, drainage and school capacity. The council has substantial brownfield and city centre housing opportunities which should be prioritised ahead of green belt farmland. Finally the proposed allocation appears inconsistent with the plans stated “Brownfield and City centre first”	Deallocate Site HA7 (Stoney Lane, Spondon - 400 homes) from the Local Plan. The allocation is UNSOUND as it fails the ‘Justified' and 'Consistent with National Policy' tests by misclassifying active Green Belt farmland as 'Grey Belt without demonstrating that all reasonable brownfield alternatives have been fully optimised. The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North	and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							Castleward), in accordance with the Plan's stated 'brownfield and City Centre first' strategy (Paragraph 81).	
OR242	Margaret Taylor	Policy HA7: Stoney Lane, Spondon	Objects		No	I would like to object to this policy It's not consistent with national policy as this is agricultural land so is not grey belt Why is city centre first policy not being implemented? Where is the infrastructure to support these homes; schools doctors, dentists etc? What about roads and drainage issues? have you driven on stoney lane? It's like driving across a field The slip road onto the A52 from stoney lane is far too short. If the houses do go ahead there really needs to be a better access road		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Surely this fails the tests by classifying the land as grey belt when it's green belt? (The farmer had a combine harvester on it the other day) These houses could be built on existing brownfield sites or, better yet, built in the regelation areas of the city such as around the railway station or at the riverside		comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.
OR69	Ellie Bond-Thorne	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing regarding the plan to build 400 homes in Spondon. This plan is deeply saddening as me and my husband have just brought our first home on [redacted] which overlooks the lovely fields. These fields have been a massive factor in us buying this home as we hope to build a family here and have them grow up alongside the agricultural farmland that surrounds us. Upon walking on these fields within recent years we have noticed a substantial amount of flooding and are shocked that it would even be considered building on when the drainage		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						within the area is unsound. Not only that it is also not justified as previously mentioned it is an agricultural farmland not the 'grey belt' the council has suggested. Lastly, to build on this land is not consistent with national policy which states to build within brownfield and City Centre first. A city centre is designed for the comings and goings of a lager volume of occupants and Stoney lane simply is not. The traffic caused by the 400 homes would be greatly concequential as the entrance and exit to the A52 is close by and ill fit due to its size. This land is very important to the community and the mental wellbeing of many of its occupants and too rid it would be a tragedy, we plead with you that you do not make a huge mistake by building on these lands.		HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.
OR243	Zoe Threlfall	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally express my deep concern and strong objection to the proposed allocation of 400 homes at Stoney Lane, Spondon, under	For the above reasons, I formally request the deletion of site HA7 (Stoney Lane, Spondon – 400	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Policy HA7 of the Local Plan. While I understand the need for housing provision within the broader Derby area, I believe this specific allocation is fundamentally flawed and detrimental to our local community and environment. My primary concerns are based on the following points: 1. Loss of Active Agricultural Land The proposed site is not poor-quality or previously developed green belt land; it is active, productive agricultural farmland. Releasing this land for development would mean the permanent loss of a valuable environmental and agricultural asset. Once paved over, this land cannot be recovered, and its loss damages local biodiversity and food production capabilities. 2. Urban Sprawl and Merging of Boundaries Developing the Stoney Lane site would significantly contribute to the further expansion of urban development. Green belt land	homes) from the Local Plan. In its current form, this allocation is fundamentally UNSOUND, as it fails both justified and consistent with national policy tests required for a legally compliant planning document. Specifically, the inclusion of HA7 relies on the unacceptable misclassification of active, productive Green Belt farmland as 'grey belt' land. The council has advanced this allocation without transparently demonstrating that all reasonable brownfield alternatives have been fully optimised, which is a strict prerequisite under	current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires trees and hedgerows to be retained where possible, green infrastructure buffers, on-site open space and links to the rights of way network and Dale Road Park (criteria c, e, f, k and l), and biodiversity net gain will be required under Policy EN10. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						serves a vital purpose in checking the unrestricted sprawl of large built-up areas and preventing neighboring settlements from merging into one another. This development would erode the distinct character and boundaries of Spondon. 3. Unsustainable Pressure on Local Infrastructure Spondon's existing infrastructure is already operating at or beyond capacity. Adding 400 homes—which likely equates to hundreds of additional vehicles and residents—will place intolerable pressure on our community resources. Specifically, the local road network is already congested, the area has known drainage challenges that could be exacerbated by reduced natural land absorption, and local schools simply do not have the capacity to absorb the sudden influx of new pupils this development would bring. 4. Substantial Alternatives Exist The council already possesses	national planning guidelines before any Green Belt boundaries can be considered for alteration. Rather than sacrificing vital agricultural land, the council should reallocate these 400 homes into the existing brownfield and city centre regeneration allocations. Capacity should be fully absorbed by areas already prioritised for development, such as those under Policy CC4, CC11 (Derby Riverside), CC13 (Railway Station Quarter), or CC14 (North Castle Ward). Directing housing delivery to these central areas would ensure the Local Plan actually operates in accordance with its	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						substantial brownfield and city centre housing opportunities. These sites are often closer to existing transport hubs, major employment centers, and established infrastructure. It is environmentally and logically sound that these sites are prioritized and exhausted before any consideration is given to releasing pristine green belt farmland for development. 5. Inconsistency with Council Strategy The proposed allocation appears entirely inconsistent with the council's own stated 'brownfield and city centre first' strategy. Proceeding with Policy HA7 undermines the integrity of this strategy and suggests a willingness to bypass sustainable urban regeneration in favor of easier, but far more damaging, greenfield development.	own stated 'brownfield and city centre first' strategy, as explicitly outlined in paragraph 81. Only by focusing on these urban regeneration sites can the council deliver a Local Plan that is both ecologically responsible and strategically sound. I strongly urge the council to re-evaluate Policy HA7, adhere to its stated strategic priorities, and remove the Stoney Lane site from the housing allocation plan. We must focus on revitalising our urban spaces and protecting our irreplaceable green belt. Thank you for your time and for taking these concerns into consideration. I look	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							forward to your response and to seeing these points addressed in the upcoming planning reviews.	
OR244	Samantha Timmis	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to you regarding the above proposal, I feel that this policy is UNSOUND. I feel that this is not justified and not consistent with National Policy due to the following:- The site is active agricultural land, rather than poor quality or previously developed "Grey Belt". Development would contribute to the furthest expansion of urban development and urban sprawl. There are significant pressures on local infrastructure, including **roads, drainage and school capacity.** The Council has substantial brownfield and city centre housing opportunities which should be prioritised before		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						releasing Green Belt farmland for development. The proposed allocation appears inconsistent with the Plan's stated **"brownfield and City Centre first"** strategy. I strongly urge you to deallocate Site HA7 (Stoney Lane, Spondon - 400 homes) from the Local Plan. The allocation is UNSOUND as it fails the "Justified" and "Consistent with National Policy" tests by misclassifying active Green Belt farmland as "Grey Belt" **without demonstrating that all reasonable brownfield alternatives have been fully optimised.** The Council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plan's stated **"brownfield and City Centre first"** strategy (Paragraph 81)".		surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Furthermore, this land is used by residents who walk across this land which greatly helps their overall fitness and mental wellbeing. Some residents do not have the financial means to travel further afield for exercise and fresh air. If this land was used for housing, this would deprive residents of this important facility and could result in increased rates of depression and anxiety amongst local residents. I strongly urge you to reconsider this proposal.		
OR246	Mrs D Tinley	Policy HA7: Stoney Lane, Spondon	Objects		No	To whom it may concern, I wish to object to the building of 400 houses on Stoney Lane in Spondon. This is against the brownfield and City Centre first strategy set out in Paragraph 81 of the local Plan. The land is still in use as agricultural land so is Green belt NOT brownfield/Grey belt. Releasing Green belt land should be an absolute last		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						resort or the Green belt will disappear meaning no UK grown food. Policy HA7 is unsound. Derby City Council should concentrate on their proposed Brownfield sites such as Derwent Riverside, Railway Station Quarter, North Castle Ward, City Centre Mixed Use sites as well as derelict private houses and business centres. Building on this Green belt land is not justified nor is it consistent with national policy. The land also has public footpaths and rights of way running through it. As well as objecting because it is Green belt, Spondon does not have the infrastructure to deal with 400 extra houses, presumably an additional 400 to 600 cars (on average 1 car per house) and between 400 to 1600 additional residents (on average 1 to 4 occupants per house).		Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Leaving Spondon during rush hour can take up to half an hour now, without the addition traffic. There are not sufficient Doctors, schools, Dentists, etc.		
OR247	Adrian Tomlin	Policy HA7: Stoney Lane, Spondon	Objects		No	I am making representation to the above development being unsound. **Policy HA7 – Stoney, Lane, Spondon – 400 Homes** **This policy is <u>UNSOUND</u>** This is: **Not Justified** Not Consistent with National Policy **See points below:** The site is active agricultural land, rather than poor-quality or previously developed "Grey Belt" Development would contribute to the further expansion of urban development and urban sprawl.	**Urgently deallocate** Site HA7 (Stoney Lane, Spondon – 400 homes) from the Local Plan. The allocation of this land is **UNSOUND** as it fails to be Justified & Consistent with National Policy tests by misclassifying active Green Belt Farm land as Grey Belt without demonstrating that all reasonable brownfield alternatives have been fully optimised. The Council should **reallocate** these 400 dwellings into existing brownfield	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						There are significant pressures on local infrastructure, including roads, drainage, health services, and school capacity The Council has substantial brownfield and city-centre housing opportunities which should be prioritised before releasing Green Belt farmland for development. The proposed allocation appears inconsistent with the Plan's stated "Brownfield & City Centre first" strategy.	and city centre regeneration allocations prioritised under Policy CC4, CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plans stated "brownfield and City Centre first" strategy (Paragraph 81).	improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.
OR248	Cerrie Tomlin	Policy HA7: Stoney Lane, Spondon	Objects		No	I am making representation to the above development being unsound. **Policy HA7 – Stoney, Lane, Spondon – 400 Homes** **This policy is <u>UNSOUND</u>** This is: **Not Justified** Not Consistent with National Policy **See points below:** The site is active agricultural land, rather than poor-quality	**<u>SPECIFIC MODIFICATION REQUEST</u>** **Urgently deallocate** Site HA7 (Stoney Lane, Spondon – 400 homes) from the Local Plan. The allocation of this land is **UNSOUND** as it fails to be Justified & Consistent with National Policy tests by misclassifying active Green Belt Farm land as Grey	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						or previously developed "Grey Belt" Development would contribute to the further expansion of urban development and urban sprawl. There are significant pressures on local infrastructure, including roads, drainage, health services, and school capacity The Council has substantial brownfield and city-centre housing opportunities which should be prioritised before releasing Green Belt farmland for development. The proposed allocation appears inconsistent with the Plan's stated "Brownfield & City Centre first" strategy.	Belt without demonstrating that all reasonable brownfield alternatives have been fully optimised. The Council should **reallocate** these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plans stated "brownfield and City Centre first" strategy (Paragraph 81).	Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements and a comprehensive surface water drainage solution (criteria h to j), and the Water and Flooding Topic Paper records no Flood Zone 3 within the site. No change required.
OR249	Robert and Carol Unwin	Policy HA7: Stoney Lane, Spondon	Objects		No	We feel it is unjustified to build another 400 houses in a Spondon village area that has always been used as agricultural land in the 40 plus years we have lived in the village. We feel		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						that this policy is not justified or consistent with national policy. It will undoubtedly increase pressure on the infrastructure of the village such as doctors, dentist and schools not to mention the the already high volume of traffic including heavy goods vehicles using the village as a through route to other destinations. We strongly object to this proposal and any others that may be planned in the future.		agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR53	Dr Austin and Mrs Mai Walker	Policy HA7: Stoney Lane, Spondon	Objects		No	We are writing because we are very concerned about the proposed development of 400 new homes on active farmland	We are asking you to deallocate Site HA7 from the Local Plan. We are persuaded	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b)

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						off Stoney Lane, Spondon. Spondon already has a number of additional houses being built and the site's development would add to further urban development in the village. There are already significant pressures on local infrastructure , including roads, drainage and school capacity. We have only lived in Spondon for 6 years and have detected a significant increase in traffic through the narrow streets of the village and Dale Road in particular. The council therefore should be thinking of changing the site of these planned 400 dwellings. There are existing brownfield sites and city centre regeneration allocations. These are already prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward). This would then be consistent with the Plan's stated brownfield and City Centre first strategy.	that the allocation does not have a sound foundation. Have all reasonable brownfield sites been considered? The site is active farmland but has been removed from the Green Belt and has been reclassified as Grey Belt. That seems to be without any justification.	and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR250	Gareth Walker	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing regarding the proposed 400 houses at Stoney Lane in Spondon and its justification in the Derby Local plan. I wish to raise my objections to the proposal on the following grounds: The land at Stoney Lane has been classified as “grey belt” in the proposal but I believe this to be incorrect. “Grey belt” land is supposed to be of poor quality but the fields in question have been farmed for crops every year. This is also not consistent with national planning policy. The land is part of the green belt separating the city boundary from Ockbrook and so helps in preventing any urban sprawl. These proposed homes, along with the Royal Hill Road and Spondon Wood developments, will place a large burden on local amenities		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						(schools/doctors/etc) which are already inadequate to the needs of current residents. The road system in Spondon will be overtaxed by the extra demand placed upon it. Furthermore the access to the development is not far from the A52 junction and so will create more congestion and possibilities for accidents. The Derby local plan proposal commits to prioritising the development of brownfield and city centre sites. There are multiple sites around the city that should be developed before any sites deemed “grey belt” should be considered. In conclusion, I believe that development HA7 at Stoney Lane Spondon should be removed from the local plan as its inclusion is unsound. The classification of the site as “grey belt” is incorrect and goes against national planning policy. The 400 proposed homes should be allocated to		where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						existing brownfield sites around the city as per the Derby local plan.		
OR252	Peter Wealthdale	Policy HA7: Stoney Lane, Spondon	Objects		No	I have looked over the proposal for Stoney Lane, and consider it “madness”. You have not considered the current traffic congestion, or parking in Spondon or for that matter in Borrowash ,which has even less parking than Spondon. We already have a site of 250+being built , plus the Royal Avenue site and possible Bluebells development, this will mean approx. 1000 extra houses and cars using the village. Without pulling down existing buildings and allround road improvements , I can,t see that this plan makes any sense, So I object most strongly.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires access at the southern end of Stoney Lane, contributions to off-site transport improvements and active travel and bus links (criteria g, h and l), and paragraph 307

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								requires impacts on the A52 to be carefully assessed and mitigated. No change required.
OR253	Michael Wheatley	Policy HA7: Stoney Lane, Spondon	Objects		No	I am writing to formally raise my objection to the inclusion of Policy HA7, Stoney Lane, Spondon, as a housing allocation for approximately 400 homes. I consider this policy to be **unsound**, principally because the site has, in my view, been incorrectly categorised as *grey belt* when the land is actively used agricultural farmland and should properly be regarded as **Green Belt**. The classification of the site is fundamental to the justification for its allocation. If the land has been incorrectly assessed as grey belt, the evidence base underpinning Policy HA7 is flawed and the allocation cannot reasonably be considered justified. **Incorrect classification of agricultural land**		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires trees and hedgerows to be retained where possible, green infrastructure buffers, on-site open space and links to the rights

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The site comprises active agricultural land and is not previously developed land. I therefore question the basis on which it has been identified as grey belt rather than Green Belt land. The Council should provide clear, site-specific evidence demonstrating how the site meets the applicable definition and criteria for grey belt land. In particular, the assessment should accurately reflect the site's current agricultural use, its Green Belt status, and the purposes served by the Green Belt in this location. If the site does not meet the relevant definition of grey belt land, its release for housing through Policy HA7 would require reconsideration. The Council should not rely upon an incorrect designation to justify the removal of this land from the Green Belt.		of way network and Dale Road Park (criteria c, e, f, k and l), and biodiversity net gain will be required under Policy EN10. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Conflict with the Council's brownfield and city-centre-first approach I am also concerned that Policy HA7 is inconsistent with the Council's stated approach of prioritising **brownfield land and development within the city centre** before releasing Green Belt or other greenfield land for development. Policy HA7 proposes approximately 400 homes on active agricultural land outside the city centre. This appears difficult to reconcile with a strategy that prioritises the regeneration and redevelopment of brownfield sites and the city centre. There are alternative brownfield opportunities within Derby, including sites within and around the city centre, which should be properly assessed and exhausted before the Council seeks to allocate valuable agricultural and Green Belt land for development.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Council should therefore demonstrate, with robust evidence, why the housing requirement cannot be met to a greater extent through available brownfield and city-centre opportunities, and why the release of this particular site is necessary. **Soundness of Policy HA7** For these reasons, I consider Policy HA7 to raise significant concerns in relation to the **justification, effectiveness and consistency** of the emerging plan. In particular, I request that the Council: Reconsider the classification of the Stoney Lane site and provide the evidence supporting its identification as grey belt. Properly assess the site's status as active agricultural land and its role within the Green Belt. Demonstrate how the allocation is consistent with the relevant national planning policy		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						requirements concerning Green Belt and grey belt land. Provide a clear assessment of available brownfield and city-centre sites capable of contributing towards Derby's housing requirement. Explain why those alternative sites cannot be prioritised before allocating approximately 400 homes at Stoney Lane. Reassess Policy HA7 if the evidence does not demonstrate that the allocation is justified and consistent with national policy. I respectfully request that this objection is taken into account as part of the examination of the plan and that Policy HA7 is reconsidered unless the Council can provide robust evidence demonstrating that the site has been correctly categorised and that its allocation is necessary, justified and consistent with national planning policy. I would be grateful if you could confirm that this representation		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						has been formally recorded against **Policy HA7 – Stoney Lane, Spondon**.		
OR254	Jonathan Woollard	Policy HA7: Stoney Lane, Spondon	Objects		No	Remove site HA7 (Stoney Lane, Spondon, 400 homes) from the Local Plan. The allocation is unsound as it fails the 'justified' and 'consistent with national policy' tests, relying on the classification of Green Belt farmland as 'grey belt' without showing that brownfield alternatives have been fully maximised. There are significant pressures on local infrastructure including roads, drainage, energy supply and access to GP surgeries. This development will increase all these pressures.	The 400 homes should instead be reassigned to brownfield and city centre regeneration sites under Policies CC4, C11 (Derby Riverside), CC13 (Railway Station Quarter) and CC14 (North Castleward), in line with the Plan's 'brownfield and city centre first' approach (Paragraph 81).	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR30	Adam Woolley	Policy HA7: Stoney Lane, Spondon	Objects		No	I wish to make a formal objection regarding the above proposed housing development in Spondon. I strongly believe that the proposition is completely unsound and should not go ahead. I fail to see the justification in classifying this land as 'Grey Belt'. To my understanding, 'Grey Belt' is a designation given to land that is poor-quality or underperforming Green Belt land or has been previously developed. Being a long-term Spondon resident of 46+ years, and living adjacent to this land, I can assure you that this land has never previously been developed and appears very productive indeed. I believe that the Council has wrongly categorised this active agricultural farmland as Grey Belt. Not only is it active, productive farmland it also helps to prevent urban sprawl	In view of the above I sincerely request the deallocation of Site HA7 (Stoney Lane, Spondon – 400 homes) from the Local Plan. The allocation is UNSOUND as it fails the 'Justified' and 'Consistent with National Policy' tests by misclassifying active Green Belt farmland as 'Grey Belt' without demonstrating that all reasonable brownfield alternatives have been fully optimised. The Council should reallocate these 400 dwellings into existing brownfield and city centre	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and provides an important Green Belt function. At a time when so much agricultural land is being lost, surely it is vitally important that we protect the parts that remain, both for food production, and for boundaries? It is also my belief that allocating farmland as Grey Belt conflicts with the National planning Policy. The Council's own Local Plan commits to a "brownfield and City Centre first" strategy (Paragraph 81), yet this current proposal releases Green Belt farmland before fully utilising available brownfield sites. As I understand it, the Council already has major brownfield sites allocated for housing, including: Derby Riverside (Policy CC11) – 600 homes. Railway Station Quarter (Policy CC13) – 500 homes. North Castleward (Policy CC14) – 400 homes.	regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy CC14 (North Castleward), in accordance with the Plan's stated 'brownfield and City Centre first' strategy (Paragraph 81)." I appreciate you taking the time to read this objection and I hope it will be taken into consideration. Should you wish to discuss this any further I am happy to be contacted at the email address above.	active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						City Centre Mixed-Use Sites (Policy CC4) – Over 1,400 homes. Surely this demonstrates that, at present, not all available brownfield alternatives have been fully considered? I also believe there are other factors that need to be seriously considered here: Volume of traffic The road network is already overloaded with heavy traffic congestion, especially around peak times. The idea of adding hundreds more vehicles from a new estate would cause further chaos and seriously endanger Local Residents who must contend with this volume of traffic daily. For a pedestrian trying to cross Stoney Lane, Sandringham Drive, Sancroft Road, or Dale Road during these peak times it is very hazardous as commuters rush past. A pedestrian can be standing at the kerbside for many minutes before a crossing opportunity may be presented, and then hurry to avoid oncoming traffic,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						especially in winter months when lighting and weather conditions are poor. I mention these roads as they will be the main routes in and out of Spondon from this estate. Construction traffic and impact on Local Residents during construction The construction of a project of this size, spread over this timeframe, is going to have a massive impact on the lives of Local Residents. Large numbers of construction vehicles, plus the vehicles of workers will add to the already huge volume of traffic using the local roads. The construction work will be noisy and dirty, making life for local people unpleasant. Winter will see mud on the roads making them dangerous for road users, especially cyclists and motor cyclists, and summer will see large amounts of dust. G.P. surgeries and dentists Trying to get an appointment to see an NHS medical practitioner is already very difficult with		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						appointments being filled days, if not weeks in advance. The current population of Spondon is simply too large for the existing medical services to operate effectively. The additional populace this estate brings will make this problem even more acute. Is any provision being made to address this issue? Schools Spondon's schools are full-to-capacity and increasing the local population will only add further pressure to the system. What provision is to be made for additional school places? Spondon's aging infrastructure It seems only logical to ask that if a large new estate is added, will the local service infrastructure be able to cope? What about the water and electricity supply, and sewers to remove the resulting waste? At times of heavy rain our drainage system overflows causing damage to roads and property.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Another estate will only exacerbate the problem. Mental health and a wonderful resource on our doorstep The pandemic shone a light on how important our green spaces are for people's mental health. It has long been understood the link between nature and its positive effects on mental state. To walk the public footpaths through these fields is a pleasure and a facility that many people enjoy every day, including, dog walkers, families, ramblers and commuters. Although, I'm sure, a right of way will be maintained through the new estate, an important open space will be greatly reduced. Should we not be protecting these natural resources for the benefit of all instead of building on them? Hasn't Spondon already done its bit for development? With the developments on Royal Hill Road, Dove Meadow, Nottingham Road and Spondon Wood, plus smaller infill over		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the years, hasn't Spondon provided sufficient space already for development? Our small community has grown and grown in recent years and is in danger of merging with the urban sprawl of Derby. Surely our local boundaries and Green Belt land is now more important to protect than ever?		
OR251	Frances and Geoffrey Woolley	Policy HA7: Stoney Lane, Spondon	Objects		No	We consider that the above policy for 400 homes at the above on agricultural land conflicts with the principles of national planning policy. Spondon cannot contend with further homes being built due to heavy lorries thundering through our village, lack of doctors and schools. The council has substantial brownfield and city centre housing opportunities which should be prioritised before using green belt farmland and a small village. We trust common sense will prevail and take Spondon out of consideration for building more homes and making life more difficult for its residents.		Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.
OR245	Phillip Woolley	Policy HA7: Stoney Lane, Spondon	Objects	No	No	I consider this specific allocation as UNSOUND on the following grounds under paragraph 35 of the National Planning Policy framework (NPPF): Not justified: The site selected is not backed by proportionate, robust evidence regarding local transport capacity, environmental impacts, or Green Belt and Green Wedge release. Not Effective: Serious highway capacity, noise, infrastructure constraints jeopardise the delivery and viability of the site.	To make the local plan sound, I request that the Planning Inspector consider the following modifications: Deallocate Site HA7 (Stoney Lane, Spondon – 400 homes) from the Local Plan. The allocation is UNSOUND as it fails the 'justified' and 'Consistent with National Policy' tests by misclassifying active Green Belt farmland as 'grey	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Not consistent with National Policy: The allocation conflicts with the national policy regarding Green Belt protection, air quality, noise pollution, and sustainable transport integration. 2. Detailed grounds of Unsoundness. A. Transport and Highways Impact (Unsound: Unjustified and Ineffective) A 52 Brian Clough Way Congestion. The site directly borders the A52, which at times is already a severely congested strategic trunk road. The additional vehicle trips from 400+ houses, combined with existing traffic plus the additional traffic from other current and recent developments around Spondon will significantly add to and worsen congestion at key junctions (e.g. Spondon roundabout/Raynesway interchange and even Pentagon Island)	Belt' without demonstrating that all reasonable alternatives have been fully optimised. The council should reallocate these 400 dwellings into existing brownfield and city centre regeneration allocations prioritised under Policy CC4, Policy CC11, (Derby Riverside), Policy CC13 (Railway Station Quarter) or Policy 14 (North Castleward), in accordance with the Plan's stated brownfield and City Centre first' strategy (Paragraph 81).	HA7 requires noise attenuation from the A52 and contributions to education and transport infrastructure (criteria d, h and i), and Policy EN11 requires major development to be accompanied by an Air Quality Assessment. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Local Road Network Constraints: Local Road networks around Stoney Lane are narrow and ill equipped to absorb substantial additional residential traffic, raising severe highway safety concerns for both pedestrians (including people using the adjacent infant/junior Asterdale School on the South side of the A52 junction) and for cyclists. This traffic will also impact the centre of Spondon along with other areas of Spondon which are already heavily congested at times. This additional traffic along with that from other current housing schemes will also adversely affect roads in nearby Ockbrook. B. Air Quality, Environmental Health and Liveability. (Unsound. Consistent with National Policy) A 52 noise and Pollution. Positioning 400 homes immediately adjacent to the high speed high volume A52 introduces significant air and noise pollution risks. While the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						plan mentions acoustic buffering, relying on artificial buffers raises doubts about whether acceptable living conditions (NPPF Section 15) can be achieved across the site. Viability Constraints: The cost of extensive mitigation measures (e.g., sound barriers, acoustic glazing, enhanced ventilation systems} undermines the site viability, making the high target of 40% affordable housing unrealistic or deliverable. (Effective) C. Loss of Green Belt /Green gap and Ecological Harm (Unsound: Unjustified) Exceptional circumstances not Demonstrated. Releasing Green Belt land and Green Wedge land and changing to Grey belt at Stoney lane lacks justification, particularly when brownfield - first site capacity in the city centre has not been fully optimised. Also Crops grown in 2026 on this site and now harvested were just as		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						good as any in these fields between Spondon and Ockbrook and contradicts the suggestion that this land is poor agricultural grey belt. Brownfield sites available include: Derby Riverside (policy CC11) – 600 homes Railway Station quarter (policy CC13) - 500 homes North Castleward (policy CC14) – 400 homes City Centre Mixed-Use Sites (policy – CC4) – Over 1400 homes Urban Sprawl: Developing this site weakens the open green boundary of Spondon, reducing the vital buffer separating the suburb from neighbouring settlements and harming local biodiversity. D. infrastructure and Community Capacity (Unsound and ineffective) Cumulative Strain: Spondon has absorbed significant residential development over recent years		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						with some currently still in progress. The Infrastructure Delivery plan (IDP) fails to demonstrate how local GP surgeries, primary/secondary school places, and surface water drainage systems will cope with an additonal 400 households.		
OR24	Tamsin Youren	Policy HA7: Stoney Lane, Spondon	Objects		No	The Policy above is unsound and does not comply or is consistent with national planning policy. The reclassification from Green Belt to Grey Belt contravenes national planning policy. The farmland is not under-performing or poor-quality and is, and has been for many decades, been in permanent use as productive farmland. The land also supports a mixed biodiversity of wildlife, included increasingly threatened skylarks, ground nesting birds such as pheasants, grouse and skylarks as well as providing a much-needed green belt to do exactly what it was set up to do: protect green areas on the outskirts of urban	I request that the site is deallocated from the local plan. The allocation is unsound as it fails the justified and consistent with national policy tests by misclassify an active green belt farmland as grey belt without demonstrating or giving evidence that that brownfield site alternatives have been fully optimised and tested for reuse. The council must reallocate these 400 dwellings into existing brownfield and city centre	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy HA7 requires contributions to education and off-site

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						developments and prevent urban sprawl. There are countless brownfield sites across the city that can be utilised and haven't been considered, including the recently vacated Albert Looms sites in Megaloughton Lane in Spondon. What the city does not need are more business centres that will remain vacant as many of the new ones have that have been built recently, but the intelligent re-use and development of these sites into housing (much like the successful redevelopment of the former Rolls Royce site off the ring road). Infrastructure: Spondon already has limited entrances/exits to the A52. For eastbound traffic from the north of the A52, the Stoney Lane exit is the primary route leaving the village. The slip road is already challenging to use and to build a substantial development here would require the installation of a huge junction to allow access	regeneration allocations prioritised under Policy CC4, Policy CC11 (Derby Riverside), Policy CC13 (Railway Station Quarter), or Policy CC14 (North Castleward) in accordance with the Plan's stated brownfield and city first strategy. The fact that this hasn't been considered is a massive oversight by planners and officials and they must be held to account.	transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						east and west bound, creating more traffic management problems and volume of traffic. The route westbound towards the city is via Spondon village, which is already very busy during peak commuter times; many drivers simply drive up to the Borrowash junction and return westbound towards the city, once more creating more traffic along Stoney Lane. The current housing market in the village and across the UK has seen a huge increase in property available for sale. Today alone there are 121 properties for sale, which suggest there isn't a need for new homes to be built. Once again, and as mentioned consistently with other proposed developments, schools in the village are already full and unable to support more pupils. Developments across the city as well in the local area haven't yielded the promised additional of medical services such as doctors, dentists and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						pharmacies, once again adding to further pressures on community resources. Above all, it is vital that the Green Belt status is not compromised and used as an excuse to avoid development of the plentiful brownfield sites across the city and the reclassification of empty business units across the city.		
OR91	Carole Zajciw	Policy HA7: Stoney Lane, Spondon	Objects		No	I am contacting you in relation to the above planning application for a proposed 400 homes to be built off Stoney Lane. I believe that Policy HA7 is unsound as this is **not justified or consistent with National Policy.** My objections to this development are as follows this is designated as active agricultural land and not consistent with the 'Brownfield and City Centre first' strategy.	I would like to see the site deallocated from the Local Plan. this development should be reallocated to the exisiting 'regeneration brownfield and city centre sites' already in existence and should be prioritised there before releasing Green Belt farm land	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. Policy

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the land is misclassified as Grey Belt and all other brownfield alternatives should be utilised the land performs an important Green Belt function and currently contributes to preventing urban sprawl other identified brownfield sites have substantial opportunities and capacity Spondon's infrastructure - schools, doctors surgery, roads, drainage and access cannot accommodate this potential influx there are already significant pressures on the village due to the high volume of lorries, cars, trucks etc. which causes significant travel issues at peak times already the additional traffic through the village centre could make unsafe for pedestrians (young and old) the village cannot cope with a potential additional 400+ cars on top of the already significant volume of housing already in construction, and additional proposed		HA7 requires contributions to education and off-site transport improvements, access at the southern end of Stoney Lane, and active travel and bus links (criteria g to i and l), and Policy GD9 secures contributions to health facilities where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						developments in this village area.		
C252	Geoffrey Lowe	Paragraph 302	Objects	No	No	This area is not 'Grey Belt'. The land is actively farmed, good quality, agricultural land.	The proposal to build on this land off Stoney Lane should be removed.	Grey belt is defined in the NPPF by a site's contribution to Green Belt purposes (a), (b) and (d), not by its current use or agricultural quality, and the Green Belt Assessment (2025) found this site meets that definition; the allocation is needed alongside the brownfield and City Centre sites that make up most of the supply, as explained in the Housing Requirement and Spatial Strategy Topic Paper. The loss of agricultural land has been weighed in the Sustainability Appraisal, and Policy HA7 requires a high-quality design with landscape and green infrastructure buffers to the countryside and to existing homes

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								(criteria b, c and e). No change required.
Policy HA8: Former Police Station, Cotton Lane								
C531	Roy Woolley*	Policy HA8: Former Police Station, Cotton Lane	Objects	Yes	No	Policy HA8 (Former Police Station, Cotton Lane), Policy CC4 (Residential-Led Allocations), and Housing Strategy (Para 176) • Soundness Tests Failed: Justified, Effective, and Consistent with National Policy (NPPF 198 – Ground Conditions and Pollution) • Participation at Hearing: Yes 'Data Deficits' is the technical background PDF uploaded in response to 485 with file name Data_Deficits_Regulation_19_Draft__Roy_Woolley_FINAL.pdf. Reason the Policy is Unsound: The plan allocates extensive new residential development (Data Deficits, Section 8) along and feeding directly into the Osmaston Road / AQMA No. 1 corridor—including HA8 (Cotton Lane, 100+ dwellings), HA10 (Rolls-Royce Elton Road), HA11 (Shaftesbury Street), HA15 (Former Ivy House School), Marble Square, and over 2,000 dwellings across City Centre	1. Amend Policy HA8 and corridor-related allocations to require a comprehensive cumulative corridor transport and air quality appraisal prior to master planning, accounting for diverted network flows and commercial trip generation. 2. Condition major residential approvals upon the provision of dedicated active travel links that do not route pedestrians and schoolchildren directly along narrow, congested canyon kerbsides.	Policy EN11 requires major development to be accompanied by an Air Quality Assessment and not to worsen existing poor air quality or create new exceedances, and Policy EN13 addresses wider pollution impacts. These requirements will apply to each allocation at application stage, alongside the Council's statutory air quality monitoring. This site is subject to a resolution to grant permission subject to s106 (23/01676/FUL) No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						brownfield allocations (Policy CC4), including 674 at Eagle Quarter without assessing cumulative exposure within an entrenched pollution sink. 1. Intensifying Sensitive Receptors in an Unresolved AQMA: Placing high-density family and specialist residential (Data Deficits, Section 8) uses into a corridor that has failed to achieve sustained AQMA revocation for over 25 years (Data Deficits, Section 1) directly contravenes national policy on health and pollution exposure; as per NPPF 198: "Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development." 2. Ignored Cumulative Trip Generation: Traffic assessments treat allocations piecemeal. DfT		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						count points on Osmaston Road (Sensors 27256 and 47261) demonstrate heavy reliance on uncounted estimates, while key feeder links such as Ascot Drive (carrying increasing traffic) have not been counted by DfT since 2009 (Data Deficits, Section 3). Furthermore, historical highway decisions (sealing Litchurch Lane onto London Road) forced more industrial and commuter traffic onto Osmaston Road (Data Deficits, Section 7). Adding residential trip generation from HA8 and wider sites onto this network without cumulative capacity modelling is unjustified. 3. Severe Pre-Existing Health Vulnerabilities: Health data from 2004 showed that premature coronary heart disease (CHD) mortality in Osmaston was 43.4% higher than the city average. As of 2026, Child poverty remains significantly higher in Osmaston and other similarly deprived Derby wards (Data Deficits, Section 9). Funnelling additional traffic and introducing new residents without binding		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						mitigation actively compounds established health inequalities, contrary to NPPF requirements.		
Policy HA9: Bramblebrook House/Humbleton View, Littleover								
OR266	Fisher German on behalf of Bloor Homes	Policy HA9: Bramblebrook House Humbleton View, Littleover	Support	Yes	Yes	No objection to the site, however in respect of five-year housing land supply assumptions the Council should consider whether there is a need to discount in accordance with the PPG Paragraph: 026 Reference ID: 68-035-20190722: "How can authorities count older people's housing in the housing land supply? Local planning authorities will need to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply. This contribution is based on the amount of accommodation released in the housing market. Further guidance is set out in Housing for Older and Disabled People."		Support welcomed. Applications for older people's housing in the housing land supply will follow national planning practice guidance.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
Policy HA10: Elton Road Works								
OR257	Marrons on behalf of BDW Trading Ltd (Redrow Homes Midlands)*	Policy HA10: Elton Road Works	Object		No	Elton Road Works is proposed for allocation within the LPD, for residential development comprising the erection of 'a minimum' of 80 dwellings. Appendix 2 of the Submission Draft anticipates all 80 dwellings being completed within the plan period, assuming all completions to materialise in Year 9 (2031/32). This site, however, is set apart from other allocations in the LPD, for the Council recognises that it is presently unavailable for residential development, being in active employment use. The site is assessed within the Council's SHLAA under Site Reference: DER0011. As regards planning history and site delivery progress, the SHLAA records that the site is occupied by Rolls Royce as a research and development laboratory. However, the Council suggests that Rolls Royce have communicated an intention to develop the site and relocate the existing use within 5 years.		SA Appendix G records that Rolls-Royce has confirmed its intention to vacate the site within around three years and make it available for development, and the trajectory at Appendix 2 does not anticipate completions until 2031/32. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						As regards constraints, the SHLAA finds that the site will need careful assessment in terms of contamination and acknowledges that neighbouring land uses may affect the developable area. The SHLAA ultimately concludes that the site is not currently available, that its capacity may be liable to change and that, whilst there is no known reason why redevelopment could not occur within the plan period, delivery is contingent upon Rolls Royce vacating the site. Notwithstanding the above, no planning application has been submitted, and no firm timetable has been adduced setting out a route to redevelopment. There is also no agreed Statement of Common Ground ("SoCG") or similar mechanism to evidence Rolls Royce's commitment to relocation. It is unarguable that the site represents a sustainable brownfield development opportunity. However,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						suitability alone is insufficient. The Council must also demonstrate a reasonable prospect that the site will become available and be developed at the point envisaged by the trajectory. That is particularly important where the site was previously earmarked for development as part of the Osmaston Regeneration Area in the Derby City Local Plan Part 1: Core Strategy, under Policy AC14. Nonetheless, the allocation materialising depends on circumstances entirely outside the control of the Council. Whilst the suitability constraints do not, in principle, preclude development, they introduce further uncertainty as to when the site will be capable of redevelopment. No evidence has been provided identifying a replacement facility, confirming a commitment to vacate, establishing a programme for relocation or otherwise demonstrating that the site will become available within the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						assumed timeframe. Simply, the allocation relies upon a series of overly ambitious assumptions, rather than objective evidence of availability. Presumably, those assumptions are the same reasons as to why the site never materialised under Policy AC14 of the adopted development plan. Drawing the above together, the respondent submits that there is limited objective evidence demonstrating that the site will become available and deliver the scale of development anticipated by the Council within the assumed timescales. The respondent therefore submits that, in the absence of firm evidence to the contrary, it would be unreasonable to conclude that the site is deliverable or developable and that its inclusion within the Council's supply must be treated with the utmost caution.		
OR31	Network Rail Infrastructure Ltd	Policy HA10: Elton Road Works	Support	Yes	Yes	The alteration to Policy HA10 to make specific reference to protecting Network Rail land		Support is welcomed

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and adjacent mature tree cover at the north end of the site is noted. As such Network rail can now support this policy as worded.		
Policy HA11: Shaftesbury Street								
OR257	Marrons on behalf of BDW Trading Ltd (Redrow Homes Midlands)*	Policy HA11: Shaftesbury Street	Objects		No	Shaftesbury Street is proposed for allocation within the LPD, for residential development comprising the erection of 'a minimum' of 20 dwellings. Appendix 2 of the Submission Draft, however, anticipates the delivery of 21 units, with all completions expected to materialise in Year 6 (2028/29). Shaftesbury Street comprises the site of the former Shaftesbury Sports Centre, together with areas of open space, parking and landscaping. The site is assessed within the Council's SHLAA under Site Reference: DER0369. As regards planning history and site delivery progress, the SHLAA records that the site has historically comprised a mix of open space, playing facilities and a built leisure centre, the		SA Appendix G records that a planning application is being prepared for around 21 affordable homes on this Council-owned site, with development expected to begin in 2027. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						latter having been demolished. Whilst the Council has explored opportunities for residential development, the SHLAA notes that a 'worked up' affordable housing proposal has since 'fallen away'. As regards constraints, the SHLAA identifies the presence of open space, mature trees and access considerations as restricting opportunities for redevelopment. The assessment also finds that the demolished leisure centre occupies a broadly central location within the site and renders it difficult to redevelop the site for housing in isolation. Uncertainty around what will happen to the demolished leisure centre is recorded as a further unknown and might bear on the appropriateness of residential development. Significantly, in the respondent's view, the SHLAA concludes that, whilst the site offers redevelopment opportunities, there is no information		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						regarding delivery, density, or dwelling numbers and, therefore, 'no dwelling numbers can currently be classed as deliverable or developable'. Should the Council maintain that the site ought to be progressed as an affordable housing scheme, the respondent would direct attention to the findings of the Local Plan Viability Scoping Report which concludes that the cumulative effect of affordable housing, accessible housing standards, SPD financial contributions, the Building Safety Levy and the Future Homes Standard creates significant viability pressures across large parts of the city. Notwithstanding those conclusions, the Submission Draft allocates the site for approximately 20 dwellings. In the absence of any planning application or firm evidence demonstrating how the identified constraints may be overcome, the basis upon which the Council has determined the site is an appropriate and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						developable allocation remains unclear. In summation, the respondent submits that the contribution anticipated from Policy HA11 is insufficiently evidenced. The Council's own evidence base identifies significant uncertainty as to its developability over the longer term and there is no material published alongside the Regulation 19 consultation which might justify a departure from these conclusions. Accordingly, in the absence of firm evidence to the contrary, it would be unreasonable to conclude that the site is deliverable or developable and its inclusion within the Council's supply must be treated with the utmost caution.		
Policy HA12: North of Sinfin Moor Lane								
OR41	Councillor Tim Prosser	Policy HA12: North of Sinfin Moor Lane	Objects		No	The version approved by council gave the following explanation for this allocation: *"This land is identified in the current local plan as proposed public open space as part of a wider designation to create a*		SA Appendix G records that the land has been allocated as proposed public open space since 2006 without being delivered and that a

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						new park between Shelton Lock and Chellaston. ***This park has not been delivered, and the land is not within the control of the Council and therefore cannot remain as proposed public open space in the local plan as there is no mechanism to deliver the policy.****"* That justification was not itself one of the three EN3 tests — it was not a "surplus to requirement" assessment (a), it was not "replaced by equivalent or better provision" (b), and it was not "alternative sports/recreational provision" (c). It was a *deliverability* argument (the land was never in Council control, so the designation was always aspirational). **In the document published for Regulation 19 consultation, this entire explanation has been deleted, and nothing has been put in its place.** The policy text for HA12 now says nothing at all		scheme of 41 homes has been resolved for approval subject to a Section 106 agreement. The proposed public open space allocation is not deliverable, and the effect on open space will be assessed against Policy EN3 at application stage. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						about the site's open space history, the abandoned park designation, or why that designation is being removed. Rather than curing the EN3 compliance problem, the published version has made it worse: there is now no explanation anywhere in the plan for the loss of this previously-designated open space. Has an Open Space Study assessment actually been carried out for this site? If the answer is "no, because the designation was never delivered," on what basis does the published plan consider the loss of this land compliant with Policy EN3, which governs the loss of open space elsewhere in the same document?		
Policy HA13: Former Beaufort Business Centre, Chaddesden								
No representations were received for this policy.								
Policy HA14: Kitchener Avenue/Browning Street								
OR257	Marrons on behalf of BDW Trading Ltd (Redrow	Policy HA14: Kitchener Avenue/Browning Street	Objects		No	Kitchener Avenue is proposed for allocation within the LPD, for residential development comprising the erection of 'a		HA14 is a Council-owned site that the Council has identified for new affordable

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
	Homes Midlands)*					minimum' of 25 dwellings. Appendix 2 of the Submission Draft anticipates all 25 dwellings being completed within the plan period, assuming all completions to materialise in Year 8 (2030/31). The site occupies land at the junction between Browning Street and Kitchener Avenue, in the Sunnyhill area of the city. The site is assessed within the Council's SHLAA under Site Reference: DER0319. As regards planning history and site delivery progress, the SHLAA records that the site is open and undeveloped, under local authority ownership. Whilst it adjoins land related to Village Primary School, the SHLAA suggests that the site is separate and unused. As regards constraints, the SHLAA is less forgiving. For, it notes that the two adjacent streets are narrow, with high volumes of on-street parking. The site is also adjacent to Village Medical Centre, a large, and		homes (SA Appendix G), and its delivery is now being taken forward by the Council's Regeneration and Brownfield Sites Delivery Team. The trajectory at Appendix 2 does not anticipate completions until 2030/31. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						often busy practice. On this basis, it is probable that only part of the site will be suitable for development, due to its constraints, including uncertainty as to how access might be afforded. Most significantly, the SHLAA concludes that the site is unavailable. It notes that the Council would need to ensure that the site was not associated with the school and determine whether it was required to be retained for any other purpose before it could be identified as being available for residential development. According to the SHLAA, further work is required, including the Council making a decision about the use, and disposal of, the site. Until that has been established, the SHLAA makes clear that 'it cannot be included in any housing supply'. Upon review, the site has no relevant planning history, nor is there any evidence that firm progress is being made towards		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						submission. Notwithstanding these issues, the Submission Draft allocates the site for approximately 25 units. In the absence of any substantive evidence which might suggest that the issues identified in the SHLAA have been, or indeed can be, overcome, the basis upon which the Council has determined the site is an appropriate and developable allocation remains unclear. In summation, the respondent submits the contribution anticipated from Policy HA14 is insufficiently evidenced. The Council's own evidence base identifies significant uncertainty as to its developability over the longer term and there is no material published alongside the Regulation 19 consultation which might justify a departure from these conclusions. Accordingly, the respondent submits that, in the absence of firm evidence to the contrary, it would be unreasonable to conclude that the site is deliverable or developable and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						that its inclusion within the Council's supply must be treated with the utmost caution.		
OR41	Councillor Tim Prosser	Policy HA14: Kitchener Avenue/Browning Street	Objects		No	HA14 appears to be one of only two identified lapsed playing field sites in Derby; the Council's own adopted methodology requires open space use and "excess of provision" to be considered and evidenced before redevelopment; the cited evidence shows shortfalls rather than excess; and a Section 77/Academies Act consent process sits outside the Local Plan entirely — none of which is acknowledged, referenced, or addressed in HA14's policy text or supporting paragraphs in the submitted plan. This has not changed between the two versions of the document. **HA14's policy text** doesn't reference the site's school history at all — it's simply described as *"a grass field owned by Derby City Council."*		HA14 is a Council-owned site identified for new affordable homes (SA Appendix G), and its delivery is now being taken forward by the Council's Regeneration and Brownfield Sites Delivery Team. Any planning application will be assessed against Policy EN3, and any statutory consents relating to former school land will be addressed separately from the Plan. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The plan cites an Open Space Study that, by its own stated methodology, is the wrong document to justify releasing former school playing field land. **The Council's principal Open Space Study, cited in the evidence base specifically to support Policy EN3, cannot be used to justify releasing HA14 under EN3's "surplus to requirement" test (criterion a), because school playing field land was structurally excluded from its scope from the outset:** *"Types of provision not assessed or included as part of the study are private gardens, institutional grounds, school playing fields or private sport clubs. Such forms of provision are not available to members of the public to access to the same level as typical open space." (Section 3.1)* This Open Space Study is dated **May 2018** — nearly eight years old by the time of this Regulation 19 consultation,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						based on a site audit that is now equally stale. For a plan being examined against 2026/2027 population and demand levels, relying on unrefreshed 2018 open space audit data is itself a potential "justified"/robust-evidence soundness point. Derby's Playing Pitch Strategy names the site directly. From Part 5 (Strategic Recommendations), under *"Recommendation a — Protect playing field sites through local planning policy":* *"There are two lapsed playing field sites identified in Derby;* ***former Normanton Primary School and Village Primary School****. Normanton Primary School playing fields were previously identified for potential development but has not presently been taken forward for development of any kind."* "Lapsed" status does not let the Council off the hook — this document says so explicitly, and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						directly contradicts how HA14 is currently drafted in the Local Plan: *"Lapsed - last known use was as a playing field more than five years ago. These sites* ***fall outside of Sport England's statutory remit but still have to be assessed using the criteria in paragraph 97*** *of the National Planning Policy Framework and Sport England would nonetheless challenge a proposed loss of playing pitches/playing field which fails to meet such criteria.* ***It should be emphasised that the lawful planning use of a lapsed site is still that of a playing field.****"* The Strategy's own recommended priority order for any lapsed site — including this one — is explicit and sequential: "Explore the feasibility of bringing the site back into use…" "The site could become public open space to meet a need identified in the Open Space Study; **or**"		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						"Redevelop the site for an alternative use but use the capital receipt to invest in existing sites in the locality" Housing is only the *third* option in the Council's own adopted methodology, and only after the first two have been considered — there is no evidence in the HA14 policy text that this sequence was followed or documented. **The Sport England "excess" test — the evidence points the wrong way** For a lapsed/disused site specifically, Sport England's **Policy Exception E1** requires: *"A robust and up to date assessment has demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport."*		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						But this same document's headline findings show **shortfalls, not excess**, across almost every relevant pitch sport and analysis area of the city — football shortfalls at youth 9v9 now, worsening to nearly all formats by 2028; 3G pitch shortfalls in the North East and South East; rugby union shortfalls. There is no citywide "excess" finding anywhere in this strategy that could support the E1 exception. The Council's own evidence base appears to point *against* the "excess" finding the exception requires, which is a serious problem for delivering HA14 as allocated, independent of anything in the Local Plan text itself. **Also:** *"Local authorities wanting to dispose of school playing field land need consent under* ***Section 77 of the Schools Standards and Framework Act 1998****, but consent is now also required for disposal of any land used by a school or academy*		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						*under **Schedule 1 to the Academies Act 2010**."* This sits entirely outside the Local Plan process. Even if the plan is adopted with HA14 intact, the Secretary of State's consent for change of use would still be a separate, undisclosed precondition to delivery, relevant to whether HA14 is realistically "effective"/deliverable within the plan period as required by the soundness tests. **One more evidential weak point** This Strategy is dated **June 2018** and states its own findings should be treated as out of date if not reviewed within three years of sign-off, with underlying supply/demand data ideally refreshed every two years. It is now **eight years old** with no evidence of a refresh cited in the Local Plan's evidence base. That compounds the earlier point about the 2018 Open Space Study: the Council's key open space/playing field evidence base is stale by its own		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						stated standards, a further "robust, up-to-date evidence" soundness point under NPPF para 96 (quoted directly in this Strategy) relevant to essentially every open space and playing field allocation in the plan, not just HA14.		
Policy HA15: Former Ivy House School								
No representations were received for this policy.								
Policy HA16: Gypsy and Traveller Site Allocation								
OR54	Andreas Baker	Policy HA16: Gypsy and Traveller Site Allocation	Objects		No	We and I am sure other residents also do not want this, this is wanton destruction of a nice green area for no reason. We do not wish to be plagued by these people they do not pay tax they leave their rubbish and mess for every one else to clean up and [redacted]. I do not care if you think this is bigoted having had to put up with them pitching up illegally in Chaddesden area they are a nuisance and trouble.		Comments about the behaviour of future occupiers are not material planning considerations, and the Council has a duty to plan for the identified accommodation needs of Gypsies and Travellers. Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						If they were law abiding and paid tax kept the place clean I and many would not have objection to them but they do not.		
OR71	Matt Buchanan	Policy HA16:	Objects		No	I object to Policy HA16 because I do not consider that the evidence currently demonstrates that this particular allocation is adequately justified when its environmental, recreational and active-travel impacts are weighed against reasonable alternatives. The need for additional Gypsy and Traveller accommodation is not disputed. Policy H12 itself recognises that need and provides for future accommodation through "site(s)" and planning permissions. However, the Regulation 19 evidence appears to proceed on the basis that accommodating all 17 pitches on one site is the Council's preferred option, rather than demonstrating why a distributed solution across more than one suitable location would not be reasonable.	I therefore request that Policy HA16 is reconsidered and that the Council: publishes or identifies the assessment of a distributed-site alternative; demonstrates why HA16 performs better than reasonable alternatives; undertakes or publishes robust site-specific ecological and arboricultural evidence; demonstrates how existing active-travel routes and accessible public open space will be retained; and clarifies how the environmental effects	SA Appendix G and the Gypsy and Traveller Site Provision Topic Paper explain why a single Council-owned site able to meet the full need was preferred: no private sites were promoted, and a Council-owned site of around 0.85ha guarantees deliverability. Ecological, tree and active travel matters will be addressed at application stage, with Policy HA16 recognising the active travel links and mature trees and requiring the remainder of the land to remain as accessible public open

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						This matters because the Plan contains major strategic housing allocations where entirely new residential neighbourhoods, infrastructure and services are already being planned. HA1 Rykneld Road is allocated for at least 800 homes with a new primary school, expanded local-centre provision, improved bus services, new walking and cycling routes, highway works, flood mitigation, green infrastructure and public open space. HA3 East of Moorway Lane is allocated for at least 335 homes and includes new highway access, public open space, biodiversity improvements, walking and cycling connections and a local centre. I have been unable to identify in the published evidence an assessment of the reasonable alternative of incorporating smaller numbers of permanent Traveller pitches within one or more of these large strategic residential allocations, rather	acknowledged in the Sustainability Appraisal are consistent with the Plan's wider policies on green infrastructure, biodiversity and trees.	space. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						than concentrating all provision at HA16. Appendix F records that residents previously raised concern about the adequacy of the alternatives assessment, and the Council responded that the Regulation 19 Sustainability Appraisal now contains the rationale for site selection. I therefore ask the Council to identify where a distributed-site option was assessed and, if it was not, to explain why it was not treated as a reasonable alternative. There are also significant site-specific concerns at HA16. The Local Plan itself acknowledges that the site contains **active travel links and mature trees**, while Policy HA16 states that the remainder of the site beyond the fenced Traveller accommodation should remain accessible public open space. The Sustainability Appraisal further acknowledges that development would result in the loss of existing public open space and records a negative leisure and recreation effect.The		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						biodiversity assessment also requires closer scrutiny. The Sustainability Appraisal expressly asks whether development will maintain or enhance woodland and tree cover, prevent habitat fragmentation and support the city's natural capital. On the ground, the site contains mature trees, naturally regenerating woodland, dense understory vegetation and connected habitat structure. The assessment nevertheless records a positive biodiversity effect. I do not consider that the published evidence clearly demonstrates how the existing ecological value of the site has been established before reaching that conclusion. There is a similar unresolved issue with access and public use. If part of the site is to be enclosed and fenced, the Council should demonstrate now — at allocation stage — how existing active-travel routes and meaningful accessible public open space will be		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						retained. Policy HA16 states that the exact siting and access arrangements will be considered later, at planning-application stage. In my view, that leaves an important question unanswered: whether the allocation can in fact accommodate 17 pitches while satisfactorily retaining mature trees, ecological connectivity, public open space and active-travel links. I support the provision of suitable Gypsy and Traveller accommodation. My objection concerns the evidence supporting the selection of **this particular site** and whether the allocation has been shown to be justified and sound.		
C513	Matthew Buchanan*	Policy HA16: Gypsy and Traveller Site Allocation	Objects	No	No	I object to Policy HA16 because I do not consider that the evidence currently demonstrates that this particular allocation is adequately justified when its environmental, recreational and active-travel impacts are weighed against reasonable alternatives. The need for	I therefore request that Policy HA16 is reconsidered and that the Council: publishes or identifies the assessment of a distributed-site alternative; demonstrates why	SA Appendix G and the Gypsy and Traveller Site Provision Topic Paper explain why a single Council-owned site able to meet the full need was preferred: no private sites were promoted, and a

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						additional Gypsy and Traveller accommodation is not disputed. Policy H12 itself recognises that need and provides for future accommodation through "site(s)" and planning permissions. However, the Regulation 19 evidence appears to proceed on the basis that accommodating all 17 pitches on one site is the Council's preferred option, rather than demonstrating why a distributed solution across more than one suitable location would not be reasonable. This matters because the Plan contains major strategic housing allocations where entirely new residential neighbourhoods, infrastructure and services are already being planned. HA1 Rykneld Road is allocated for at least 800 homes with a new primary school, expanded local-centre provision, improved bus services, new walking and cycling routes, highway works, flood mitigation, green infrastructure and public open space. HA3 East of Moorway Lane is allocated for at least 335	HA16 performs better than reasonable alternatives; undertakes or publishes robust site-specific ecological and arboricultural evidence; demonstrates how existing active-travel routes and accessible public open space will be retained; and clarifies how the environmental effects acknowledged in the Sustainability Appraisal are consistent with the Plan's wider policies on green infrastructure, biodiversity and trees.	Council-owned site of around 0.85ha guarantees deliverability. Ecological, tree and active travel matters will be addressed at application stage, with Policy HA16 recognising the active travel links and mature trees and requiring the remainder of the land to remain as accessible public open space. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						homes and includes new highway access, public open space, biodiversity improvements, walking and cycling connections and a local centre. I have been unable to identify in the published evidence an assessment of the reasonable alternative of incorporating smaller numbers of permanent Traveller pitches within one or more of these large strategic residential allocations, rather than concentrating all provision at HA16. Appendix F records that residents previously raised concern about the adequacy of the alternatives assessment, and the Council responded that the Regulation 19 Sustainability Appraisal now contains the rationale for site selection. I therefore ask the Council to identify where a distributed-site option was assessed and, if it was not, to explain why it was not treated as a reasonable alternative. There are also significant site-specific concerns at HA16. The Local Plan itself acknowledges that the site		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						contains active travel links and mature trees, while Policy HA16 states that the remainder of the site beyond the fenced Traveller accommodation should remain accessible public open space. The Sustainability Appraisal further acknowledges that development would result in the loss of existing public open space and records a negative leisure and recreation effect. The biodiversity assessment also requires closer scrutiny. The Sustainability Appraisal expressly asks whether development will maintain or enhance woodland and tree cover, prevent habitat fragmentation and support the city's natural capital. On the ground, the site contains mature trees, naturally regenerating woodland, dense understory vegetation and connected habitat structure. The assessment nevertheless records a positive biodiversity effect. I do not consider that the published evidence clearly demonstrates how the existing ecological value of the site has		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						been established before reaching that conclusion. There is a similar unresolved issue with access and public use. If part of the site is to be enclosed and fenced, the Council should demonstrate now — at allocation stage — how existing active-travel routes and meaningful accessible public open space will be retained. Policy HA16 states that the exact siting and access arrangements will be considered later, at planning-application stage. In my view, that leaves an important question unanswered: whether the allocation can in fact accommodate 17 pitches while satisfactorily retaining mature trees, ecological connectivity, public open space and active-travel links. I therefore request that Policy HA16 is reconsidered and that the Council: publishes or identifies the assessment of a distributed-site alternative; demonstrates why HA16 performs better than reasonable alternatives; undertakes or publishes robust		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						site-specific ecological and arboricultural evidence; demonstrates how existing active-travel routes and accessible public open space will be retained; and clarifies how the environmental effects acknowledged in the Sustainability Appraisal are consistent with the Plan's wider policies on green infrastructure, biodiversity and trees. I support the provision of suitable Gypsy and Traveller accommodation. My objection concerns the evidence supporting the selection of this particular site and whether the allocation has been shown to be justified and sound.		
OR75	Sam Clark	Policy HA16: Gypsy and Traveller Site Allocation	Objects		No	I am emailing in response to proposed changes in my local area. I have been made aware of the proposed use of land on public open space in Wilmorton, Pride Park, Derby. The proposal being that the natural green woodland be turned into a traveller site. I believe that this will have a substantial negative effect on		Policy HA16 recognises the mature trees and active travel links on the site and requires the land beyond the fenced pitches to remain as accessible public open space, improved with further planting; biodiversity net gain will be required under

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the area as a whole. This woodland is important as it is an open public space used by many and taking this away would limit the options in the area for any green space for people to use, thus having a negative impact. The space is a public walkway used by all to connect Wilmorton to the City Centre, The train station and beyond. Limiting or removing this access would force the public to find other means, including reverting to driving thus having a negative impact on the environment. The land itself is home to mature trees and established habit for animals. This is not a justifiable reason to take away trees that have been there for centuries and to destroy homes for wildlife, forcing them elsewhere or killing them all together. There are other sites throughout Derbyshire that are far more suitable with less consequence and the council will have to prove that they		Policy EN10. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						have been assessed prior to any work taking place. I urge the council to reconsider this project and to start the process again. I understand the need for sites like this but this land is not the place for it. The impact on the environment and the wider community would be catastrophic.		
OR89	Joe Cross	Policy HA16: Gypsy and Traveller Site Allocation	Objects		No	I have unfortunately been informed earlier today that there are considerations for a permanent traveller site to be build on Wilmorton recreation area. I am a home owner on [redacted] and I strongly object any proposal of this kind. Statistics show this would drastically impact the value of my home in a negative way, similarly this green space has been beneficial for young people and families with small children for as long as I have lived here. It would be a massive shame to lose this in the local community		Noted. Effects on property values are not a material planning consideration. Policy HA16 retains the land beyond the fenced pitches as accessible public open space, and the Gypsy and Traveller Site Provision Topic Paper confirms that education, health and shopping facilities are within easy reach of the site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I take pride in the community here at Wilmorton and this plan has caused concern for a number of residents. I have worries of the overall peace and order of the neighbourhood should a 17 patch site be built there. This area already has limited resources of schools, healthcare centres and public facilities. By pushing more into this space only creates a significant strain on these resources and limits the availability for other users who have lived here for a prolonged period of time Traveller spaces are evidently needed, however I urge this is not at the expense of the safety and needs of this community I hope this email assists in the decision proposed.		
OR104 & C519	George Fletcher*	Policy HA16: Gypsy and Traveller Site Allocation	Objects	No	No	There has been no assessment of Wilmorton Park's suitability for travellers against any other site in Derby, including the other 46 parks. The rules say that there must be a sequential Approach and Alternatives: For	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320	The Gypsy and Traveller Site Provision Topic Paper sets out how nearly 90 Council-owned sites were assessed and shortlisted to

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						a park conversion to be considered justified, the local planning authority must show during examination that they explored alternative locations and that other options were undeliverable due to severe constraints (such as absolute Green Belt protection, flood risk, or lack of access). Additionally, there has been no assessment of the adverse affects on the approx. 320 households in Wilmorton of this development. There is no stated estimate of the proportion of the park that will be undamaged after the development, so how can any decisions be made?	households of Wilmorton.	nine, which were appraised against the same criteria. Policy HA16 retains the land beyond the fenced pitches as accessible public open space, and the extent of the pitches will be defined at application stage. No change required.
OR78	Councillor Alan Graves	Policy HA16: Gypsy and Traveller Site Allocation	Objects	No	No	Further to the Test of Soundness Guidance Note, here are my comments on the Regulation 19 draft, specifically Policy HA17 (Gypsy and Traveller Site Allocation, Wilmorton). This builds on the representation I've already submitted via the consultation portal. **Question 1: Legal compliance**		The Sustainability Appraisal assesses the site against all 17 objectives, including leisure and recreation (Appendix E), and SA Appendix G sets out the reasons for its selection. No brownfield sites were promoted for Gypsy and Traveller use, and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Evidence base accessibility: the "info4derby" link on the Council website (source for deprivation/socioeconomic data) is not working, which limits the public's ability to scrutinise the evidence underpinning this allocation during the statutory consultation period. I'd query whether the Sustainability Appraisal has properly assessed the loss of open/green space at this location, including its use by existing services (a mental health facility on London Road, the YMCA, local schools and residents). **Question 2: Soundness** Positively prepared — The Plan repeatedly states a brownfield/regeneration-first approach, but HA17 allocates an existing green space. Several brownfield sites appear not to have been considered as alternatives for this allocation despite featuring in the Council's own Green Wedge		the Council's assessment of nearly 90 of its own sites is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						review as suitable for development: the MotoX land behind the old DET building/Riverside function suite (ref. 0289), the former BT building on Raynesway behind Lidl, land between the Raynesway slip road and Belmore Way, land adjacent to the Cinch superstore and Severn Trent site off Raynesway (ref. 0279), the unnamed parcel ref. 290, land behind Kuhne & Nagel on the A6, and the Rolls-Royce Marine Operations site (ref. RR1). I'd ask that the site selection evidence explain why these were discounted in favour of HA17. Justified — The proposed site sits only 1km from the existing Traveller site at Imari Park. With the city spanning roughly 14–15km, the evidence base should set out the site selection methodology, including spacing/distribution rationale, and why this proximity was considered acceptable.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Effective — Deliverability is questionable given access constraints: the surrounding streets are narrow, densely parked terraced streets unsuited to regular manoeuvring of tow vehicles and caravans (combined length 13–14m, width 2.44m). Access via London Road or Pride Parkway would add pressure to a junction (Pride Parkway/City Point) that already queues back during peak periods. I'd also question whether the infrastructure evidence base has tested capacity at local GP practices, dentists, and Lakeside School, which is already oversubscribed. Consistent with national policy — The allocation should be tested against the NPPF's brownfield-first presumption and open space protection policies alongside the duty to provide for Traveller accommodation needs; as drafted, HA17 appears to sit in tension with the Plan's own stated regeneration strategy.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						I'd also note that a community petition on this allocation has attracted 706 signatures to date and will be submitted to Democratic Services before the consultation closes, as evidence of the strength of local concern.		
OR264	Nick Haddon	Policy HA16: Gypsy and Traveller Site Allocation	Objects		No	I cannot understand why you would be considering taking a substantial chunk of a small park area when there must be ex industrial sites or parts of much larger green areas where taking an area of this size would have far less impact. Why not Chaddesden, Alvaston, Darley or Allestree park? For those to lose a section this size would barely be noticeable, whereas here it takes a quarter or so of the space including path ways to access bus stops and Pride Park. My boys learnt to ride their bikes on those paths as it was the only safe area for them to learn on tarmac. It would be extremely		The Gypsy and Traveller Site Provision Topic Paper sets out how nearly 90 Council-owned sites were assessed and shortlisted to nine, which were appraised against the same criteria. Policy HA16 recognises the active travel links on the site and retains the land beyond the fenced pitches as accessible public open space. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						disappointing if a large proportion of this green space and it's mature trees were to be taken away from the kids and families that use it and may not have easy access or private transport to other park areas.		
OR111	Phil Harrison	Policy HA16: Gypsy and Traveller Site Allocation	Objects		No	Hello I have lived in wilmorton 42 years I am disabled and would not feel safe with a campsite for travelers, through the years we have had travellers [redacted]. I own my own home and would not be able to sell if I had to. We have now been subjected to too many hmos in these little houses. I am in my 60s and classed as a seriously vulnerable person. Why don't you put them in Duffield it's quieter there and lots of space there thank you please do not put this site on wilmorton. On Fri, 13 Mar 2026, 19:04 wrote: Planning for traveler's site in Wilmorton, l strongly object to this as I have lived in Wilmorton for 42 years it is the only place that is safe for children to play and walk a dog.I do not want		Noted. Effects on property values are not material planning considerations, and the Council has a duty to plan for the identified accommodation needs of Gypsies and Travellers. Policy HA16 retains the land beyond the fenced pitches as accessible public open space. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						my property to be dropped in price. I am a disabled person and feel this purposel will distroy the community.		
OR126	Pam Holliday	Policy HA16: Gypsy and Traveller Site Allocation	Objects		No	I refer to the Emerging Local Plan for Derby regarding the proposal of an establishment of a Traveller/Gypsy site on Wilmorton Recreation Ground, Wilmorton, Derby. I object to the proposal of a traveller/gypsy site at this location in the strongest terms. I fully appreciate the Council is duty bound to find suitable sites for travellers but while travellers' needs are part of the equation, another part is the recognition of the interests of the settled community. Specifically:- **Environmental** – the proposed site presently contains many trees and bushes that are a haven for small animal and bird life and also help block the view and noise from the busy dual carriageway that is Pride Parkway. Undoubtedly all these		Policy HA16 requires appropriate fencing and planting, recognises the mature trees on the site and retains the remainder as accessible public open space with further planting; biodiversity net gain will be required under Policy EN10. The Gypsy and Traveller Site Provision Topic Paper sets out the site selection process. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						trees and bushes will be removed (never to be replaced) to accommodate the site and result in the displacement/loss of said animals and bird life and increased visual and noise pollution from the road. Trees once removed are lost for ever. So many mature trees have been felled on the Recreation Ground over the last few years and have never been replaced. Trees are vital for the environment and the health of our planet. **Loss of amenity** – the proposed site will considerably further reduce the size of the recreation ground by at least a third (a large chunk of the recreation ground was also lost some years ago to the allotments). If this scheme goes ahead, there won't be much recreation ground left. The recreation ground is popular with dog walkers, joggers, golfers, folk from local businesses enjoying their lunch break, and families - especially in the summer with sunbathing,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						picnics and ball games. The recreation ground is a valuable asset for all the residents of Wilmorton, surrounded as we are by industry, businesses and lack of greenery. Houses in Wilmorton don't have large gardens – only small back yards – and the green space of the Wilmorton Recreation Ground is the only large open green amenity area residents can easily access on our doorstep. The propped development would make the recreation ground a far less desirable place in which to walk and spend quality time. Also, I choose to live in Wilmorton because of the peace and quiet it currently provides. A development of this nature would result in a significant increase in the population, be severely detrimental to the value of houses, add to existing parking problems in the area and will have a serious impact on noise		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						levels, given its proximity to established residences. **Infrastructure Capacity** – local services are already overstretched. The addition of 17 plus families will put unbearable pressure on local GP surgeries and schools in the Wilmorton area. **Road Safety** – the proposed site will border a very busy dual carriageway and present a danger to children living on the site. **Access** – access and egress to the proposed site is off a very busy dual carriageway. This is totally unsuitable for the large vehicles used by gypsies and travellers. **Construction of Pride Parkway in 1997** - Somebody on the Facebook "Spotted Alvaston and Surrounding Areas" page posted this comment:- *"…and if I remember it was agreed the remaining land from the road construction was*		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						to be left as open space for residents - it was part of allowing the road to go through…" It seems to me to imply that the construction of Pride Parkway was given the go ahead on the condition that the area of land we know as Wilmorton recreation ground was to be permanently allocated as open amenity space for residents. This needs to be looked into. The City Council/County Council will undoubtedly have records from when Pride Parkway was constructed. These records need to be found and studied to see if this was indeed the case. I urge the Council to reject this proposal and look for more suitable, alternative sites that do not negatively affect the existing environment and community		
C534	UPNR Ka*	Policy HA16: Gypsy and Traveller Site Allocation	Objects	No	No	I would like to see if the Council has considered the existing nature, trees, roads before making plans to allocate space	While I understand need for such space for Gypsy or such purposes, there is	The Gypsy and Traveller Site Provision Topic Paper identifies the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						for 17 permanent caravan pitches. This will add pressure to the A6 and other local roads which are already unable to keep up growing needs, population and vehicles. There was already a building constructed near allotments to reduce free green space for residents. This plan will see a lot of matured trees go down and disturb the biodiversity let alone the congestion. This is another blow to already shirking space in our towns.	abundant space in the city's outskirts/other areas to allocate for such projects. Or may be council needs think on the right number of pitches to balance everything in the area including existing infra, green /open space and residents.	potential for an independent access from the main road adjacent to the site, and Policy HA16 recognises the mature trees and requires the remainder of the land to remain as accessible public open space. The number of pitches reflects the need identified in the GTAA 2023 to 2040, with additional provision to 2043. No change required.
OR43	Ann Mason	Policy HA16: Gypsy and Traveller Site Allocation	Objects		No	I do not believe a lot of what this plan promises and I certainly do not agree with a Gypsy Site so close to existing residents in Alvaston, this is wrong!		The Council has a duty to plan for the identified accommodation needs of Gypsies and Travellers, and the site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. Policy HA16 requires appropriate fencing and planting to form an enclosed site. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR41	Councillor Tim Prosser	Policy HA16: Gypsy and Traveller Site Allocation	Objects		No	There are four issues with HA16, one of which has been partly addressed between the agreed version and the version published for Regulation 19 consultation. Cross-reference to “Policy H10” instead of the correct H12 — **partly corrected** The apparent breach of Policy EN3 (no exception criteria satisfied for the open space loss) — **unresolved** Section 123(2A) Local Government Act 1972 open space disposal procedure (separate statutory hurdle) — **unresolved** The 17-pitch figure’s traceability to published, current needs evidence — **partly addressed** Cross-reference In the Item 10 version, Policy HA16 stated: **In the document published for Regulation 19 consultation, the operative policy box has been corrected to cite “Policy H12.”** However, the fix is incomplete: the supporting text immediately		The 17 pitches meet the GTAA 2023 need for 14 pitches to 2040, with additional provision to 2043, as set out in the Gypsy and Traveller Site Provision Topic Paper, and Policy HA16 retains the remainder of the site as accessible public open space, with effects on open space to be assessed against Policy EN3 at application stage. Any disposal of open space would follow the separate statutory procedure under section 123(2A) of the Local Government Act 1972, and the cross-reference in paragraph 311 is noted. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						below the policy box, which states the criteria "will be applied to any application," **still cites "(see Policy H10)"** — the old, incorrect reference Apparent breach of Policy EN3 The proposed site is currently Public Open Space. The policy text itself gives away the site's current status, and this wording is unchanged between both versions of the document: "…appropriate fencing and planting to form an enclosed site for the Traveller community… **The remainder of the site beyond the fenced off Gypsy and Traveller accommodation should remain as accessible public open space**…" The word "remain" only makes sense if the **whole site currently functions as accessible public open space** — the policy is carving out a fenced, exclusive-use residential portion from what is presently open to the public, while the leftover fragment stays open. Testing this against Policy EN3's three		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						exceptions for loss of open space: *surplus to requirement assessment* — none is cited or referenced for this site anywhere in the text; *equivalent or better replacement elsewhere* — not offered; the "remaining" open space is smaller, on the same site, not a replacement in a "suitable location" as EN3 requires; *alternative sports/recreational provision outweighing the loss* — does not apply at all; this is residential accommodation, not sport or recreation. Unlike the Rolls-Royce cricket pitch relocation (which offers a replacement site) or even HA12 as originally drafted (which at least attempted a "not deliverable" argument), **HA16 does not fit any of EN3's three exceptions** — it is simply silent on the point, in both versions of the document. Disposal of open space land		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						This sits **entirely outside the Local Plan/planning permission process** and would apply regardless of what the plan says: **Section 123(2A) of the Local Government Act 1972** requires a council to advertise, for two consecutive weeks in a local newspaper, its intention to dispose of land that "consists or forms part of an open space," and to consider any objections received, before disposal can proceed. This applies to any land that has been used by the public as open space, whether or not formally designated. Given the policy text's own description of the site as currently "accessible public open space," this statutory advertising/objection process would be a precondition to delivering HA16 as drafted, and there is nothing in either version of the plan indicating it has been anticipated or flagged. It is a real procedural risk to deliverability, separate from the EN3/soundness point, and is unaffected by the changes made between the two drafts.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The 17-pitch figure — partly addressed, but new questions raised The agreed version of the plan's evidence base list stated: *"Gypsies and Travellers Accommodation Assessment (**GTAA), 2024**"* — a document that could not be found published anywhere on the Council's evidence base webpage, which lists only the 2015 GTAA and refers in passing to a GTAA "published in July 2023." The July 2023 GTAA — the most recent, methodologically current assessment that actually covers Derby and is publicly available — gives Derby City's **full pitch need for the entire 2020–2040 period** as **14 pitches** (ethnic definition) / **13 pitches** (PPTS 2015 definition) in Table 5.10. That is the *entire* 20-year need, comfortably spanning the Local Plan period (2023–2043), yet the Item 10 version allocated land for a minimum of 17 permanent		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						caravan pitches — more than the entire assessed 20-year need under the only current, published GTAA that covers Derby. **The document published for Regulation 19 consultation adds a new paragraph reconciling this figure:** *"The evidence indicated a need for some 14 pitches for permanent Gypsy and Traveller accommodation within the city between 2020 and 2040. Policy HA16 makes provision for 17 pitches to cover the period between 2040 and 2043 (the end of the plan period) given a need for one further pitch a year as set out in the GTAA. The site allocated to meet Gypsy and Traveller need is large enough to meet need should the GTAA need requirements vary when the study is reviewed."* This is a genuine attempt to close the evidence gap (14 + 3, at an assumed rate of one further pitch per year for 2040–2043 = 17), but it raises fresh		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						questions rather than resolving the matter fully: The “one further pitch a year” rate for 2040–2043 is not stated anywhere in the 2023 GTAA and is not sourced to any other document named in the plan. Where does this rate come from, and has it been tested against the GTAA’s own household growth methodology? It remains unclear whether this reconciliation is based on the 2023 GTAA or the still-unverified “2024” GTAA, since the new paragraph does not specify a year. **The entire evidence base list — including the “GTAA, 2024” citation — has been deleted from the document published for Regulation 19 consultation**, and replaced with unrelated text about which older plans are superseded. The published document therefore contains no consolidated evidence base list at all. Rather than resolving the traceability problem, this		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						removes the only citation trail a consultee had for checking the source of the figures relied upon in the plan. The Council should confirm which GTAA (and which specific data) the 17-pitch figure and its extrapolation now rest on, and should reinstate a complete, accurate evidence base list in the document published for consultation.		
OR184	Alan Pywell	Policy HA16: Gypsy and Traveller Site Allocation	Objects		No	I am writing as a local resident to register my strongest technical objection to the proposed allocation of land west of Pride Parkway in Wilmorton for a permanent Gypsy and Traveller site under Policy HA16 of the emerging Local Plan. While I recognise the Council's statutory duty to meet the housing needs of diverse communities, this specific location fails to satisfy the strict criteria set out in **Policy H12 (Gypsies, Travellers and Travelling Showpeople)**. My objections are based strictly on material planning	For these technical highway capacity, match-day safety, and environmental asset reasons, the land west of Pride Parkway is entirely unsuitable. I request that the Council removes this allocation from the Local Plan and prioritises unconstrained brownfield alternatives.	The Gypsy and Traveller Site Provision Topic Paper identifies the potential for an independent access from the main road adjacent to the site, and Policy HA16 requires the exact siting and access arrangements to be considered in detail at application stage, when highway safety, including on match days, will be assessed against Policy H12. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						considerations and the criteria set forth in Policy H12: **1. Severe Deficiencies in Highway Safety and Cumulative Parking Saturation (Policy H12, Section e)** Policy H12 explicitly mandates that sites must be *"accessed safely by vehicles from the public highway."* The surrounding road network is entirely incapable of safely absorbing the transport movements required by this development due to severe pre-existing capacity constraints: **HMO Density and Pavement Parking:** The immediate Wilmorton area contains a high concentration of Houses in Multiple Occupation (HMOs). This high residential density has already led to acute parking saturation, with regular, widespread vehicle parking on pavements along local streets like Bowmer Road. This severely restricts road width and compromises pedestrian safety. Many residential homes now have 2 or 3 vehicles parked		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						down streets in this immediate area. **Refuse collection:** The bottom of Bowmer Road is already heavily congested with parked vehicles and there have been many occasions that refuse collection on a Friday has been aborted resulting in Eton Street residents not having bins emptied. This was due to the refuse vehicle being unable to pass. **Incompatibility with Caravan Movements:** Bowmer Road's restricted geometry is already routinely choked by this HMO overflow parking. It is physically impossible for long towing vehicles, multi-axle caravans, or heavy emergency vehicles to safely maneuver, turn, or exit without creating severe structural blockages and a high risk of collisions. Alternatively any entrance/exit off the already busy dual carriageway from Pride Pkwy/Hattow St would cause obstruction in a		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						bottle neck that already suffers severe congestion. **Match-Day Gridlock:** This existing daily congestion is heavily exacerbated on match days by Derby County Football Club and travelling supporters. Pride Parkway regularly reaches total gridlock. Introducing slow-moving, long vehicles into an area already suffering from HMO saturation and match-day traffic poses an unacceptable hazard to highway safety. **2. Direct Destruction of Environment and Loss of Landscape Buffer (Policy H12, Section f)** Policy H12 requires sites to provide a good quality of life for occupiers while *"minimising the impact on the amenity of nearby residents and the character of the local area."* **Established mature trees:** The required removal of established mature trees on this site to make way for hardstanding pitches explicitly violates this. These trees function as a critical		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						environmental, visual, and acoustic barrier between the Wilmorton residential community and the heavy traffic of Pride Parkway. The proposed site is a woodland area that's been established over 25yrs. **Destruction of footpaths:** The proposed layout requires taking up or heavily diverting well-used public footpaths crossing this green space. This path is a vital asset for community recreation and active travel. Enclosing or disrupting this right-of-way directly diminishes the residential amenity of established Wilmorton residents, conflicting with Section 4 of the policy. **4. Flood Risk Vulnerability (Policy H12, Section d)** Policy H12 states that *"due to the highly vulnerable nature of caravans and mobile homes, sites in Flood Zone 3 will not be supported."* Because parts of the River Derwent catchment carry high localized flood risks,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the Council must formally demonstrate via a site-specific Flood Risk Assessment (FRA) that this allocation will not displace floodwater or compromise the physical safety of highly vulnerable mobile homes.		
OR104 & C519	George Fletcher*	Paragraph 311	Objects	No	No	The only suitability criteria considered is that it is council owned land. However, most of the other 46 parks are also council owned.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	The Gypsy and Traveller Site Provision Topic Paper sets out how nearly 90 Council-owned sites were shortlisted to nine and appraised against the same criteria, including accessibility, contamination and environmental factors, not ownership alone. No change required.
OR153	Jim McCulloch	Paragraph 311	Objects		No	I am writing to submit a formal objection to the allocation of land west of Pride Parkway in Wilmorton for a 17-pitch Gypsy and Traveller site within the Regulation 19 Draft Local Plan. This representation argues that the current allocation fails the	The Wilmorton allocation is unsound, geographically over-concentrated within a 0.60 square kilometer bottleneck, short-sighted in light of LGR restructuring,	The Plan must meet the needs identified for its own area, and the Gypsy and Traveller Site Provision Topic Paper explains why this site, which can meet the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						test of soundness under national planning policy due to poor spatial distribution, conflict with local green protections, and a total failure to look ahead to the expanded infrastructure network created by the newly confirmed Local Government Reorganisation (LGR). The incorporation of precise spatial, demographic, and compounded public health metrics demonstrates that this allocation represents an unsustainable over-concentration that actively harms the health equity goals of both the settled and Traveller communities. The specific grounds for objection are outlined below: • **Unacceptable Monocultural Density South of the River Derwent:** The draft plan creates an artificial, single-use residential density by placing 100% of the city's permanent and newly proposed Gypsy and Traveller allocations south of the River Derwent. Derby's	and actively contradicts the Council's health equity mandates. I request that this allocation be removed from the final submission plan. A comprehensive, sequential assessment must be undertaken to relocate the 17-pitch requirement fairly to alternative locations north of the river, utilizing the superior health, transport, and land-use infrastructure within Chaddesden or Spondon to actively improve life outcomes for both the Traveller and settled communities.	full need with good access to services, was selected. Future local government reorganisation does not remove the need to plan for that need now. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						primary existing permanent provision is already established south of the river at Imari Park on Russell Street in Osmaston (17 permanent pitches). Squeezing this new 17-pitch site into the Wilmorton/Meadow Lane pocket forces all permanent pitches into a narrow geographic radius. When anchoring a boundary from Imari Park, across the proposed Wilmorton site, and down to New City Park (which contributes 40 established residential park home pitches), the entire target zone shrinks to a highly compact 0.45 to 0.60 square kilometers (roughly 45 to 60 hectares). Aggregating 100% of the city's permanent Gypsy and Traveller allocations into a corridor under 0.60 square kilometers creates an unsustainable monocultural footprint. This intense concentration places an unfair infrastructure burden on local schools, health services, and park networks in this specific sector of the city.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						• **Severe Institutional Imbalance Relative to Local Housing Stock:** The immediate, established residential block of Wilmorton (surrounding City Park Homes) consists of roughly 700 houses. Introducing a 17-pitch permanent Traveller allocation directly adjacent to this pocket—while a 40-pitch residential park estate (New City Park) and a 17-pitch permanent Gypsy/Traveller site (Imari Park) operate within a straight-line radius of less than 1 kilometer—radically skews the local housing mix. This clustering means that managed park homes and Traveller provisions will represent a disproportionately high ratio of total residential units within this 0.60 square kilometer pocket. This clear spatial clustering violates the core objective of the Planning Policy for Traveller Sites (PPTS), which requires that local authorities ensure layout sizes do not dominate the nearest settled community.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						• **Failure to Align with Local Government Reorganisation (LGR) Frameworks:** The current draft plan relies on an outdated spatial boundary. Following the Government's formal decision on July 16, 2026, Derby City Council and its neighbors are being abolished to form a unified Derbyshire South Unitary Authority. Under this expanded legislative and geographic footprint, the upcoming authority will encompass all of Derby, South Derbyshire, Erewash, and southern Amber Valley. It is structurally unsound to force a high-density allocation into a highly constrained 45-to-60 hectare city bottleneck. The incoming LGR boundary opens up a vast geographic area spanning hundreds of square kilometers and includes strategically linked development corridors that can accommodate these needs far more effectively and sustainably.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						• **Violating the Marmot Principles & Entrenching Compounded Health Inequalities:** Derby City Council is explicitly committed to the Marmot Place Framework to combat health disparities. Public health data indicates that the River Derwent acts as a distinct health boundary; the southern pockets (Alvaston, Osmaston, and Wilmorton) suffer a severe 9-year deficit in overall life expectancy and a low Healthy Life Expectancy (HLE) of just 54 to 57 years, leaving residents to navigate chronic illness decades too early. This local deficit critically compounds a severe national health crisis. Nationally, Gypsy and Traveller communities have a life expectancy 10 to 12 years lower than the general public, with an estimated baseline HLE bottleneck of just 40 to 45 years. Furthermore, 42% of this community suffers from long-term chronic illnesses—predominantly respiratory and cardiovascular diseases. Forcing 100% of the city's new and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						existing permanent allocations into a narrow, highly congested 0.60 square kilometer southern urban corridor—sandwiched directly between the heavy traffic air pollution of Pride Parkway and active rail networks—acts as an act of environmental injustice. It deliberately clusters a population highly susceptible to chronic respiratory failure into the precise geographic zone of Derby that features the worst baseline air quality and the most overburdened healthcare infrastructure. • **Securing Better Health Outcomes North of the River:** To deliver genuinely better health and life outcomes for future Traveller generations, allocations must be situated north of the River Derwent in wards like Chaddesden or Spondon. In these northern wards, the Healthy Life Expectancy climbs significantly to 64 to 68+ years, offering an extra 7 to 11 years of active, disease-free life. Relocating the site allocation north of the river		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						actively promotes better health outcomes by providing cleaner environmental baselines, resilient infrastructure and connectivity (via the A52, Raynesway, and the Chaddesden Mobility Hub), and unburdened primary care capacity that can offer preventative rather than reactive chronic condition treatment. • **Violation of Local Green Space (LGS) and Local Green Infrastructure Protections:** The proposed Wilmorton site directly encroaches upon land designated as protected Local Green Space (LGS) and vital Local Green Infrastructure buffers running through the Meadow Lane corridor toward Alvaston Park. This narrow green buffer is the only barrier preventing the 700-home Wilmorton residential zone from being entirely consumed by surrounding commercial expansion. Sacrificing these protected green assets for permanent development		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						undermines the core environmental sustainability objectives of the wider Local Plan.		
C546	Rachel Smith*	Paragraph 311	Objects	No	No	I am very concerned regarding the prpposal of a Gypsy site in Wilmorton. This will cause a negative environmental impact. Firstly cuttinh down trees when we should br planting them and the amount of extra cars in an already overcrowded area. It is also well documented that travellers dont look aftrr these aread. I am also very concerned that this will affect property prices in the area. I will have to leave if you proceed and I have lived here for 30 years.		Noted. Effects on property values and assumptions about the behaviour of future occupiers are not material planning considerations. Policy HA16 recognises the mature trees on the site and retains the remainder as accessible public open space with further planting, and access arrangements will be assessed at application stage. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
7. Economy								
C507	Community Campaigner David Barton	Paragraph 312	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic	Entirety of Document- Traditional Architecture will provide the greatest surge in economic growth whilst mitigating against concerns held by a majority of key stakeholders.	Noted. Design quality is secured through Policy GD1 and the Plan's other design and heritage policies, which respond to local character without prescribing a single architectural style. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						that can withstand local, regional, national and international pressures.		
C507	Community Campaigner David Barton	Paragraph 312	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-	Entirety of Document- Traditional Architecture blends perfectly with the natural and built environments alike and so is the preferred option to achieve all targets.	Noted. Design quality is secured through Policy GD1 and the Plan's other design and heritage policies, which respond to local character without prescribing a single architectural style. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.		
C507	Community Campaigner David Barton	Paragraph 312	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or	Entirety of Document- Traditional Architecture will see a surge in sustainable high quality investment opportunities that must be capitalised upon.	Noted. Design quality is secured through Policy GD1 and the Plan's other design and heritage policies, which respond to local character without prescribing a single architectural style. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.		
Policy E1: New Employment Locations								
OR169	Carney Sweeny on behalf of SmartParc Ltd*	Policy E1: New Employment Locations	Support		Yes	Our client is the landowner and developer of the SmartParc site, which has secured planning permission with development having been commenced on site. Plot 1 and Plot 8 have been completed and occupied, with development of Plot 9 and the Energy Centre also having been completed. Further reserved matters approvals have been secured for Plot 4 and Plot 6a demonstrating a commitment to the delivery of this site. Overall, our client is supportive of the principle to allocate the SmartParc site for employment uses under Policy E1 and Policy		Support welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						E6. It is noted that most of our previous representations to draft Policy E6 have been taken on board with the proposed uses reflecting the approved uses under planning permission: 23/00148/VAR.		
OR258	Pegasus Group on behalf of Infinity Park Derby LLP*	Policy E1: New Employment Locations	Object	No	No	Our client considers Policy E1 to be unsound because the amount and type of employment land is not justified by evidence, reasonable options for the scale of logistics employment and not been adequately tested in the Council's Sustainability Appraisal, and is inconsistent with National Planning Policy, specifically paragraph 32. An explanation of these points is set out below. **Justification for Scale and Type of Employment** Policy E1 states that:	The Council should update its Employment Land evidence to ensure that it takes appropriate account of market signals for logistics demand, and Policy E1: New Employment Locations should be modified to include the updated requirement for logistics B8 requirements.	The Economy Topic Paper explains that the Employment Land Review 2023 considered a range of forecasting methods and engaged with the market, and that the Plan meets the highest of its outputs, allocating 133ha against an indicative need of around 88.5ha; removing the B8 limit would not add land to the supply but would change the potential future use of land already allocated. The Sustainability Appraisal tested the spatial options with the same employment supply because no reasonable alternative sites capable of meeting the level of need suggested by

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						"In contributing to EMCCAs Vision for Growth, 133 hectares of new employment land is allocated in a variety of accessible locations to accommodate a range of employment generating activities, including offices (E(g)(i))) B2 and B8 development, research and development (E(g)(ii)) and other industrial processes (E(g)(iii))". Policy E1 continues: *"The majority of demand for new land will be met at five strategic employment locations including: (amongst other sites)* *b) Land South of Wilmore Road, including Infinity Park Derby (75ha) (see Policy E5)".* In terms of the amount and type of employment land, the Council relies upon a		Savills have been promoted. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						single report for its justification: Employment Land Review, Derby City Council and South Derbyshire District Council Final Report October 2023. (ELR 2023). Our client has commissioned specialist employment advice from Savills which is appended to this representation which is in two parts: Logistics Needs Assessment Prepared for Infinity Park Derby LLP June 2025 (LNA 2025) Appendix B to representation. Addendum Update to 2025 Logistics Need Assessment August 2026" (*Employment Addendum 2026*). Appendix C to this representation Section 2 of the LNA 2025 outlines that the Council's ELR 2023 has not sufficiently considered relevant market signals. The LNA 2025 notes that (particularly post-COVID),		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						market trends have shifted substantially online, meaning that the reliance placed by the Council's evidence base on backward-looking methods for establishing logistics demand are likely to underestimate the need for logistics floorspace. It should also be noted that, local authorities surrounding Derby City and South Derbyshire have undertaken independent assessments that focus on logistics supply and demand, including (1) Bolsover, Chesterfield and North East Derbyshire HMA authorities; (2) Greater Nottinghamshire Core and Outer HMA authorities; and (3) Leicestershire and Leicester FEMA authorities. They undertook their own more detailed logistics studies to understand the demand for strategic warehousing and logistics facilities within their study		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						areas given that the authorities are located within the wider 'Golden Triangle' for logistics. Although Derby and Derbyshire are also within the wider 'Golden Triangle' there is no such detailed study or understanding of the strategic logistics need within this HMA (or within the Derby Functional Economic Market Area, which overlaps the Greater Nottinghamshire and Leicestershire authorities). The Employment Addendum 2026 states that there does not appear to be any Council evidence that demonstrates the need or the rationale for a fixed 50% cap on B8 floorspace. The number appears to be arbitrary and unsupported by evidence. The Employment Addendum 2026 also points out that the evidence base underpinning both the adopted and emerging local		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						plans lacks quantitative justification for limiting B8 development. The lack of evidence is unusual because most local authority evidence bases explicitly distinguish between the market dynamics for B2 and B8 uses. The need for this detailed analysis is more important where councils introduce policies that impact the balance between the two uses. The Employment Addendum 2026 points out that where the Council's employment forecasts distinguish between manufacturing (B2) and logistics (B8), they indicate negative demand for B2 floorspace. For the reasons set out above, the Council's evidence conflicts with paragraph 32 of the 2024 NPPF as it relies on methodologies which do not take sufficient account of market signals. For context it should be noted		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						that 2026 NPPF Policy E1 1 (a) maintains the requirement to take account of market signals, confirming this is an established policy direction of Government. The Council's evidence on logistics is flawed and is likely to underestimate the need for employment land for logistics purposes. The proposed Policy E1: New Employment Locations is therefore not justified. **Testing of Reasonable Alternatives through Sustainability Appraisal** Our client considers that, had the Council carried out a robust assessment of the need for logistics uses, this would have identified other reasonable alternatives that would require assessment through the Council's Sustainability Appraisal. Our client considers that the Council has not met its		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						duties under the SEA Regulations to test reasonable alternatives.		
OR267	Planning and Design Group on behalf of Wheeldon Brothers*	Policy E1: New Employment Locations	Object	Yes	No	The Plan is considered unsound insofar as it excludes the contained western frontage of Land East of Sir Frank Whittle Road from the employment strategy and retains the whole site within the Green Wedge without a proportionate assessment of the frontage-focused alternative now promoted. The detailed reasons are set out in the enclosed representation. In summary, the omission is not justified by the Sustainability Appraisal or Green Wedge Review, does not adequately address the qualitative need for smaller local employment sites and treats ecological, heritage, contamination and access matters as barriers without evidence that they are incapable of mitigation.	The modifications sought are set out in full under "Suggested Modifications" in the enclosed representation. Modify Policy E1 and the Policies Map to allocate the western frontage of Land East of Sir Frank Whittle Way, between the A61 and the Great Northern Greenway, for employment-led commercial development. The allocation should support smaller local industrial and employment units and complementary mixed commercial and roadside retail uses, subject to criteria addressing landscape containment, ecology	The Regulation 18 representation referred to a reduced, frontage-only site but included no plan, so no revised site area could be assessed, and the Green Wedge Review assessed the area previously identified, as explained in the Economy Topic Paper. With 133ha allocated against an indicative need of around 88.5ha, there is no identified need to release further Green Wedge land for employment. There are also other technical / policy reasons for not allocating the site, as detailed in the Economy Topic Paper. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							and BNG, heritage and archaeology, access, drainage and design. Modify Policy EN6 and the Policies Map so that only the allocated western frontage is removed from the Chaddesden/Derwent Industrial Area Green Wedge, with the Greenway forming its eastern boundary and the wider land east of the Greenway remaining protected as Green Wedge.	
Policy E2: Existing Employment Locations								
OR168	Rapleys LLP on behalf of Lidl GB Ltd	Policy E2: Existing Employment Locations	Object	No	No	Draft Policy E2 sets out a series of criteria for when it may be appropriate to redevelop existing or proposed employment land, or employment buildings, for alternative uses. It is Lidl's view that greater flexibility should be incorporated into these criteria, particularly in	In order to be considered sound, Lidl proposes that the wording of Draft Policy E2 is amended to all confirm that all Class E uses should be explicitly supported within existing employment locations.	Policy E2 safeguards existing employment areas for office, B2 and B8 uses, which sit outside Class E, because a blanket acceptance of all Class E uses could displace employment uses and undermine the town centre strategy, as explained in the Economy Topic Paper. The

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						respect of the types of uses that may be supported within safeguarded and allocated employment sites. The approach taken must be consistent with national planning reforms that have deliberately broadened the definition of employment generating uses through the introduction of Use Class E (Commercial, Business and Service) in September 2020. The Government's intention in creating Class E is clear: a wide range of commercial, business and service activities are now recognised as employment generating economic uses, many of which can deliver equal or greater economic benefits than traditional Class B uses. Class E uses typically support high levels of job creation, provide accessible local services, and contribute positively to economic resilience. There is		policy's criteria already allow alternative uses where they are justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						therefore a logical and policy consistent basis for grouping Class E uses alongside Class B uses within employment locations. Lidl stores typically generate around 40 full-time equivalent jobs, all paid at or above the Living Wage Foundation rate for eligible employees, and without the use of zero hour contracts. This represents a significant and reliable contribution to local employment. In many cases, the level of job creation associated with a Lidl store exceeds that of a comparable Class B floorspace. Lidl's operational model also supports training, career progression and long-term employment opportunities within the local area. On this basis, Lidl considers that all Class E uses should be explicitly supported within existing employment		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						locations, recognising their economic contribution, alignment with national policy direction, and ability to deliver high-quality employment opportunities. A more flexible and inclusive approach to employment land policy would ensure that safeguarded sites can respond to modern economic needs, support investment, and accommodate a broader range of employment generating uses.		
Policy E3: Local Labour Agreements								
C510	Marsha Ramroop Unheard Voice Consultancy Ltd*	Policy E3: Local Labour Agreements	Support	Yes	No	Policy E3 is one of the most powerful equity levers in the plan, and its supporting text makes my argument for me: paragraph 327 states plainly that Local Labour Agreements are 'an important mechanism for addressing health inequalities', and paragraphs 329 and 330 identify the priority cohorts, young people not in	• Specify in Policy E3 that Local Labour Agreements and Section 106 heads of terms should include targeted recruitment and skills pathways from the city's most deprived wards and the priority cohorts named at paragraph 329, developed with Derby College, the	Support welcomed. The detailed content of Local Labour Agreements, including the priority cohorts identified in paragraph 329, is best agreed scheme by scheme with the Council's Employment and Skills team rather than prescribed in policy. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						education or employment, people with SEND and learning disabilities, and care leavers, alongside the Council's Employment and Skills team already coordinating recruitment pipelines into inclusive jobs. This is exactly right, and I strongly support it. The modification I seek is to carry that ambition from the supporting text into the operative policy, and to extend it from labour into supply chains. Development on the scale this plan proposes will generate two decades of contracts, jobs and training places; Table 1 records that 45 of Derby's 151 LSOAs are among England's most income-deprived 20% and that there is a gap between the wages of jobs in the city and the incomes of its residents. Procurement shapes markets: without explicit commitments, supply chain spend defaults to established, larger	University of Derby and community organisations. • Include apprenticeship and employment commitments monitored and reported by ethnicity, sex, disability and age, so that 'local labour' demonstrably includes the whole of the local labour force. The Appendix 1 indicator for E3 currently counts only the number of agreements signed; it should also capture who benefits from them. • Include supply chain commitments to local SMEs, explicitly including underrepresented and diverse-owned businesses, with spend transparently	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						contractors, and skills routes default to those already closest to opportunity. A policy whose equality purpose lives only in supporting text is vulnerable to being negotiated away scheme by scheme.	reported. This retains wealth in Derby's communities and builds the resilient, diversified business base the Economy chapter seeks.	
OR258	Pegasus Group on behalf of Infinity Park Derby LLP*	Policy E3: Local Labour Agreements	Object	Yes	No	Policy E3: Local Labour Agreements states: *"Where appropriate, applicants proposing major development will be encouraged to enter into a 'Local Labour Agreement' with the Council to ensure that local people are given the opportunity to work and develop their skills" (emphasis added)* The use of the phrase 'where appropriate ' lacks clarity and it is unclear how a decision maker on a development proposal should apply Policy E3. The Policy is therefore not effective and is inconsistent with NPPF policy 16 of the 2024 NPPF. Policy E3 should therefore be	The use of the phrase 'where appropriate ' lacks clarity and it is unclear how a decision maker on a development proposal should apply Policy E3. The Policy is therefore not effective and is inconstant with NPPF policy 16 of the 2024 NPPF. Policy E3 should therefore be modified to clearly explain the circumstances in which the Policy should be applied.	Policy E3 applies to major development, and 'where appropriate' allows the Council to apply it proportionately to the nature of each scheme, as explained in the Economy Topic Paper. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						modified to clearly explain the circumstances in which the Policy should be applied.		
Policy E4: Office Development								
No representations were received for this policy.								
Policy E5: Land South of Wilmore Road (Infinity Park)								
OR36	Derby Climate Coalition	Policy E5: Land South of Wilmore Road (Infinity Park)	Support		Yes	We support the addition of points j) and k) regarding active travel.		Support welcomed.
OR258	Pegasus Group on behalf of Infinity Park Derby LLP*	Policy E5: Land South of Wilmore Road (Infinity Park)	Object	Yes	No	Our client supports the principle of allocating land at Land South of Wilmore Road (Infinity Park) for employment uses, as the site is in a suitable location, and is fundamental to ensuring that employment land needs of Derby City are met. However, our client strongly objects to Policy E5: criterion C which states: *[The Council will] "limit the amount of B8 development across the whole site to 50% of overall floorspace,*	Policy E5 should be modified to delete criterion C, as the requirement is not justified by evidence, is inconsistent with the 2024 NPPF and 2026 NPPF, and poses a risk to the deliverability of the allocation. Policy E5 f) should be separately articulated for various policy requirement contained in this	The Economy Topic Paper explains why the 50% limit on B8 floorspace is justified: Infinity Park Derby forms part of the East Midlands Investment Zone and is identified for advanced manufacturing and clean energy, the wider Derby market is already well supplied with large logistics space, and the Avison Young market assessment identifies weaker recent take-up of large logistics units. The limit carries

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						excluding complementary uses" *Paragraph 346 of the draft Plan states:* *"To align with the objectives and to safeguard the nationally significant potential of the site, the Council will not permit more than 50% of the overall floorspace (excluding complementary uses) to be used for logistics (B8)."* Our client considers that the above restriction is not justified by evidence and is unnecessary for the Council to achieve the stated objectives of the Local Plan. **Evidence** Our client has commissioned specialist employment advice from Savills which is appended to this representation which is in two parts: Logistics Needs Assessment Prepared for Infinity Park Derby LLP June 2025 (LNA 2025) Appendix B to	criterion and the reference to residential amenity should be removed as this is not justified. Policy E5 f) b) to d) should be deleted as they are not justified.	forward adopted Policy AC15, does not reduce the overall employment land supply, and criterion (f) is considered sufficiently clear to apply. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						representation. Addendum Update to 2025 Logistics Need Assessment August 2026" (*Employment Addendum 2026*). Appendix C to this representation Section 2 of the LNA 2025 outlines that the Council's ELR 2023 has not considered relevant market signals and it is considered that it underestimates the current and future demand for logistics land. The LNA 2025 notes that (particularly post-COVID), market trends have shifted substantially online, meaning that the reliance placed by the Council's evidence base on backward-looking methods for establishing logistics demand substantially underestimate the true level of demand. The Council's employment land evidence conflicts with paragraph 32 of the NPPF as it relies on methodologies		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						which do not take sufficient account of market signals. For context it should be noted that 2026 NPPF Policy E1 1 (a) maintains the requirement to take account of market signals, confirming this is an established policy direction of Government. The Council's evidence on logistics is therefore flawed. The Employment Addendum 2026 includes a review of the Council's evidence base in the context of 2024 and 2026 national planning policy. Employment Addendum 2026 finds that that neither the policy framework nor the evidence base provide a clear quantitative justification for limiting B8 development to 50% of total floorspace of site allocation Policy E5. The restriction is also inconsistent with market signals, occupier requirements and the way		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						that modern industrial occupiers actually operate. The 2026 NPPF recognises that Development Plan policy needs to take account of way modern industrial markets operate, and Policy E1 (2) states: "Given changing commercial property requirements, development plans should not be overly prescriptive about the types of uses or unit sizes that would be acceptable on particular sites (other than where there is a clear and justified rationale for being specific about acceptable uses at the plan-making stage)". Employment Addendum 2026, Section 3 finds limited analysis undertaken by the Council which distinguishes between demand for B2 and B8 uses and no evidence that demonstrates why a 50% cap is required. Where the Council's		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						evidence does distinguish between manufacturing and logistics demand (ELR 2023 Appendix 14), the forecasts indicate negative demand for manufacturing floorspace and more favourable demand for logistics floorspace. Savills experience and research also demonstrates that the distinction between B2 and B8 uses is becoming increasingly blurred in the I&L sector. Modern industrial occupiers increasingly co locate manufacturing, assembly, storage, fulfilment and distribution functions. Across a range of sectors, logistics facilities perform a critical role in supporting manufacturing activity through the storage of raw materials, inventory management, freight consolidation and the distribution of finished products. The policy approach of the Council treats B2 and B8 uses as		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						separate, isolated functions that do not reflect how contemporary supply chains are structured. The market assessment shows that demand for industrial and logistics floorspace remains strong across Derby and the wider market area, with availability rates indicating ongoing supply constraints. Occupiers continue to compete for a limited amount of available stock and the market is constrained by supply rather than a lack of demand. It should be noted that our client is very willing to deliver advanced manufacturing uses (and always have been). The fact that such uses have not been taken forward is a reflection of the lack of demand for such uses on this site, rather than a preference for B8 uses on		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the site from our client. In conclusion, the specific percentage restriction of B8 uses set out in Policy E5: criterion c is not justified by the Council's evidence. Furthermore, the Council's evidence uses a methodology which is at odds with NPPF paragraph 32 as it does not take sufficient account of market signals. **Policy Effectiveness** Policy E5 criterion f) a) refers to both biodiversity resources, rights of way and amenity of nearby residential areas. The content with disparate policy areas within a single criterion makes the criterion difficult to interpret and also to make an assessment as to whether the policy requirement are met. The policy is not effective and not consistent with NPPF paragraph 16 as it is not clear how a decision maker		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						should react to a development proposal. The reference to residential amenity is not justified as the site is not close to residential property. **Justification for Landscaping Requirements** Policy E5 criterion f) b) to d) set out various landscaping requirements, but which do not feature within the planning permission granted for the site. Development is therefore demonstrably acceptable without these additional landscaping elements, there is no justification for including these specific requirements.		
Policy E6: SmartParc, Spondon								
OR169	Carney Sweeny on behalf of SmartParc Ltd*	Policy E6: SmartParc, Spondon	Support		Yes	Our client is the landowner and developer of the SmartParc site, which has secured planning permission with development having been commenced on site. Plot 1 and Plot 8 have been	Our proposed deletion/s to draft Policy E6 is shown in red text below: *Amendment to Draft Policy E6:* *The former Celanese*	Support welcomed. The reference to 'where justified' allows the Council to consider any future changes to the range of uses beyond those already permitted under application

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						completed and occupied, with development of Plot 9 and the Energy Centre also having been completed. Further reserved matters approvals have been secured for Plot 4 and Plot 6a demonstrating a commitment to the delivery of this site. Overall, our client is supportive of the principle to allocate the SmartParc site for employment uses under Policy E1 and Policy E6. It is noted that most of our previous representations to draft Policy E6 have been taken on board with the proposed uses reflecting the approved uses under planning permission: 23/00148/VAR. One comment which has not been taken into account is the reference to 'where justified' in the policy wording. It is unclear what	*Acetate site in Spondon, known as SmartParc is identified for ongoing redevelopment associated with research, production, distribution, training and education related to the food and drink industry.* *Redevelopment of the SmartParc site, as identified on the Policies Map, will continue to be supported, including the development of new manufacturing (B2), storage and distribution (B8) uses, associated Use Class E and Class F1 uses and other ancillary uses ~~where justified~~. New office development (E(g)(i)) will be supported where it meets the provisions of Policy E4, including*	23/00148/VAR. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						justification the LPA would be seeking as proposed uses, including ancillary uses are already permitted under planning permission reference: 23/00148/VAR. The reference to 'where justified' should therefore be removed from the policy wording as the principle of the proposed uses has already been established through the grant of planning permission.	*sequential assessment.* *Proposals for supporting energy generation / waste disposal and / or decentralised green energy production will also be supported where they would serve businesses on site and / or form part of a wider network.* *Any uses that would undermine the primary function of the SmartParc site, associated with the food and drink industry, will be resisted.*	
OR266	Fisher German on behalf of Bloor Homes	Policy E6: SmartParc, Spondon	Support	Yes	Yes	The continued identification of SmartParc, Spondon for strategic employment growth is supported. This should be supported with commensurate residential development within Spondon, highlighting the		Support welcomed. Residential development in Spondon is addressed through the housing allocations, including Policy HA7.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						integral sustainability of the Spondon suburb offering high quality living and working opportunities.		
Policy E7: Indurent Park								
No representations were received for this policy.								
Policy E8: Rolls-Royce Operations								
No representations were received for this policy.								
Policy E9: Defined Centres								
OR229	Lichfields on behalf of Derbion*	Policy E9: Defined Centres	Object		No	Derbion does not consider the policy to be sound. Policy E9 defines the hierarchy of centres, with the City Centre, as identified by Policy CC2, being the sequentially preferable location for main town centre uses. The PSA, defined in Policy CC8, is to be the focus for new retail. The Policy also confirms that the City Centre will be a focus for commerce, culture, leisure and the visitor economy, and the CAA will be a focus for new office development (Class	The CAA boundary should be further extended to include Bradshaw Way and Riverside Car Park and recognise that the sites are entirely suitable locations for a range of commercial activities or new office development. An expanded CAA which incorporates both sites will help the plan capitalise on Derby's regeneration potential. Subject to	The Central Activity Area is drawn to concentrate office and leisure investment in the core of the City Centre and avoid diluting its vitality, as explained in the Economy Topic Paper. Bradshaw Way and Riverside Car Park lie within the wider City Centre, which remains the sequentially preferable location for food, drink and leisure uses under Policy E9. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						E(g)(i)) under policies E4 and CC7. The Policy states that new food, drink, and leisure uses will be directed to the City Centre as a whole, but specifically encouraged to the CAA in the first instance. *Policy Consideration* The inclusion of Derbion in the PSA and CAA is supported; however we object to Derbion's other sites including Bradshaw Way and Riverside not being included within the CAA. The Policy specifically seeks to focus office development and new food, drink, and leisure uses to the CAA and the drafting has the effect that such uses outside of the CAA would garner less support in policy terms. *Tests of Soundness* Positively prepared – Derbion's sites at Bradshaw Way and Riverside Car Park are not included within the CAA boundary despite being in a highly accessible and	this amendment, the Defined Centres policy would be acceptable.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						sustainable location. The policy does not recognise the sites' suitability to accommodate a range of commercial, office and food/drink/leisure uses.		
Policy E10: Main Town Centre Uses Outside of Centres								
OR168	Rapleys LLP on behalf of Lidl GB Ltd	Policy E10: Main Town Centre Uses Outside of Centres	Object	No	No	As currently drafted, Policy E10 proposes a locally set retail impact threshold requiring a Retail Impact Assessment for all retail and leisure proposals over 280 sq m (net) located outside defined centres. Over the past 10–20 years, the food retail sector has undergone a significant structural shift. The majority of convenience shopping is now undertaken in mid- to large format foodstores, many of which operate successfully in edge- or out-of-centre locations. These formats are typically unsuited to central locations due to their operational requirements, parking needs, and catchment driven	In the absence of clear evidence supporting the 280 sq m threshold, we consider that a higher, more proportionate threshold, such as 2,500 sq m, would better reflect modern food retail formats, align with national guidance, and ensure that policy requirements remain justified and effective.	The 280 sq m threshold is based on the recommendations of the Retail and Centres Study (Lambert Smith Hampton, 2026), which sets out its rationale at paragraphs 511 to 517, including the absence of any projected need for new retail floorspace, which makes trade diversion from existing centres more likely. The threshold triggers a proportionate assessment rather than a presumption against development. Further information on this point is included in the Economy Topic Paper. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						shopping patterns. As a result, the primary trade draw effects of new foodstore development tend to fall on existing edge- or out-of-centre facilities, rather than on retailers trading within defined town centres. It is essential that food retail requirements align with wider policy objectives to ensure that local communities have convenient access to affordable foodstore provision close to where they live and work. A proportionate and locally responsive impact threshold is therefore important to support sustainable patterns of development, reduce the need to travel, and maintain a competitive and accessible food retail offer for residents. Given this context, the risk of significant adverse impacts arising from a new		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						foodstore of below 2,500 sq m in an edge- or out-of-centre location is generally considered low. A threshold of 2,500 sq m would provide an appropriate safeguard against larger format schemes with greater potential to affect town centre vitality and viability, while ensuring that smaller, well-located proposals are not subject to disproportionate policy hurdles. We understand that the proposed locally set threshold of 280 sq m net is drawn from the Council's Retail & Centres Study (July 2026). However, having reviewed the Study, we are unclear how the evidence justifies a threshold as low as 280 sq m. The published material does not set out an impact based rationale for selecting this figure, nor does it demonstrate that proposals of this scale pose a realistic risk of significant		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						adverse impacts on Derby's defined centres.		
Policy E11: Tourism and Culture								
OR36	Derby Climate Coalition	Policy E11: Tourism and Culture	Support	Yes	Yes	We strongly support the addition of point i) regarding access.		Support welcomed.
OR162	Historic England	Policy E11: Tourism and Culture	Support			Policy E11: Tourism and Culture	Support	Support welcomed.
OR20	Theatres Trust	Policy E11: Tourism and Culture	Support	Yes	Yes	We welcome the plan's support for cultural facilities, which is consistent with both the current and previous versions of the NPPF.		Support welcomed.
Policy E12: Managing the Proliferation of Specific In-Centre Uses								
No representations were received for this policy.								

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
8. Natural Environment								
C507	Community Campaigner David Barton	Paragraph 408	Object	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be	Entirety of Document- Authentic Traditional Architecture will confer the greatest complementary support for nature and surrounding ecosystems.	Noted. Design quality is secured through Policy GD1 and the Plan's other design and heritage policies, which respond to local character without prescribing a single architectural style. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.		
Policy EN1: Green and Blue Infrastructure								
OR36	Derby Climate Coalition	Policy EN1: Green and Blue Infrastructure	Objects	Yes	No	Generally support, but the addition of a couple of “where possible” weakens this policy compared with the Reg 18 draft.	Delete "where possible" and revert to Reg18 Draft wording.	The 'where possible' wording in criteria (c) and (f) allows the policy to be applied proportionately on

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and they should be deleted.		constrained sites, such as brownfield sites in the City Centre, while still requiring green and blue infrastructure to be considered from the outset. Policy EN1 continues to safeguard the green and blue infrastructure network and resists loss or harm unless the need for and benefits of development clearly outweigh the impacts. No change required.
C537	Rob Hoddinott	Policy EN1: Green and Blue Infrastructure	Object	No	No	" Proposals which cause loss or harm to the green and blue infrastructure network will not be supported unless the need for, and the benefits of the development clearly outweigh any adverse impacts." The assessment for HA16 is flawed as it ignores the depravity index issues in the location so that the site can be put forward. Other brownfield sites have not been	Use brownfield sites.	No brownfield or other sites were promoted for Gypsy and Traveller use, so the Council assessed nearly 90 of its own sites, as set out in the Gypsy and Traveller Site Provision Topic Paper. Policy HA16 retains the land beyond the fenced pitches as accessible

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						demonstrated as being assessed to the public.		public open space, to be improved with further planting. No change required.
OR128	Home Builders Federation*	Policy EN1: Green and Blue Infrastructure	Object		No	*Policy EN1 is not considered to be sound as it is not effective, justified, or consistent with national policy* It is unclear from this policy is how the level of urban greening that would be required through the use of the Urban Greening Factor relates to the statutory national requirement 10% Biodiversity Net Gain (BNG). There would appear to be the potential for significant overlap with BNG that will need to be explored to ensure that the Council is not creating unnecessary administrative burdens on all applicants. If the Council were to take forward the use of the Urban Greening Factor, HBF would suggest that it is not a requirement on all major sites. For example, some medium size sites or sites near existing open spaces might be encouraged		Paragraph 420 explains how the Urban Greening Factor and statutory Biodiversity Net Gain work together, including that urban greening provided on site will contribute to the 10% requirement. The scores apply only to major development and only 'where viable', and the policy already refers to the Derbyshire Local Nature Recovery Strategy at criterion (b) and paragraph 414. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						but not required to use the urban greening factor to inform the design. It would also seem inappropriate to require its use where specific provision has been agreed as part of a site allocation. The Plan will also need to clearly set out UGF relates to the wider BNG and LNRS objectives.		
OR229	Lichfields on behalf of Derbion*	Policy EN1: Green and Blue Infrastructure	Object		No	Policy EN1 outlines the approach to safeguarding, enhancing and providing new green and blue infrastructure. This includes an expectation for development proposals. Major development proposals are expected to demonstrate that the feasibility of integrating and maintaining these has been fully investigated. The policy further requires all major development proposals. *Policy Consideration* Derbion objects to the current policy drafting which requires to maximise the use of green roofs and walls and to provide an Urban Greening Factor ('UGF') score of at least 0.3 for mixed-use or commercial development	The Policy wording should be amended to recognise situations where proposals cannot meet the stated UGF targets and therefore allow for robust, site-specific evidence to be submitted to demonstrate that this cannot reasonably be achieved and that a lower score would be acceptable. This would ensure that greening objectives are pursued wherever feasible while avoiding a rigid approach that could	The Urban Greening Factor scores already apply only 'where viable', so a lower score can be accepted where site-specific evidence shows that the target cannot viably be met, which is the outcome the suggested wording seeks. This reflects the Viability Topic Paper's conclusion that site-specific viability should continue to be considered where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and 0.4 for residential sites. While Derbion supports the principle of promoting further urban greening in new development and wider national policy trends, it is essential that Policy EN1 retains flexibility to ensure these requirements do not act to stifle development from coming forward because of viability issues. *Tests of Soundness* Justified – The application of a fixed UGF target to all sites risks being overly rigid and does not consider whether any Site-specific constraints (including existing built form, site configuration, or viability) may make the delivery unachievable.	compromise deliverability. *"Where viable, all major development must maximise the provision of on-site green infrastructure by providing:* *an Urban Greening Factor score of at least 0.5 for residential development on greenfield sites* *an Urban Greening Factor score of at least 0.4 for residential development* *an Urban Greening Factor score of at least 0.3 for mixed-use or commercial development Where it can be demonstrated through robust Site-specific evidence that these requirements are unviable, a lower threshold will be permitted."*	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR227	Lichfields on behalf of Derby Station Quarter Board	Policy EN1: Green and Blue Infrastructure	Support		Yes	Policy EN1 sets out the Council's strategy for the protection, enhancement and delivery of green and blue infrastructure, including minimum Urban Greening Factor (UGF) thresholds for new development. In our Regulation 18 representations, the Derby Station Quarter Board supported the objective of increasing urban greening, but recommended that the policy be applied with an appropriate degree of flexibility, so that the requirements did not inadvertently constrain otherwise sustainable development on viability grounds, particularly on constrained city centre brownfield sites. We welcome the introduction of “where possible” and “where viable” caveats throughout Policy EN1 since the Regulation 18 Draft, consistent with the flexibility we previously requested. We consider that this approach appropriately balances the Council's		Support welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						ambitions for urban greening with the need to ensure that policy requirements do not undermine the deliverability of development on constrained brownfield sites, including within the Station Quarter. We consider Policy EN1 to be sound and have no further comments to raise.		
OR258	Pegasus Group on behalf of Infinity Park Derby LLP*	Policy EN1: Green and Blue Infrastructure	Objects	Yes	No	The policy includes reference in criterion c) to providing and enhancing natural connections to the surrounding GI network using features such as existing planting, trees, groups of trees, wetland, hedgerows and opportunities for wild food foraging for animals as the key starting point for green infrastructure proposals, and retain, reinforce and embed them into the design of the development. Whilst this is supported in principle, there will be occasions where existing planting, trees or hedgerows need to be removed to achieve safe access to a site or good design. It is important that Draft Policy	Policy EN1: Green & Blue Infrastructure should be modified to ensure the Policy is effective in the following respects: include wording 'where possible' is added to the end of criterion c) to ensure the policy is effective. set out circumstances such as for construction or energy uses where green roofs may not be appropriate set out how the urban green will operate alongside	Criterion (c) already begins 'Where possible', which provides the flexibility sought, and criterion (d) asks major development to investigate the feasibility of green roofs and walls rather than to provide them in every case, so structural, operational and solar energy considerations can be taken into account. Paragraph 420 explains how the Urban Greening Factor works alongside statutory Biodiversity Net Gain,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						EN1 includes some flexibility and recognises that whilst existing features will provide a starting point for design decisions, it may not always be possible or appropriate to retain all existing features. It is suggested that an addition of the wording 'where possible' is added to the end of criterion c). Policy EN9: Trees and Hedgerows also deals with existing trees and hedgerows (another example of duplication between policies) and starts with "Where possible existing trees should be retained in new developments" and then states "where appropriate" in relation to hedgerows. The proposed addition of "where possible" to policy EN1 would therefore be consistent with this later policy. **Maximising Green Roofs** The policy includes reference to criterion d) whereby major development proposals will be expected to maximise the use of green roofs and walls and	statutory Biodiversity Net Gain.	and the scores apply only 'where viable'. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						demonstrate that the feasibility of integrating and maintaining these measures has been fully investigated. Green roofs on employment buildings are installed at the expense of openings for natural light (which goes against the energy hierarchy and reducing energy demand as part of the design) and adds significant weight requiring structural reinforcement resulting in high installation costs and the need for expensive, ongoing maintenance to ensure there are no water leakages or fire hazard. Some occupiers do not want green roofs due to operational reasons. It should also be noted that there is an opportunity cost for green roofs as it prevents the possibility of installing solar panels which play an important part in meeting energy needs, reducing carbon emissions and mitigating climate change. The policy therefore needs to be flexible to consider these implications and also this		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						requirement will need to be tested through the Local Plan viability appraisal to ensure it is justified and positively prepared. **Urban Greening Factor** Draft Policy EN1 also requires all major development to maximise the provision of on-site green infrastructure and, where viable, for mixed-use or commercial development to provide an Urban Greening Factor score of at least 0.3. Whilst the principle of urban greening is supported and greenfield development provides good opportunities for the surface cover types required to meet the standard (such as natural/semi-natural vegetation, street trees, SuDs and hedgerows), the key concern about this policy requirement is how it will interact with the need for efficient use of land and a 10% biodiversity net gain on a site. The full implications of this		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						proposed policy are not well understood as this is not a policy requirement we have previously encountered. It is unclear from the consultation documents what evidence there is to justify this policy or whether the implications have been assessed from a practical and viability perspective. It is suggested that the Council consider some worked examples to understand the implications of this additional policy requirement and it will be important this requirement is considered as part of the Whole Plan Viability Assessment.		
OR256	Pegasus Group on behalf of Miller Homes, William Davis and Miller Gadsby (Heatherton) Ltd*	Policy EN1: Green and Blue Infrastructure	Objects	Yes	No	Retention of Existing Features The policy includes reference in criteria c) to providing and enhancing natural connections to the surrounding GI network using features such as existing planting, trees, groups of trees, wetland, hedgerows and opportunities for wild food foraging for animals as the key starting point for green infrastructure proposals, and retain, reinforce and embed	Amend Policy EN1 criterion c) to require the retention, reinforcement and integration of existing natural features 'where possible' to ensure consistency with Policy EN9 and practical deliverability.	Criterion (c) already begins with 'Where possible', so the flexibility sought is already provided and the policy is consistent with Policy EN9. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						them into the design of the development. Whilst this is supported in principle, there will be occasions where existing planting, trees or hedgerows need to be removed to achieve safe access to a site or good design. It is important that Policy EN1 includes some flexibility and recognises that whilst existing features will provide a starting point for design decisions, it may not always be possible or appropriate to retain all existing features. It is suggested that an addition of the wording 'where possible' is added to the end of criteria c). Policy EN9: Trees and Hedgerows also deals with existing trees and hedgerows (another example of duplication between policies) and starts with 'Where possible, existing trees should be retained in new developments' and states 'where appropriate' in relation to hedgerows, and therefore the proposed addition of		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						'where possible' to Policy EN1 would be consistent with this later policy.		
OR256	Pegasus Group on behalf of Miller Homes, William Davis and Miller Gadsby (Heatherton) Ltd*	Policy EN1: Green and Blue Infrastructure	Objects	Yes	No	Urban Greening Factor Policy EN1 also requires all major development to maximise the provision of on-site green infrastructure and, where viable, for residential development on greenfield land to provide an Urban Greening Factor score of at least 0.5. Whilst the principle of urban greening is supported and greenfield development provides good opportunities for the surface cover types required to meet the standard (such as natural/semi-natural vegetation, street trees, SuDs and hedgerows), the key concern about this policy requirement is how it will interact with the need for efficient use of land and a 10% biodiversity net gain on a site. The full implications of this proposed policy are not well understood as this is not a	Reduce the residential greenfield Urban Greening Factor requirement to 0.4 unless the Council can evidence that 0.5 is locally justified, viable and compatible with housing delivery, biodiversity net gain and efficient land use.	Natural England's guidance includes a score of 0.5 for greenfield residential development where appropriate, and the Plan applies it only 'where viable', which the representation supports. Paragraph 420 explains that urban greening provided on site will contribute to the 10% Biodiversity Net Gain requirement, so the two requirements work together. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						policy requirement we have previously encountered. It is unclear from the consultation documents what evidence there is to justify this policy or whether the implications have been assessed from a practical and viability perspective. It is suggested that the Council consider some worked examples to understand the implications of this additional policy requirement and it will be important this requirement is considered as part of the Whole Plan Viability Assessment. The proposed caveat of 'where viable' is supported. We note that the Natural England standards are for major residential development to meet a National Urban Greening Factor of at least 0.4. It only states 0.5, where appropriate, for residential greenfield development. It does not appear that any work has been undertaken to establish whether this would be appropriate in the Derby context in light of other policy		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						requirements, and therefore this is unjustified. The policy is not justified as the Council has not demonstrated why 0.5 rather than 0.4 is locally necessary.		
C510	Marsha Ramroop Unheard Voice Consultancy Ltd*	Policy EN1: Green and Blue Infrastructure	Objects	Yes	No	This Regulation 19 draft deserves credit for its honesty. Paragraph 6 now acknowledges that 'spatial inequalities persist in regard to the accessibility of green spaces, transport links, and environmental quality'; paragraph 17 acknowledges that deprivation is uneven across the city; and paragraph 430 states plainly that 'access to high quality public open space is not evenly distributed', with paragraph 432 recording the contrast found by the Council's own Open Space Study. I welcome these admissions unreservedly, alongside the protection of Green Wedges and the ambition for a connected green and blue network. The gap is that no operative policy acts on them. Having established that access is unequal, the plan sets no requirement to assess provision	Amend Policy EN1 or EN3 to require assessment of accessible green space provision against the Appendix 5 standards, disaggregated by ward-level deprivation, and to prioritise green infrastructure investment and developer contributions where access and health outcomes are poorest, giving policy effect to the plan's own findings at paragraphs 6, 430 and 432. • Where Green Wedge land has been narrowed (paragraph	Paragraph 430 commits the Council to prioritise improvements and new provision in areas of identified deficiency to support health equity, and Policy EN1(k) seeks active travel routes connecting residential areas, particularly areas of deprivation, with green spaces. Policies EN1 and EN3 require long-term management and maintenance of new green infrastructure and open space to be secured, including through legal agreements It's important for green space contributions to be spent relative to

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						against the Appendix 5 standards by deprivation, and no priority for directing green infrastructure investment to the wards where access and health outcomes are worst, despite the 11.1-year life expectancy gap recorded at paragraph 19. A concession in the evidence with no corresponding mechanism in policy is the definition of a plan that is not effective on this point: the two maps, deprivation and green space access, are both in the plan's evidence base, and the policies never lay one over the other. Second, nature's standing where wedges narrow. The vision at paragraph 50 accepts that some wedges have become narrower to accommodate housing, compensated by 'qualitative enhancements'. Enhancement promises are only as strong as their stewardship: without secured funding, defined responsibility and a voice for ecological interests in long-term management, enhancement becomes a landscaping condition that	50), require that qualitative enhancements be secured with long-term stewardship and management funding through Policy GD9, with governance that includes community and ecological representation for the lifetime of the management arrangement.	where development takes place, because of the rules around s106 and the need to demonstrate necessity. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						fades after practical completion. Nature is a stakeholder in these decisions, not merely a constraint awaiting a stronger argument.		
C518	Beverley Rhodes*	Policy EN1: Green and Blue Infrastructure				Derby City Local Plan response All areas of greenspace are important to reduce the loss of wildlife in the City. I find it very unusual that the concept of Local Nature Reserve has been remove from the Plan. As a recognisable part of Derby City Countryside looked after by local people I do feel that it would be wise for the Council to recognise this element of the natural environment. Why? Local Nature Reserves are a contract between Council and Natural England, local people and the biodiversity of Derby, in which we attempt to improve the biodiversity of open space areas. LNRs are a designation that were originally protected in the Local Plan for the people of DErby. Local Nature Reserves provide 78% of the Accessible Green Space Target set by Natural England and there are 11 of them in Derby. They are	In order to retain a shared commitment towards all the green space areas then the LNRs and their management plans need to be mentioned more than once. Lets support our volunteers! In summary: • Local Nature Reserves are defined areas of wildlife and biodiversity that are supported by a management plan with specific targets that will improve biodiversity value. They are the areas of the City driving wildlife improvement for the benefit of	Local Nature Reserves are protected as Locally Designated Sites under Policy EN8, which only exceptionally permits development affecting them where criteria (f) to (h) are met, and several are listed in Appendix 6 and form part of the green and blue infrastructure network protected by Policy EN1 (paragraph 412). The preparation of management plans for Local Nature Reserves is carried out by the Council and its partners outside the Local Plan. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						important for Derby people and essential spaces for the Council to be proud of. Local Wildlife Sites ARE marked on the Local Plan but not all of these sites are public areas and very few have a management plan to improve the quality of wildlife in the City. Whilst they need protecting and with a buffer zone, they only play a small part in biodiversity improvement and they are designated as Local Nature Reserves with management plans. Biodiversity is important. It is access to high quality biodiversity which leads to wildlife entering gardens, being part of photographs, healthy living, recreation and sport, education, and better living for people in Derby. You have talked about Green Infrastructure but it is clear that has been frequently threatened by development and is now shrunk. So The Green Infrastructure, green wedges, green belt, LWS can ONLY work for biodiversity if there are Local Nature reserves and their management plan is in place to	your green infrastructure. • Local Nature Reserves are areas of land where the management plan provides a focus for a range of partners to enable them to work together for t he benefit of the people and wildlife of the City. Partners include volunteers, site users, cyclist, Councillors, Council departments, external partners and so many more. • Having the knowledge of where LNRs are in the City should be used to drive new areas of green space, with management plans, to improve their wildlife value for people. • Both LNRs and LWS are protected from	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						make improvements for biodiversity. Local Nature Reserves are also the hub of our public engagement, each one providing time, time, time, skills, valuable effort, ideas, shared opportunities, litter picking and visions for wildlife in the City and the Plan needs to recognise how critical the link between us as ordinary people and the Council needs to be maintained. Trust, as we have had challenged at ChAddesden Wood, is so very easily lost. The management plan produced to support LNRs is an opportunity to restore that Trus. Please place them back on the map. The rewilding at Allestree Park is one example of doing better for LNRs because it has a management plan. Please be reminded DWT do not look after other LNRs but remain important for the people that live nearby for them. DWT have not been behind the LNRs it is local people and they need to be rewarded for their challenging and persistent effort to improve biodiversity in the	development in the new NPPF. I am available to make further comments when required. [redacted]	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						City. LNRs are also on areas of green space that are not protected from development as is a LWS, such as sports pitches, caravan parks, rugby, paths etc.		
OR36	Derby Climate Coalition	Policy EN1: Green and Blue Infrastructure	Objects	Yes	No	Generally support, but the addition of a couple of “where possible” weakens this policy compared with the Reg 18 draft. and they should be deleted.	Delete "where possible" and revert to Reg18 Draft wording.	The 'where possible' wording in criteria (c) and (f) allows the policy to be applied proportionately on constrained sites, such as brownfield sites in the City Centre, while still requiring green and blue infrastructure to be considered from the outset. Policy EN1 continues to safeguard the green and blue infrastructure network and resists loss or harm unless the need for and benefits of development clearly outweigh the impacts. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR226	The Planning Bureau Limited on behalf of McCarthy & Stone & Churchill	Policy EN1: Green and Blue Infrastructure	Object		No	Policy EN1, requires amongst other areas for major development maximise on site green infrastructure via provide Urban Greening via an Urbak Greening Factor of at least 0.5 for residential development on greenfield site, an Urban Greening Factor score of at least 0.4 for other residential development and an Urban Greening Factor score of at least 0.3 for mixed-use or commercial development. The council should note that it is often expensive to deliver 'Urban Greening' including green walls and roofs, as well as being costly and difficult to maintain. Without good management practices, these features can suffer and become a visual amenity issue rather than a benefit. There can therefore be viability issues with urban greening as there can be significant costs for the installation of green features such as green walls and roofs.		The Urban Greening Factor scores apply only 'where viable', and criterion (d) asks major development to investigate the feasibility of green roofs and walls rather than to provide them in every case. This flexibility reflects the Viability Topic Paper's conclusion that site-specific viability should continue to be considered where justified. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Council will be aware of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002-20190509). The evidence underpinning the council's policy requirements should therefore be robust and be used to form deliverable and realistic policies. WE have considered the Viability Assessment accompanying the local plan and it is not clear that Urban Green ng has been considered within it as an additional cost. It therefore likely that the requirement would create additional viability challenges for development and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						should be deleted from the plan. The council should note that where Urban Greening requirements have been introduced in other locations such as London, delivery of housing since the London Plan was adopted in 2021 has been severely hampered, to the degree that the government has recently announced an emergency package of measures aimed at accelerating housing building in London given slow delivery which in our view has been caused by the viability challenges. The council should therefore reconsider the policy requirement and ensure it is realistic and viable.		
OR104 & C519	George Fletcher*	Paragraph 412	Objects	No	No	Destroying Wilmorton Park is completely at odds with this policy. No assessment has been made against any of the other 46 parks has been made.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	The Gypsy and Traveller Site Provision Topic Paper sets out how nearly 90 Council-owned sites were assessed and shortlisted to nine, which were

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								appraised against the same criteria. Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. No change required.
OR15	Derbyshire Swift Conservation	Paragraph 418	Objects	Yes	No	There is no reference to the National Planning Policy Framework (NPPF) and there is no contingency to reduce non-compliance by including a post-construction check	The Swifts Local Network Planning Group have produced a standard planning condition which we propose is utilised in this Local Plan. This condition is based on a condensed version of the British Standard standard condition, with elements of the Brighton & Hove standard condition, plus additional text relating to post-construction evidence. Standard condition: No development shall take place until written details are	The National Planning Policy Framework is already a statutory material consideration in planning applications. Criterion (e) of Policy EN1 already requires integrated features such as swift bricks to be built into the fabric of buildings, with external boxes only accepted where this is not possible, and paragraph 418 refers to British Standard BS 42021:2022. The detailed wording of planning conditions, including any requirement for evidence of

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							approved by the local planning authority of the model and location of [X] integrated swift bricks, to be fully installed prior to completion of the external walls of each building and retained thereafter. A plan for the selection, siting, positioning and installation should be submitted to, and approved in writing by, the local planning authority. The plan should identify, as a minimum: a) the type and number of swift bricks to be installed; b) the specific buildings on the development into which boxes are to be installed, shown on appropriate scale drawings; c) the location on each building where bricks are to be installed,	installation, is a matter for the application stage rather than the Plan. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							shown on appropriate building plans and elevations. The integral nest box plan should be implemented in accordance with the approved details and all nest bricks retained in that manner thereafter. Swift bricks should be used unless these are not practical due to the nature of construction, in which case alternative designs of suitable swift boxes should be provided in their place for approval by the local planning authority. Evidence in the form of photographs of swift bricks installation, and approval by a suitably qualified ecologist, must be provided prior to occupation. Reason: To enhance	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							the biodiversity of the site and to comply with the NPPG	
Policy EN2: Dark Infrastructure								
OR36	Derby Climate Coalition	Policy EN2: Dark Infrastructure	Support	Yes	Yes	We support the inclusion of this policy.		Support welcomed.
OR162	Historic England	Policy EN2: Dark Infrastructure	Support			Policy EN2 we welcome the references to heritage within the policy.		Support welcomed.
Policy EN3: Open Space, Sport and Recreation Buildings								
OR104 & C519	George Fletcher*	Policy EN3: Open Space, Sport and Recreation Buildings	Objects	No	No	I don't believe any of the policy objectives listed have been achieved by destroying Wilmorton Park.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process and alternatives are set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
C537	Rob Hoddinott	Policy EN3: Open Space, Sport and Recreation Buildings	Object	No	No	HA16 is totally contrary to this policy. In the local plan consultation I proposed numerous waste land sites which could house this facility, that has been ignored and not referenced in the consultation. This is open space that is being removed and contrary to almost every element of the local plan which repeatedly talks about preserving green space.	It needs moving to a brown city centre site not remove prime green space located next to a very deprived area.	No sites were promoted for Gypsy and Traveller use through the call for sites from those with control of the sites, or demonstrating an interest in development so the Council assessed nearly 90 of its own sites to secure a deliverable site, as set out in the Gypsy and Traveller Site Provision Topic Paper. Sites suggested during consultation that are not in Council ownership could not be shown to be available for this use. No change required.
C537	Rob Hoddinott	Policy EN3: Open Space, Sport and Recreation Buildings	Object	No	No	“an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity		Policy HA16 requires the land beyond the fenced pitches to remain as accessible public open space and to be improved with further planting, and any planning application will be

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and quality in a suitable location" This has not been applied in the case of HA16		assessed against Policy EN3 and the other policies of the Plan. The reasons for selecting the site are set out in the Gypsy and Traveller Site Provision Topic Paper and SA Appendix G. No change required.
OR256	Pegasus Group on behalf of Miller Homes, William Davis and Miller Gadsby (Heatherton) Ltd*	Policy EN3: Open Space, Sport and Recreation Buildings	Support	Yes	Yes	The Policy EN3 requirement for 1.4 hectares per 1,000 population of amenity green space and 2.4 hectares per 1,000 population of major open space, together with the provision of long term maintenance is noted. The policy's reference to cross-boundary development and the need for the Council to work with neighbouring authorities to ensure a consistent and co-ordinated approach to the provision of public open space is also noted.		Support welcomed.
C552	Dr Beatty	Paragraph 429	Objects	No	No	The removal of green space and old trees for a traveller accommodation in wilmorton ,	Leave the much needed green space in wilmorton	Policy HA16 retains the land beyond the fenced pitches as accessible public open

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						seems to be the opposite of this		space, to be improved with further planting. The site selection process and alternatives are set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
C552	Dr Beatty	Paragraph 430	Objects	No	No	Wilmorton is in an area of deprivation and The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this policy	Leave the green space in wilmorton	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting, so the park will remain available to local residents. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR104 & C519	George Fletcher*	Paragraph 430	Objects	No	No	Destroying Wilmorton Park is contrary to this statement.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting, so the park will remain available to

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								local residents. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR104 & C519	George Fletcher*	Paragraph 430	Objects	No	No	Destroying Wilmorton Park which is in adeprived area, is contrary to this statement.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting, so the park will remain available to local residents. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
C552	Dr Beatty	Paragraph 431	Objects	No	No	The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this policy	Leave the green space in wilmorton	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process and alternatives are set out in the Gypsy and Traveller Site

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								Provision Topic Paper. No change required.
C552	Dr Beatty	Paragraph 432	Objects	No	No	The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this policy. In an area of terraced house and fe s population, the removal of a green space and old established trees should not be allowed.	Keep the green space in wilmorton	Policy HA16 recognises the mature trees on the site and retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. Any planning application will be assessed against Policy EN9, which requires existing trees to be retained where possible and compensatory planting where trees are lost. No change required.
C552	Dr Beatty	Paragraph 433	Objects	No	No	If the developer is the council, it appears the rules don't apply		Information on site selection can be found in the Gypsy and Traveller Topic paper. Any planning application for the site will be assessed against the policies of the Plan in the same

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								way as any other application, including Policies EN3, EN8, EN9 and EN10. Policy HA16 retains the land beyond the fenced pitches as accessible public open space. No change required.
OR104 & C519	George Fletcher*	Paragraph 435	Objects	No	No	No evidence that such an audit been carried out in the case of destroying Wilmorton Park.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	Any planning application will be assessed against Policy EN3, including the Derby Play Audit, and Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
Policy EN4: Allotments and Community Gardens								
No representations were received for this policy.								

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
Policy EN5: Green Belt								
OR167	Amber Valley Borough Council	Policy EN5: Green Belt				The draft Local Plan Policy EN5: Green Belt states that: The principle, general extent and permanence of the Nottingham-Derby Green Belt within the city is supported and maintained… Chapter 3 of the Derby Green Belt Assessment (undertaken by LUC on behalf of the City Council) published in September 2025, sets out the Assessment Methodology. It refers to several terms used within the PPG which it considers require further definition to be applied as part of its assessment process. In paragraph 3.25, which refers to the Purpose A definition of 'Near to' it states that: Although villages are not large built-up areas, a village that lacks very strong separation from a large built-up area is considered a 'satellite' settlement, the land around which still has some association with the large built-up area and therefore makes some contribution to Purpose		The Green Belt Assessment (LUC, 2025) was prepared by independent specialists and objectively evaluates each parcel according to the NPPF definition of grey belt. Amber Valley Borough Council confirmed they had no objections to the methodology used when consulted at the beginning of the commission. The concept of 'satellite settlements' is LUC's own terminology and is used to help convey one aspect of their interpretation of the NPPF's terms 'near to' and 'incongruous pattern of development', which are used in the PPG (and now NPPF Annex

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						A. To the north and east of Derby, Quarndon, Little Eaton, Breadsall, Ockbrook and Borrowash would all be considered satellite settlements. Paragraph 3.39 refers to the contribution of a parcel to Purpose A, which is determined in line with the illustrative factors listed in the PPG guidance, but with an additional 'very strong' level of contribution. It refers to factors which can tip a 'strong' rating into the 'very strong' category which include: • A very strong sense of separation from the urban area, with no notable urbanising influence from it; or • A significant impact on the separation of a satellite settlement from a large built-up area, resulting in a very incongruous impact on the settlement pattern.		E) guidance on Purpose A. The use of the category 'very strong' is not contrary to the NPPF or a 'restrictive interpretation' The 'strong' and 'very strong' categories both fall within the NPPF's guidance for the 'strong' category but add a finer grain to the assessment outputs to help guide decision-making. The NPPF guidance on assessing Green Belt to identify grey belt offers considerable scope for interpretation, as is evidenced by the different approaches taken by different practitioners, but the Council are confident that the approach taken by the consultants is sound.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Amber Valley Borough Council is currently undertaking a Green Belt Review and as part of this process an initial assessment of Derby City Council's Green Belt Study has identified methodological concerns relating to the interpretation of Green Belt Purpose A. In particular, the concept of 'satellite settlements' appears to depart from the approach set out in national policy and risks widening the application of Purpose A beyond its intended focus on preventing the unrestricted sprawl of large built-up areas. Furthermore, Annex E of the National Planning Policy Framework (NPPF) refers to land making a strong, moderate or weak contribution to the relevant Green Belt purposes. The introduction of a 'Very Strong' category therefore represents a more restrictive interpretation of Green Belt function than would result from a direct application of the NPPF.		The approach to other sources of supply before any Green Belt release is set out in the Housing Requirement and Spatial Strategy Topic Paper, and the Council will continue to engage with Amber Valley on the Assessment's methodology, including the treatment of satellite settlements, as its own Green Belt Review progresses. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						It is unclear how the above methodology has impacted upon the assessment of individual parcels, in particular where they are considered to be 'strong' in relation to purpose A, and whether this approach has led to parcels therefore not being considered as grey belt. Part of the land which separates Quarndon from the Allestree suburb of Derby lies within Derby City and part lies within Amber Valley, with much of it lying within the Green Belt. The study identifies the part of the Green Belt to the north of Allestree as being important in relation to Green Belt purposes, which appears to position the settlement as a satellite settlement within the wider urban area. The Council is unable to reach a definitive view on this matter until its own Green Belt Review has been completed, and would wish to reserve the right to not refer to Quarndon as a satellite		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						settlement pending the conclusion of its own Green Belt Review. Until such time as that is the case, the Council cannot be satisfied that such a designation is consistent with its own methodology and emerging evidence base, and that it would not prejudice the assessment of other parcels of land within Amber Valley which lie between Quarndon and Allestree. Notwithstanding the conclusions in the Derby Green Belt Review regarding the purpose of individual parcels, paragraph 146 of the NPPF (2024) refers to exceptional circumstances which may justify the alteration of the Green Belt boundary, including where an authority cannot meet its identified need for homes. In this respect, given the above concerns regarding the methodology of the Derby Green Belt Review there is		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						uncertainty as to whether all sources of supply have been fully exhausted in seeking to meet Derby's own housing needs. Accordingly, the Council would wish to reserve the right to comment further on this matter once its own assessment work has been completed.		
OR161	Derbyshire County Council	Policy EN5: Green Belt	Supports	Yes	Yes	As noted above, two Green Belt Reviews / Assessments have previously been carried out of the Nottingham – Derby Green Belt. The important conclusions of both of these Green Belt Reviews, was that the area of the Nottingham – Derby Green Belt between the two urban areas of Derby and Nottingham and extending northwards towards the settlements in the Amber Valley were strategically the most important areas of the Green Belt in meeting the main Green Belt purposes set out in national policy, particularly its function in constraining the eastward sprawl of Derby City and preventing the coalescence of the cities of Nottingham and		Support welcomed. Derbyshire County Council's comments on the Stoney Lane, Spondon allocation are addressed in the responses to Policy HA7.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Derby with each other and the settlements in Erewash Borough in between and northwards in preventing the coalescence of the urban area of Derby with settlements in Amber Valley. The above being the case, and notwithstanding the comments above in respect of the Stoney Lane, Spondon allocation, Derbyshire County Council fully supports the policy approach in Policy EN5, which seeks to ensure that the principal, general extent and permanence of the Nottingham-Derby Green Belt within the city is supported and maintained.		
OR266	Fisher German on behalf of Bloor Homes	Policy EN5: Green Belt	Objects	Yes	No	The references in the Plan to applications being determined in accordance with National Policy are supported, particularly Grey Belt principles which are a key element of the amendments to the Framework in December 2024 and the 2026 NPPF. Paragraph 147 of the Framework states “Before concluding that exceptional		The Green Belt Assessment (LUC, 2025) found that Locko Road does not meet the definition of grey belt, and SA Appendix G explains that the site was not selected because of its Green Belt sensitivity, its detachment from the urban form and local

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development…has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground". It is clear therefore the Council should have had an agreed Statement of Common Ground prior to concluding Green Belt release was necessary. As discussed earlier in these representations, the 2026 SoCG does not provide sufficient detail in terms of the approach to the City's unmet need. Paragraph 146 of the Framework states "exceptional circumstances in this context include, but are not limited to,		facilities, and its potential effect on the setting of the Locko Park historic estate. The Housing Requirement and Spatial Strategy Topic Paper explains that the Plan only considers Green Belt land that meets the grey belt definition, and the Sustainability Appraisal found that options requiring large-scale Green Belt release would have significant negative effects. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan" [our emphasis]. Table 4.2 of the consultation document confirms that all three promoted Green Belt sites considered, Locko Road Spondon, Stoney Lane Spondon and Asterdale Leisure Centre would not have a fundamental impact on the Green Belt if developed. Paragraph 4.12 of the Derby GBA states "While these three sites represent a notable proportion of the limited Green Belt within Derby,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						they constitute only a very small fraction of the wider Nottingham–Derby Green Belt as a whole" [our emphasis]. Paragraph 4.13 continues "the potential development sites are sufficiently disparate from each other that they would not have a cumulative effect on the Green Belt purposes". Taken tother, it is clear that even if all three sites were to be developed, this would not fundamentally undermine the purposes of the Gren Belt, according to the Council's own Green Belt evidence, thus would not conflict with Paragraph 146. . Whilst detailed commentary on Grey Belt and Locko Road is provided below, it is noted that the Council's Green Belt Assessment clearly concludes that development of all the assessed promoted sites (Locko Road, Stoney Lane and Asterdale Leisure Centre) would not fundamentally impact the purposes of the remaining Green Belt purposes when		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						taken together. Therefore, even if the Council does not consider the site as Grey Belt, the site should still be selected, as there is no rule or requirement that the Council should only release Grey Belt land. On the contrary Paragraph 148 of the Framework sets out the clear hierarchy under which Green Belt land should be released. It states, “where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations” [our emphasis]. Therefore, even if accepting the site was not Grey Belt (which is not our position), that does not preclude it from being allocated, it simply must come after the exhaustion of sequentially preferable Grey Belt locations. Given alternative locations have clearly been exhausted in that there remains significant unmet needs, the Council must then use lower		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						functioning Green Belt land to meet as much housing need as possible, particularly in the context that its own evidence confirms the development of all would not fundamentally undermine the remaining purposes of the Green Belt as per Paragraph 146 of the Framework. As discussed below, the Council's own evidence broadly acknowledges that Locko Road is lower functioning Green Belt land, scoring only slightly above Stoney Lane against Purposes A and C, thus should still be selected to meet needs as fully as possible in accordance with NPPF Paragraph 146 which as set out above requires authorities to meet needs in full – or logically as fully as they are able. Locko Road, Spondon As set out above, BHL's case is clear that Locko Road qualifies as Grey Belt. The Inspector's attention is directed to the appended Green Belt Appraisal by Define (Define GBA) which sets out our position fully. The		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Define GBA outlines clear flaws with the Derby City Green Belt Assessment (DGBA) undertaken by LUC. These arguments are presented at a high level below, but the full case is set out in the Define GBA. Firstly, the manner in which the DBGA subdivides the Locko Road site into separate parcels results in the site being assessed in an illogical, contrived and unrepresentative way. The approach adopted by LUC artificially creates constraints and negative effects that do not arise when the site is considered in its entirety, as it has consistently been promoted. This is evidenced by previous submissions to the Council, including the Call for Sites submission (Site Reference DER0345), which has always presented Locko Road as a single, cohesive development opportunity. The DGBA splits the Locko Road proposal into parcels DY6 (abutting the Spondon urban		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						fringe) and DY7 (to the north disconnected to the Derby City urban fringe) as shown on Figure 2 below. Refer to Annex 1, Figure 2 Attention is drawn to Paragraph 2.4.7 of the Define GBA (Appendix 1) which states: "The DGBA states that parcel DY6 abuts the urban edge of Spondon and does not benefit from a physical feature that restricts and contains development (DGBA, page 87, 2nd bullet). The DGBA then separately concludes (DGBA, page 94, 3rd bullet) that development of parcel DY7 would result in an incongruous pattern of development as it is remote from the urban edge of Spondon and relies on how development might sit on the site's topography, notwithstanding that landform/topography is not part of the criteria set out in para 005 of the PPG methodology."		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						LUC have failed to apply their own methodology here, informed by the Framework, which stipulate that the boundaries of the parcels assessed should use “physical features that are readily recognisable and likely to be permanent” (NPPF Paragraph 149f, DGBA Paragraph 3.28). Extending north from Spondon, the most obvious boundary is the one utilised by the proposed scheme, the Lees Brook west of Locko Road and unnamed watercourse to the east. The boundary selected by LUC does not follow historic field patterns or any strong physical boundaries on the ground. In coming to the conclusion that DY6 does not benefit from a physical feature that restricts and contains development, raises the clear question why LUC drew the parcel boundary in that location, given their own methodology was that parcels should be defined by significant variations in physical elements.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Our clear view is that when the parcel is assessed as a whole, then there is a clear defensible boundary to the north. Again, the LUC report is inconsistent, as it does not recognise the Lees Brook as a physical feature capable of restricting and containing development, despite coming to the entirely opposite conclusion in respect of the East of Spondon proposals (DY10) stating: "The outer edge of the parcel follows a well-treed hedgerow and stream (marking the city boundary) which would limit the urbanising impact of development on adjacent open land". That statement accurately describes the northern boundary of the Locko Road proposals. If there is a difference between the two, it's that the Locko Road tree belt is more established, but our case is they should be viewed as performing the same overall function. There are obvious flaws in the LUC report which have		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						artificially impacted the assessment of the Locko Road proposals. Define provide a comprehensive Grey and Green Belt assessment of the Locko Road site in its entirety, as promoted, at Section 3 of their report. This work underpins the forthcoming application which is being submitted speculatively under Grey Belt/Golden Rules principles. BHL are of the clear view when the site (as promoted and as will be submitted as part of the application) is assessed comprehensively and not as separate parcels it meets the applicable tests of Grey Belt land. As set out above, even if it does not, that does not preclude the Council from allocating it in light of the massive shortfall in deliverable housing land it is required to address. Is the site Grey Belt? Again, the below summarises the Define GBA, and the Inspectors are again directed towards it. To qualify as Grey		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Belt as per the definition at page 73 of the 2024 Framework the following criteria must be met – it must be either brownfield land or greenfield land which does not contribute strongly to purposes A, B and D of paragraph 143 of the Framework. Grey Belt land excludes land where the application of policies relating to footnote 7 (excluding Green Belt) provide strong reason to restrict or refuse the development. Again, a full assessment is provided in the appended Define report, but BHL's case is presented at a high level below for ease of reference. Purpose A – to check the unrestricted sprawl of large built up areas LUC score the site as performing a Strong function towards Purpose A, Define argue this should be Moderate. The PPG provides illustrative features which may indicate what scoring a site should receive. It is agreed that the site is		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						adjacent to a large built-up area. To make a strong contribution to Purpose A, the PPG suggests sites should lack "physical feature(s) in reasonable proximity that could restrict and contain development". The key area of difference between BHL and DCC is whether Lees Brook and the surrounding tree belt qualify as a physical feature that contains development. BHL are clear that the same conclusions should have been reached by LUC as they do for DY10 i.e. that a watercourse with surrounding tree belt amounts to a physical feature which restricts development. Moreover, when considering Locko Road specifically, the topography of that part of the site would also clearly restrict development. As such, there is a clear physical feature in reasonable proximity which would restrict and contain development. Another potential feature listed in the PPG relates to the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						creation of an incongruous pattern of development, with an example of an extended finger of development extending into the Green Belt. Again, BHL's position is that the development would not amount to an extended finger into the Green Belt, nor would it be incongruous pattern of development. BHL therefore conclude the site should have been scored as making a moderate contribution to purpose A, in the same way DCC / LUC have scored parcel DY10 Purpose B – to prevent neighbouring towns merging into one another Define agree with LUC in that the land makes a highly limited contribution to the merging of towns (Weak/No). Purpose D - to preserve the setting and special character of historic towns Define agree with LUC in that the land makes a highly limited contribution to the preservation		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and character of historic towns (Weak/No). Therefore, under an assessment of the purposes of the Green Belt relative to Grey Belt, the only difference between Locko Road and the proposed allocation east of Spondon is the assessment under Purpose A. BHL assert that following the PPG guidance and the logic applied in respect of DY10, where a wooded watercourse on the city boundary was found to form a physical feature which restricts development, Locko Road should have been scored as moderate and thus qualify as Grey Belt. The NPPF confirms that Footnote 7 areas can exclude land as Grey Belt if they provide a strong reason to prevent development. It is noted that the site lies within reasonable proximity to Locko Park, which contains a Grade II Listed Hall, and the parkland for which is also Grade II registered. It is noted that the Council's		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						evidence does not allege that the site should be excluded on Footnote 7 principles. Regardless, significant work has been undertaken in preparation of the emerging Planning Application. BHL's Heritage Assessment by Pegasus Group (Appendix 4) confirms that the site is considered to contribute to the significance of the Locko Park assets through setting, being part of the wider agricultural surrounds which have some historic illustrative value as to the wider context of the assets, and which provides some of the separation the complex currently has from the built up area of Spondon. However, intervisibility is noted to be extremely limited, comprising a heavily filtered and distant glimpse through a tree belt from the upper levels of the house, limited similar glimpses from the parkland, and no direct intervisibility from the lodges. Where visibility of the site occurs, it has a backdrop of existing built form of Spondon. The site is also experienced in		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						dynamic views along Locko Road and along footpath approaches, although separated from the parkland by intervening undeveloped land. The proposed development comprises change of character to the site, although the northern areas will be used for drainage and green infrastructure, with the areas of residential development placed in the southern areas. There will be some reduction in the historic illustrative value the site contributes to the assets through setting, as part of the historic agricultural context, and providing part of the current separation. However, agricultural context and separation will remain along Locko Road. Overall, the proposed development is anticipated to cause less than substantial harm at the low end of the spectrum to the parkland, and at the very low end of the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						spectrum to Locko Park house and lodges. This impact is not considered to be significant and would thus not amount to a strong reason to prevent development. No other Footnote 7 constraints are considered to be impacted. Therefore, a Footnote 7 area does not provide a reason to preclude Grey Belt status. Grey Belt Conclusions The site, when considered consistently and correctly, should be assessed as Grey Belt. It makes no contribution to two of the relevant purposes of the Green Belt (Purpose B and D), and a moderate against the other (Purpose A). This is the same scoring matrix as the Council's preferred allocation. The grounds for a strong contribution against Purpose A are not considered consistent with the Council's own methodology or tenable against the guidance within the PPG. BHL therefore urge the Council to reassess the site in this context. Regardless, as set out		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						above, even if the Inspectors agree with the Council that the site is not Grey Belt, this does not preclude its allocation, and the Plan remains obliged by the Framework to utilise non-Grey Belt land in the Green Belt to meet housing needs in full where all Grey Belt land has been utilised (NPPF Paragraphs 146 and 148).		
OR80	Councillor J Wright	Policy EN5: Green Belt	Objects		No	Not justified: The Council at its meeting dated 26th February approved an amendment to the MTFP that: It was moved by Councillor J Wright and seconded by Councillor Smale that the minute was amended by the addition of the following words: 1. That £0.150m be added to the budget for Communities and Place for the purposes of Regeneration of the City Centre through Housing, to be funded from resource to support additional capacity as defined by the Delivery Board to deliver future savings and efficiencies of £0.250m. 2. To note that a £0.150m one-off external,		The City Centre housing capacity work commissioned following the Council's budget decision has identified further opportunities for homes on upper floors and infill sites, which supports the Plan's City Centre strategy and windfall allowance. The Plan only releases Green Belt land that meets the grey belt definition, after brownfield and City Centre sites, as set out in the Housing Requirement and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						specialist consultancy report will identify suitable locations in the city centre for homes. The city centre having better/closer public transport, health, education, employment prospects and leisure facilities than green field sites will provide the infrastructure required for residents that would benefit most: younger residents, older (including those with extra care needs), looked-after children, and temporary accommodation. The report will focus on: • building upon the capacity work already undertaken for the local plan to consider the provision of minimum, maximum and average unit numbers for the strategic city centre sites Riverside, Castleward, Northern Gateway and Station Gateway • the capacity testing should include master-planning/layouts for the major city centre housing led regeneration sites as stated above. Particularly for Riverside • the report could additionally provide some high level evidence around strategic		Spatial Strategy Topic Paper. It is important that any allocated site is demonstrably deliverable. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						housing requirement, viability testing, market demand/requirement and deliverability of these sites. The report will also aim to identify sufficient locations/numbers to reduce / remove the pressure on our green belt and green wedges. The initiative will lead to increased certainty for developers by providing a robust demand analysis, increased social housing for the city and protection of 8 our precious green spaces. This motion provided a counter-balance to the previously completed 'Green Belt Review' that examined the city's green belt, wedges and other green spaces to identify sufficient locations to help to meet the city's housing needs requirement. This review focussed only on protected green spaces within the city boundaries and there was no comparative brownfield site review to support the Council's stated ambitions of a) protecting and enhancing the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						green belt/wedges and utilising a 'brownfield first' approach. The budget amendment, above, was agreed to support a comprehensive review of brownfield/other non-green sites within the city centre and develop 'City centre regeneration through housing' strategy. This report has not yet been produced to provide that balance to the green belt review and so preceding with the emerging plan is not balanced, is inconsistent with national policy, local policy 'brownfield and city centre first (para 81) and fails to comply with Council policy regarding the budget whilst also frustrating the will of the Council by not waiting for the 'city centre regeneration through housing' review to be completed and integrated into the process.		
Policy EN6: Green Wedges								
OR36	Derby Climate Coalition	Policy EN6: Green Wedges	Objects	Yes	No	We would support EN6 if the rest of the plan had done so. We note that mentions of changes to the green wedges in the housing allocations in the	The Council needs to make up its mind if it supports Green Wedges or not. If it does, then references	The wording in question was removed, as the regulation 19 plan is the submission plan,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Reg 18 draft have been removed in this draft. While this is understandable as they are not really policy, it does hide the position from those readers only looking at parts of the plan. See also para 448 and policy EN7.	to modifying them in the housing allocations chapter should be deleted. If it does not think it possible or desirable to retain the policy as in the adopted plan, it should delete EN6 (and OBJ8) and just rely on EN7.	the wording would no longer be accurate on adoption. The Green Wedge Review (2025) informed the limited changes to Green Wedge boundaries needed to accommodate allocations, and Policy EN6 continues to protect the remaining Green Wedges. Green Wedge land has only been allocated where the Review found the wedge function to be weak or relatively weak, or where a viable wedge can be maintained, as set out in the Housing Requirement and Spatial Strategy Topic Paper. No change required.
C506	Dorina Balan*	Policy EN6: Green Wedges	Objects	Yes	No	Please see attached full Regulation 19 Representation document. In summary: the plan is not positively prepared, not justified, not effective, and not consistent with national	Please see attached full Regulation 19 Representation document for full details of requested modifications. In	SA Appendix G explains that the site was not allocated because it is very narrow, has contaminated land

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						policy in its treatment of Site 415 (Railway Line at Whitehouse Farm, Shelton Lock, Derby, DE24 9QF, Title No. DY92232) under Policy EN6 (Green Wedges). Full details in attached document.	summary: remove Site 415 from the Green Wedge designation and allocate it for residential development of approximately 20-28 bungalows.	along its length and has no vehicular access because of a ransom strip, so it is not demonstrably deliverable even though the Green Wedge Review found low/moderate harm. The Glossary explains that Green Gaps offer the same protection against development as Green Wedges, so a change of designation would not of itself make the site suitable for housing. No change required.
C506	Dorina Balan*	Policy EN6: Green Wedges	Objects	Yes	No	This representation objects to the designation of Site 415 (Railway Line at Whitehouse Farm, Shelton Lock, Derby, DE24 9QF, Title No. DY92232) under Policy EN6 (Green Wedges) in the Proposed Submission Local Plan. The plan is unsound for all four reasons: NOT POSITIVELY PREPARED Derby City Council's own evidence confirms an unmet housing need of approximately 5,840 homes	The following modifications are requested (full details in attached representation document): Modification 1: Follow the council's own Green Wedge Review recommendation (Paras 4.270-4.272, Part 2, September	SA Appendix G explains that the site was not allocated because it is very narrow, has contaminated land along its length and has no vehicular access because of a ransom strip, so it is not demonstrably deliverable even though the Green

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						over the plan period. The city can only accommodate 12,500 homes against a total requirement of 18,340 homes. Site 415 is a brownfield-character former railway site — no rails or infrastructure remain, only compacted earthworks — 3.84 acres, 600 metres long, in Flood Zone 1, with two existing access points (Heigham Close and Hoveton Close), no TPOs, no ecological designations, existing utility infrastructure confirmed, and a completely clean planning history. Its exclusion from allocation whilst Derby faces a housing shortfall of nearly 6,000 homes is contrary to the positively prepared test. NOT JUSTIFIED The council's own Green Wedge Review (Part 2, September 2025, Paras 4.270-4.272) recommended this Green Wedge be reclassified as a Green Gap due to its compromised position — the plan has not followed this recommendation without providing any justification. The council's own evidence rates	2025) and reclassify the Allenton/Sinfin Industrial Area Green Wedge as a Green Gap, consistent with the evidence base. The plan has departed from this recommendation without justification — that departure should be corrected. Modification 2: Remove Site 415 (Railway Line at Whitehouse Farm, Shelton Lock, Derby, DE24 9QF, Title No. DY92232) from any Green Wedge or Green Gap designation, on the grounds that it: — Sits on the eastern periphery of the designation and does not perform the settlement separation function — Is rated the lowest harm site in the entire Green Wedge	Wedge Review found low/moderate harm. The Glossary explains that Green Gaps offer the same protection against development as Green Wedges, so a change of designation would not of itself make the site suitable for housing, and an appeal decision on a different site does not alter this assessment. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Site 415 as the lowest harm site of all promoted sites in the entire Green Wedge (low-moderate harm — Para 4.259, Page 174). The plan's own supporting text at paragraph 447 explicitly states: "Green Wedges do not have the permanence of the Green Belt" — acknowledging the designation is not absolute. The plan allocates housing immediately adjacent under Policy HA12 — specifically referencing "proximity of development to the railway embankment to the east" (which is Site 415) — creating a fundamental inconsistency that is not justified. A directly relevant and material planning appeal decision further demonstrates that the plan is not justified: Appeal Reference APP/C1055/W/24/3356476 (Land west of Royal Hill Road, Spondon, Derby) was decided by Inspector Andrew Smith on 16 May 2025. The Inspector allowed 90 homes on a Derby Green Wedge site, making the following findings which are	by the council's own evidence (low-moderate harm, Green Wedge Review Para 4.259) — Is brownfield-character previously disturbed land (former railway trackbed — no rails, no infrastructure, only compacted earthworks) — Is completely inaccessible and provides no public amenity — Is immediately adjacent to the Policy HA12 housing allocation, with the plan itself referencing "the railway embankment to the east" — Has a directly comparable appeal decision (APP/C1055/W/24/3356476, Spondon Derby, May 2025) where 90 homes were allowed in a Derby Green Wedge despite MODERATE	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						directly applicable to Site 415: — "Policy CP18 cannot be considered fully consistent with the Framework." (Para 38) — Policy EN6 in the emerging plan is the successor to CP18. The same finding applies. — "Green Wedges, whilst not having the permanence of Green Belt..." (Para 8) — directly supporting the argument that the designation should not be applied as if it were absolute. — "The adverse impacts identified, comprising moderate harm to the function of the [Green Wedge]... would not, in combination, significantly and demonstrably outweigh the proposal's substantial benefits." (Para 43) — the Inspector allowed 90 homes despite MODERATE harm. Site 415 has been rated LOW-MODERATE harm — lower than the Spondon site. The planning balance is even more firmly in favour of development on my site. — Para 33 confirmed "a significant supply shortfall is presently calculable" in Derby — Derby's housing position has	harm — higher than the low-moderate harm on Site 415 Modification 3: Allocate Site 415 for residential development with a policy framework supporting a bungalow-led development of approximately 20-28 homes, with access from Heigham Close and Hoveton Close, design conditions ensuring compatibility with the bungalow character of Shelton Lock, 10% Biodiversity Net Gain, and timber reuse under Policy CL5. Alternative Modification: Modify Policy EN6 or its supporting text to make clear that Site 415, given its peripheral location, lowest harm rating,	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						not improved since May 2025 and the unmet need of 5,840 homes in the emerging Local Plan confirms this. NOT EFFECTIVE Site 415 is highly deliverable — two existing access points, Flood Zone 1, no statutory constraints, existing utility infrastructure nearby, and a clean planning history. Its exclusion reduces the plan's effectiveness in addressing Derby's 5,840 home shortfall. NOT CONSISTENT WITH NATIONAL POLICY The NPPF 2024 requires significant weight to be given to housing need. The plan is also inconsistent with the Grey Belt principle introduced by the NPPF 2024. The Proposed Submission Local Plan itself includes the NPPF 2024 Grey Belt definition in its Glossary: "land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143." Whilst Grey Belt technically applies to Green Belt, the underlying principle —	brownfield character, adjacency to the HA12 housing allocation, and the context of Derby's unmet housing need of 5,840 homes, should be considered on its individual merits with significant weight given to housing need. Full details, evidence, and suggested policy wording are set out in the attached Regulation 19 Representation document.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						that land not strongly contributing to its designation should not receive blanket protection — is directly applicable here. The council applied this logic to Stoney Lane, Spondon (Policy HA7). The same logic applies to Site 415 — a former railway trackbed on the periphery of the designation, rated lowest harm, providing no public amenity, and with housing allocated immediately adjacent. Site 415 does not perform the Green Wedge function. It does not separate distinct settlements. Whilst open to farmland on its western side, the countryside linkage function is performed by the wider body of the Green Wedge — not this narrow peripheral strip. The council's own Green Wedge Review confirms Site 415 "does not divide the GW for most of its length." The site is completely inaccessible on foot — overgrown, fly-tipped, and providing no public amenity or open space benefit. A Green Wedge designation is intended		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						to protect valued open space. This site delivers none. Full details are set out in the attached Regulation 19 Representation document (Regulation_19_Representation_Site415_DEFINITIVE.docx) submitted with this representation.		
OR104 & C519	George Fletcher*	Policy EN6: Green Wedges	Objects	No	No	Turning Wilmorton Park into a traveller camp does not meet this criteria.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	The site in question is not located within a Green Wedge. However, Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process and alternatives are set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR265	P&DG on behalf of JGP Properties*	Policy EN6: Green Wedges	Objects		No	JGP recognises the important strategic role that the Green Wedge policy plays in shaping the city's character, identity and environmental quality. It is acknowledged that the Green		SA Appendix G explains that Lime Lane was not allocated, even at the reduced scale of around 50 homes,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Wedge forms an important component of Derby's spatial strategy by maintaining areas of open land between the city's neighbourhoods, defining the City's urban structure and providing green links/areas through settlements to the countryside beyond. However, the aims and purposes of the Green Wedge must be carefully balanced against the need to meet the identified housing needs of the city. Indeed, Green Wedge policy does not have the same force as Green Belt policy. As stressed in the above capacity section, this is particularly important given that Derby is unable to meet its housing needs within its own administrative boundary. The Local Plan must, therefore, demonstrate that all reasonable opportunities to accommodate additional housing within the city have been properly considered. In this context, the Green		because of concerns about the effect on the Chaddesden Wood ancient woodland and Local Nature Reserve, which Derbyshire Wildlife Trust and the Woodland Trust continue to raise. Green Wedge land has only been allocated where supported by the Green Wedge Review, as set out in the Housing Requirement and Spatial Strategy Topic Paper. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Wedge should not operate as an outright constraint to development. The plan-making process provides an opportunity to consider whether individual sites can accommodate development whilst retaining the underlying functions of the Green Wedge. This is particularly relevant to Land South of Lime Lane, Oakwood.		
OR80	Councillor J Wright	Policy EN6: Green Wedges	Objects		No	Not justified: The Council at its meeting dated 26th February approved an amendment to the MTFP that: It was moved by Councillor J Wright and seconded by Councillor Smale that the minute was amended by the addition of the following words: 1. That £0.150m be added to the budget for Communities and Place for the purposes of Regeneration of the City Centre through Housing, to be funded from resource to support additional capacity as defined by the Delivery Board to deliver future savings and efficiencies of £0.250m. 2. To note that a		The City Centre housing capacity work commissioned following the Council's budget decision has identified further opportunities for homes on upper floors and infill sites, which supports the Plan's City Centre strategy and windfall allowance. The Plan only releases Green Wedge land where supported by the Green Wedge Review, after brownfield and City Centre sites, as set out in the Housing

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						£0.150m one-off external, specialist consultancy report will identify suitable locations in the city centre for homes. The city centre having better/closer public transport, health, education, employment prospects and leisure facilities than green field sites will provide the infrastructure required for residents that would benefit most: younger residents, older (including those with extra care needs), looked-after children, and temporary accommodation. The report will focus on: • building upon the capacity work already undertaken for the local plan to consider the provision of minimum, maximum and average unit numbers for the strategic city centre sites Riverside, Castleward, Northern Gateway and Station Gateway • the capacity testing should include master-planning/layouts for the major city centre housing led regeneration sites as stated above. Particularly for Riverside • the report could additionally provide some high		Requirement and Spatial Strategy Topic Paper. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						level evidence around strategic housing requirement, viability testing, market demand/requirement and deliverability of these sites. The report will also aim to identify sufficient locations/numbers to reduce / remove the pressure on our green belt and green wedges. The initiative will lead to increased certainty for developers by providing a robust demand analysis, increased social housing for the city and protection of 8 our precious green spaces. This motion provided a counter-balance to the previously completed 'Green Belt Review' that examined the city's green belt, wedges and other green spaces to identify sufficient locations to help to meet the city's housing needs requirement. This review focussed only on protected green spaces within the city boundaries and there was no comparative brownfield site review to support the Council's stated ambitions of a) protecting and enhancing the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						green belt/wedges and utilising a 'brownfield first' approach. The budget amendment, above, was agreed to support a comprehensive review of brownfield/other non-green sites within the city centre and develop 'City centre regeneration through housing' strategy. This report has not yet been produced to provide that balance to the green belt review and so preceding with the emerging plan is not balanced, is inconsistent with national policy, local policy 'brownfield and city centre first (para 81) and fails to comply with Council policy regarding the budget whilst also frustrating the will of the Council by not waiting for the 'city centre regeneration through housing' review to be completed and integrated into the process.		
C552	Dr Beatty	Paragraph 444	Objects	No	No	The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this	Keep the green space in wilmorton	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								process and alternatives are set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
C552	Dr Beatty	Paragraph 445	Objects	No	No	The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this	Keep the green space in wilmorton	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process and alternatives are set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
C552	Dr Beatty	Paragraph 447	Objects	No	No	The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this	Keep the green space in wilmorton	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process and alternatives are set out in the Gypsy and Traveller Site

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								Provision Topic Paper. No change required.
C552	Dr Beatty	Paragraph 448	Objects	No	No	The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this The council want to build on a greed wedge in wilmorton. This clearly is the opposite of what is proposed here. Who holds the council to account?	Keep the green space in wilmorton	Whether a site lay within the Green Belt or a Green Wedge was one of the criteria applied to all nine shortlisted sites, as set out in the Gypsy and Traveller Site Provision Topic Paper. Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. No change required.
OR36	Derby Climate Coalition	Paragraph 448.	Objects	Yes	No	Given that parts of the plan show that the Council has succumbed to development pressure in places, we do not believe that the Council will be willing or able to ensure that the principle of the Green Wedge will not be adversely affected.	See comment on EN6	Paragraph 448 is given effect by Policy EN6, which limits development within Green Wedges and requires development adjacent to them not to harm their function. The Plan's monitoring framework reports the amount of Green Wedge land

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								developed in conflict with the policy. No change required.
OR104 & C519	George Fletcher*	Paragraph 448	Objects	No	No	Destroying Wilmorton Park is completely contrary to this paragraph.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process and alternatives are set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR267	P&DG on behalf of Wheeldon Brothers Ltd*	Paragraph 448	Objects		No	The general protection afforded to Derby's Green Wedges by Policy EN6 need not be weakened. Instead, revise the boundary of the Chaddesden/Derwent Industrial Area Green Wedge only to the extent necessary to accommodate the western frontage allocation. The Great Northern Greenway should form the eastern boundary of the allocation. The wider land east of the Greenway should remain within the Green	The following paragraph should be inserted at the end of the supporting text to Policy EN6, immediately before Policy EN7: The western frontage of Land East of Sir Frank Whittle Road is allocated for employment-led mixed commercial development under	SA Appendix G explains that the Green Wedge Review found development east of Sir Frank Whittle Road would cause a high degree of harm to the remaining Chaddesden/Derwent Industrial Area Green Wedge, and that the site has Local Wildlife Site, biodiversity and contamination

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Wedge and be protected and enhanced for landscape, recreational, ecological and green-infrastructure purposes.	Policy E1(f) and is excluded from the Green Wedge. The allocation is limited to a contained frontage development envelope. The remaining land adjoining the Great Northern Greenway will continue to form part of the Chaddesden/Derwent Industrial Area Green Wedge and will be retained and enhanced as an open, landscaped and ecologically functional corridor. Policies Map The Policies Map should be modified to: identify a defined western frontage parcel as an employment-led mixed commercial allocation under Policy E1(f);	constraints. No plan of the reduced frontage site was provided at Regulation 18, and with 133ha of employment land allocated against an indicative need of around 88.5ha there is no identified need to release further Green Wedge land, as explained in the Economy Topic Paper. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							remove only that defined development envelope from the Chaddesden/Derwent Industrial Area Green Wedge; retain the balance of the land within the Green Wedge; and identify, where appropriate, the Great Northern Greenway corridor and associated structural landscaping and habitat enhancement area as protected green infrastructure. These modifications would provide certainty over the maximum extent and form of development, preserve the principal functions of the Green Wedge and secure	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							environmental enhancements alongside the Great Northern Greenway. They would also provide a more diverse employment land portfolio capable of meeting the needs of smaller local businesses while maintaining the Plan's strategic employment and City Centre objectives.	
Policy EN7: Green Gaps								
OR36	Derby Climate Coalition	Policy EN7: Green Gaps	Objects	Yes	No	As para 449 makes clear, this policy has been invented to make up for the fact that the Council has not been willing or able to maintain objective and details of the Green Wedge policy in the adopted local plan. If that were the case, this policy would be unnecessary.	See comment on EN6.	Paragraph 449 explains that Green Gaps are former Green Wedges whose direct link to the countryside has been severed, and the Glossary confirms that they offer the same protection against development as Green Wedges. Policy EN7 ensures that these areas

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								remain protected where they still perform important functions. No change required.
OR104 & C519	George Fletcher*	Policy EN7: Green Gaps	Objects	No	No	It is not possible to tell if Wilmorton Park is a green gap or wedge. However destroying it is contrary to the aims of this policy.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process and alternatives are set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
Policy EN8: Biodiversity and Geodiversity								
OR176	Spring Planning on behalf of the Trustees of the Sisters of the Holy Name	Policy EN8: Biodiversity and Geodiversity	Objects		No	It is considered that the proposed wording of Policy EN8, as outlined below, remains too restrictive in requiring development to meet all these criteria. The way the policy is currently worded suggests that Local Wildlife sites have to achieve a higher test than more regionally or nationally significant sites. This is on the	On this basis it is therefore maintained that (f) should be deleted from draft Policy EN8. This amendment would better align Policy EN8 with the wording of draft Policy EN1 which	Criterion (f) reflects the NPPF principle that significant harm to biodiversity should first be avoided, including by locating development on an alternative site with less harmful impacts, and it applies only to development

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						basis that development on a Local Wildlife Site would need to accord with criterion 'a' to 'h'. It is considered that if development proposals can demonstrate that there are benefits which outweigh any harm and mitigation/compensation can be delivered this should be sufficient. Demonstrating that a scheme could not be delivered on alternative sites, which are not in the control of the applicant to bring forward, is excessive where the other two criteria can be adequately addressed. It is considered that Policy EN8 is currently unsound as this is unjustified. *"Proposals for development in, or likely to have an adverse effect (directly or indirectly) on a Locally Designated Site such as Local Nature Reserves, Local Wildlife Sites, Local Geological Sites and/ or ancient woodlands, veteran trees and hedgerows or wildlife corridors, priority habitats and species will only be exceptionally permitted where:*	states that *"Proposals which cause loss or harm to the green and blue infrastructure network will not be supported unless the need for, and the benefits of the development clearly outweigh any adverse impacts. Where impacts are unavoidable, development will only be supported if suitable mitigation measures are provided."*	affecting locally designated sites and other sensitive features. Paragraph 452 explains that sites are protected in proportion to their status within the hierarchy of designations. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						they cannot be located on alternative sites that would cause less or no harm; and the public benefits of the development clearly outweigh the impacts on the features of the site and the wider network of natural habitats; and adequate mitigation or, as a last resort, compensation measures are provided."		
C552	Dr Beatty	Paragraph 454	Objects	No	No	Had this been done and published for the area in Wilmorton? The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this		Any planning application for the site will need to address Policy EN8, including an ecological assessment where required, and Policy HA16 recognises the mature trees and active travel links on the site. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
C552	Dr Beatty	Paragraph 455	Objects	No	No	Significant harm to the green space in wilmorton is not being avoided The removal of green space and old trees for a	Keep the green space in wilmorton	Any planning application for the site will be assessed against Policies EN8,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						traveller accommodation in wilmorton , seems to be the opposite of this		EN9 and EN10, and Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
Policy EN9: Trees and Hedgerows								
OR225	Forestry Commission	Policy EN9: Trees and Hedgerows				While trees, woodlands and other green infrastructure are considered in your local plan. There is the opportunity to further strengthen this. For example, regarding retention of trees “where possible”, an expectation should be expressed that existing trees will be retained except in exceptional circumstances. A minimum canopy cover standard for new development could also be set, which should include not only tree lined streets, but use a variety of		Policy EN9 requires new development to include tree-lined streets and trees elsewhere, such as on open space, and compensatory planting where trees are lost, and paragraphs 456 and 457 recognise the need to increase Derby's relatively low canopy cover. The choice of appropriate, climate-resilient species can be

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						planting styles from open grown standard trees, small spinneys, community orchards and shelterbelts. Climate resilient species should also be chosen. Use of the Forestry Commission Ecological Site Classification Tool (ESC) can assist with selection of tree species that are ecologically suited to particular sites and includes climate change predictions to allow for future suitability and woodland resilience. Specific mention of tree planting could be suggested as part of mitigation strategies to improve air quality in particular, where new development activity has potential to create additional noise or air pollution.		addressed at application stage, and Policy EN1(h) already seeks multifunctional benefits from green infrastructure, including improved air quality. No change required.
OR29	The Woodland Trust	Policy EN9: Trees and Hedgerows	Objects	Yes	No	The Woodland Trust welcomes the inclusion of Policy EN9 and supports the recognition of the important contribution that trees, woodlands and hedgerows make to Derby. However, amendments are required to ensure the policy is	The policy should include a clear and measurable tree replacement requirement where the loss of trees is exceptionally justified. The current wording lacks	Policy EN9 requires compensatory planting wherever trees are lost, on site wherever possible, and where this is not practicable a financial contribution based on the value of the lost

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						effective, justified and fully consistent with national policy.	certainty and may result in inconsistent outcomes. A minimum replacement ratio, such as three new trees planted for every one tree lost, should be specified to secure a net increase in canopy cover and ensure that losses are adequately compensated over time. Secondly, the policy should require replacement and new planting to comprise native tree and hedgerow species that reflect Derby's local landscape character. Where practicable, stock should be sourced from local or regional nurseries to support local provenance and strengthen resilience to pests and diseases. Finally, the wording	tree using the Capital Asset Value for Amenity Trees tool, which links replacement to the amenity value lost rather than to a fixed ratio. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							relating to ancient woodland, ancient trees and veteran trees should be strengthened and aligned directly with national policy. Ancient woodland is an irreplaceable habitat and ancient and veteran trees are nationally important assets. The policy should mirror the wording of the NPPF and make clear that development resulting in the loss or deterioration of ancient woodland, ancient trees or veteran trees should be refused other than in wholly exceptional circumstances, rather than simply specifying this would be in cases where the benefits clearly outweigh the loss.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							This would ensure that the policy is fully consistent with national policy and provides clear guidance for applicants and decision-makers.	
C552	Dr Beatty	Paragraph 456	Objects	No	No	The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this	Keep the green space in wilmorton	Policy HA16 recognises the mature trees on the site and retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. Any planning application will be assessed against Policy EN9, which requires existing trees to be retained where possible and compensatory planting where trees are lost. No change required.
C552	Dr Beatty	Paragraph 457	Objects	No	No	The removal of green space and old trees for a traveller	We should keep the green space in	Policy HA16 recognises the mature trees on the site and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						accommodation in wilmorton , seems to be the opposite of this	wilmorton	retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. Any planning application will be assessed against Policy EN9, which requires existing trees to be retained where possible and compensatory planting where trees are lost. No change required.
C552	Dr Beatty	Paragraph 458	Objects	No	No	The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this	We should keep the green space in wilmorton	Policy HA16 recognises the mature trees on the site and retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. Any planning application will be assessed against Policy EN9, which requires existing trees to be retained where

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								possible and compensatory planting where trees are lost. No change required.
C552	Dr Beatty	Paragraph 458	Objects	No	No	The councils application for The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this	Keep the green space in wilmorton	Policy HA16 recognises the mature trees on the site and retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. Any planning application will be assessed against Policy EN9, which requires existing trees to be retained where possible and compensatory planting where trees are lost. No change required.
C552	Dr Beatty	Paragraph 460	Objects	No	No	The councils application for The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this	Keep the green space in wilmorton	Policy HA16 recognises the mature trees on the site and retains the land beyond the fenced pitches as accessible

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								public open space, to be improved with further planting. Any planning application will be assessed against Policy EN9, which requires existing trees to be retained where possible and compensatory planting where trees are lost. No change required.
Policy EN10: Biodiversity Net Gain								
OR128	Home Builders Federation*	Policy EN10: Biodiversity Net Gain	Object		No	*Policy EN10 is not considered to be sound as it is not effective, justified, or consistent with national policy* The first raft of intended changes to national BNG policy and practice have now been implemented. This includes the introduction of a 0.2 Ha exemption and small sites being able to deliver off-site. The BNG policy and supporting text needs updating to reflect these changes		Policy EN10 applies to 'qualifying development' and to any percentage mandated through national policy (which is a material consideration) or guidance, so changes to the statutory exemptions and the national framework will apply without the need to amend the Plan. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR227	Lichfields on behalf of Derby Station Quarter Board	Policy EN10: Biodiversity Net Gain	Object		No	Policy EN10 sets out the Council's approach to securing measurable Biodiversity Net Gain (BNG) as part of new development. The Derby Station Quarter Board supports the principle of delivering measurable BNG and recognises its contribution to creating and enhancing habitats. However, BNG, and the metrics, processes and validation requirements by which it is assessed and secured, are already comprehensively defined in national legislation (the Environment Act 2021) and associated statutory guidance, which apply directly to all qualifying development regardless of local plan policy. The Derby Station Quarter Board notes that no changes have been made to Policy EN10 since the Regulation 18 Draft, and we therefore reiterate our previous representations on this policy in full. In our view, it has not been demonstrated why additional local policy wording or validation requirements are		Policy EN10 does not alter the statutory metric or exemptions, but adds local considerations, including regard to the Derbyshire Local Nature Recovery Strategy, a preference for off-site gains within Derby where possible, and the local validation information needed to confirm that the statutory requirement can be met. Paragraph 468 explains that the sequential approach is intended to ensure the city benefits from habitat enhancements arising from development. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						necessary, over and above the statutory framework which already applies. We consider this raises a soundness concern in respect of the "justified" test, as the need for local policy requirements which duplicate national legislation has not, in our view, been supported by proportionate evidence. We therefore suggest that Policy EN10 is amended to remove any requirements which duplicate the statutory BNG framework, and to confine the policy to matters not already addressed through national legislation. This would ensure the policy is justified and does not impose unnecessary or duplicative burdens on development.		
OR240	Pegasus Planning on behalf of Catesby Estates*	Policy EN10: Biodiversity Net Gain	Object	Yes	No	Policy EN10: Biodiversity Net Gain is an unnecessary duplication of a national policy. A 10% biodiversity net gain is a mandatory requirement with significant national guidance available to guide the process of achieving the requirements. Paragraph 16f of the NPPF	Policy EN10 should be deleted in order that there is no unnecessary duplication of statutory requirements and national policy.	While the policy does contain some duplication of national policy it was felt important to guide applicants and give context. Policy EN10 sets out local considerations,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						advises that Local Plans should avoid unnecessary duplication. The proposed policy also adds an unnecessary sequential element to how off-site units are secured. The statutory requirements already set out a sequential approach to the location of off-site units related to the whether the site is within the same, adjacent or other Local Planning Authority or National Character Area. The proposed policy approach overreaches national policy and law by adding further levels of complexity, by seeking a ward by ward assessment to be undertaken. In addition to this, there does not appear to be the necessary evidence on the availability of registered units on a ward by ward basis to support this approach in any event and therefore there are questions about whether this approach is feasible. The added local considerations go beyond those set out in law and are		including regard to the Derbyshire Local Nature Recovery Strategy and a preference for off-site gains within Derby, and paragraph 473 explains that the Council intends to develop habitat banks across the city to provide locally sourced units. The ward-based sequence applies only 'where possible', so it does not prevent the use of registered units elsewhere where local options are not available. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						unnecessary, inappropriate and impractical. There is no indication that this ward by ward approach will deliver better biodiversity outcomes, in fact a biodiversity improvement close to the site could be less important than one strategically placed within an important corridor.		
OR258	Pegasus Group on behalf of Infinity Park Derby LLP*	Policy EN10: Biodiversity Net Gain	Object	Yes	No	Draft Policy EN10: Biodiversity Net Gain is an unnecessary duplication of a national policy. A 10% biodiversity net gain is a mandatory requirement with significant national guidance available to guide the process of achieving the requirements. Paragraph 16f of the NPPF advises that Local Plans should avoid unnecessary duplication. The policy also adds an unnecessary sequential element to how off-site units are secured by seeking a sequential approach to prioritising offsite gains within the same ward as the development followed by adjacent wards and other sites	Policy EN10: Biodiversity Net Gain should be deleted as it unnecessarily duplicates or contradicts national policy on Biodiversity Net Gain.	Policy EN10 sets out local considerations, including regard to the Derbyshire Local Nature Recovery Strategy and a preference for off-site gains within Derby, and paragraph 473 explains that the Council intends to develop habitat banks across the city to provide locally sourced units. The ward-based sequence applies only 'where possible', so it does not prevent the use of registered units elsewhere where local

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						within Derby. The biodiversity metric already incentivises offsite gains to be close to the development site. This is so that communities local to the development benefit from increases in biodiversity. The metric also provides an incentive to achieve off-site biodiversity gains in areas of strategic significance as set out in the local nature recovery strategy. The City Council's proposed approach overreaches beyond existing guidance and adds a further level of complexity and constraint that is not required, and therefore inconsistent with the NPPF paragraph 16f		options are not available. No change required.
OR256	Pegasus Group on behalf of Miller Homes, William Davis and Miller Gadsby (Heatherton) Ltd*	Policy EN10: Biodiversity Net Gain	Object	Yes	No	Policy EN10: Biodiversity Net Gain is an unnecessary duplication of national policy. A 10% Biodiversity Net Gain is a mandatory requirement with significant national guidance available to guide the process of achieving it. Paragraph 16 (f) of the NPPF advises that Local Plans should avoid unnecessary duplication. Furthermore, the	Policy EN10 should be deleted in order that there is no unnecessary duplication of statutory requirements and national policy.	Policy EN10 sets out local considerations, including regard to the Derbyshire Local Nature Recovery Strategy and a preference for off-site gains within Derby, and paragraph 473 explains that the Council intends to

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						2026 NPPF states that materially inconsistent policies should be given very limited weight. The policy also adds an unnecessary sequential element to how off-site units are secured. Nationally, off-site units already have a sequential element applied to their value if located outside the LPA area or National Character Area. It is considered that the City Council's proposed approach overreaches beyond national policy and law by adding further complexity through a ward-by-ward assessment. The Council should evidence the availability of registered units on a ward-by-ward basis and demonstrate whether the outlined approach is feasible, necessary, appropriate and viable. In addition to this, there does not appear to be the necessary evidence on the availability of registered units on a ward by ward basis to support this approach in any event and		develop habitat banks across the city to provide locally sourced units. The ward-based sequence applies only 'where possible', so it does not prevent the use of registered units elsewhere where local options are not available. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						therefore there are questions about whether this approach is feasible. The added local considerations go beyond those set out in law and are unnecessary, inappropriate and impractical. There is no indication that this ward by ward approach will deliver better biodiversity outcomes, in fact a biodiversity improvement close to the site could be less important than one strategically placed within an important corridor. Policy EN10 is not consistent with national policy or justified because it unnecessarily duplicates the statutory biodiversity net gain regime and imposes an additional ward-by-ward approach to securing off-site biodiversity units without evidence that this is necessary, and the policy as drafted is therefore not justified.		
OR226	The Planning Bureau Limited on behalf of	Policy EN10: Biodiversity Net Gain	Object		No	Policy EN10: Biodiversity Net Gain states '*Where off-site compensation is required, this shall be provided in-line with*	For the policy to be consistent with national policy and legislation the	The sequential approach applies only 'where possible' and expresses a local

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
	McCarthy & Stone & Churchill					*the Council's sequential approach'*. The Council should reconsider and delete the additional wording it proposes with regard to BNG and the mitigation hierarchy to ensure that the plan is consistent with national policy. The Council should note that Paragraph: 006 Reference ID: 74-006-20240214 of the government guidance on Biodiversity Net gain states that '*Plan-makers should be aware of the statutory framework for biodiversity net gain, but they do not need to include policies which duplicate the detailed provisions of this statutory framework. It will also be inappropriate for plans or supplementary planning documents to include policies or guidance which are incompatible with this framework, for instance by applying biodiversity net gain to exempt categories of development or encouraging the*	Council should: Reconsider the additional policy wording to ensure it is consistent with recently published legislation and planning guidance. As a minimum delete the wording '~~*Where off-site compensation is required, this shall be provided in-line with the Council's sequential approach*~~' as it is not consistent with national policy.	preference for where off-site gains are delivered; it does not change the statutory metric or the biodiversity gain hierarchy, and statutory credits remain a last resort. Paragraph 468 explains that the approach is intended to ensure the city benefits from habitat enhancements arising from development. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						use of a different biodiversity metric or biodiversity gain hierarchy.'.		
OR29	The Woodland Trust	Policy EN10: Biodiversity Net Gain	Object	Yes	No	The Woodland Trust welcomes the inclusion of Policy EN10 and supports the Council's commitment to securing biodiversity net gain through new development. However, the policy should be strengthened to ensure that biodiversity gains are delivered as close as possible to the location where impacts occur to ensure the policy is sound.	The policy should establish a clear spatial hierarchy for the delivery of biodiversity net gain units. This should require developers to prioritise biodiversity enhancements on-site in the first instance. Where it can be robustly demonstrated that on-site provision is not feasible, biodiversity units should be secured within the Derby City Council area. Only where opportunities cannot be identified within the local authority should off-site units be delivered elsewhere, and then priority should be given to sites within neighbouring local	Policy EN10 already requires net gain to be provided on site first and, where that is not practicable, sets a sequential approach that prioritises off-site gains within the same ward, then adjacent wards and then elsewhere in Derby before sites outside the city are considered. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							authorities that are ecologically connected to Derby and contribute to local nature recovery objectives.	
Policy EN11: Air Quality								
OR36	Derby Climate Coalition	Paragraph 476	Supports	Yes	Yes	We are pleased to see the addition of this para compared to the Reg 18 draft, as we consider that it strengthens the policy.		Support welcomed.
OR240	Pegasus Planning on behalf of Catesby Estates*	Policy EN11: Air Quality	Object	Yes	No	Policy EN11: Air Quality states: *'Major development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. To achieve this, a statement should be submitted demonstrating:* *g) how proposals have considered ways to maximise benefits to local air quality',* Policy EN11: Air Quality (criteria g) appears to go	Policy EN11: Air Quality (g) should be modified to be clear that air quality improvements are encouraged rather than required. Without modification the Policy is unjustified and unsound.	Criteria (g) and (h) apply only to major development subject to Environmental Impact Assessment and require a statement showing how benefits to local air quality have been considered and how exposure will be reduced, rather than requiring improvements to be delivered. Policy EN11 sets out the detailed approach to air quality while Policy

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						beyond mitigating the impacts of development, requiring improvements to air quality. It is important that the policy does not go beyond what is directly related to development, any improvements can be encouraged but should not be required. There is significant duplication between this policy and EN213 Pollution. It is unclear why a separate policy on Air Quality and Land Contamination is needed when the Pollution policy also covers these matters.		EN13 addresses pollution more generally, so the two policies are complementary. No change required.
OR258	Pegasus Group on behalf of Infinity Park Derby LLP*	Policy EN11: Air Quality	Object	Yes	No	This policy appears to go beyond mitigating the impacts of development, in criteria g) and h), requiring improvements to air quality. It is important that the policy does not go beyond what is directly related to development, any improvements can be encouraged but should not be required.	Policy EN11: Air Quality should be modified to delete criteria g) and h) as these are not justified and otherwise unnecessary.	Criteria (g) and (h) apply only to major development subject to Environmental Impact Assessment and require a statement showing how benefits to local air quality have been considered and how exposure will be reduced, rather than

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Furthermore, there is significant duplication between this policy and EN24: Pollution. It is unclear why a separate policy on Air Quality and Land Contamination is needed when the Pollution policy also covers these matters.		requiring improvements to be delivered. Policy EN11 sets out the detailed approach to air quality while Policy EN13 addresses pollution more generally, so the two policies are complementary. No change required.
OR256	Pegasus Group on behalf of Miller Homes, William Davis and Miller Gadsby (Heatherton) Ltd*	Policy EN11: Air Quality	Object	Yes	No	Policy EN11: Air Quality sets out that development proposals should seek opportunities to identify and improve air quality and should not reduce air quality. This policy appears to go beyond mitigating the impacts of development by requiring improvements to air quality in criteria g) and h). It is important that the policy does not go beyond what is directly related to the development; improvements can be encouraged but should not be required. Again, there is significant duplication between this policy and EN13: Pollution. It is unclear why a separate policy	Policy EN11: Air Quality (g) should be modified to be clear that air quality improvements are encouraged rather than required. Without modification the Policy is unjustified and unsound.	Criteria (g) and (h) apply only to major development subject to Environmental Impact Assessment and require a statement showing how benefits to local air quality have been considered and how exposure will be reduced, rather than requiring improvements to be delivered. Policy EN11 sets out the detailed approach to air quality while Policy EN13 addresses pollution more

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						on Air Quality and Land Contamination is needed when the Pollution policy also covers these matters. Policy EN11 is not justified or effective because it imposes additional requirements to improve air quality beyond mitigating the impacts of development, without evidence that these requirements are necessary or would deliver better outcomes, while also unnecessarily duplicating the matters addressed by Policy EN13 and national policy.		generally, so the two policies are complementary. No change required.
C531	Roy Woolley*	Policy EN11: Air Quality	Object	Yes	No	• Matter / Policy Reference: Policy EN11 (Air Quality, Paras 474–480) and Policy EN13 (Pollution, Para 485) • Soundness Tests Failed: Justified, Effective, and Consistent with National Policy Reason the Policy is Unsound: Policy EN11 and EN13 rely on an evidence base that is procedurally and scientifically ambiguous, rendering the spatial strategy and development management criteria neither Justified nor	1. Reinstall a diffusion tube in the Ascot Drive-Mitre Island corridor. 2. At a minimum, install PMx monitoring on this stretch of road. 3. Seek tube placements with clear access to the surrounding air. 4. Consider ways to redirect pedestrian traffic away from this stretch of road. 5. A	The information provided as part of the objection does not demonstrate that the Council's air quality monitoring network is in adequate, that concentrations exceeding the air quality objectives are at risk or that modifications to the policy are necessary on air quality

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Effective. LAQM.TG22 and LAQM.PG22 refer, respectively, to the Defra Local Air Quality Management Technical and Policy Guidance documents. The references cited are collected in Chapters 10 and 11 of 'Data Deficits' – a PDF uploaded in the response to Point 485 with file name Data_Deficits_Regulation_19_Draft__Roy_Woolley_FINAL.pdf. The council's baseline assertion of ongoing compliance across AQMA No. 1, which, as mentioned, specifies 'the entire length of Osmaston Road', is undermined by severe empirical data issues detailed in the accompanying technical PDF (Data Deficits: Sections 2,4,5): 1. The 2.3 km Topographic Monitoring Void: Along the Osmaston Road corridor, a spatial gap of 2,343m exists between two NO2 diffusion tubes spanning 69.3% of the monitored road. In addition, this gap is not a uniform plane; the Defra Digital Terrain Model (DTM) data shows a 15-metre vertical depression/topographic	full assessment of air quality, including current and future PMx and NO2 levels, must be undertaken before any transport additions or changes are made to this section of road. 6. Amend the Local Plan Monitoring Framework to introduce a mandatory remedial trigger should any monitoring data indicate annual mean exceedances of NO2 or persistent PM2.5 hotspots.	grounds. The available data indicates a substantial margin of compliance with the air quality objectives. Consequentially, it is highly unlikely that further modelling of cumulative impacts would materially alter the conclusions reached. A full technical response to the objection from the Council's environmental health air quality team has been appended to the Sites Topic Paper. Air quality impacts associated with proposals for development will continue to be assessed through the development management process, as required by the NPPF and/or Policy EN11 Air Quality. It is

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						basin floor (falling from 62.74 m ASL to 46.47m ASL). 2. Decommissioning of Critical Receptors: The removal of tube DT18 in 2020 meant that NO2 levels in the most populous area of Osmaston Road, and the one with the most complicated traffic flows, were omitted from any further analysis. 3. Invalid Micro-Siting: Some monitoring tubes (notably RW1, OR3, and OR4) are near dense vegetation, which contrasts with several specific LAQM.TG requirements such as 'Sites should be in as open a setting as possible in relation to surrounding buildings.' (Para 7.148), 'The site should be open to the sky, with no overhanging vegetation or buildings.' (Para 7.208), and 'It is important to note that vegetation needs cutting back occasionally.' (Para 7.149). 4. Failure to Model Combined Factors: EN11 treats developments as isolated schemes that rely on generalised dispersion models and fails to address the cumulative nature of increased		considered that adequate protection and safeguarding for local air quality are already provided without modifications to the policy.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						or altered traffic flows. 5. Particulate Matter (1): The 2025 ASR (pp.7) discusses PM2.5 in the context of bonfire complaint enforcement, chimney smoke, wood-burning stoves and the dust from construction sites. LAQM.TG22 also explicitly mentions 'soot from vehicle exhausts' and 'dust from tyres and brakes' as the sources of (primary) PM2.5 (para 2.73) – two things which, considering the length and the high and potentially increasing volumes of traffic on Osmaston Road, should be monitored. 6. Particulate Matter (2): LAQM.TG22 also states (Para 7.12) that for NO2/Particulate Matter assessments, the following are some of the types of roads that should be considered: 'Narrow congested streets with residential properties close to the kerb.' 'Roads with high HDV flows.' 'Junctions' and 'Roads with significantly changed traffic flows' - Osmaston Road meets several of these criteria (Data Deficits: Sections 3,4,7, 8).		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
C552	Dr Beatty	Paragraph 460	Objects	No	No	The removal of green space and old trees for a traveller accommodation in wilmorton , seems to be the opposite of this , as it will directly impact sir quality in the immediate area	Keep the green space in wilmorton	Any planning application for the site will be assessed against Policies EN11 and EN13, and Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
OR41	Councillor Tim Prosser	Paragraph 476	Objects		Yes	A number of new policy tests and technical standards appear in the document published for Regulation 19 consultation that were not in the agreed draft, including: A new development test under the Air Quality policy's supporting text, that "development must avoid generating additional car traffic or creating conditions that worsen pollution." Para 476		The Regulation 19 consultation was carried out on the published Plan, and all parties, including councillors, have had the opportunity to comment on its content. The Council is satisfied that the Plan has been prepared in accordance with the relevant legal and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						None of these are corrections of the draft text — each is new policy substance, imposing new obligations on developers or committing the Council to new positions, that a consultee reading only the agreed draft version would not have seen and that were not passed by cabinet or council. It's been explained to me that these changes were made under delegated powers to **"make minor changes for the purposes of presentation, error correction and clarity"** to the document approved by cabinet and council before its publication for Regulation 19 consultation. This objection concerns whether that delegation has been exceeded and the documents contents altered substantially from the regulation 18 consultation and the agreed draft.		procedural requirements, which will be set out in the submission documents. No change required.
Policy EN12: Contaminated Land								
OR104 & C519	George Fletcher*	Paragraph 483	Objects	No	No	Wilmorton Park is known to sit on contaminated land. There is	An alternative location needs to be	Potential contamination was

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						no evidence that an assessment of the suitability of the other 46 parks has been made with respect to this matter.	found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	one of the criteria applied to all nine shortlisted sites in the Gypsy and Traveller Site Provision Topic Paper, and SA Appendix G notes that any contamination can be mitigated, as on the adjacent former Wilmorton College development. Policy HA16 requires any potential land contamination to be properly mitigated through the planning application process, in line with Policy EN12. No change required.
Policy EN13: Pollution								
OR104 & C519	George Fletcher*	Policy EN13: Pollution		No	No	There is no evidence that these criteria have been met with sto installing a traveller camp on Wilmorton Park.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	Any planning application for the site will be assessed against Policy EN13 and the other policies of the Plan, and Policy HA16 requires any potential land contamination to be properly mitigated.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
C531	Roy Woolley*	Policy EN13: Pollution	Objects	Yes	No	Reason the Policy is Unsound: Policy EN11 and EN13 rely on an evidence base that is procedurally and scientifically ambiguous, rendering the spatial strategy and development management criteria neither Justified nor Effective. LAQM.TG22 and LAQM.PG22 refer, respectively, to the Defra Local Air Quality Management Technical and Policy Guidance documents. The references cited are collected in Chapters 10 and 11 of 'Data Deficits' – a PDF uploaded in the response to Point 485 with file name Data_Deficits_Regulation_19_Draft__Roy_Woolley_FINAL.pdf. The council's baseline assertion of ongoing compliance across AQMA No. 1, which, as mentioned, specifies 'the entire length of Osmaston Road', is undermined by severe empirical	1. Reinstall a diffusion tube in the Ascot Drive-Mitre Island corridor. 2. At a minimum, install PMx monitoring on this stretch of road. 3. Seek tube placements with clear access to the surrounding air. 4. Consider ways to redirect pedestrian traffic away from this stretch of road. 5. A full assessment of air quality, including current and future PMx and NO2 levels, must be undertaken before any transport additions or changes are made to this section of road. 6. Amend the Local Plan Monitoring	The information provided as part of the objection does not demonstrate that the Council's air quality monitoring network is inadequate, that concentrations exceeding the air quality objectives are at risk or that modifications to the policy are necessary on air quality grounds. The available data indicates that a substantial margin of compliance with air quality objectives. Consequently, it is highly unlikely that further modelling of cumulative impacts would materially alter

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						data issues detailed in the accompanying technical PDF (Data Deficits: Sections 2,4,5): 1. The 2.3 km Topographic Monitoring Void: Along the Osmaston Road corridor, a spatial gap of 2,343m exists between two NO2 diffusion tubes spanning 69.3% of the monitored road. In addition, this gap is not a uniform plane; the Defra Digital Terrain Model (DTM) data shows a 15-metre vertical depression/topographic basin floor (falling from 62.74 m ASL to 46.47m ASL). 2. Decommissioning of Critical Receptors: The removal of tube DT18 in 2020 meant that NO2 levels in the most populous area of Osmaston Road, and the one with the most complicated traffic flows, were omitted from any further analysis. 3. Invalid Micro-Siting: Some monitoring tubes (notably RW1, OR3, and OR4) are near dense vegetation, which contrasts with several specific LAQM.TG requirements such as 'Sites should be in as open a setting as possible in relation to surrounding	Framework to introduce a mandatory remedial trigger should any monitoring data indicate annual mean exceedances of NO2 or persistent PM2.5 hotspots.	the conclusions reached. A full technical response to the objection from the Council's environmental health air quality team has been appended to the Sites Topic Paper. Air quality impacts associated with proposals for development will continue to be assessed through the development management process as required by the NPPF and/or Policy EN11 Air Quality. It is considered that adequate protections and safeguards for local air quality are already protected without modifications to the policy.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						buildings.' (Para 7.148), 'The site should be open to the sky, with no overhanging vegetation or buildings.' (Para 7.208), and 'It is important to note that vegetation needs cutting back occasionally.' (Para 7.149). 4. Failure to Model Combined Factors: EN11 treats developments as isolated schemes that rely on generalised dispersion models and fails to address the cumulative nature of increased or altered traffic flows. 5. Particulate Matter (1): The 2025 ASR (pp.7) discusses PM2.5 in the context of bonfire complaint enforcement, chimney smoke, wood-burning stoves and the dust from construction sites. LAQM.TG22 also explicitly mentions 'soot from vehicle exhausts' and 'dust from tyres and brakes' as the sources of (primary) PM2.5 (para 2.73) – two things which, considering the length and the high and potentially increasing volumes of traffic on Osmaston Road, should be monitored. 6. Particulate Matter (2):		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						LAQM.TG22 also states (Para 7.12) that for NO2/Particulate Matter assessments, the following are some of the types of roads that should be considered: 'Narrow congested streets with residential properties close to the kerb.' 'Roads with high HDV flows.' 'Junctions' and 'Roads with significantly changed traffic flows' - Osmaston Road meets several of these criteria (Data Deficits: Sections 3,4,7, 8).		
C531	Roy Woolley*	Paragraph 485	Objects	Yes	No	Governance & Statutory Silos • Matter / Policy Reference: Policy EN13 (Pollution, Supporting Paragraph 485) • Soundness Tests Failed: Effective and Consistent with National Policy • Participation at Hearing: Yes LAQM.TG22 and LAQM.PG22 refer, respectively, to the Defra Local Air Quality Management Technical and Policy Guidance documents. The references cited are collected in Chapters 10 and 11 of 'Data Deficits' – a PDF uploaded with the comments for this point. Reason the Policy is Unsound: Paragraph 485 of	1. Update Paragraph 485 to reference the statutory duties and targets of the Environment Act 2021. 2. Add explicit policy wording mandating that major site allocations within or adjoining AQMA No. 1 must be subject to a published Health Impact Assessment (HIA) prepared jointly with the Director of Public Health and integrated into the	Statute isn't normally to be repeated in the local plan. Policies EN11 and EN13 ensure that the air quality effects of development, including within the Air Quality Management Area, are assessed at application stage. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Policy EN13 states that the council will seek to "complement and not duplicate the work of other agencies" and cites statutory duties under the Environment Act 1995. This approach renders the plan ineffective. 1. Reliance on Superseded Frameworks: Citing the Environment Act 1995 document (Data Deficits: Section 1) while failing to integrate the strengthened statutory duties introduced by the Environment Act 2021—specifically regarding mandatory inter-departmental AQAPs, binding PM2.5 targets, and proactive public exposure reduction—reflects an outdated regulatory baseline. 2. Departmental Silos: The plan assumes planning decisions and statutory air quality management are independent workstreams (Data Deficits: Section 6). LAQM.PG22 Para 5.5 requires that AQAPs should integrate transport, planning, and public health departments. 3. Lack of Transparency and Public Engagement: The plan	council's statutory Air Quality Action Plan.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						provides no mechanism for public exposure reporting or inter-agency accountability, ignoring Defra guidance on public access to air quality information following the Ella Adoo-Kissi-Debrah Prevention of Future Deaths report (PG22 Chapter 6).		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
9. Historic Environment								
C507	Community Campaigner David Barton	Paragraph 486.	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be	Entirety of Document- Traditional Architecture can showcase the value of the City's biggest single USP which interlocks economy, ecology and environment altogether seamlessly.	Noted. Policy HE4 already expects proposals involving the demolition of listed or locally important buildings to show that all reasonable alternatives to demolition have been considered, and design quality is secured through Policy GD1 without prescribing a single architectural style. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.		
OR162	Historic England	Paragraph 486	Support			We recognise that a number of proposed site allocations within the Plan already have planning permission/ have commenced and as a result we understand that these allocations underwent heritage assessment		Noted and welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						as part of a planning application, where required, and so we do not raise any specific queries on these sites.		
OR162	Historic England	Paragraph 486	Support			We welcome and support the inclusion of Chapter 9 in the document, and we welcome the opportunity to have given comments on the policy wording previously and welcome the amendments that are now reflected within the text.		Support welcomed.
OR162	Historic England	Paragraph 486	Object			Paragraph 486 – amend 'historic parks and gardens' with 'Registered Parks and Gardens' and elsewhere in the document.		Agreed, Change suggested through the submission minor corrections list
Policy HE1: Conserving and Enhancing the Historic Environment								
OR240	Pegasus Planning on behalf of Catesby Estates*	Policy HE1: Conserving and Enhancing the Historic Environment	Object	Yes	No	*Justification and Consistency with National Policy* Policy HE1 criterion (e): *"require proposals for new development, located within Archaeological Alert Areas, or other areas of archaeological potential to initially be accompanied by a desk-based*	Policy HE1 criterion (e) should be modified to remove the requirement for archaeological assessment to be undertaken before any decision can be taken, as this is unnecessary and unjustified.	Criterion (e) reflects the NPPF expectation that an appropriate desk-based assessment and, where necessary, a field evaluation are submitted. (Para 207 Dec 2024 NPPF) where a site may contain heritage

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						assessment of available evidence. Where appropriate further archaeological evaluation may also be required. This should be submitted before the planning application is determined to inform design and enable an informed and reasonable planning decision". It is unclear why the provision of archaeological assessment is required before any decision can be taken. It is common for the written specification to be agreed post decision or for this to be agreed and conditioned as a pre-commencement condition, particularly for outline applications which aim to establish the principle of development. Policy HE1 (f) states: *"ensure that development within the city avoids or minimises harm to the significance of heritage assets located outside of the city boundary, within adjoining local*	Policy HE1 criterion (f) should be modified so that so that reference is harm is consistent with national planning policy.	assets with archaeological interest, so that decisions are properly informed. Criterion (f) reflects the NPPF aim of avoiding or minimising conflict between a heritage asset's conservation and a proposal (para 208 Dec 2024 NPPF). This does not displace the national policy approach of weighing less than substantial harm against public benefits. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						authority areas, particularly through impacts upon the setting of assets, both through individual and cumulative impacts". This appears to be higher test than the national policy requirements where less than substantial harm can be weighed against public benefits.		

OR256	Pegasus Group on behalf of Miller Homes, William Davis and Miller Gadsby (Heatherton) Ltd*	Policy HE1: Conserving and Enhancing the Historic Environment	Object	Yes	No	*Policy HE1 criterion (e):* *"require proposals for new development, located within Archaeological Alert Areas, or other areas of archaeological potential to initially be accompanied by a desk-based assessment of available evidence. Where appropriate further archaeological evaluation may also be required. This should be submitted before the planning application is determined to inform design and enable an informed and reasonable planning decision".* *This requirement is duplicated in Policy HE6: Archaeology and Scheduled Monuments, another example of the repetition between policies. Policy EN18 sets out that the archaeological assessment may comprise archaeological desk-based assessment, field evaluation or other investigative techniques as appropriate, undertaken in accordance with a written specification agreed with the Council.*	Policy HE1 criterion (e) should be modified to remove the requirement for archaeological assessment to be undertaken before any decision can be taken, as this is unnecessary and unjustified. Policy HE1 criterion (f) should be modified so that the reference to harm is consistent with national planning policy.	Criterion (e) reflects the NPPF expectation that an appropriate desk-based assessment and, where necessary, a field evaluation are submitted where a site may contain heritage assets with archaeological interest, so that decisions are properly informed. (Para 207 Dec 2024 NPPF). Policy HE6 sets out the detailed approach. Criterion (f) reflects the NPPF aim of avoiding or minimising conflict between a heritage asset's conservation and a proposal. (para 208 Dec 2024 NPPF). This does not displace the national policy approach of weighing less than substantial harm against public benefits. No change required.

						It is unclear why the provision of this information is required before any decision can be taken. It is common for the written specification to be agreed post decision or for this to be agreed and conditioned as a pre-commencement condition, particularly for outline applications which aim to establish the principle of development. This policy as drafted could delay decision making unnecessarily and would not change the ultimate outcome achieved. *Policy HE1 (f) states:* *"ensure that development within the city avoids or minimises harm to the significance of heritage assets located outside of the city boundary, within adjoining local authority areas, particularly through impacts upon the setting of assets, both through individual and cumulative impacts".* *This appears to be higher test than the national policy requirements where less than substantial harm can be*		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						weighed against public benefits. This approach is not consistent with national policy.		
C510	Marsha Ramroop Unheard Voice Consultancy Ltd*	Policy HE1: Conserving and Enhancing the Historic Environment	Objects	Yes	No	The Historic Environment chapter is thorough and rightly ambitious for the Derwent Valley Mills World Heritage Site, the city's listed buildings and its 16 conservation areas. Derby's industrial story is genuinely of international importance and I support its protection without reservation. But the plan's definition of heritage stops, in effect, at the railway age. Paragraph 490 traces the city's 'rich legacy of heritage assets' from the Roman fort through Georgian townhouses to twentieth-century industrial heritage, and there it ends. Derby's story since 1945 has been written substantially by communities from Pakistan, India, the Caribbean and, more recently, Eastern Europe; paragraph 16 records their presence, concentrated in Normanton, Arboretum, Blagreaves and Littleover. The places that carry their memory and identity, places of worship,	• Commit to a review of the Local List with a community nomination round targeted at heritage currently underrepresented, supported by outreach in the wards concerned. • Amend the supporting text to Policy HE1 to recognise social and communal value, the significance a place holds for a community's identity and collective memory, as a dimension of heritage significance, consistent with Historic England's published approach to assessing significance.	Policy HE4 commits the Council to maintain and update its list of buildings and structures of local importance, and paragraph 489 recognises how the public connects with heritage and the value of heritage to society. Places of importance to Derby's communities can be considered for inclusion on the local list as it is updated and treated as non-designated heritage assets in decisions. However, reviewing the Local List sits outside of the Local Plan process. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						community halls, shops, streetscapes, are largely invisible in the plan's heritage framework. Objective OBJ16 (paragraph 70) promises 'an exciting cultural offer representative of our communities'; the heritage policies do not yet deliver the planning side of that promise. And as paragraph 28 itself warns, once historic features are lost, they cannot be replaced, any more than a mill can. A heritage framework justified by evidence that overlooks part of the city's significance is incomplete.	• Reference the cultural infrastructure of Derby's diverse communities within Policy E11 (Tourism and Culture), so that the visitor and cultural economy reflects the whole city's story.	
Policy HE2: Derwent Valley Mills World Heritage Site								
No representations were received for this policy.								
Policy HE3: Darley Abbey Mills Complex								
No representations were received for this policy.								
Policy HE4: Listed Buildings and Locally Listed Buildings								
OR162	Historic England	Policy HE4: Listed Buildings and Locally	Object			Policy HE4 we recommend rewording the opening sentence, instead of considering the 'desirability' to preserve the		The opening sentence of Policy HE4 reflects the statutory duty in section 66 of the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
		Listed Buildings				significance of heritage assets, ensure that it is clear that the significance of heritage assets will be protected and where possible, enhanced. Additionally, the paragraph relating to 'substantial harm' should aim to avoid harm in the first instance and mitigate harm. We consider that the text needs rewriting to ensure that harm to the significance of heritage assets is avoided and mitigated, where possible.		Planning (Listed Buildings and Conservation Areas) Act 1990, and the policy already states that the Council will seek to avoid or minimise harm to listed buildings in the first instance, with Policy HE1 requiring harm to be avoided, minimised and mitigated. The Council considers the policy sound as drafted and will discuss the suggested wording with Historic England through a Statement of Common Ground.
Policy HE5: Conservation Areas								
No representations were received for this policy.								
Policy HE6: Archaeology and Scheduled Monuments								
OR162	Historic England	Policy HE6: Archaeology and Scheduled Monuments	Object			Policy HE6 the final paragraph – any works should be approved with the local authority archaeological service and any recording should be updated on		Policy HE1(d) already requires recording to be published through the Historic Environment Record,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the Historic Environment Record, as a minimum.		and Policy HE6 requires archaeological work to follow a written specification agreed with the Council and its results to be made publicly accessible, so the two policies together provide for this. No change required.
Policy HE7: Historic Parks, Gardens and Designed Landscapes								
OR162	Historic England	Policy HE7: Historic Parks, Gardens and Designed Landscapes	Object			Policy HE7 amend references to 'Registered'.		Agreed, Change suggested through the submission minor corrections list
OR162	Historic England	Paragraph 553	Object			Paragraph 553 should reference the need to protect the significance of heritage assets, including their setting.		Policy HE7 already requires the significance of historic parks and gardens, including their associated features and settings, to be preserved and enhanced, and paragraph 553 is read alongside it. The Council will discuss

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								the suggested wording with Historic England through a Statement of Common Ground.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
10. Climate Change								
C507	Community Campaigner David Barton	Paragraph 556	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be	Entirety of Document- Traditional Architecture will provide the greatest contributing influence on combatting the Climate Crisis through its rich Carbon capacity/ embodied carbon alongside appropriate retrofitting of Old Builds.	Noted. Policy CL6 already prioritises the renovation, repair, reuse or retrofit of existing structures over demolition, and design quality is secured through Policy GD1 without prescribing a single architectural style. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.		
Policy CL1: Flood Risk and Water Management								
OR36	Derby Climate Coalition	Policy CL1: Flood Risk and Water Management	Objects	Yes	No	We support this including the minor changes from the Reg 18 draft, except for the deletion compared with the Reg 18 draft of "Proposals should	Given that drought conditions in the last two summers followed by floods, we think this wording	Policy GD9 requires major development to demonstrate a co-ordinated approach to infrastructure and can

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						demonstrate that there is adequate wastewater infrastructure and water supply capacity to serve the development. Where it is likely to create a specific shortfall or exacerbate existing deficiencies, developers will be required to adequately mitigate or compensate for those deficiencies".	should be re-instated.	secure contributions towards water and sewerage infrastructure, and Policy EN13 requires development not to contribute to water pollution by discharging to foul sewers that are near or at capacity. Policy CL1 also requires development to contribute to the objectives of Severn Trent's Water Resource Management Plan, so water supply and wastewater capacity remain addressed by the Plan. No change required.
OR162	Historic England	Policy CL1: Flood Risk and Water Management	Object			Policy CL1 should also reference the need for flood alleviation measures and drainage solutions to protect the significance of heritage assets and their setting and ensure that the historic environment is fully considered in any proposals.		Policy HE1 applies to flood alleviation and drainage proposals as to any other development, requiring a heritage statement where the significance of heritage assets,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								including their setting, may be affected, and Policy CL2(e) requires new flood defences to take account of the historic and archaeological sensitivity of the River Derwent Corridor. As the Plan is read as a whole, no change is required.
OR240	Pegasus Planning on behalf of Catesby Estates*	Policy CL1: Flood Risk and Water Management	Object	Yes	No	Proposed Policy CL1: Flood Risk and Water Management repeats national policy on the sequential test and Sustainable Drainage Systems, and is another example of unnecessary duplication of a national policy. Paragraph 16f of the NPPF advises that Local Plans should avoid unnecessary duplication.	CL1: Flood Risk and Water Management should be modified to remove policy elements which duplicate national policy so that it is consistent with NPPF 16 f of the NPPF.	While parts of the policy do repeat national policy, we felt it was useful in this context to guide applicants. Policy CL1 sets out how national policy on flood risk and drainage will be applied in Derby, including local requirements such as 10 metre buffers to watercourses and flood defences and the relationship with the Our City Our River programme in Policy CL2. It is therefore not unnecessary

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								duplication. No change required.
OR256	Pegasus Group on behalf of Miller Homes, William Davis and Miller Gadsby (Heatherton) Ltd*	Policy CL1: Flood Risk and Water Management	Object	Yes	No	Policy CL1: Flood Risk and Water Management repeats national policy on the sequential test and Sustainable Drainage Systems and is another example of unnecessary duplication of a national policy. Paragraph 16 (f) of the 2024 NPPF advises that Local Plans should avoid unnecessary duplication. The proposed policy includes reference to proposals demonstrating that there is adequate wastewater infrastructure and water supply capacity to serve the development. The policy notes that where it is likely to create a specific shortfall or exacerbate existing deficiencies, developers will be required to adequately mitigate or compensate for those deficiencies. Paragraph 201 of the 2024 Framework also states that planning decisions should assume that other regulatory regimes will operate effectively.	CL1: Flood Risk and Water Management should be modified to remove policy elements which duplicate national policy so that it is consistent with paragraph 16 (f) of the NPPF.	The policy sets out how national policy on flood risk and drainage will be applied in Derby, including local requirements such as 10 metre buffers to watercourses and flood defences and the relationship with the Our City Our River programme, so it is not unnecessary duplication. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						This has been strengthened in the new NPPF through Policy DM7: Relationship with Other Regulatory Regimes and introduction of National Decision-Making Policies identifies it as a core principle that planning decisions should be based on whether development would be an acceptable use of land, and that other regulatory regimes should be assumed to operate effectively unless they have land-use implications. This paragraph in the policy related to wastewater infrastructure and water supply capacity is therefore inconsistent with the current and emerging national policy.		
Policy CL2: Our City Our River (OCOR)								
OR162	Historic England	Policy CL2: Our City Our River (OCOR)	Object			Policy CL2 we welcome the reference to heritage. The policy should be clear that any proposals are fully considerate of the significance of the historic environment and do not harm the significance of		Policy CL2(e) already requires new flood defences to be sympathetically designed, taking account of the historic and archaeological sensitivity of the River

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						heritage assets and their setting.		Derwent Corridor, and Policy HE1 applies to all proposals affecting the significance of heritage assets and their setting. As the Plan is read as a whole, no change is required.
Policy CL3: Sustainable Design & Construction								
OR36	Derby Climate Coalition	Policy CL3: Sustainable Design & Construction	Objects		No	The policy lacks teeth.	Insert "at the latest" at the end of the first line between "carbon" and "by 2035". Under "Energy Hierarchy" change "should" to "must".	Policy CL3 requires major development to demonstrate in a Sustainability Statement how its principles and requirements have been applied, which ensures they are given proper weight in decisions. The policy is framed to complement the Building Regulations and the Future Homes Standard, which set mandatory energy standards for new buildings. This along with the material consideration of NPPF

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								policy means that no change is required.
OR162	Historic England	Policy CL3: Sustainable Design & Construction	Support			Policy CLC3 we welcome references to the historic environment. The maintenance and retention of heritage assets is a positive tool in the climate change agenda.		Support welcomed.
OR227	Lichfields on behalf of Derby Station Quarter Board	Policy CL3: Sustainable Design & Construction	Support		Yes	Policy CL3 sets out the Council's requirements for sustainable design and construction, including adherence to the Energy Hierarchy and a fabric-first approach. The Derby Station Quarter Board supports these overarching objectives. However, our Regulation 18 representations raised concern that the Regulation 18 Draft required major non-residential development to achieve a minimum BREEAM 'Excellent' rating, and larger residential schemes to achieve BREEAM Communities 'Excellent', without an explicit viability caveat. We considered this represented a very high policy bar which, without an accompanying whole-plan viability assessment, risked		Support welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						undermining the deliverability of allocated city centre sites, where abnormal costs and regeneration objectives already place pressure on scheme viability. A similar issue was recently identified in the Regulation 19 consultation of the South Warwickshire Local Plan, whereby the inspector identified the potential for stringent sustainability requirements to undermine other aspects of the plan delivery, unless appropriate caveats were included to make clear that they would be subject to viability. The Derby Station Quarter Board welcomes the removal of the BREEAM 'Excellent' requirement in the Publication Draft. This directly addresses the soundness concern raised in our Regulation 18 representations regarding the effectiveness and deliverability of this standard, and represents a material reduction in delivery risk for regeneration schemes within the city centre, including		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the Station Quarter. We note that the requirement to provide an energy assessment has been retained, which we have no objection to. We consider Policy CL3 to be sound and have no further comments to raise.		
OR240	Pegasus Planning on behalf of Catesby Estates*	Policy CL3: Sustainable Design & Construction	Object	Yes	No	*Sustainability Statement* Three policies: Policy CL3: Sustainable Design & Construction, Policy CL6: Embodied Carbon and Policy CC6: Tall Buildings, all require developments to be supported by a Sustainability Statement. It is considered that the approach is not consistent with paragraph 16 (d) and (f) of the Framework as the policies that are not clearly written and unambiguous, and present unnecessary duplication. *Energy Efficiency* Policy CL3 states that new builds need to meet the fabric energy efficiency required under Part L of the Building Regulations. The part of policy CL3 is	Policy CL3 should be modified to: Clarify the role of the required Sustainability Statement. Remove the reference to meeting Building Regulations as this is unnecessary duplication with other regulatory regimes and is not consistent with paragraph 16 (f) of the NPPF. Remove the reference to local water efficiency requirements as these are not justified by evidence.	The Sustainability Statement is required only for major development, and Policies CL3 and CL6 refer to the same statement, which must be commensurate with the scale of the development. The reference to Part L confirms that the Plan does not seek energy efficiency standards beyond the Building Regulations, and the 110 litres water efficiency standard applies only 'where viable' and is supported by the Water and Flooding Topic Paper, which identifies significant pressures on Severn Trent Water's

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						unnecessary duplication with other regulatory regimes and is not consistent with paragraph 16 (f) of the NPPF. *Water Efficiency* On water efficiency the draft policy requires all new dwellings to achieve the Optional Technical Housing Standard of 110 litres per day per person for water efficiency as described in the Building Regulations. This is the national optional technical housing standard. The Building Regulations require all new dwellings to achieve a 125 litres per day per person (Part G), so this draft policy goes beyond the current national requirements. Water efficiency is a matter dealt with through Building Regulations and there is insufficient evidence provided for a locally needed lower requirement. Furthermore, there is no indication of consultation with		Strategic Grid Zone. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						key stakeholders such as Severn Trent Water or the Environment Agency which would justify the requirement There is also no evidence that the impact on viability has been tested and therefore the implications on housing supply.		

OR256	Pegasus Group on behalf of Miller Homes, William Davis and Miller Gadsby (Heatherton) Ltd*	Policy CL3: Sustainable Design & Construction	Object	Yes	No	Sustainability Statement Policy CL3: Sustainable Design & Construction requires all developments to be supported by a Sustainability Statement; this requirement is also included within Policy CL6: Embodied Carbon and therefore represents duplication between policies. This is also a further document which will need to be prepared in support of a planning application and is particularly onerous for smaller developments. The Council will need to consider how this interacts with the Government's proposals for a more consistent and proportionate approach to local information requirements for validation. It is considered that the approach is not consistent with paragraph 16 (d) and (f) of the Framework as the policies are not clearly written and unambiguous, and	Policy CL3 should be modified to: Clarify the role of the required Sustainability Statement. Remove the reference to meeting Building Regulations as this is unnecessary duplication with other regulatory regimes and is not consistent with paragraph 16 (f) of the NPPF. Remove the reference to local water efficiency requirements as these are not justified by evidence.	The Sustainability Statement is required only for major development, and Policies CL3 and CL6 refer to the same statement, which must be commensurate with the scale of the development. The reference to Part L confirms that the Plan does not seek energy efficiency standards beyond the Building Regulations, and the 110 litres water efficiency standard applies only 'where viable' and is supported by the Water and Flooding Topic Paper, which identifies significant pressures on Severn Trent Water's Strategic Grid Zone. No change required.

						present unnecessary duplication. New Development The policy notes that new builds need to meet the fabric energy efficiency required under Part L of the Building Regulations. This is already required by the Building Regulations and is therefore unnecessary duplication, which paragraph 16 (f) of the NPPF advises Local Plans should avoid. Energy Efficiency Policy CL3 states that new builds need to meet the fabric energy efficiency required under Part L of the Building Regulations. The part of policy CL3 is unnecessary duplication with other regulatory regimes and is not consistent with paragraph 16 (f) of the NPPF. Water Efficiency This policy requires all new dwellings to achieve the Optional Technical Housing Standard of 110 litres per day		

						per person for water efficiency as described in the Building Regulations. This is the national Optional Technical Housing Standard. Building Regulations require all new dwellings to achieve a 125 litres per day per person (Part G), so this policy goes beyond the current national requirements. The policy should therefore clearly distinguish between the mandatory national standard and the optional requirement. Water efficiency is a matter dealt with through Building Regulations and there is insufficient evidence provided for a locally needed lower requirement. There is no indication of consultation with key stakeholders such as Severn Trent Water or the Environment Agency. There is also no evidence that the impact on viability has been tested and therefore the implications on housing supply. In the absence of such evidence, the requirement is		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						not justified and is therefore unsound. The policy should either be deleted or amended to require the 110 litres per person per day standard only where the Council has demonstrated the necessary local justification.		

OR226	The Planning Bureau Limited on behalf of McCarthy & Stone & Churchill	Policy CL3: Sustainable Design & Construction	Object		No	Whilst the council's commitment to meeting both its and the UK Government's target of net zero carbon emissions is commendable, it appears that the Council is going to achieve this through having mandatory carbon and climate standards by 2035 that go beyond government targets. The council should note that the Future Homes and Building Standards Circular 01/2026 was published on 24th March 2026 amends part L of the Building Regulations. The Future Homes and Buildings Standards will ensure that new homes and non-domestic buildings are built with low carbon heating and high levels of energy efficiency, so that buildings constructed to these standards will not require retrofitting to become zero carbon in use as the electricity grid decarbonises. It is noted that the new NPPF at policy PM13 with respect to		Policy CL3 does not set energy efficiency standards beyond the Building Regulations, as it expects new homes to meet Part L and the Future Homes Standard and supports proposals that go further, consistent with the Future Homes Standard costs included in the viability assessment. The 2035 net zero aim reflects the Council's Climate Change Action Plan, as explained in paragraph 557. No change required.

						setting standards states the following: 'iii. Energy efficiency, for which any standards that go beyond the current or proposed Building Regulations should have a clear and robustly costed rationale which shows that there will not be an adverse impact on the viability and deliverability of development. Any such standards should be expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP) or other approved calculation methodology.' It is also noted that the viability assessment accompanying the local plan only seems to take account of the Future homes Standards and does not go beyond that. It is our view that rather than having a separate policy that introduces separate standards, but does not do this by suggesting an uplift of TER or specifying a SAP, the council		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						should instead rely on the building regulations and Future Homes Standards. This will allow developers to be consistent in the standards they are delivering and to keep up with requirements and for the plan to be consistent with the 2026 NPPF.		
Policy CL4: Renewable & Low Carbon Energy								
OR36	Derby Climate Coalition	Policy CL4: Renewable & Low Carbon Energy	Objects	Yes	No	This policy seems unnecessarily restrictive , given that the city needs to encourage low carbon energy. The supporting text suggests that most of the criteria should only apply to major schemes like iEnergy's, but we worry that it will discourage local, volunteer-led groups from starting negotiations.	Clarify what type and size of scheme this policy applies to.	Policy CL4 expressly supports community-led schemes, and its criteria only resist proposals with significant adverse impacts, so small community schemes that do not give rise to such impacts will be supported. Early engagement with the Council is welcomed. No change required.
OR162	Historic England	Policy CL4: Renewable & Low Carbon Energy	Support			Policy CLC4 we welcome reference to the historic environment within this policy.		Support welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
Policy CL5: Low Carbon Energy Centres								
OR36	Derby Climate Coalition	Policy CL5: Low Carbon Energy Centres	Supports	Yes	Yes	We support this policy, which is new since the Reg 18 draft.		Support welcomed.
OR162	Historic England	Policy CL5: Low Carbon Energy Centres	Objects			Policy CLC5, incorporate heritage into the final sentence.		Criterion (d) of Policy CL5 requires proposals to accord with other relevant policies of the Plan, including the historic environment policies HE1 to HE7. As the Plan is read as a whole, no change is required.
Policy CL6: Embodied Carbon								
OR36	Derby Climate Coalition	Policy CL6: Embodied Carbon	Supports	Yes	Yes	We support this policy.		Support welcomed.
OR162	Historic England	Policy CL6: Embodied Carbon	Objects			Policy CLC6, incorporate the maintenance and retention of heritage assets within this policy.		Policy CL6(a) already prioritises the renovation, repair, reuse or retrofit of existing structures over demolition, which includes heritage assets, and Policy CL3 sets out a

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								whole building approach to the retrofit of traditional buildings and heritage assets. Policy HE1 also promotes the sensitive conversion and re-use of underutilised heritage assets. As the Plan is read as a whole, no change is required.
OR256	Pegasus Group on behalf of Miller Homes, William Davis and Miller Gadsby (Heatherton) Ltd*	Policy CL6: Embodied Carbon	Object	Yes	No	Policy CL6: Embodied Carbon and Policy CL3: Sustainable Design & Construction require all developments to be supported by a Sustainability Statement. This is a further document which will need to be prepared in support of a planning application and is particularly onerous for smaller developments. The Council will need to consider how this interacts with the Government's proposals for a more consistent and proportionate approach to local information requirements for validation.	Combine the Sustainability Statement requirements in Policies CL3 and CL6 into a single proportionate requirement, applied only where necessary and aligned with national validation guidance.	The Sustainability Statement is required only for major development, and Policies CL3 and CL6 refer to the same statement, which must be commensurate with the scale of the development. It is therefore a proportionate requirement that does not apply to smaller schemes. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Policy CL6 and Policy CL3 are not justified or effective, and are potentially inconsistent with national policy, because they impose a blanket requirement for a Sustainability Statement on all developments without demonstrating that such information is necessary or proportionate to the scale and likely impacts of development. This risks creating an unnecessary validation and application requirement, particularly for smaller schemes, contrary to the national objective of ensuring that information requirements are proportionate and limited to the minimum necessary to determine an application.		
OR226	The Planning Bureau Limited on behalf of McCarthy & Stone & Churchill	Policy CL6: Embodied Carbon	Object		No	Policy CL6 requires development to take opportunities to reduce the development's embodied carbon content by conserving resources, minimising the use of materials by reusing and recycling, and reducing the amount of material sent for disposal.	The council should also consider removing the policy area from the draft Local Plan given draft policy HO9 within the consultation draft NPPF.	Policy CL6 applies 'where possible' and does not set a numerical embodied carbon target or require Environmental Product Declarations, so it does not add a fixed cost that would

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						As such we would like to remind the council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "*The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan"* (Paragraph: 002 Reference ID: 10-002-20190509). The introduction of an embodied carbon policy must not be so inflexible that it deems sites unviable and any future policy needs to ensure this to make sure it is consistent with NPPF/PPG and can justified by the council. The viability of specialist older persons' housing is more finely balanced than 'general needs' housing and we are strongly of the view that these housing typologies		affect viability. The Sustainability Statement need only be commensurate with the scale of the development, and the Plan is to be examined against the December 2024 NPPF under the transitional arrangements. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						should be robustly assessed in the forthcoming Local Plan Viability Assessment. Additionally, new development will often be far more sustainable in many circumstances including building fabric by use of modern methods of construction but also extending beyond that, such as sustainability through optimisation of use of a site. The council also need to verify that embodied carbon figures are available to developers from suppliers through an Environmental Product Declaration as in our experience this is not yet readily available from the majority of suppliers.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
11. Infrastructure and Community								
C507	Community Campaigner David Barton	Paragraph 601	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be	Entirety of Document- Traditional Architecture will provide the greatest contributing influence on combatting the Climate Crisis through its rich Carbon capacity/ embodied carbon alongside appropriate retrofitting of Old Builds.	Noted. Design quality is secured through Policy GD1 and the Plan's other design and heritage policies, which respond to local character without prescribing a single architectural style. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.		
C552	Dr Beatty	Paragraph 603	Objects	No	No	The removal of green space in wilmorton to show horn traveller accommodation in seems to be the opposite of yhis	Keep the green space in wilmorton	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting, so the park will

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								remain available to local residents. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
C552	Dr Beatty	Paragraph 608	Objects	No	No	The loss of a community green space in wilmorton to show horn traveller accommodation in is the opposite of this	Keep the green space in wilmorton	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting, so the park will remain available to local residents. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.
Policy IC1: Social and Community Facilities								
OR33	Campaign for Pubs	Policy IC1: Social and Community Facilities	Objects	Yes	No	The 'public house' is part of our history and heritage, and a cornerstone of communities up and down the land, in our cities, towns, villages. Yet our pubs are under threat, and we are losing them at a distressing rate. They have long been too easy to	Public houses are often among the last remaining community facilities in rural settlements, playing a vital role in reducing social isolation, supporting	Public houses are among the local community facilities protected by Policy IC1 (paragraph 604(e)), and their loss is only permitted where it is clearly

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						close down and then convert or demolish, which makes them vulnerable to those who do not value them or want to preserve them in the same way that most of us do. The losses are exaggerated by weakness of many existing local plans which make the achievement of change of use far too easy. We consider that the conditions proposed for the Protection of Existing Community Facilities within Policy IC1 are too weak to offer adequate protection to public houses and other community facilities.	local employment, encouraging tourism and strengthening community cohesion. The loss of a public house can have a significant adverse impact on the social and economic wellbeing of towns and villages across the Blaby district, which has experienced a number of pub closures in recent years, with some sites subsequently proposed for residential development. Once a pub is lost, it is often impossible to replace – particularly in villages, where it may be the last remaining meeting place. Local councillors have an important role to play in protecting community assets, including public	demonstrated that the facility is no longer viable or that a suitable replacement is available. Paragraph 608 requires applicants to justify any loss with evidence, including the views of the community it serves, which allows marketing evidence to be considered where relevant. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							houses. Local plans need to identify the assets deserving protection, and install robust policies which target protection for traditional public houses which should include (ALL of the following conditions to be satisfied): Marketing - It is incumbent on an applicant to prove that reasonable efforts have been made to sell or let the premises as a public house. Marketing evidence must be provided which demonstrates that the premises have been marketed for a sustained period of at least 12 months with a reputable commercial estate agent with experience in the pub and retail trade. The	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							pub must have been priced as a public house and not as a private house or development opportunity (the value of a building as a private house is usually significantly higher than its value as a public house). Viability - A viable pub is simply one that can make enough to cover its bills, pay the wages of its staff and fund the necessary upkeep of the building, plus in the case of a non-community pub, leaving enough to make an acceptable living for the business owner/operator. In the case of a community pub, it just needs to cover its costs and wages and the upkeep of the building. That is still a viable and	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							sustainable pub model – and allows a pub to continue to operate and employ local people bring money into the local community, which otherwise would be lost. Often pubcos, supermarkets and developers cynically argue that pubs are not 'viable' because they haven't made enough to suit their own inflated commercial interests, even though the pub has a good turnover and is profitable. Sometimes, even despite profitability, pub owners seek to close and develop pubs to cash in. It is wrong that any viable pub should be lost, especially where there is an individual, company or community prepared to buy it and retain it	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							as a pub. Many licensees, communities and other companies and individuals have been denied the chance to buy and run a pub, which is outrageous. Councils often fall for claims by developers planning consultants that pubs are 'unviable' and worse still have ignored the fact that a pub did have a clear and viable future as a pub. It is incumbent upon an applicant to provide evidence of the trading history of the pub. This must be supported with financial evidence of past trade from a reputable source such as an accountant. Potential - planners should consider the potential for a pub to trade successfully	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							under the guidance of an experienced pub operator. Loss of the last traditional pub in an area should be strongly resisted. It is equally valid that more than one traditional pub can successfully trade in an area where there is demand for the variety of services that public houses can offer. We will stress again that ALL conditions must be satisfied. We have lost many valuable community facilities due to local plans allowing change of use based on one condition being satisfied.	
OR161	Derbyshire County Council	Policy IC1: Social and Community Facilities	Supports	Yes	Yes	It is noted that there are references to potentially requiring developer contributions to meet the additional demands on libraries caused by new developments (p30 of the IDP Draft		Support welcomed. Policy GD9 allows contributions to be sought towards infrastructure needed to mitigate the impact of development, and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Infrastructure Delivery Plan (IDP). However, it would be helpful if this also mentioned museums, as new developments often trigger the deposit of archaeological and paper archives generated by construction activity. It would also be helpful if this was linked to Policy CC5 (Non-Residential Regen Opportunities) item b) which specifically identifies opportunities to improve Derby Museum, Art Gallery & former Central Library building (p228 of the Local Plan Reg 19 draft), and possibly Policy E11 (Tourism & Culture) on p124).		the deposit of archaeological archives is addressed by Policy HE6, which requires the results of archaeological work to be archived and made publicly accessible.
OR39	NHS Property Services	Policy IC1: Social and Community Facilities	Supports	Yes	Yes	Draft Policy IC1 focuses on the Council's objective to ensure the provision of high-quality, inclusive social and community facilities and services and the protection of existing local community facilities. Supporting paragraph 604 (g) includes public health care facilities, including GP surgeries, dental practices, pharmacies, community health services and wellbeing units within the	For the purposes of clarity in the interpretation of the policy, NHSPS are seeking the following modification (shown in red italics) to Draft Policy IC1 Supporting Paragraph 609. NHSPS would request that the wording is amended to clarify that the NHS estate strategy or service	Support welcomed. Paragraph 609 already confirms that the formal declaration of a healthcare facility as surplus to NHS requirements, or its identification as surplus in a published estates strategy or service transformation plan, will be considered sufficient to justify its

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						definition of local community facilities. Supporting paragraph 609 states that where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, this will be considered sufficient to justify the loss of an existing healthcare facility. The policy also requires developments that increase the demand for community facilities and services to make contributions towards, or provide for, new or improved facilities as set out in Draft Policy GD9. NHSPS supports the provision of sufficient, quality community facilities and welcomes the Council's inclusion of an additional supporting paragraph (609) which includes NHSPS wording as requested at Regulation 18 stage. Where it can be demonstrated that health facilities are surplus	transformation plan would be considered sufficient to satisfy draft Policy IC1, and that the NHS would not be subject to additional requirements that may delay the delivery of essential healthcare facilities and services for the community. Proposed Modification to Supporting Paragraph 609: Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, this will be considered sufficient	loss, so the further wording sought is not needed. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land or submission of onerous information	to justify the loss of an existing healthcare facility *and will satisfy the requirements under Draft Policy IC1.*	
OR240	Pegasus Planning on behalf of Catesby Estates*	Policy IC1: Social and Community Facilities	Object	Yes	No	Policy IC1 states that: *"Where a development proposal would generate a site-specific impact which requires mitigation, the impact will be mitigated on-site or through the provision of financial contributions in accordance with the Council's Planning Obligations SPD or successor". (emphasis added)* With the introduction of new national planning system, Council's can no longer adopt new Supplementary Planning Documents. In this context the	Policy IC1 should be modified to remove the reference to successor documents to SPDs, as such document do not exist under the new planning system, and are therefore incorrect and ambiguous and contrary to paragraph 16 of the NPPF.	The Planning Obligations SPD (2018) will continue to apply on adoption of the Plan, as the Viability Topic Paper explains, and the reference to a successor document allows for any replacement guidance or mechanism that national legislation provides for. The wording is therefore sufficiently clear. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						reference to “successor” documents to SPD is incorrect and ambiguous and contrary to paragraph 16 of the NPPF.		
Policy IC2: Cemetery								
OR197	Stephen Peat	Policy IC2: Cemetery	Objects			Derby City Council on August 28th, 2026 has invited residents on the future of **Markeaton Crematorium.** The only problem not all the people of Derby want to be cremated. For example, there are groups in Derby who want to be buried from the Catholic, Jewish and Islamic who believe in burials include the new American Pope wanted Catholics to be buried because if followed the ways of Jesus. I believe Derby needs to consult on a new burial ground one in the West of Derby and one in the East of Derby covering residents living in the West, and residents living in the East of Derby including Ockbrook and Borrowash especially in the new Southern Derbyshire Council starting from April 2027 with		A site selection process has been undertaken by the Council before the site was allocated which included detailed environmental surveys. Policy IC2 identifies a new cemetery adjacent to the existing crematorium to meet the city's long-term burial needs, and criterion (c) requires provision to meet the burial needs and requirements of all members of the community. Paragraph 610 explains that Nottingham Road Cemetery will meet

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						new elections with full Council going live in April 2028. Both George Simmett of Spondon and A.W Lymn Funeral Care Services agree a new Cemetery is needed for the East of Derby because several clients who use these services are not happy with the closure of Stoney Lane Cemetery. They do not want to travel to Nottingham Road or a future burial ground near Mickleover which requires three buses to visit the site. In the new Council from 2027 and live in early 2028 will need to examine this issue in the new Council. This is why some of the NA7 Stoney Lane could be used with a reduction in housing number to below 100. But there are many areas of Brownfield land is around Derby to build the 400 houses outside Spondon. I hope Derby City and Southern Derbyshire new Councillors will need to discuss this issue		burial needs in the medium term, and the Policy HA7 allocation is needed to meet housing need, as set out in the Housing Requirement and Spatial Strategy Topic Paper. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						including planning a new cemetery in the local plan.		
Policy IC3: Education Provision								
OR161	Derbyshire County Council	Policy IC3: Education Provision	Supports	Yes	Yes	It is welcomed and supported that the County Council's comments made on the Regulation 18 Plan have been taken into account in the Regulation 19 Plan with a comment on Policy HA5 now incorporated on page 80; h) financial contributions to be made towards primary and secondary education infrastructure. A new school/schools for this cross-boundary community is to be provided on the South Derbyshire part of the site. Derbyshire County Council would welcome the opportunity for further collaborative working and engagement going forward to consider the cross boundary school place planning implications of the fifteen proposed housing sites.		Support welcomed. The Council will continue to work with Derbyshire County Council on cross-boundary school place planning,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
Policy IC4: Higher and Further Education								
No representations were received for this policy.								
Policy IC5: Communication Infrastructure								
No representations were received for this policy.								

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
12. Transport and Movement								
C507	Community Campaigner David Barton	Paragraph 630	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be	Entirety of Document- Traditional Architecture will provide the greatest contributing influence on combatting the Climate Crisis through its rich Carbon capacity/ embodied carbon alongside appropriate retrofitting of Old Builds.	Design quality is secured through Policy GD1 and the Plan's other design and heritage policies, which respond to local character without prescribing a single architectural style. Policy HE4 already expects proposals involving the demolition of listed or locally important buildings to show that all reasonable alternatives to demolition have been considered. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.		
Policy T1: Active and Sustainable Transport								
OR36	Derby Climate Coalition	Policy T1: Active and Sustainable Transport	Objects	Yes	Yes	We strongly support this policy, especially the need to follow the transport hierarchy, but have a couple of comments. Point h) has changed from	Change point h) as mentioned in 5 above.	Support for Policy T1 is noted and welcomed. However, the frequency and quality

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						"400m from a bus stop" in the Reg 18 Draft to "being located within walking distance of a bus stop". We would prefer "locations that are well served by frequent high quality bus services" as in the equivalent policy (CP23) in the current plan. In an urban environment, there is no point in having a convenient bus stop if it is only served occasionally. We are pleased to see the addition of point j) to "encourage low car development wherever possible".		of bus services form part of the negotiations with private operators and applicants. The presence of a bus stop within walking distance provides a consistent and measurable basis for policy implementation. No change required.
OR161	Derbyshire County Council	Policy T1: Active and Sustainable Transport	Supports	Yes	Yes	An important consideration in the City Council's policy approach to the above, is that the four HMA authorities of Derbyshire County Council, Derby City Council, Amber Valley Borough Council and South Derbyshire District Council and supported by National Highways, have recently jointly commissioned Systra Consultants to undertake comprehensive transport modelling works of all the strategic housing and employment sites being either		Support welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						committed or proposed for allocation in the three LPAs respective. The transport modelling works were completed by Systra and the final report was provided to the four authorities in January 2026. Using the East Midlands Gateway Model, the modelling works have applied a range of scenarios (as below) to understand the likely impacts of the strategic sites on the highway network and the likely mitigation required to address their likely impacts. 2044 Do Minimum – Baseline containing committed development only. 2044 Do Something 1 – Local Plan development excluding mitigation. 2044 Do Something 2 – Scenario 1 and "Known Mitigation" measures. 2044 Do Something 3a/3b – Do Something 2 and PT, Active Mode, and Highway Mitigation. 2044 A38 Sensitivity Test – removes the A38 Grade		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Separation to understand implications for the HMA strategy. 2044 A38 Sensitivity Test – removes the A38 Grade Separation to understand implications for the HMA strategy The outputs from the modelling works have been important in informing the City Council's policy approach in Policies T1 and T2. The modelling works clearly demonstrate and support the importance and need for the implementation of the A38 Derby Junctions Grade Separation scheme and implementation of South Derby Integrated Transport Link, including the A50 junction, in delivering housing and employment growth in the HMA. Both of these schemes are supported by Derbyshire County Council. In particular, the modelling works conclude that: In the absence of the known mitigation improvement schemes (the A38		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						improvements, EMIP mitigation and new A50 junction), the existing infrastructure struggles to accommodate the extra HMA traffic and as a result some non-development traffic moves away from key routes such as the A38 and A50 onto alternative, less suitable roads. The extra traffic generated by the HMA developments cause congestion increases at a number of junctions across the Derby HMA area, with junctions within Derby City being the most significantly affected. The identified Known Mitigation schemes are expected to significantly influence route choice and congestion across the network, improving accessibility to development sites at Infinity Garden Village, EMIP and Boulton Moor. The schemes will also influence longer distance routings by improve accessibility of the A38, A50 and M1 on the SRN. The modelling report also highlights the need for significant public transport		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						improvements to support growth in the City and wider HMA and recommends a series of route improvements to existing services in and around the City. In particular, the report concludes that: The public transport enhancements encourage a greater number of passengers to use public transport in both peaks, especially from the larger strategic sites on the edge of Derby where public transport mode share is significantly positively impacted. Active mode improvements are expected to encourage some journeys to move away from car; however, the impact is generally small and consequently there is a relatively neutral impact on highway flows and congestion.		
OR36	Derby Climate Coalition	Paragraph 638	Supports	Yes	Yes	We are pleased to see the Study result and think it deserves wider publicity!		Support welcomed.
Policy T2: Strategic Transport Infrastructure								
OR167	Amber Valley	Policy T2: Strategic				An Area of Future Growth at Brun Lane, Mackworth is	The sub point c should be split to	Criterion C identifies the link road and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
	Borough Council	Transport Infrastructure				identified in the adopted Amber Valley Borough Local Plan, with the potential for 2,000 homes and related infrastructure. The area of land immediately to the southwest lies in South Derbyshire and is identified in the draft South Derbyshire Local Plan Part 1 Review as a Long Term Strategic Housing Growth Area South of Mackworth. It is imperative that proposals for any development proposal which comes forward at these sites is part of a comprehensive and coordinated scheme as endorsed by the above mentioned long term polices, including a comprehensive master plan and appropriate delivery of infrastructure and services, particularly linked to the City Council aspiration for additional highway linkages. In Derby City's Hearing Statement for the Amber Local Plan examination, it stated: "A connection around the west of Mickleover is fundamental in	refer to facilitating active travel links between this area and the City as follows: Implementation of a new west of Mickleover integrated transport link as part of a package of transport interventions; construction of new active travel routes and provision of public transport between the City and the Area for Future Growth at Brun Lane, Mackworth In Amber Valley and South Derbyshire;	active travel routes as initiatives the Council will work with partners to support. In the context of local government reorganisation, and recognising that delivery outside the City depends on neighbouring authorities. The HMA transport work identifies a West of Mickleover Integrated transport link as part of a package of interventions. The Council will continue to work with Amber Valley and South Derbyshire on the route and form of any link, including through the Statement of Common Ground. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						terms of optimising route choice for car borne trips so that they do not travel through inappropriate existing congested parts of the network, such as Mickleover District Centre, but also for providing access and connectivity between growth for public transport and non-vehicular modes. The proposed link between the A52 and B5020 would provide one of the key parts of a connection that could potentially link up the growth on the western fringes of Mickleover. As such, it is important locally, and from a more strategic infrastructure perspective, that this link is provided". Amber Valley highlighted at the time (Dec 2024) that the City had produced no evidence on routing and options of routes. It is noted that the wording of policy TP2 - Strategic Transport Infrastructure, has been amended to:		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Policy T2: Strategic Transport Infrastructure The Council will work with partners to deliver a long-term transport strategy for the city and the region and support the implementation of strategic proposals and initiatives that help create an economically and environmentally sustainable transport network. Initiatives will include: c) implementation of a new link road between the A52 and B5020 and the construction of new cycle and walking routes from the Amber Valley allocation at Brun Lane into the city; The amendment to Policy T2 identifies as an 'initiative' the "implementation of a new link road between the A52 and B5020 and the construction of new cycle and walking routes from the Amber Valley allocation at Brun Lane into the city". This seeks to allocate a link road in an area wholly		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						outside of the administrative area of Derby City. The HMA Strategic Transport Assessment considered a series of interventions associated with development in Amber Valley and South Derbyshire in the Radbourne Lane area. It refers to a link in this area as part of a West of Mickleover Integrated Transport Link. This is part of a package of interventions in and around Derby to mitigate the impacts of development on the highway network. No further work has been undertaken to consider how a link could be implemented, including where it might go, and so reference to the Brun Lane site should be removed. Instead, the Policy should refer to increasing capacity and mitigating impacts of development to the West of the City through a West of Mickleover Integrated Transport Link between the A516 and the A52 as part of a package of transport interventions.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						It is concluded that this policy is unsound as is it's not effective as involves provision of infrastructure in neighbouring authority areas. This could be overcome by amending the policy as set out above.		
OR236	Caddick Land*	Policy T2: Strategic Transport Infrastructure	Objects	Yes	No	Section 1 of these representations explain the significant change in circumstances since the Regulation 18 Stage consultation; specifically the removal of funding for the A38 junction improvement projects which are critical to future growth within Derby and the wider HMA. A38 Junctions projects and status The 'A38 Derby Junctions' was a significant project (of some £600m) to deliver major upgrades to three roundabouts to the west and north of Derby city centre: • A38/A5111 Kingsway • A38/A52 Markeaton		An official decision on the future of the A38 has yet to be made. Until an official statement has been made, the project will remain in the Plan. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						• A38/A61 Little Eaton Each of these junctions experience existing significant congestion and require upgrading to accommodate existing and future traffic growth. In June 2026 the Government announced the potential cancellation of the project (in The Defence Investment Plan Funding explainer), stating: 'DfT will provide savings of up to £700m from its roads funding. The Department will consult on reductions to the third Road Investment Strategy (RIS3) - including the potential cancellation of the A38 Derby Junctions and A46 Newark Bypass schemes, both of which are yet to enter contract and not as far along as other road schemes. There will be stakeholder consultations before any final decision is taken.'		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The implication is clear; there is a genuine likelihood the project will not progress. Derby Local Plan and the A38 junctions project The importance of the A38 junctions is interwoven with the local plan strategy, the proposed site allocations to deliver growth, and the infrastructure needed to deliver the plan. The local plan states: Essential and complementary infrastructure both inside and outside the city will have progressed. The South Derby Integrated Transport Link (Phases 1 and 2) will be completed and A38 grade separation will be delivered. (Paragraph 53). And; In order to deliver a safe, sustainable and efficient transport network it will be necessary to implement a range of different transport		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						infrastructure projects and actions. Some of these will be to address existing problems on the network, some will be to facilitate growth, and some will be to improve and protect the network of pedestrian and cycle routes that cross the city. The schemes in question will not just be implemented by the City Council but partner organisations such as National Highways and Network Rail. The A38 carries heavy flows of north-south long-distance traffic. Also, where it passes through Derby, significant volumes of local traffic cross or join and leave the A38. This results in congestion and delays at the A38/A5111 Kingsway roundabout, the A38/A52 Markeaton roundabout and the A38/A61 Abbey Hill roundabout. Following the conclusion of the Government's Spending Review, funding for the A38 Derby Junctions scheme has now been confirmed and work is underway on the Development		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Consent Order. There is no definite timescale for this work, but it is anticipated that it will be in the lifetime of the plan. The Council will ensure that any land needed to implement these schemes will be protected. (Paragraphs 641 and 642). This is understandably reflected in Policy T2 (Strategic Transport Infrastructure) which states: … Initiatives will include: a) the implementation of National Highways A38 Derby Junctions Grade Separation scheme;… This approach is underpinned by the local plan evidence base, which itself is predicated on this infrastructure being delivered within the plan period and at such a time to resolve existing constraints and support growth (i.e., the infrastructure is needed now, and certainly early in the plan period).		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Evidence base and associated documents – Strategic Transport Assessment The A38 project is, understandably, considered and accounted for in the Strategic Transport Assessment (January 2026) which underpins the emerging plan. Notably, the Assessment undertakes a sensitivity test based on the A38 Junctions project not progressing (as outlined in Section 7 of the Transport Modelling). Tellingly, the Assessment concludes at paragraphs 7.2.4, 7.2.6, and 7.2.7 respectively: 'The removal of the A38 scheme reduces the effectiveness of the HMA mitigation strategy. At several HMA sites close to the A38 (in Mickleover and Mackworth, for example), development traffic struggles to access the wider highway network, and traffic that is able to get out of the development sites experience		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						increases in congestion and journey times… ‘ ‘The removal of the grade separation on the A38 results in increased congestion at the A38 junctions where the grade separation has been removed. The significant reassignment away from the A38 causes a reduction in congestion at other junctions along the A38 compared to the mitigation scenario, but an associated increase in congestion at several routes either side of the A38 as traffic is forced onto less suitable local roads.’ ‘Compared to the Do Minimum scenario, the absence of the A38 scheme results in significant increases in congestion at many local junctions across the whole of Derby City, including the Ring Road, the A516 and the A52.’ It goes on to conclude at paragraph 7.3.2, that:		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						'Network statistics for the AOI are provided in Table 25 and Table 26. In both peaks, the removal of the A38 Grade Separation scheme makes congestion worse across the HMA area and reduces the effectiveness of the HMA package to 32% in the AM peak and 29% in the PM peak.' Then at paragraph 7.4.2: 'The removal of the A38 Grade Separation scheme is expected to significantly influence route choice and congestion across the network.' Summary on transport matters The Transport Assessment is clear; without the A38 junction improvements the plan will result in significant adverse impacts across the network. In turn this undermines the Sustainability Appraisal for the Plan and the policies within the plan.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						This is a significant issue which must be addressed before the plan is progressed, and on the current evidence the plan is unsound. Summary on A38 matters The plan is predicated on A38 junction improvements which are, at best, uncertain, and in reality are unlikely to be delivered during the plan period. Without this major infrastructure the plan may result in significant adverse impacts which are not accounted for in either the local plan policies or the associated evidence base. The plan is therefore unsound in this regard.		
OR36	Derby Climate Coalition	Policy T2: Strategic Transport Infrastructure	Objects	Yes	No	The policy and para 642 will need updating if the government's proposals to cancel the A38 scheme are confirmed, as we hope. It is disappointing to see the first three headings related to road changes designed to encourage car use, which are is in keeping	Remove the word "support" from the second line – the policy would then read that the city council would help to deliver initiatives but would not signify agreement with	An official decision on the future of the A38 has yet to be made. Until an official statement has been made, the project will remain in the Plan. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						with the aims of the climate sections of the plan. We support the addition of points h) and i) compared to the Reg 18 draft and would like to see the inclusion of more detailed proposals. Point c) should not be be included in the plan as the works are not in the city.	decisions imposed on the city by outside bodies. Delete point c).	
OR161	Derbyshire County Council	Policy T2: Strategic Transport Infrastructure	Object	Yes	Yes	1. A38 Derby Junctions Scheme (Policy T2) Derbyshire County Council supports the inclusion of the A38 Derby Junctions Scheme within Policy T2. However, uncertainty remains regarding the future delivery of the scheme and the Plan places significant reliance upon its implementation to support growth. The Local Plan should demonstrate how planned development could be accommodated should the scheme not be delivered within the Plan period and identify any alternative infrastructure interventions or contingency measures that may be required. This would provide greater	The Plan would be strengthened by: Requiring major developments to deliver walking, wheeling and cycling infrastructure in accordance with LTN 1/20 (or successor guidance). Requiring developers to demonstrate how proposals will provide high-quality active travel connections to schools, employment areas, district and local centres, public transport hubs and	An official decision on the future of the A38 has yet to be made. Until an official statement has been made, the project will remain in the Plan. As the Plan should be read as a whole, the requirements of other policies to promote walking and cycling. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						confidence that the growth strategy remains deliverable under a range of infrastructure delivery scenarios. The Transport Modelling Works tested a scenario, which assessed the likely impacts on the City's road network if the A38 Derby Junctions was not implemented, which should provide the evidence for further consideration of this matter by the City Council. 2. South Derby Integrated Transport Link (Policy T2) Derbyshire County Council supports the inclusion of the South Derby Integrated Transport Link within Policy T2. However, unlike other transport interventions referenced within the policy, its role in delivering sustainable transport infrastructure is not clearly articulated. The policy should explicitly reference provision for walking, wheeling, cycling and public transport to ensure consistency with Policy T1 and Objective 12, and to reinforce	green infrastructure networks. Using stronger policy wording to require direct, coherent, safe and inclusive routes, rather than simply encouraging 'improved connectivity'. Providing clearer expectations for route continuity, site permeability, crossing provision, junction design, accessibility, subjective safety and infrastructure suitable for users of all ages and abilities. Requiring more comprehensive provision for secure cycle parking, cargo bikes and adapted cycles. Prioritising delivery of active travel infrastructure in the early phases of	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the expectation that the scheme will function as a genuinely multi-modal corridor. 3. Cross-Boundary Growth and Connectivity Derbyshire County Council welcomes the Plan's recognition of the wider Derby Urban Area and the importance of cross-boundary planning. However, greater emphasis should be placed on the need for strong sustainable transport connections between Derby's allocations and the substantial strategic growth areas planned in neighbouring authorities, particularly within South Derbyshire. Significant housing growth is proposed both within Derby and immediately beyond the city boundary, including the wider Mickleover growth area. These developments should be planned as connected communities rather than separate development parcels.	development to ensure sustainable travel choices are available from first occupation. Requiring active travel audits and connectivity assessments to accompany major planning applications, and that these be realistic and based on conditions 'on the ground', not just on distance. Strengthening support for cross-boundary walking, wheeling and cycling connections between Derby and adjoining growth areas and neighbouring authorities	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Plan should therefore place greater emphasis on delivering direct, safe and attractive walking, wheeling and cycling links between these growth areas and key destinations. Improving cross-boundary permeability will help reduce reliance on private car travel and avoid local journeys having to navigate strategic highway infrastructure, including the Findern Interchange corridor. This would support the objectives of Policies GD1, GD7 and T1, whilst helping create a cohesive sustainable transport network across the wider Derby Urban Area. 4. Active Travel Review (Walking, Wheeling and Cycling) Overall, the Plan demonstrates a strong commitment to active travel and is significantly more ambitious than many Local Plans. Active travel is embedded throughout the Vision, Objectives, Placemaking Principles, Health and Wellbeing policies, Green Infrastructure		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						policies and the dedicated Transport and Movement chapter. The Plan recognises Derby's compact form, acknowledges the need to reduce car dependency and seeks to make walking, wheeling and cycling the preferred choice for short journeys. Policy T1 (Active and Sustainable Transport) appropriately places walking and wheeling first in the transport hierarchy, followed by cycling and public transport. Objectives 1, 9 and 12 further reinforce this commitment. However, while these desired outcomes are well expressed, there is less clarity regarding how they will be consistently delivered through the development management process. Much more policy detail is required around exactly how developers and decision-makers must achieve those outcomes. Several policies encourage improved active travel		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						connectivity but stop short of requiring infrastructure to defined design standards, and there is limited reference to LTN 1/20 or equivalent guidance. As a result, policy interpretation and delivery may vary between developments. 5. Monitoring and Baseline Evidence Before establishing targets for active travel, it is important that the City Council first identifies a robust baseline. The Plan provides some transport-related evidence, including commuting distances and levels of car use, but does not establish a comprehensive baseline for walking, wheeling, cycling, public transport and car mode share. Once a baseline has been established, the monitoring framework should include indicators such as: Walking, wheeling and cycling mode share.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Changes in mode share over time. Length of new active travel infrastructure delivered. Percentage of residents with access to high-quality active travel routes. Delivery of active travel infrastructure associated with strategic development sites. Number of developments meeting agreed active travel design standards. Establishing both a baseline and monitoring framework would provide a clearer understanding of whether the Plan is successfully delivering its active travel objectives over the plan period. 6 Sustainable Travel & Highways Conclusion Derbyshire County Council supports the overall direction of the Local Plan and its commitment to sustainable growth, active travel and cross-boundary working. However,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						further consideration should be given to the implications of uncertainty surrounding the A38 Derby Junctions Scheme, strengthening active travel delivery requirements, and improving sustainable connectivity between Derby and adjoining growth areas. Addressing these matters would help provide greater confidence that the Plan is deliverable, effective and capable of supporting sustainable growth across the wider Derby Urban Area.		
Policy T3: Servicing, Accessibility and Parking								
OR256	Pegasus Group on behalf of Miller Homes, William Davis and Miller Gadsby (Heatherton) Ltd*	Policy T3: Servicing, Accessibility and Parking	Objects	Yes	No	Policy T3: Servicing, Accessibility and Parking sets out that all new development should provide appropriate levels of parking for cars, powered two wheelers and bicycles, having regard to the standards set out in Appendix 4. Appendix 4 includes a standard of 1 space per bedroom for cycle parking. This will have significant implications for the design and layout of	Replace the one cycle space per bedroom standard with a flexible, evidence-based requirement that reflects dwelling type, layout, tenure and anticipated demand.	Appendix 4 clearly states that the parking standards shown are a guide. It allows for parking provision to be varied where it is supported by evidence, for example Census statistics, parking beat surveys, tenure, accessibility scores, first principles based on similar

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						development and is not supported. This would mean for each 3 or 4 bed home, space to park three or four bikes would be required. The proposed cycle parking standard of one space per bedroom is not considered sound. Whilst the Council has prepared a Parking Study Report by Systra, this is focused on parking provision in the City Centre and there is no clear evidence that the study establishes a need for cycle parking to be calculated on a 1 space per bedroom basis, on residential developments. Furthermore, there is no proportionate evidence demonstrating that this level of provision is necessary or appropriate, or that the implications for viability and deliverability have been properly assessed. It may also undermine the effectiveness and deliverability of the Plan where the requirement cannot reasonably be accommodated within layouts. The Council		development elsewhere. The cycle parking guidance is based on the Department for Transport Note LTN 1/20. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						should therefore provide clear evidence demonstrating the justification for this standard, or otherwise the policy should be amended to provide a more proportionate and flexible standard based on the size and type of development and anticipated demand, rather than applying one cycle space per bedroom as a blanket requirement.		
Policy T4: Protected Routes								
OR37	Derby and Sandiacre Canal Trust*	Policy T4: Protected Routes	Objects	Yes	Yes	The supported text at 650 does not pay sufficient regard to the Council Plan and Policies in this document.	Whilst welcoming the reference to the canal restoration, it should be expanded to indicate that the restoration would support policies in the emerging plan by encouraging a more vibrant sustainable transport route encouraging visitor attraction, improved blue and green infrastructure with links carried on beyond the city boundary and by	The supporting text of Policy T4 should be read alongside the Local Plan as a whole since the wider Council Plan objectives and relevant Local Plan policies are addressed throughout the document. As such, individual supporting text sections are not intended to repeat all wider strategic objectives where they have already been

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							mitigating climate change by its environment and ability to assist with flood protection.	established elsewhere in the document. The benefits associated with canal restoration referenced in this representation are considered to be adequately reflected within the supporting text to Policy T4; many of the identified benefits are not unique to canal restoration and can be realised through the provision of a range of recreational and active travel routes. Consequently, it is not considered necessary to expand the supporting text to specifically reference these benefits in the context of canal restoration alone. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR36	Derby Climate Coalition	Policy T4: Protected Routes	Supports	Yes	Yes	We support this policy, including the minor changes from the Reg 18 draft.		Support welcomed.
Policy T5: Electric Vehicle Charging Facilities								
OR256	Pegasus Group on behalf of Miller Homes, William Davis and Miller Gadsby (Heatherton) Ltd*	Policy T5: Electric Vehicle Charging Facilities	Objects	Yes	No	Policy T5: Electric Vehicle Charging Facilities sets out a requirement for new development to make provision for electric vehicle charging infrastructure, using dedicated charge points specifically designed for charging all types of electric vehicle in accordance with, or exceeding, the requirements of the Building Regulations, Part S. This requirement is unnecessary because the provision of EV charging infrastructure is already regulated through Building Regulations Part S. Paragraph 16 (f) of the 2024 NPPF confirms that policies should avoid unnecessary duplication. The policy adds no clear planning policy value and risks duplicating Building Regulations.	Delete Policy T5 or amend it to cross-refer to Part S of Building Regulations only, ensuring there is no additional local requirement unless justified by robust evidence.	Building Regulations and the planning system perform distinct functions and operate at different stages of the development process. Building Regulations Part S does not apply to all forms of development, and therefore Policy T5 serves a broader purpose that extends beyond the provisions of this document and accounts for the planning considerations associated with the location and integration of charging infrastructure into the design, layout and assessment of

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Furthermore, the new NPPF (August 2026) at Policy PM6(1)(c) confirms that plan-makers should "not duplicate, substantively restate or modify the content of national decision-making policies unless directed by other policies in this Framework". More specifically, Policy PM13 seeks to prevent local standards covering matters already addressed by Building Regulations, subject to limited exceptions. The Government identifies limiting duplication of Building Regulations as an express objective of the reforms. The Council has not demonstrated a clear local justification for reproducing the Part S requirements through Policy T5. The policy should therefore be deleted, or substantially amended, to avoid unnecessary duplication of Building Regulations, in accordance with paragraph 16 (f) of the 2024 NPPF.		planning proposals. As such, it is not considered that Policy T5 conflicts with national policy relating to the avoidance of unnecessary duplication. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
13. City Centre								
C507	Community Campaigner David Barton	Paragraph 663	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be	Entirety of Document- Traditional Architecture will provide the greatest contributing influence on combatting the Climate Crisis through its rich Carbon capacity/ embodied carbon alongside appropriate retrofitting of Old Builds.	Noted. Design quality is secured through Policy GD1 and the Plan's other design and heritage policies, which respond to local character without prescribing a single architectural style. Policy HE4 already expects proposals involving the demolition of listed or locally important buildings to show that all reasonable alternatives to demolition have been considered. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.		
Policy CC1: City Centre Strategy								
OR162	Historic England	Policy CC1: City Centre Strategy	Support			Policy CC1 we welcome the reference to the historic environment within this policy.		Support noted.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
OR229	Lichfields on behalf of Derbion*	Policy CC1: City Centre Strategy	Support		No	Draft Policy CC1 seeks to prioritise the City Centre as the most important and sustainable location for growth, including new housing. The draft Plan supports a coherent strategy for focusing new investment, renewal and regeneration activity to the City Centre, and this emphasis is supported by Derbion.		Support noted.
OR227	Lichfields on behalf of Derby Station Quarter Board	Policy CC1: City Centre Strategy	Support		Yes	The Derby Station Quarter Board continues to support the Local Plan's focus on directing investment, renewal, and regeneration to the city centre (Policy CC1). We agree that the city centre represents the most sustainable and strategically important location for growth, and support the emphasis on a brownfield-first, city-centre first approach to development. This approach aligns with national policy objectives, according with the NPPF, reflecting the requirements to make efficient use of land, prioritise previously developed land, and to increase the density of development in		Support noted.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						sustainable locations, particularly those well served by public transport. Focusing growth within the city centre, and in highly accessible locations such as the Railway Station Quarter, supports the optimisation of previously developed land in sustainable locations and reduces reliance on less sustainable peripheral sites. It is considered that this strategy is consistent national policy and represents a sound basis for accommodating growth within the plan period.		
Policy CC2, Defining the City Centre								
OR229	Lichfields on behalf of Derbion*	Policy CC2, Defining the City Centre				Policy CC2 identifies the spatial areas to which policies relating to the City Centre will relate. Derbion supports the extent of the area identified. While Policy CC2 defines the boundary of the City Centre, the hierarchy of centres is set out separately in Policy E9, which also establishes the context for the Central Activities Area (CAA). Policy CC8, in turn,		Support for the definition of the city centre is noted. Justification for not extending the extent of the CAA or PSA are set out in the Economy Topic Paper.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						defines the Primary Shopping Area (PSA). Together, these policies are important in determining the type of development that will be encouraged in different City Centre locations. Further comments are provided, including on the extent of the PSA and CAA boundaries, in individual policy responses.		
OR227	Lichfields on behalf of Derby Station Quarter Board	Policy CC2, Defining the City Centre	Support		Yes	The Derby Station Quarter Board continues to fully support the City Centre boundary as drawn, incorporating the full Railway Station Quarter, recognising the key role the Station Quarter plays in relation to the railway station and its function as a gateway to the wider City Centre. It is considered that the policy is sound.		Support noted.
Policy CC3: City Centre Living								
OR229	Lichfields on behalf of Derbion*	Policy CC3: City Centre Living	Object		No	Derbion does not consider the Policy to be sound. The draft Policy sets out Derby's plan to regenerate the City Centre with at least 5,600 new homes over the plan period.	*"[…] Recognising the challenges of bringing forward development on constrained sites in the City Centre, the*	The Plan should be read as a whole. Policy H4 relating to affordable housing is already flexible and specifically allows for

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Derby Riverside, which is a wider area that includes Riverside Car Park, is identified as one of three key new/enlarged communities driving that growth, 'providing a minimum of 600 new homes' under Policy CC11. *Policy Consideration* The draft Policy recognises challenges on bringing forward constrained City Centre sites and caps affordable housing with cross-reference to draft Policy H4 to reflect this. This viability position is also reflected in the Local Plan Viability Report (April 2026) and later Addendum (of July 2026) in terms of City Centre development. The Policy needs to retain sufficient flexibility to respond to site-specific circumstances, market conditions and abnormal costs. To reflect this, Policy CC3 should be amended to expressly allow for site-specific viability assessments on sites supporting City Centre living, which includes Bradshaw	*Council will seek up to 5% affordable housing on major sites in the City Centre, in line with Policy H4, unless robust Site-specific evidence can be provided to demonstrate that this is unviable.[…]"*	consideration of other competing planning objectives and acknowledges that lower percentages may be acceptable where justified by robust evidence. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Way, the Eagle Quarter (Policy CC4), and Riverside (Policy CC11). *Tests of Soundness* Justified – The Policy does not in itself explicitly allow for site-specific viability assessment, specifically referenced in this Policy, not just in Policy H4. The emerging policy position should continue to be proportionate and pragmatic in recognition of the viability challenges evidenced across the City Centre in the Council's Viability report.		
OR227	Lichfields on behalf of Derby Station Quarter Board	Policy CC3: City Centre Living	Support		Yes	The Derby Station Quarter Board continues to strongly support the strategy for substantial residential development within the city centre, and welcomes the retention of the Railway Station Quarter's contribution of 500 new homes within the plan period. This is the first Local Plan for Derby to actively plan for substantial residential development in the city centre,		Support noted.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and this approach is strongly endorsed. As set out in our representations in respect of Policy CC13, the concentration of residential development within the Railway Station Quarter aligns with the NPPF, which emphasises the delivery of homes within walking distance of major public transport interchanges. The Station Quarter clearly meets these criteria and represents a sustainable and appropriate location for city centre living. For the reasons set out in our representations pursuant to Policy CC13, the land required to deliver 500 homes is within rail industry control, and is suitable, available and deliverable.		
Policy CC3: City Centre Living								
No representations were received for this policy.								
Policy CC4: Residential Led, Mixed Use Site Allocations								
OR162	Historic England	Policy CC4: Residential	Object			Policy CC4 we do have some concerns regarding site		Heritage Impact Assessment (HIA)

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
		Led, Mixed Use Site Allocations				allocation CC4c. We remain concerned about this site allocation within the Plan, and how development in this area will harm the significance of a number of heritage assets, including their setting and their relationship to one another within the wider historic landscape. For example, the relationship between the Anglican Cathedral and the Catholic Cathedral and important views between will be affected by proposed tall buildings in the Queen Street area. Moreover, a variety of heritage assets could be affected and the evidence base needs to assess the impacts on each grouping of assets and what specific measures can be incorporated into the Plan to overcome this. We consider that assessment is required to understand the harm to heritage assets and how this harm can be overcome. We consider that appropriate mitigation design principles are required in a policy within the Plan, to overcome this harm		work is being undertaken by specialist consultants, including consideration of the Northern Gateway site. Historic England have provided comments to inform this work and the Council is keen to continue working closely with them to resolve any outstanding issues, including through statements of common ground if necessary.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and that the HIA we have received does not currently address this adequately or include policy wording for the Plan. We are available to work with the Council to ensure appropriate policy wording is prepared. Additional detail will be provided within our HIA comments.		
OR229	Lichfields on behalf of Derbion*	Policy CC4: Residential Led, Mixed Use Site Allocations	Object		No	Derbion does not consider the current policy drafting to be sound. *Policy Consideration* Draft Policy CC4 identifies residential-led, mixed-use regeneration allocations across the City Centre to meet the quantum set out in Policy CC3. These allocations include Derbion's sites at Bradshaw Way (478 homes) and The Eagle Quarter (674 homes). As drafted the Policy supports the Council's intention to secure the comprehensive and coordinated delivery of these sites, including resisting proposals which would prejudice their development	The Policy CC4 housing requirement should be drafted in a more flexible form to allow for the proposals to evolve in the future. Policy CC4 should retain sufficient flexibility to allow sites to come forward on a phased or standalone basis, where this would not prejudice the long-term development potential of the wider allocation. The policy should be reworded to ensure that the allocation is not predicated on the	Support for comprehensive development is noted and welcomed. In terms of opportunities to 'tame' Bradshaw Way,– there are opportunities to improve connectivity to the Nightingale Quarter and Castleward through taming the inner ring road. This is a valid planning objective. In the same way, improving connectivity between the Eagle Quarter, Derby Riverside and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						potential. Derbion supports the Council's intention to secure comprehensive redevelopment in the City Centre, however care must be taken to ensure this requirement does not become a barrier to delivery in its own right. Derbion objects to the current policy wording, that comprehensive delivery is contingent upon third-party land, ownership, or the delivery of infrastructure beyond the site boundary. This approach risks impeding the delivery of the allocations rather than facilitating regeneration. In relation to Bradshaw Way, Policy CC4 (d) refers to opportunities to enhance the connectivity of the Site to Nightingale Quarter and Castleward and refers to 'taming' of the inner ring road in this location. Draft Policy CC4 (d) specifically links to Policy T1 seeks to reduce the severance caused by the inner ring road between Derby's City Centre and the	delivery of unclear infrastructure, and this is only applied where possible and appropriate. In order to satisfy the tests of soundness, Derbion recommends the changes to the policy set out below: *"In addition to the creation of new and enlarged neighbourhoods at Derby Riverside (see Policy CC11), the Railway Station Quarter (see Policy CC13) and North Castleward (see Policy CC14), there are opportunities to regenerate key brownfield sites in the City Centre for mixed-use development, providing a minimum of 2,000 new dwellings. Whilst the regeneration of these sites will largely be*	North Castleward through the provision of active ground floor uses is also a valid planning objective. In the case of Bradshaw Way, the policy does not specify that the improvements to connectivity should be delivered as part of developing the site. Delivery of the site is not reliant on these improvements. The Plan provides sufficient indication of measures that would contribute towards 'taming'. When read alongside documents such as the Council's Ambition document and Public Realm Strategy, the intentions are clear and not ambiguous. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						surrounding City. Similarly, Policy CC4 (e) identifies Eagle Quarter as an opportunity for enhancing the connectivity between Derby Riverside, and North Castleward by providing active ground floor uses. This is also referenced in Policy T1 which states that improvements to connectivity are achievable upon completion of the Eagle Quarter. Terminology used with regards to 'taming' the inner-city ring road is ambiguous and lacks clarity on the specific interventions that are envisaged. The cross-reference to Policy T1 (n) refers to the 'reduction in severance and enhancement of placemaking', 'reducing dominance of the private car' and 'creating a more pleasant and safer environment for pedestrians and other active travel users', but this also provides little clarity. The exact nature of 'taming' the ring road is not clearly defined	*for residential uses, their sustainable location also makes them appropriate for a range of other uses, helping to provide a vibrant mix and activate the street scene. Other uses could include offices / workspace, retail, food and drink, leisure and education, subject to other relevant plan policies.* *Residential led, mixed use site allocations include:* *[…]* *d) Bradshaw Way – This site provides an opportunity for high density residential development, ~~delivering~~ with ability to accommodate approximately 478 new homes ~~across a series of blocks, stepping up in height~~, with the opportunity*	The capacity assumptions on each of the Derbion sites are derived from the two outline planning permissions that have been granted and which Derbion have committed to delivering. The Regulation 18 plan set a minimum of 400 homes to be delivered on each of the sites, providing a degree of flexibility. However, Derbion submitted representations at Regulation 18 specifically requesting that the emerging Plan reflects capacity associated with the outline applications. The Regulation 19 document (and supply position) was updated to reflect this request. Whilst it is acknowledged that

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						throughout the Plan and is an aspirational, rather than a deliverable, component of CC4 (d). Without clarity on the scale, cost and delivery mechanism it is not possible to assess the implications for the delivery of the allocations in CC4, particularly for Bradshaw Way. This reference should be removed. Both allocations reference wider connectivity and placemaking benefits that extend beyond the boundaries of the sites themselves, and which rely on land outside of Derbion's control. In this context the individual sites risk becoming unnecessarily reliant on wider development or subject to the delivery of infrastructure that will come forward under alternative timescales. Overall, Derbion object to the reliance on specific highway or public realm interventions which relies on third-party land or other applications that are	*for a tall building (subject to Policy CC6) on the London Road frontage. There are opportunities to enhance connectivity with the Nightingale Quarter and Castleward ~~through 'taming' of the inner ring road in this location (see Policy T1)~~.* *e) The Eagle Quarter – The former Eagle Market site provides an opportunity for high density residential development, ~~delivering~~ with ability to accommodate approximately 674 new homes, with the opportunity for a tall building to help terminate views along the Morledge (subject to Policy CC6). There are opportunities to enhance connectivity*	schemes may evolve over time, it is important to recognise that as the city is capacity capped, the capacity figures stated in policy should be regarded as minimums. The Council is willing to discuss potential changes with Derbion to more clearly recognise this, potentially through a statement of common ground.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						outside of the applicant's control runs the risk of undermining the delivery of regeneration through the CC4 (d) and (e) allocations. The housing figures quoted in Policy CC4 equate to 2,023 homes, an increase from 1,871 in the Regulation 18 draft. The figures are directly driven by the capacities quoted in the outline permissions (24/01738/OUT and 25/01315/OUT). Deriving the allocations directly from the capacities of outline permission which are subject to change does not provide sufficient flexibility for the form of development at Bradshaw Way and Eagle Quarter to evolve. As the schemes progress to Reserved Matters and detailed design stage. The Policy drafting should not preclude amendments; or a whole new planning permission being progressed. Derbion supports an ambitious approach to City Centre housing delivery and recognition of its sites in the	*with Derby Riverside, North Castleward, to provide active ground floor uses and to significantly improve the setting and entrance to Derby Theatre.* *[…]* *The Council will work with partners to ensure that regeneration of these sites is delivered in a comprehensive manner, aligned with ~~policy requirements~~ the Site principles set out in this policy. Proposals that would undermine this approach or prejudice ~~development potential~~ an optimised form of development coming forward on these city centre sites will be resisted. The Council will use compulsory purchase powers if*	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Policy. We enclose a letter at Annex A from Derbion which sets out their anticipated timeframes for making the sites available for development. It is also important that the Policy drafting acknowledges that the form of development on Bradshaw Way and Eagle Quarter may evolve from that in the outline planning permissions, for example. Positively prepared – The Policy CC4 housing requirement (2,023 homes) is derived directly from outline permission capacities. Derbion object to this as it is not positively prepared and doesn't recognise that development capacity / form may evolve. Justified – The reference to connectivity improvements suggests these are a requirement of delivery, without sufficient detail by way of feasibility and cost evidence and delivery responsibility. There is no evidence to suggest this is viable, which renders the	*necessary to ensure coordinated and comprehensive delivery where possible and appropriate."*	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Policy unjustified, in accordance with paragraph 35 of the NPPF. Effective – As currently worded the Policy risks being undeliverable over the plan period, because the allocations rely on third-party land and infrastructure outside of the applicant's control or is not intended to be delivered through the existing permissions. Consistent with national Policy – An overly rigid policy that doesn't allow for phased or standalone delivery, or for schemes to evolve at Reserved Matters stage does not support a flexible, viable and deliverable approach to plan-making.		
OR235	Little Ships Housing CIC	Policy CC4: Residential Led, Mixed Use Site Allocations	Object	Yes	No	We support the identification of the Council-owned car parks at Abbey Street (east and west), Darwin Place and Chapel Street for redevelopment. It is the right instinct, and we would like to see it applied across the estate.	Modification 3: the City Centre site allocations for the Council-owned car parks at Abbey Street (east and west), Darwin Place and Chapel Street. Add to the site	Support is welcomed. The Council is working on a development brief for the Abbey Street site that would see the provision of a new multi-modal hub, built alongside the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Council has indicated publicly that it intends to consolidate City Centre parking in a new multi-storey car park, with Abbey Street identified as the likely location and Chapel Street to be replaced. A replacement car park can be designed from the outset to carry homes above it; that is what has been consented at Ipswich. We ask that the allocations require it, so that these sites contribute to the City Centre housing figure as well as to the parking strategy. Parking need will change over the plan period, and a car park built now should not fix the site for twenty years. The TopHuis system developed by our associated practice builds homes on columns above a car park, so the parking stays in use during construction and afterwards. Applied to a new multi-storey car park, the columns run taller and carry as many parking decks as the Council needs, with the homes above. Because the decks are	requirements: "Where public parking is re-provided on the site, the replacement structure should be designed to accommodate residential development above it, and to allow parking decks to be converted to homes as parking demand falls over the plan period. Proposals should demonstrate how this has been provided for."	delivery of new homes. The Council's City Centre Parking Strategy also envisages the replacement of Chapel Street MSCP, with new homes built alongside as part of the wider Northern Gateway development. It may not always be desirable for homes to be built above parking, for a variety of reasons. New homes and parking will be holistically planned through masterplanning and development brief work. Redevelopment of existing parking locations is already a key component of the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						built to a residential structural grid and floor-to-floor height, they can be fitted out as further homes when parking demand falls, for example as vehicles become shared or self-driving: a fit-out rather than a rebuild, with no demolition. Construction is fast and demountable; our Brighton pilot proposes 52 homes above a working car park under a meanwhile-use permission, with the homes capable of being moved elsewhere if the land is later needed for another purpose. The allocations could secure this flexibility now at no cost to the Council's parking strategy.		Council's strategy. No change required.
OR257	Marrons on behalf of BDW Trading Ltd (Redrow Homes Midlands)*	Policy CC4 (c): Residential Led, Mixed Use Site Allocations Northern Gateway	Object		No	Northern Gateway is identified as a significant regeneration opportunity, proposed for allocation within the LPD, for development comprising, *inter alia,* the delivery of 'a minimum' of 200 dwellings, as one of the residential-led, mixed use allocations provided for under Policy CC4 of the LPD. Appendix 2 of the Submission Draft anticipates all 200 dwellings		The Council acknowledge that development within the proposed Northern Gateway allocation will be challenging and will require a multi-agency approach to overcome constraints.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						being completed within the plan period, assuming the first 100 completions in Year 12 (2034/35), followed by the remaining 100 units in Year 13 (2035/36). Turning then to the Council's own evidence, the site is assessed within the Strategic Housing Land Availability Assessment ("SHLAA") under Site Reference: DER0054. As regards planning history and site delivery progress, the SHLAA records that the area comprises a broad regeneration location containing a wide range of uses, including public houses, businesses, vehicle repair facilities, cultural uses, the former Queen Street swimming pool and Chapel Street multi-storey car park. Whilst the Council has engaged a development partner to prepare a masterplan for the area, the SHLAA acknowledges that the location remains a broad opportunity, rather than a site supported by fixed development proposals.		The SHLAA is not a decision-making document and simply identifies the key constraints that will need to be overcome. It is completely logical that a complex city centre location such as this will have constraints such as existing uses and land ownership issues. More detailed masterplanning of the area is ongoing and the Council is working with development partners (Ion and Vinci Developments) to develop a delivery strategy. The Council is committed to delivery and will utilise CPO powers if necessary, although a significant proportion of the allocated area is already within the Council's ownership.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						In relation to constraints, the SHLAA identifies a number of significant barriers to delivery. The area is under fragmented ownership, and active uses remain throughout much of the site. As a consequence, comprehensive regeneration would require the involvement of numerous landowners and occupiers and may also necessitate the Council exercising compulsory purchase powers. The SHLAA also identifies heritage and conservation constraints, together with uncertainty regarding viability and future delivery mechanisms. These conclusions are corroborated by the Council's Local Plan Viability Assessment (April 2026) wherein development within the City Centre is unviable even before policy obligations are applied, indicating that delivery in these locations is reliant on public sector intervention, regeneration initiatives or site-specific flexibility.		Delivery has been deliberately pushed towards the end of the plan period, accounting for the lead in periods needed to overcome constraints and get the delivery strategy in place. As the site is largely within the Council's control, there is a development partner in place and masterplanning work is ongoing, it is entirely reasonable for the Council to assume that 200 homes could be delivered in the next 10 years.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						On that basis, the SHLAA finds that the site is neither available nor achievable. No dwellings are identified as either deliverable or developable. Indeed, the assessment states that it is not currently possible to identify the specific sites or parcels that will come forward for redevelopment, nor establish how or when development would be delivered. Notwithstanding those conclusions, Policy CC4(c) allocates Northern Gateway for the delivery of a minimum of 200 dwellings over the plan period. However, the basis for the Council's delivery assumptions remains unclear. The SHLAA does not identify *any* deliverable or developable capacity, records the site as unavailable and unachievable, and acknowledges, in express terms, that there is no certainty regarding development viability. Furthermore, the allocation is dependent upon funding, public sector intervention, land assembly and, potentially, the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						exercising of compulsory purchase powers. The respondent acknowledges the long-term potential of Northern Gateway and does not dispute that the area may accommodate development over an extended period. However, the evidence published alongside the Submission Draft indicates that the allocation, at this juncture, represents a strategic aspiration, as opposed to a developable supply source supported by objective evidence. Given the contingencies involved in the site materialising, of which there are many, it would be unreasonable to rely on the site delivering some 200 units over the plan period. Drawing the above together, the respondent submits that the contribution anticipated from Policy CC4(c) is insufficiently evidenced. The Council's own evidence base identifies the site as neither available nor		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						achievable and records no deliverable or developable housing capacity. In the absence of further evidence demonstrating how the identified constraints and dependencies will be overcome, the inclusion of 200 dwellings within the housing trajectory should be treated with considerable caution.		
OR257	Marrons on behalf of BDW Trading Ltd (Redrow Homes Midlands)*	Policy CC4 (f): Residential Led, Mixed Use Site Allocations Abbey Street Car Parks	Object		No	Abbey Street Car Parks is identified as a regeneration opportunity, proposed for allocation within the LPD, for development comprising, *inter alia,* the delivery of 'a minimum' of 50 dwellings, as one of the residential-led, mixed use allocations provided for under Policy CC4 of the LPD. Appendix 2 of the Submission Draft anticipates all 50 dwellings being completed within the plan period, assuming the first 25 completions in Year 15 (2037/38), followed by the remaining 25 units in Year 16 (2038/39). Turning then to the Council's own evidence, the site is		The SHLAA is not a decision-making document and simply identifies the key constraints that will need to be overcome. A development brief and spatial framework are being developed for this site which include the provision of a multi-modal hub, alongside new homes. Emerging works suggests that well over 50 dwellings should be capable of being accommodated across the two parking areas. The

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						assessed within the Strategic Housing Land Availability Assessment ("SHLAA") under Site Reference: DER0407. As regards planning history and site delivery progress, the SHLAA records that the area comprises two long-established surface car parks under Council ownership. Whilst the SHLAA maintains that the car parks are underused, it concedes that plans to reinvigorate the city centre may affect public parking demand. In relation to constraints, the SHLAA records that the main issue is the continued role of the car parks in serving the city centre. Indeed, the assessment notes that a decision would be required as to whether one or both car parks remain necessary for parking purposes before the land could be released for development. The SHLAA also identifies uncertainty regarding the developable area, potential residential amenity issues arising from the adjacent inner ring road and RSPCA facility, and the		work is being used to inform the Property Rationalisation Board within the Council. The Council recognise that decisions relating to parking provision will need to be made in the near future due to Chapel Street MSCP coming to the end of its design life. As the site is largely within the Council's control and development brief work is ongoing, it is entirely reasonable for the Council to assume that a minimum of 50 homes could be delivered in years 12 to 13, recognising that the multi-modal hub is likely to be delivered as a first phase.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						realistic capacity of the site. Whilst the SHLAA recognises that the sites represent suitable brownfield development opportunities in principle, it concludes that they are neither available nor achievable. No dwellings are identified as either deliverable or developable. These concerns are reinforced by the Council's Derby Parking Study (May 2026). The Study identifies Abbey Street as a proposed location for a future multi-modal hub intended to support city centre parking provision following delivery of the LPD and the anticipated closure of Chapel Street multi-storey car park. The Parking Study expressly recognises the need for further feasibility work, planning permissions and funding before that strategy can be implemented. Similarly, the Study acknowledges that the role of Abbey Street will intensify in the short-term once Chapel Street reaches the end of its operational lifespan. As a result, the future role of Abbey Street		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						within the wider city centre parking strategy remains under consideration and it is unclear whether, or if, the site is capable of materialising within the plan period. Notwithstanding those conclusions, Policy CC4(f) allocates Abbey Street Car Parks for the delivery of a minimum of 50 dwellings over the plan period. However, the basis for the Council's delivery assumptions remains unclear. The SHLAA does not identify *any* deliverable or developable capacity, records the site as unavailable and unachievable, and acknowledges, in express terms, that there is no certainty regarding the appropriateness of releasing the site for development in the context of the wider city centre parking strategy. The respondent acknowledges the long-term potential of Abbey Street Car Parks and does not dispute that the area may accommodate development		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						over an extended period. However, the evidence published alongside the Submission Draft indicates that the allocation, at this juncture, represents a strategic aspiration, as opposed to a developable supply source supported by objective evidence. Given the contingencies involved in the site materialising, of which there are many, it would be unreasonable to rely on the site delivering some 50 units over the plan period. Drawing the above together, the respondent submits that the contribution anticipated from Policy CC4(f) is insufficiently evidenced. The Council's own evidence base identifies the site as neither available nor achievable and records no deliverable or developable housing capacity. In the absence of further evidence demonstrating how the identified constraints and dependencies will be overcome, the inclusion of 50 dwellings		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						within the housing trajectory should be treated with considerable caution.		
OR257	Marrons on behalf of BDW Trading Ltd (Redrow Homes Midlands)*	Policy CC4 (g): Residential Led, Mixed Use Site Allocations Babbington Lane Car Park	Object		No	Babington Lane Car Park is identified as a significant regeneration opportunity, proposed for allocation within the LPD, for development comprising, *inter alia,* the delivery of 'a minimum' of 150 dwellings, as one of the residential-led, mixed use allocations provided for under Policy CC4 of the LPD. Appendix 2 of the Submission Draft anticipates all 150 dwellings being completed within the plan period, assuming the first 100 completions in Year 17 (2039/40), followed by the remaining 50 units in Year 18 (2040/41). Of note, is the Council's assumed delivery rates, anticipating the site to mobilise quickly upon a grant of planning permission and provide 100 dpa in the first year, with no allowance for build-out rates to 'ramp up'. Indeed, the site adopts an unusual delivery profile, with		The SHLAA is not a decision-making document and simply identifies the key constraints that will need to be overcome. It is completely logical that a complex city centre location such as this will have constraints such as existing uses and land ownership issues. A development brief and spatial framework are being developed for this site. Emerging works suggests that over 150 dwellings should be capable of being accommodated across the site. The Council is working with partners to develop a delivery strategy. The Council is committed to delivery and will

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the first year of completions markedly higher than the remaining trajectory. Plainly, the assumed build-out rates are overly ambitious. The Council has provided no evidence demonstrating how that delivery rate has been derived, particularly where no developer partners have been identified. Turning then to the Council's own evidence, the site is assessed within the Strategic Housing and Land Availability Assessment ("SHLAA") under Site Reference: DER0411. As regards the planning history and site delivery progress, the SHLAA records that the site comprises a surface car park. It has been identified by the Council as a gateway location into the city centre from the Inner Ring Road, which presents an opportunity for regeneration and redevelopment, making the most efficient use of land. Nevertheless, the SHLAA finds that the site is neither available nor achievable. Indeed, there is		utilise CPO powers if necessary. Delivery has been deliberately pushed towards the end of the plan period, accounting for the lead in periods needed to overcome constraints and get the delivery strategy in place. Units are likely to be largely apartments and therefore completions are likely to be counted as 'blocks' as opposed to a smoother trajectory over a more sustained period.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						'no known intention from the owners to develop the site and it has not been promoted through the call for sites'. The SHLAA concludes that the site has not been promoted and there is 'no known owner or developer interest'. The main constraints are the absence of interest and uncertainty around the delivery of different uses. Groundworks may also be required and potential de-contamination measures, where redevelopment would introduce residential receptors. Notwithstanding those conclusions, Policy CC4(g) allocates Babington Lane Car Park for the delivery of a minimum of 150 dwellings over the plan period. However, the basis for the Council's delivery assumptions remains unclear. The SHLAA does not identify *any* deliverable or developable capacity, records the site as unavailable and unachievable, and acknowledges, in express terms, that there is no intention from the owners to develop the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						site. Similarly, there is no known developer interest. The respondent acknowledges the long-term potential of Babington Lane and does not dispute that the area may accommodate development over an extended period. However, the evidence published alongside the Submission Draft indicates that the allocation, at this juncture, represents a strategic aspiration, as opposed to a developable supply source supported by objective evidence. Given the contingencies involved in the site materialising, of which there are many, it would be unreasonable to rely on the site delivering some 150 units over the plan period. Drawing the above together, the respondent submits that the contribution anticipated from Policy CC4(g) is insufficiently evidenced. The Council's own evidence base identifies the site as neither available nor		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						achievable and records no deliverable or developable housing capacity. In the absence of further evidence demonstrating how the identified constraints and dependencies will be overcome, the inclusion of 150 dwellings within the housing trajectory should be treated with considerable caution.		
Policy CC5: Non-Residential Regeneration Opportunities								
No representations were received for this policy.								
Policy CC6: Tall Buildings								
OR232	Derwent Valley Mills World Heritage Site	Policy CC6: Tall Buildings	Object			Thank you for consulting the Derwent Valley Mills World Heritage Site (DVMWHS) Partnership at the regulation 19 stage of the draft local Plan. These comments will be taken to the next meeting of the DVMWHS Conservation and Planning Group on the 9th September 2026 for verification by members. We have previously provided comments on the emerging local plan, most recently in June		Criteria (f) already references the need to take account of and avoid or minimise harm to the significance of Derby's heritage assets including their setting. Heritage assets include the Derwent Valley Mills World Heritage Site (DVMWHS), as recognised in Policy HE1 and the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						2026. The following comments therefore reflect our previous advice. With regard to (Policy CC6) Tall Buildings section (f) relating to the historic environment, we advise this should specifically reference the need to avoid harm to the OUV of the DVMWHS. Within section (x) relating to the need for a Heritage Statement, including statement of significance and heritage impact assessment; we advise reference to the UNESCO toolkit in relation to potential impacts on the OUV of the DVMWHS.		supporting text of CC6. The Plan also includes a specific policy (HE2) relating to the DVMWHS, which includes the need for Heritage Statements to have regard to the UNESCO toolkit. Further references to the DVMWHS specifically within the policy wording of CC6 are not considered necessary. No change required.
OR162	Historic England	Policy CC6: Tall Buildings	Object			Policy CC6 we would recommend that the policy relates to the relevant evidence base that has informed the policy wording and proposed locations for development. We welcome clause f and g. G could be amended to ensure the protection of key views and would welcome specific reference to the World Heritage Site.		The supporting text of CC6 references the Council's Tall Buildings Study and specifically recognises that the locations considered appropriate for tall buildings are based on the Tall Buildings Study. It is not considered appropriate for further references to

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								the study to be added to the policy wording. Support for criteria (f) and (g) is noted. Criteria (f) already references the need to take account of and avoid or minimise harm to the significance of Derby's heritage assets including their setting. Heritage assets include the Derwent Valley Mills World Heritage Site (DVMWHS), as recognised in Policy HE1 and the supporting text of CC6. The Plan also includes a specific policy (HE2) relating to the DVMWHS, which includes the need for Heritage Statements to have regard to the UNESCO toolkit. Further references to the DVMWHS specifically

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								within the policy wording of CC6 are not considered necessary. No change required.
OR229	Lichfields on behalf of Derbion*	Policy CC6: Tall Buildings	Object		No	Derbion does not consider the current policy drafting to be sound. *Policy Consideration* Draft Policy CC6 sets out the criteria against which tall building proposals in Derby City Centre will be assessed. It requires proposals to be located within areas identified as suitable for tall buildings on the Policies Map and outside of this area, clear justification must be demonstrated to allow full assessment of the potential impacts. Part (a) of the Policy requires proposals for tall buildings to be submitted in as much detail as possible, either via a full application, or an outline application submitted with a design code which is supported by Derbion. This amendment from the Regulation 18 draft	The Policy should be amended to include Derbion's Riverside Car Park Site and the accompanying Figure 55 should also be updated. This will help realise the Site's potential for a tall building and maximise. To increase the scope for buildings located outside of identified tall buildings areas, Derbion also suggests the amended wording below: *b) Are located within reasonable proximity areas of the City Centre identified as having potential for tall development on the Policies Map and Figure 55. Proposals*	Support for changes made to the policy since the Regulation 18 version was published is noted. The respondent is correct in recognising that the Council's Tall Buildings Study did not consider the site of Riverside MSCP as a potential development site as it was currently in use at the time of production. Criteria (b) allows for tall building proposals in areas outside of locations identified on the Policies Map, provided a clear rationale and justification is demonstrated,

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						allowing the submission of outline applications to be submitted is supported. Bradshaw Way and Eagle Quarter are identified as areas with the potential for tall buildings in Figure 55 and this recognition is supported. Derbion considers that Riverside Car Park should also be included as a potential tall building location and for this reason object to Policy CC6. The Tall Buildings Study includes Cluster CL3 which is directly adjacent to Derbion's Riverside Car Park site. At the time of the Tall Buildings Study (2021), the Car Park was in operational use and not identified as within a potential regeneration area. Since then, the car park has become vacant, significant design and technical work has been undertaken and culminated in the submission of a Screening Opinion (24/01664/EIA) for development of up to 18 storeys. There is a clear	*outside of these identified areas will ~~generally be resisted unless~~ require clear rationale and justification for the location can be demonstrated and potential impacts on heritage assets and skyline have been thoroughly assessed, with harm avoided or minimised;*	including consideration of impacts on heritage assets. Whilst masterplanning (on behalf of the Council) of the wider Derby Riverside allocation is ongoing, no evidence has been submitted by the respondent to indicate that the site of Riverside MSCP is appropriate for tall buildings. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						opportunity for the Riverside Car Park site to be part of the regeneration area and even facilitate a tall building as part of Cluster CL. *Tests of Soundness* Justified – The Policy is underpinned by an evidence base which does not account for new land which has become available since the publishing of the Tall Buildings Study in 2021.		
OR227	Lichfields on behalf of Derby Station Quarter Board	Policy CC6: Tall Buildings	Support		Yes	Policy CC6 sets out the Council's approach to tall buildings in the city centre, including two locations within the Station Quarter identified as having potential for such development, in broad accordance with the IPG. The Derby Station Quarter Board supports the principle that tall buildings have an important role to play in accommodating growth and supporting the legibility and vibrancy of the city centre. Our Regulation 18 representations raised concern that Policy CC6, as then drafted, required all tall building		Support for the identification of tall building opportunities in the Railway Quarter and changes to the policy since Regulation 18 are noted. In terms of the definition of a tall building (2x context height) setting a 'low bar' and not being ambitious enough, this is a misinterpretation of what the policy is saying. A proposed

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						proposals to be submitted as full planning applications, with a prescriptive set of validation requirements applied uniformly to all proposals. We considered this was not justified or effective, since large-scale masterplan developments are often more appropriately brought forward through an outline application, which reduces risk for developers, supports investment, and allows the Council to retain control over height and design matters at reserved matters stage. The Derby Station Quarter Board welcomes the changes made to Policy CC6 since the Regulation 18 Draft, which directly address the concerns raised in our previous representations. In particular, we strongly welcome the introduction of the ability for tall building proposals to be submitted in outline, provided they are accompanied by a comprehensive design code, in		building is only considered 'tall' once it passes the 2x context height threshold. This is not the target or preferred height of a new building, simply the point at which it should be considered 'tall'. Indicative height recommendations are included in the Council's Tall Buildings Study, many of which are well beyond the 2x context height threshold.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						place of the previous blanket requirement for full applications. This is a significant and positive change which will reduce delivery risk for comprehensive, masterplan-led regeneration schemes, including those within the Station Quarter, and we consider it addresses the soundness concern raised in our Regulation 18 representations regarding the effectiveness of the policy. We also welcome the revised approach to validation requirements, which now makes clear that additional supporting information will be applied flexibly and proportionately, having regard to the specifics of individual sites and proposals, rather than as a rigid, universal checklist. This is consistent with both our previous representations and the direction of travel under the 2026 NPPF (DM2) regarding proportionate information requirements.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						We previously suggested that the definition of a tall building, set at twice the prevailing context height, could be more ambitious for the key locations identified as suitable for such development. This has not been amended. The Board is concerned that this 'low bar' for defining tall buildings, together with criterion b) which highlights only two very specific locations within the Station Quarter where tall buildings would be acceptable, means that many of the buildings shown within the IPG master plan are contrary to Policy CC6 as currently drafted. We would reiterate our previous requests to consider a more ambitious definition of tall buildings, or alternatively, revisit criterion b) and the associated figure 55, to provide a more flexible indication of where tall buildings are likely to be acceptable. It is considered that these changes are required to ensure that CC6 is positive and effective.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
Policy CC7: Business, Creativity and Learning								
OR229	Lichfields on behalf of Derbion*	Policy CC7: Business, Creativity and Learning	Object		No	Derbion continues to support the Plan's support for the growth of office space and creative industries to the City Centre. A strengthened office market will play an important role in growing Derby's economic prospects and assist in attracting a diverse workforce to the city, which in turn brings footfall which is welcomed by Derbion. Similarly, attracting new businesses, creativity and learning hubs to areas within the City Centre will also be an important part of the mix of securing Derby's successful regeneration. While Derbion support the overall aims of the policy, Derbion objects to the current CAA boundary which underpins the policy. The CAA currently excludes Derbion's key Sites which could significantly contribute towards meeting the Council's needs for office and creative floorspace. *Tests of Soundness* Positively prepared – The policy	The CAA boundary should be extended to include Derbion's Riverside Car Park site, as the Site has potential to deliver office and creative space that would directly contribute towards City Centre regeneration. Similarly, while Bradshaw Way benefits from an existing permission, its inclusion within the CAA would provide flexibility to explore alternative uses should market conditions change, for example as was included on the previous ref. 23/00087/OUT.	Support for the growth in office space is noted. Justification and rationale for not extending the CAA to include Derbion's land interests at sites such as Bradshaw Way and Riverside MSCP is set out in the Economy Topic Paper. The Council is committed to ensuring that sites such as Bradshaw Way are built out for residential led proposals, reflecting the current planning permissions.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						does not include Derbion's sites at Bradshaw Way and Riverside within the CAA (as defined by Figure 56) despite the Site's representing key regeneration opportunities within the City Centre that are capable of supporting the aims of the policy. Positively prepared – The provision of proportionate office/creative space supporting a wider mixed-use scheme should be recognised as acceptable regardless of the identified CAA boundary. This will support the principle of introducing a more varied range of uses within workspaces in the City Centre in line with part (c) of the policy.		
OR227	Lichfields on behalf of Derby Station Quarter Board	Policy CC7: Business, Creativity and Learning	Support		Yes	Policy CC7 seeks to encourage a more vibrant and diverse office market within the city centre and to strengthen the role of the creative industries sector, including by directing new office floorspace associated with the rail industry to the Railway Station Quarter. The Derby Station Quarter Board supports this approach, and in		Support is welcomed

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						our Regulation 18 representations we highlighted the significance of Midland House, within the Station Quarter, as a potential anchor asset in this respect.		
Policy CC8: Shopping, Eating and Drinking								
OR229	Lichfields on behalf of Derbion*	CC8 Shopping, Eating and Drinking	Object		No	Derbion does not consider the current drafting of the policy to be sound. Derbion supports the inclusion of Derbion into the PSA (Figure 57) as this recognises the role of these established retail, leisure and evening-economy sites. However, Derbion objects to the current policy drafting given the presence of other sites within their ownership that represent commercial, high-footfall locations with potential to deliver significant regeneration benefits. The sites at Bradshaw Way and Riverside currently fall outside of the CAA, but are entirely suitable locations for commercial activities and have the potential to integrate new leisure, food, drink and entertainment uses.	Incorporating Derbion's sites within the CAA would resolve the and prevent inappropriate restrictions that could undermine their contribution to the vitality and economic success of the City Centre. The Policy should be amended to remove reference to 12:30am opening hours in order to be found sound: *'New leisure uses, including food, drink and entertainment will be supported*	Justification and rationale for not extending the PSA to include Derbion's land interests at sites such as Bradshaw Way and Riverside MSCP is set out in the Economy Topic Paper. The policy does not provide a 'blanket restriction' on opening beyond 12:30am in areas outside of the CAA. It states that opening will 'generally' be restricted. There may be cases where a specific case to open beyond 12:30am can be made. However, the Council is

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						This point is addressed in more detail in the response to Policy CC7. An overly rigid approach which directs applications for ancillary commercial uses to the CAA would risk impeding wider regeneration benefits associated with mixed-use redevelopment and stifling the regeneration of the City Centre. A blanket restriction on late-night opening hours to 12:30am for all development outside the CAA is a disproportionate and inflexible approach. In addition, the control of opening hours through planning policy runs the risk of duplicating or conflicting with separate regulations under the Licensing Act 2003. Therefore, the Policy should not include a blanket restriction to late night opening hours so applications only consider impacts with regard to residential amenity and character, with any specific opening hour restrictions secured via condition on a Site-by-Site basis.	*across the City Centre, as defined by Policy CC1, but will be encouraged to locate within the Central Activity Area (CAA), in the first instance, helping support key regeneration activities. In areas of the City Centre outside of the CAA, ~~late night opening hours will generally be restricted to 12:30am to respect the~~ development must respect residential amenity and character of these areas.*	committed to ensuring that the character and amenity of areas outside of the CAA is protected to maintain and develop residential neighbourhoods. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Tests of Soundness Positively prepared – The policy is not favourable to ancillary new leisure uses in Derby's City Centre which have the potential to maximise regeneration, especially where these are delivered through mixed-use redevelopment. This can be achieved by including Derbion's sites at Bradshaw Way and Riverside within the CAA (Figure 56). Consistent with national policy – The policy is not consistent with policy as it detracts from addressing genuine planning considerations, such as residential amenity and character. Rather, the current wording applies a blanket approach to opening hours which duplicates the role of licensing rules.		
Policy CC9 Active and Inclusive Frontages								
OR229	Lichfields on behalf of Derbion*	Policy CC9 Active and Inclusive Frontages	Object		No	Derbion itself benefits from an open Class E consent, confirmed by CLEUD ref. 24/01654/CLE. However, for other units in the City Centre and new commercial units that come	Derbion recommends that this restriction is removed to provide greater flexibility in the types of commercial uses that	The policy maintains Class E flexibilities and is focussed on restricting uses that fall outside out the E use class, generally

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						forward, such restrictions would significantly reduce flexibility. This would make it more difficult to re-occupy vacant units, at a time when expediting reoccupation of vacant units should be a key priority. Class E was introduced nationally to provide precisely this flexibility and support centres in responding to changing economic conditions. The Policy places further restrictions on City Centres which risks undermining efforts to revitalise Derby City Centre. *Tests of Soundness* Justified – The restriction is not justified as it conflicts with the rational for Class E uses, which is intended to provide flexibility for City Centre units to respond to rapidly changing economic conditions and encouragement long-term occupancy of commercial units.	could come forward and contribute towards the regeneration of the City Centre. The Policy should retain Class E flexibility in order to aid reoccupation of units in the future *"The streets where active and inclusive ground floor frontages should be maintained are identified on the Policies Map and Figure 58. Within these frontages, the Council will seek to resist proposals that would introduce 'dead' frontage during the daytime either through the nature of the use or the opening hours. Uses within these areas should be, where practicable, open to the public*	sui generis uses. The only element of the policy that slightly impinges on Class E flexibilities is the final paragraph that seeks to ensure that open ended E use class permissions avoid the potential for dead frontages. The supporting text uses the example of restricting offices, where it would result in dead frontage. This remains a valid planning objective. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							and maintain a shop front and / or display of visual interest. *The Council will also ~~seek to resist~~ support proposals that maintain active frontage and will resist proposals within these frontages that would introduce uses that cannot be accessed by all of Derby's communities during the daytime unless it can demonstrated that an active/inclusive use is not reasonably achievable, or that the proposed use would not materially harm the vibrancy or street scene of the frontage:* *[…]* *Where open ended E use class proposals are submitted, the ~~Council will seek to~~*	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							~~*impose conditions where appropriate to restrict uses within the use class,*~~ *the design of proposals should seek to ensure that the potential for dead frontage is minimised."*	
Policy CC10: Streets and Spaces								
No representations were received for this policy.								
Policy CC11: Derby Riverside								
OR37	Derby and Sandiacre Canal Trust*	Policy CC11: Derby Riverside	Object	Yes	No	The policy and supporting text does not represent sufficiently the Council Plan and other policies in this emerging document	An additional paragraph in the Supporting Text should make reference to new water based riverside facilities and the potential for the extension of use of the river from Darley Abbey Mills through the City Centre to Wilmorton Park. This would comply with the Vibrancy aims of	The policy recognises the aim of utilising the River Derwent and wider Riverside area for recreation. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
							the Council Plan and policies in this emerging document in relation to sustainable travel, visitor attraction and enhancement of blue and Green Corridors.	
OR232	Derwent Valley Mills World Heritage Site	Policy CC11: Derby Riverside	Object			Thank you for consulting the Derwent Valley Mills World Heritage Site (DVMWHS) Partnership at the regulation 19 stage of the draft local Plan. These comments will be taken to the next meeting of the DVMWHS Conservation and Planning Group on the 9th September 2026 for verification by members. We have previously provided comments on the emerging local plan, most recently in June 2026. The following comments therefore reflect our previous advice. The City Council proposes high density development at Derby Riverside (Policy CC11) and North Castleward (Policy CC14).		Heritage Impact Assessment (HIA) is being developed as part of the masterplanning of the Derby Riverside area. The Derwent Valley Mills World Heritage Site Partnership and Historic England have been involved in discussions about this emerging work and have provided comments on drafts. The Council's Digital Twin is being used to help inform these discussions.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						In each case, development would include tall buildings, and the draft local plan acknowledges a potential impact upon the OUV of the DVMWHS. We continue to advise that Heritage Impact Assessments (HIAs) should be prepared for these site allocations prior to adoption of the local plan. As far as we are aware these have not been undertaken. Historic England advises that site allocations should be subject to a Heritage Impact Assessment (HIA); it has published an advice note to that effect (HEAN3). UNESCO has published a "Guidance and Toolkit for Impact Assessments in a World Heritage Context" (2022). World Heritage Centre - Guidance and Toolkit for Impact Assessments in a World Heritage Context The *Derby City Digital Twin*		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						may be used to model (e.g.) the effects of tall buildings upon views from the World Heritage Site. If the OUV of the DVMWHS would be harmed by (e.g.) tall buildings, for either site allocation it may be necessary to amend the development accordingly. This may affect the deliverability of these sites.		
OR257	Marrons on behalf of BDW Trading Ltd (Redrow Homes Midlands)*	Policy CC11: Derby Riverside	Object		No	Derby Riverside is identified as a significant brownfield regeneration opportunity, proposed for allocation within the LPD, for development comprising, *inter alia,* the delivery of 'a minimum' of 600 dwellings, as part of a longer-term vision for the delivery of c.1,500 homes. Appendix 2 of the Submission Draft anticipates all 600 dwellings being completed within the plan period, assuming the first 200 completions in Year 13 (2035/36), followed by a sustained delivery rate of 200 dpa between Years 14-15 (2036/37 to 2037/38). Of note, is the Council's assumed		The Council acknowledge that development within the proposed Derby Riverside allocation will be challenging and will require a multi-agency approach to overcome constraints. The SHLAA is not a decision-making document and simply identifies the key constraints that will need to be overcome. It is completely logical that a complex city centre location such as this will have

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						delivery rates, anticipating the site to mobilise quickly upon a grant of planning permission and provide 200 dpa for 3 consecutive years, with no allowance for build-out rates to 'ramp up'. Plainly, the assumed delivery profile is overly ambitious. Indeed, the Lichfields Start to Finish 3rd Edition, indicates that, in order to achieve build-out rates of 200 dpa, the site will require at least 4 outlets. Nevertheless, the Council has provided no evidence demonstrating how the delivery rate has been derived, with no indication as to the number of outlets intending to deliver the site. Turning then to the LPD itself, paragraph 725 of the supporting text records that the area has its challenges, notably flood risk associated with the River Derwent, but also the proximity of the inner ring road and Derwent Valley Mills World Heritage Site. The LPD maintains that the delivery of package II of the 'Our City Our		constraints such as existing uses and land ownership issues. More detailed masterplanning of the area is ongoing and the Council is working with partners to develop a delivery strategy. The Council is committed to delivery and will utilise CPO powers if necessary. In terms of flood risk, OCOR package II is being implemented, which will protect the area, although is acknowledged that this does not remove the land from FZ3. Delivery has been deliberately pushed towards the end of the plan period, accounting for the lead in periods

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						River' ("OCOR") programme will help address flood risk issues, whilst high quality and contextual placemaking will ensure that new development addresses issues associated with the inner ring road and responds appropriately to heritage assets. Paragraph 727 states that initial work indicates that the area could accommodate c.1,500 new homes. However, it is likely that -600 homes can be delivered on catalyst sites within the plan period. That analysis is 'softer' than that contained in Appendix 2 of the Council's Housing Land Capacity Position Paper, wherein DCiC describe the site as 'very challenging' and requiring 'significant intervention'. The site is also assessed within the Council's Strategic Housing and Land Availability Assessment ("SHLAA''), under Site Reference: DER004. As regards constraints, the SHLAA records that there are a range of constraints and limitations to development. The OCOR		needed to overcome constraints and get the delivery strategy in place. Units are likely to be largely apartments and therefore completions are likely to be counted as 'blocks' as opposed to a smoother trajectory over a more sustained period.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						programme has the benefit of planning permission to create a flood wall and conveyance corridor through the city centre. Part of this has been implemented but further phases still require implementation and funding. There are a range of different land plots, some in use and some not, and land assembly will be required. Furthermore, viability will be difficult and will require external funding and development partners. Finally, the SHLAA notes that this is likely to be a long-term major project which will require significant resource and intervention by the Council, with additional constraints in the form of heritage assets and the World Heritage Site ("WHS"). On that basis, the SHLAA finds that the site is neither suitable, available nor achievable. Notwithstanding the eventual implementation of the OCOR programme, the SHLAA notes that the site is likely to remain		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						at high risk of flooding. Much of the land is under private ownership and will require a combination of willing landowners and developers and/or intervention including potential Compulsory Purchase Orders. Save for the latter, these are matters that lie entirely outside the control of the Council. Most significantly, however, the SHLAA concludes that, beyond the site at Phoenix Street, there is 'no certainty' of development viability/delivery to 'count any numbers' in the developable or deliverable housing supply. In order to include this site in the housing trajectory, the SHLAA submits that a 'significant amount of work' is required to make the land suitable and available, as well as seeking delivery mechanisms. These conclusions are corroborated by the Council's Local Plan Viability Assessment (April 2026) wherein development within the City Centre is unviable even before policy obligations are		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						applied, indicating that delivery in these locations is reliant on public sector intervention, regeneration initiatives or site-specific flexibility. The respondent also notes the publication of the Derby City Level 2 Strategic Flood Risk Assessment ("SFRA'') (July 2026) which supports the Regulation 19 consultation. The Level 2 SFRA finds that Derby Riverside is one of the sites most at risk of fluvial flooding; that it is located within an existing EA Flood Warning Area; and that it is one of the sites most at risk from climate change. Table 5.1 of the SFRA assigns a RAG rating of 'red' - reserved for sites where a high percentage of the site (>20%) is at risk from fluvial and/or surface water flooding in the 0.1% AEP event. Paragraph 8.1 then concludes that Derby Riverside is one of the sites at greatest risk, and will require careful consideration and 'significant mitigation' to pass the flood risk element of the Exception Test.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Notwithstanding those conclusions, Policy CC11 allocates Derby Riverside for the delivery of a minimum of 600 dwellings within the plan period. However, the basis for the Council's delivery assumptions remains unclear. The SHLAA does not identify *any* deliverable or developable capacity, records the site as unsuitable, unavailable and unachievable, and acknowledges, in express terms, that there is no certainty regarding development viability or delivery, over and above the consented Phoenix Street site. Furthermore, the allocation is dependent upon the funding and implementation of the OCOR programme, public sector intervention, land assembly and, potentially, the exercising of compulsory purchase powers. The respondent acknowledges the long-term potential of Derby Riverside and does not dispute that the area may accommodate development		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						over an extended period. However, the evidence published alongside the Submission Draft indicates that the allocation, at this juncture, represents a strategic aspiration, as opposed to developable supply source supported by objective evidence. Given the contingencies involved in the site materialising, of which there are many, it would be unreasonable to rely on the site delivering some 600 units over the plan period. Drawing the above together, the respondent submits that the contribution anticipated from Policy CC11 is insufficiently evidenced. The Council's own evidence base identifies the site as neither suitable, available nor achievable, and records no deliverable or developable housing capacity. In the absence of further evidence demonstrating how the identified constraints and dependencies will be overcome, the inclusion of 600 dwellings		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						within the housing trajectory should be treated with considerable caution.		
OR162	Historic England	Policy CC11: Derby Riverside	Object			Policy C11, clause k, we welcome the inclusion a reference to the historic environment. However, we would recommend amending the wording in the clause to ensure that it is the significance of heritage assets, including their setting and key views that are protected, as well as the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site. Any mitigation and avoidance measures identified within the Heritage Impact Assessment for this area should also be incorporated into policy. Any harm that may arise should be avoided or minimised in the first instance and only as a last resort would it relate to the need for clear and convincing justification.		Support for criteria (k) is welcomed. Criteria (k) already makes reference to the need for proposals to avoid or minimise harm to the significance of heritage assets and references the need to respect the setting of heritage assets. No change required.
OR229	Lichfields on behalf of Derbion*	Policy CC11: Derby Riverside	Object		No	Derbion object to the current wording of the policy. Currently, the policy wording does not ensure development is provided of a scale that	Criterion (n) should be amended to recognise that sites may not come forward with a mix of	The Council is attempting to strike a balance between being aspirational but also realistic in terms

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						optimises housing delivery and recognises the potential of the area as a sustainable location. Draft Policy H2 seeks minimum densities of 80 dph, whilst the Council's Tall Buildings Study identifies achievable densities ranging from 80–150 dph for 3–4 storey development, up to 280 dph at 5 storeys and 450 dph at 8 storeys[1]. The densities sought at Bradshaw Way and The Eagle Quarter also significantly exceed the minimum considered in the Sustainability Appraisal and Policy H2, demonstrating the potential to optimise development in highly sustainable in the locality through the integration of tall buildings (subject to Policy CC6). On this basis, Policy CC11 is not ambitious enough in terms of the quantum of homes sought at Derby Riverside and does not reflect the tall building potential discussed in relation to Policy CC6. Derbion would welcome the opportunity to discuss the	house types and full range of tenures. The Policy should recognise support for proposals that will meet identified local needs and this should be considered on a site-by-site basis. Criterion (o) should either be amended to include a clearly defined methodology for assessing 'direct competition' with the CAA, or removed from the Policy entirely. This would provide greater certainty as to where a broad mix of Class E uses will be supported across the City Centre, rather than leaving this constrained by an undefined and untested competition test. Criteria (q) and (r) should be amended	of capacity assumptions. Whilst it is acknowledged that sites such as Riverside MSCP may well provide 'additional' capacity over and above the numbers already being counted, no evidence has been submitted by the respondent to justify their assertions that there is a realistic opportunity that Riverside MSCP could be redeveloped or that tall buildings may be appropriate. It is important to note that Derbion do not have full control of the Riverside MSCP site. The Council is keen to continue discussions with Derbion about the Riverside MSCP site and wider area, as part of the ongoing masterplanning that

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						development potential of the Riverside Car Park with the Council to ensure that regeneration across the Riverside allocation area is maximised. Criterion (g) seeks to ensure a new primary school is delivered as part of the regeneration of Derby Riverside. The Policy is not clear on the mechanism through which the school would be delivered and whether this be sought through planning obligations on sites within the Riverside Area. This is important for viability considerations. Criterion (o) seeks to ensure that the creation of Class E uses does not directly compete with the PSA and CAA. Further clarity is needed on how 'direct competition' will be considered, particularly as the Policy also supports development coming forward through mixed-use regeneration. Criterion (o) should allow for flexibility, recognising that City Centre developments, for example at	to allow for Site-specific circumstances to be taken into consideration with regards to public realm and landscaping to be delivered on Site. Criterion (s) should be removed as it lacks clarity on the types of uses that would need to be relocated. The Policy should be removed as it does not recognise that the City Centre will evolve over time and will change in response to changing needs caused by regeneration. The removal of this criterion would more effectively support the regeneration of Derby Riverside. The policy should be amended in accordance with	is being undertaken. Criteria (o) seeks to ensure that development within the allocation does not detract from the vitality and viability of the CAA and PSA through the creation of E uses that will directly compete. This criterion has been included to ensure that vibrant uses are focussed into the heart of the city centre and not spread too thinly across a wider area. E uses within the allocated area should be carefully curated to ensure that they complement the PSA and CAA as opposed to drawing trade away from these key areas. Criteria (q) and (r) relate to

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Riverside Car Park, could come forward with a broad range of uses. This does not necessarily mean such developments will directly compete with the CAA, but instead reflects how the City Centre may evolve over the plan period. Criteria (q) and (r) are unclear on whether such improvements are expected on site, or via planning contributions. Individual sites within the City Centre can be constrained, or due to the configuration of development, find it difficult to provide 'significant contributions' to greening for example. The Policy drafting needs to be careful as to not create onerous expectations for developments which is at odds with part (j) which seeks to optimise the development potential. Criterion (s) is not clear on the types of development where it would be appropriate for new development to provide for the relocation of existing uses. It is	these recommendations in order to be sound: *"n) provide homes across a mix of types and tenures where this is appropriate for meeting local need;* *o) not detract from the vitality and viability of the wider City Centre, particularly the Primary Shopping Area (PSA) and Central Activity Area (CAA) ~~through the creation of E use class floorspace that will directly compete~~;* *q) provide enhancements to the public realm network unless robust Site-specific evidence can be provided to demonstrate that this is unviable;* *r) make a significant contribution to the greening of the City*	enhancements to public realm and 'greening'. The allocation covers a large area and encompasses several potential plots or development sites. It may be appropriate for some plots to deliver these priorities on site, whereas in other areas, less so. It may be that these objectives are also implemented by the Council or other partners, rather than the development sector. A case-by-case approach will be needed given the nature of the area. Policy GD9 seeks to ensure that new development is supported by necessary infrastructure such as education facilities.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						currently unclear how this would work in practice. The application of this policy appears to require all applications to relocate existing uses, but this wouldn't allow for the City Centre to evolve and improve over time. Finally, the Policy's requirement for comprehensive redevelopment must ensure this does not become a barrier for development. Derbion's Riverside Car Park site should be capable of being delivered individually, ahead of the other sites in the wider Riverside Allocation. As long as principles of the wider regeneration area are established, the applications should be capable of coming forward without relying on land outside of an applicants' control. *Tests of Soundness* Positively prepared – When compared against the findings of the Council's Tall Buildings Study and comparable City Centre schemes (Bradshaw	*Centre, through landscaping, and tree planting as part of the development of building plots, including through the provision of amenity green space, but also enhancements to public realm, unless robust Site-specific evidence can be provided to demonstrate that this is unviable;* ~~*where appropriate, make provision for the incorporation or relocation of existing uses, including existing residential uses;"*~~	This can either be through on-site provision of off-site through contributions. The exact mechanism for the delivery of a new primary school in the city centre will be contingent on the timing of residential delivery and projected school capacity at the time. Further clarity on the school issue will come from the ongoing masterplanning work.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Way, Eagle Quarter) the Riverside allocation should seek to maximise the development potential and seek to deliver more than 600 homes. The Policy should recognise that higher densities can be supported within appropriate locations, such as Riverside Car Park. Consistent with national policy – Policies should be underpinned by robust viability evidence and that policies avoid placing unjustified or unviable burdens on development. As currently drafted the policy criteria imposes undefined and onerous requirements without any evidence that these have been viability tested or can be practically delivered. Criteria (o), (q), (r), and (s) risk being too rigid and conflict with criterion (j), making the application of the policy ambiguous for a decision maker.		
Policy CC12: University of Derby, City Centre Hub								
OR162	Historic England	Policy CC12: University of	Objects			Policy CC12, page 248, it seems the allocation site includes the		The Friar Gate frontage was included

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
		Derby, City Centre Hub				block of buildings between Agard Street and Friargate and it is not clear how this boundary has been arrived at in respect of the historic environment. The block of buildings fronting Friargate include a number of listed buildings which have special qualities themselves. They provide a striking frontage reflecting the growth of Georgian development to the west of the city, away from the polluted and crowded environment of Derby's core at the time. As well as reflecting a period of growth in their own right they contribute to the significance of the Friargate Conservation Area (CA) too. The important group of buildings on Friargate includes listed buildings at GI, GII* and GII as well unlisted buildings which make a positive contribution to the character of the CA. In particular, it is necessary to understand that the significance of these buildings and the CA depends upon the complex of rear ranges and garden and yard		within the definition of the allocated area to ensure that its sensitivity is taken account of in developing proposals in the surrounding area. It was never the intention to give the impression that these buildings are development opportunities. However, it is recognised that their inclusion is potentially unhelpful. The Council is keen to continue dialogue with Historic England, particularly in relation to the emerging HIA work and is willing to enter into a statement of common ground to agree potential remedies, if necessary.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						spaces as well as the polite frontages. Also, the relation of those structures and spaces and related archaeological remains to the form of new buildings on Agard St is key to the effective management of the CA. The draft Plan does not set out why the block of buildings are included in the site allocation and the supporting text for the Policy does not address either. The draft Heritage Impact Assessment we have received does not consider this either. We recommend that this part of the allocation is removed from the site allocation. We also recommend that any avoidance and mitigation measures required for the rest of the site allocation are incorporated into the policy wording and as such we remain concerned about this site allocation. Additional comments will be available within our HIA feedback. We are available to work with the Council to ensure appropriate policy wording is prepared.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
Policy CC13: Railway Station Quarter								
OR162	Historic England	Policy CC13: Railway Station Quarter	Supports			Policy CC13, we welcome the reference to heritage and heritage led regeneration. Clause k, we welcome the inclusion a reference to the historic environment. However, we would recommend amending the wording in the clause to ensure that it is the significance of heritage assets, including their setting and key views that are protected, as well as the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site. Any mitigation and avoidance measures identified within the Heritage Impact Assessment for this area should also be incorporated into policy. Any harm that may arise should be avoided or minimised in the first instance and only as a last resort would it relate to the need for clear and convincing justification.		Support for criteria (k) is noted. Criteria (k) already makes reference to the need for proposals to avoid or minimise harm to the significance of heritage assets and references the need to respect the setting of heritage assets. No change required.
OR227	Lichfields on behalf of Derby Station	Policy CC13: Railway Station Quarter				The Derby Station Quarter Board notes the renumbering of this policy from CC14 to CC13, and confirms our continued		Support for the policy is noted and evidence of the suitability, availability and

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
	Quarter Board					strong support for the Council's broad strategy to secure the residential-led regeneration of the Railway Station Quarter. As set out in detail in our Regulation 18 representations, the Board confirms that, in respect of land within rail industry control, the proposed allocation is suitable, available and deliverable within the plan period. Suitability The principle of residential-led redevelopment within the Railway Station Quarter is established through the Council's adopted Station Quarter IPG. Sub-Area A is identified within that framework as a principal, early redevelopment parcel. The land comprises the Zone 3 surface car park immediately adjacent to Derby Railway Station and within walking distance of the city centre and Pride Park. It is therefore one of the most sustainable locations in the city, with direct access to		deliverability of the proposals is welcomed. Support for the introduction of criteria (h) is noted. In respect to criterion (n), the respondent wishes to see greater recognition that some small-scale commercial uses may be appropriate to support wider regeneration. The Council agree that small scale commercial uses may be appropriate, and this is recognised in criterion (c). Criterion (n) simply seeks to ensure that such uses are of a nature and scale that is genuinely ancillary / complementary and doesn't compete directly with wider offerings in the core

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						rail services and existing infrastructure. The redevelopment of Sub-Area A forms part of a comprehensive regeneration strategy for the wider Station Quarter, which includes the rationalisation and re-provision of existing surface parking in accordance with the adopted IPG framework. The IPG identifies the delivery of a replacement multi-storey car park within Sub-Area B as an enabling intervention to facilitate residential-led redevelopment of Sub-Area A. The principle of this coordinated approach is therefore embedded within the Council's established strategy for the area. Policy CC13 anticipates delivery of up to 500 homes in the immediate phase of regeneration across the Station Quarter, to be delivered within the plan period, with longer-term aspirations for circa 1,500 homes in total.		city centre. No change is needed. Criterion (r) relates to development making financial contributions to primary and secondary school capacity, to be kept under review. The respondent asserts that such contribution should be proportionate to the demographic profile of potential occupiers of the development, which is likely to be largely apartments. The Council acknowledge the point being made but also stress that there is increasing evidence of families living in apartments, particularly in the Castleward and Nightingale Quarter areas.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Sub-Area A within the IPG forms the key residential component within that strategy and is identified as being capable of accommodating up to 530 dwellings at an appropriate density reflecting its station-adjacent location. This level of development is consistent with the site's highly accessible location, and Government objectives of maximising the use of previously developed land and optimising development around public transport interchanges. There are no insurmountable physical or environmental constraints that would prevent the redevelopment of Sub-Area A or Sub-Area B in accordance with the established IPG principles. Detailed proposals will be prepared to respect heritage assets, townscape character and to meet design quality expectations. Additionally, the allocation of the Railway Station Quarter		Criterion (s) relates to surface water management and the provision of SuDS. The respondent requests that this requirement is caveated with 'where appropriate / feasible'. Policy CL1 (relating to flood risk and water management) also covers this requirement but includes a caveat, 'unless it is demonstrated that to be inappropriate to do so'. When the Plan is read as a whole, this caveat already exists. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						strongly accords with the clear shift in emphasis set out in the 2026 NPPF towards residential and mixed-use development within a reasonable walking distance of railway stations that provide a high level of connectivity to jobs and services. The Railway Station Quarter clearly meets this criterion, benefiting from immediate proximity to Derby Railway Station, which provides frequent services and strong links to the wider city centre and employment areas. Policy CC13 therefore aligns closely with the overarching direction of travel established by the 2026 NPPF. Accordingly, Sub-Area B is suitable for the delivery of a consolidated car park and multimodal transport hub, and Sub-Area A is suitable for residential-led redevelopment at the anticipated quantum of circa 500 units. Availability		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Network Rail and East Midlands Railway respectively own the freehold and leasehold of the Zone 1, Zone 2 and Zone 3 car parks. An ownership plan showing the extent of this land is included at Annex 1. Train Operating Companies in Great Britain are being brought under public ownership and transitioning to Great British Railways (GBR) as contracts expire. It is currently anticipated that EMR will be nationalised in December 2026. It is anticipated that this move will simplify rail industry landownership structures across the Station Quarter. The rail industry therefore controls the land identified in the IPG for the proposed multi-storey car park, which will in turn allows for the release of the surface-level parking within Sub-Area A. Platform 4 also controls the majority of Sub-Area A itself, identified as the earliest residential phase, capable of delivering up to 530 dwellings. Together with the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						forthcoming simplification of rail ownership structures through GBR, this consolidated ownership strengthens the availability of land needed to deliver both the residential component and its enabling infrastructure. A small parcel within Sub-Area A, adjacent to the Zone 3 car park, is in separate private ownership. This does not act as a ransom strip, as a feasible development layout can be delivered without it. Development solely on rail industry controlled within this Sub-Area could deliver up to 403 dwellings, with control of the remaining parcel intended to be secured in due course. Platform 4 supports comprehensive regeneration of the Railway Station Quarter and will not pursue piecemeal development that could prejudice adjoining land or the wider IPG. Overall, the land required to deliver the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						anticipated 500 dwellings is substantially consolidated under a single, committed ownership. Deliverability Policy CC4 anticipates delivery of a minimum of 500 homes within the plan period. Sub-Area A alone is capable of delivering up to 530 dwellings, or 403 dwellings in the land already within the control of Platform 4. As identified in the draft Policy, the key enabling requirement for redevelopment is the rationalisation of existing surface parking, through the delivery of a new multi-storey car park and multimodal transport hub (MMTH) at Sub-Area B, in the location of the existing Zone 2 Car Park. The MMTH will rationalise existing surface-level parking within the Station Quarter and to act as an enabling intervention to unlock the immediate residential development Zone 3, as well as acting as a catalyst for wider		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						regeneration in surrounding Sub-Areas. The principle of the car park, and the broad approach to its design, are established through the IPG. Platform 4's intention is to secure planning permission for, and construct, the MMTH at the earliest possible stage. Platform 4 confirms that funding from the Combined Authority is in place to progress a planning application for the MMTH, and that it intends to submit this application in 2026, before the emerging Local Plan is submitted for examination. This facility will enable the immediate release of Sub-Area A for residential redevelopment, and support the comprehensive regeneration of the Station Quarter. The enabling parking solution is therefore a defined intervention with a route to achieving funding, rather than an aspirational assumption.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Subject to delivery of the replacement parking facility, residential development on Sub-Area A could reasonably commence within approximately three years. In terms of build-out, a scheme of up to 530 dwellings would be capable of delivery within the plan period. Even applying a conservative build rate of approximately 80 to 100 dwellings per annum, the full quantum could be delivered within approximately five to seven years from commencement, particularly if delivered through more than one outlet. Platform 4 and its predecessor organisations have significant experience in delivering complex regeneration schemes in a railway setting, typically in partnership with private developers, local authorities, and transport agencies. It has an established working relationship with Derby City Council and has been actively		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						engaged in driving plans for regeneration within the Railway Station Quarter through the preparation of the IPG. Elsewhere, Platform 4 is playing an instrumental in successful regeneration schemes at Cardiff station, Manchester Mayfield, and London Liverpool Street Station. This experience and capability provide confidence that development can be brought forward in a timely and coordinated manner, consistent with the assumptions in the emerging Local Plan. These factors materially reduce delivery risk when compared to more complex brownfield regeneration sites involving fragmented ownership or significant constraints. Given the ability to bring forward residential development at Sub-Area A together with the enabling car park consolidation at Sub-Area B, the Railway Station Quarter therefore provides a realistic		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and credible basis for meeting the plan period target of 500 homes. Furthermore, Platform4 are now in pre-application discussions with Derby City Council in respect of emerging proposals at Sub-Areas A and B and are committed to submitting planning applications for the development of both sites at the earliest opportunity. Comments on Criterions h), n), r) and s) The Derby Station Quarter Board wish to raise a number of points of detail, including matters arising from changes made since the Regulation 18 Draft. The addition of Criterion h) is welcomed; requiring the integration and prioritisation of sustainable travel connections, which we consider to be a positive addition consistent with the Board's ambitions for the Station Quarter as a		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						sustainable, well-connected place to live. In respect of criterion n), which requires that development does "not detract from the vitality and viability of the wider City Centre, particularly the Primary Shopping Area (PSA) and Central Activity Area (CAA) through the creation of E use class floorspace that will directly compete", the Board supports this approach which is consistent with national policy. However, as set out in the IPG, it is considered that some small-scale ancillary commercial uses (for example coffee shops, fitness studios, small-scale convenience retail) would be appropriate to support the delivery of high density housing and regeneration of the area, including for example within the red brick building adjacent the railway sidings Sub-Area, within the proposed commercial building to the east of the station, and/or within the ground floor of a proposed residential building, to allow for		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the comprehensive regeneration of the area, improve the offering at Pride Park, and bring vitality and interest to the residential-led development at Sub-Area A. We would welcome some acknowledgement in the policy or supporting text that such uses could be carefully considered on a case-by-case basis, provided it is demonstrated that the vitality and viability of the PSA and CAA are preserved. The Derby Station Quarter Board considers that further detail is required regarding Criterion r), which requires financial contributions to primary and secondary school capacity "where appropriate…to be kept under review." Given that development within the Station Quarter is anticipated to comprise predominantly, if not exclusively, apartments, which typically generate a lower proportion of school-age children than family housing, particularly given the location,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						we consider it important that any contributions sought are calculated on a basis that reflects the likely demographic profile of the development, and we would welcome this being made explicit either within the policy or its supporting text, to ensure the policy is justified and effective. The Derby Station Quarter Board notes the new criterion s), requiring development to "improve surface water management through the provision of high-quality SuDS." This objective is supported in principle. However, SuDS solutions can often be difficult to achieve on tightly constrained, previously developed urban sites of the type found within the Station Quarter. It is therefore suggested that this criterion is amended to include the caveat "where feasible and appropriate, in accordance with the drainage hierarchy," to ensure the policy remains effective and deliverable across		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the range of site conditions found within the allocation. Conclusions on Policy CC13 The Derby Station Quarter Board supports the Council's regeneration strategy for the Railway Station Quarter and the comprehensive approach embedded within the draft allocation. Sub-Area A is suitable for residential-led redevelopment of up to 530 dwellings in this highly sustainable location, and the land required to deliver both the residential development and the associated enabling multi-storey car park is substantially consolidated within rail industry control. The replacement parking infrastructure is supported by a clear funding and delivery pathway, and residential development can realistically be delivered within a ten year time frame. However, as set out above, we consider that minor modifications to criterions n), r)		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and s) to ensure the policy is effective, and sufficiently flexible so to ensure the comprehensive regeneration of the Station Quarter is achievable. As a point of detail, noting the change in Policy Numbering from CC14 to CC13, there are some instances in the draft plan where the references to these policies still needs to be updated to reflect this change. The Derby Station Quarter Board welcomes continued engagement with the Derby City Council Planning Policy Team and broader partners to secure coordinated and high-quality regeneration of this strategic gateway location.		
OR257	Marrons on behalf of BDW Trading Ltd (Redrow Homes Midlands)*	Policy CC13: Railway Station Quarter	Object		No	The Railway Station Quarter is identified as a significant regeneration opportunity, proposed for allocation within the LPD, for development comprising, *inter alia,* the delivery of 'a minimum' of 500 dwellings, as part of a longer-term vision for the delivery of		The Council acknowledge that development within the proposed Railway Station Quarter allocation will be challenging and will require a multi-

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						c.1,500 homes. Appendix 2 of the Submission Draft anticipates all 500 dwellings being completed within the plan period, assuming the first 200 completions in Year 9 (2031/32), followed by a sustained delivery rate of 100 dpa between Years 10 - 12 (2032/33 to 2033/34). Of note, is the Council's assumed delivery rates, anticipating the site to mobilise quickly upon a grant of planning permission and provide 200 dpa in the first year, followed by 100 dpa thereafter for 3 consecutive years, with no allowance for build-out rates to 'ramp up'. Indeed, the site adopts an unusual delivery profile, with the first year of completions markedly higher than the remaining trajectory. Plainly, the assumed build-out rates are overly ambitious. Indeed, the Lichfields Start to Finish 3rd Edition, indicates that, in order to achieve build-out rates of 200 dpa, the site will require at least 4 outlets. Nevertheless, the Council has provided no		agency approach to overcome constraints. The SHLAA is not a decision-making document and simply identifies the key constraints that will need to be overcome. It is completely logical that a complex city centre location such as this will have constraints such as existing uses and land ownership issues. Following on from development of Interim Planning Guidance (IPG), more detailed masterplanning of the area is ongoing and the Council is working with partners, including Platform4, to develop a delivery strategy. The Council is committed to delivery and will utilise CPO powers if

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						evidence demonstrating how that delivery rate has been derived, with no indication as to the number of outlets intending to deliver the site. Turning then to the LPD itself, paragraph 738 of the supporting text records that there is fragmented land ownership, and that connections between the station, the city centre and Pride Park are sub-optimal. Whilst the Council has delivered new and improved walking and cycling routes to upgrade these linkages, there is still much work to be done. Then, at paragraph 741, the LPD alludes to initial work completed as part of the Interim Planning Guidance for the area which indicates that the area could accommodate c.1,500 new homes. However, it is likely that only c.500 homes can be delivered on catalyst sites within the plan period. Finally, at paragraph 745, the supporting text states that the Council will continue to work		necessary to deliver the wider vision for the area. It is important to note that the majority of land needed to deliver the first phases (500) is already in the control of the rail industry. Delivery has been deliberately pushed towards the end of the plan period, accounting for the lead in periods needed to overcome constraints and get the delivery strategy in place. Units are likely to be largely apartments and therefore completions are likely to be counted as 'blocks' as opposed to a smoother trajectory over a more sustained period.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						with partners to further develop plans for this area and is committed to the delivery of new homes. If necessary, and as a last resort, the Council may utilise compulsory purchase powers to ensure delivery. As regards the latter, it is unclear why the Council's prerogative to exercise compulsory purchase powers is expressly referenced, if there were in fact comfort surrounding land assembly. The site is also assessed within the Strategic Housing and Land Availability Assessment ("SHLAA'') under Site Reference: DER0412. As regards the planning history and site delivery progress, the SHLAA records that the area is identified based on 'very early and initial scoping'. Much of the area is in use and 'there are no formal plans', with the broad area identified as a 'conceptual opportunity'. In relation to constraints, the SHLAA reiterates that the broad location is but a concept. There would need to be significant		The Station Quarter Board have submitted very positive comments that provide useful evidence to demonstrate the suitability, availability and deliverability of sites to deliver the assumed capacity.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						masterplanning, land assembly and funding. These concerns are echoed within the Derby Station Quarter Interim Planning Guidance (June 2025) which finds that regeneration remains at an early stage and that 'there is currently no funding available to support implementation'. On that basis, the SHLAA finds that the site is neither available nor achievable. Indeed, although the area may be classed as sustainable, it is set amongst commercial and education uses and may present difficulties creating links to any new, or existing, community. Furthermore, the station and railway lines form a significant physical barrier, with the better opportunities existing to the west of the station; linked to the city centre and the emerging residential communities at Castleward and the Nightingale Quarter. The SHLAA concludes that mechanisms to deal with land ownership are 'very complex', and masterplanning must		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						overcome issues in safeguarding residential amenity (given the proximity of the railway lines). Whilst the Great British Railways venture brings an opportunity to consider these opportunities, there is no certainty, and a complex set of hurdles to overcome. As such, 'no dwelling numbers or certainty of delivery can be applied. A great deal of the site is unavailable and viability is uncertain'. These conclusions are corroborated by the Council's Local Plan Viability Assessment (April 2026) wherein development within the City Centre is unviable even before policy obligations are applied, indicating that delivery in these locations is reliant on public sector intervention, regeneration initiatives or site-specific flexibility. The respondent also notes the publication of the Derby City Level 2 Strategic Flood Risk Assessment ("SFRA'') (July 2026) which supports the Regulation 19 consultation. The Level 2		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						SFRA finds that the Railway Quarter is one of the sites most at risk of fluvial flooding and that it is located within an existing EA Flood Warning Area. Table 5.1 of the SFRA assigns a RAG rating of 'red' - reserved for sites where a high percentage of the site (>20%) is at risk from fluvial and/or surface water flooding in the 0.1% AEP event. Paragraph 8.1 then concludes that the Railway Quarter is one of the sites at greatest risk, and will require careful consideration and 'significant mitigation' to pass the flood risk element of the Exception Test. Notwithstanding those conclusions, Policy CC13 allocates the Railway Station Quarter for the delivery of a minimum of 500 dwellings over the plan period. However, the basis for the Council's delivery assumptions remains unclear. The SHLAA does not identify *any* deliverable or developable capacity, records the site as unavailable and unachievable,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and acknowledges, in express terms, that there is no certainty regarding development viability, with the site identified as merely a conceptual opportunity. Furthermore, the allocation is dependent upon funding, public sector intervention, land assembly and, potentially, the exercising of compulsory purchase powers. The respondent acknowledges the long-term potential of the Railway Station Quarter and does not dispute that the area may accommodate development over an extended period. However, the evidence published alongside the Submission Draft indicates that the allocation, at this juncture, represents a strategic aspiration, as opposed to a developable supply source supported by objective evidence. Given the contingencies involved in the site materialising, of which there are many, it would be unreasonable to rely on the site		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						delivering some 500 units over the plan period. Drawing the above together, the respondent submits that the contribution anticipated from Policy CC13 is insufficiently evidenced. The Council's own evidence base identifies the site as neither available nor achievable and records no deliverable or developable housing capacity. In the absence of further evidence demonstrating how the identified constraints and dependencies will be overcome, the inclusion of 500 dwellings within the housing trajectory should be treated with considerable caution.		
OR31	Network Rail Infrastructure Ltd	Policy CC13: Railway Station Quarter	Support	Yes	Yes	The alteration to Policy CC13 criterion (i) is noted. It now gives a degree of flexibility in accommodating additional car parking at the station provided robust justification is given for any such increase. As such Network Rail can now support this policy as worded.		Support is noted.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
Policy CC14: North Castleward								
OR232	Derwent Valley Mills World Heritage Site	Policy CC14: North Castleward	Object			Thank you for consulting the Derwent Valley Mills World Heritage Site (DVMWHS) Partnership at the regulation 19 stage of the draft local Plan. These comments will be taken to the next meeting of the DVMWHS Conservation and Planning Group on the 9th September 2026 for verification by members. We have previously provided comments on the emerging local plan, most recently in June 2026. The following comments therefore reflect our previous advice. The City Council proposes high density development at Derby Riverside (Policy CC11) and North Castleward (Policy CC14). In each case, development would include tall buildings, and the draft local plan acknowledges a potential impact upon the OUV of the DVMWHS. We continue to advise that		Heritage Impact Assessment (HIA) work is being undertaken by specialist consultants, including consideration of the North Castleward site. The DVMWHS Partnership have been consulted as part of the development of this work. The Council is keen to continue working closely with stakeholders to resolve any outstanding issues, including through statements of common ground if necessary.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Heritage Impact Assessments (HIAs) should be prepared for these site allocations prior to adoption of the local plan. As far as we are aware these have not been undertaken. Historic England advises that site allocations should be subject to a Heritage Impact Assessment (HIA); it has published an advice note to that effect (HEAN3). UNESCO has published a "Guidance and Toolkit for Impact Assessments in a World Heritage Context" (2022). World Heritage Centre - Guidance and Toolkit for Impact Assessments in a World Heritage Context The *Derby City Digital Twin* may be used to model (e.g.) the effects of tall buildings upon views from the World Heritage Site. If the OUV of the DVMWHS would be harmed by (e.g.) tall buildings, for either site allocation it may be necessary		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						to amend the development accordingly. This may affect the deliverability of these sites.		
OR162	Historic England	Policy CC14: North Castleward	Supports			Policy CC14, clause i) we welcome the inclusion a reference to the historic environment. However, we would recommend amending the wording in the clause to ensure that it is the significance of heritage assets, including their setting and key views that are protected, as well as the Outstanding Universal Value of the Derwent Valley Mills World Heritage Site. Any mitigation and avoidance measures identified within the Heritage Impact Assessment for this area should also be incorporated into policy. Any harm that may arise should be avoided or minimised in the first instance and only as a last resort would it relate to the need for clear and convincing justification.		Support for criteria (i) is noted. Criteria (i) already makes reference to the need for proposals to avoid or minimise harm to the significance of heritage assets and references the need to respect the setting of heritage assets. No change required. Heritage Impact Assessment (HIA) work is being undertaken by specialist consultants, including consideration of the North Castleward site. Historic England have provided comments to inform this work

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
								and the Council is keen to continue working closely with them to resolve any outstanding issues, including through statements of common ground if necessary.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
14. Monitoring and Review								
C507	Community Campaigner David Barton	Paragraph 750	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be	Entirety of Document- Traditional Architecture will provide the greatest contributing influence on combatting the Climate Crisis through its rich Carbon capacity/ embodied carbon alongside appropriate retrofitting of Old Builds.	Noted. Design quality is secured through Policy GD1 and the Plan's other design and heritage policies, which respond to local character without prescribing a single architectural style. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.		
Policy MH1: Monitoring and Review								
OR128	Home Builders Federation*	Policy MH1: Monitoring and Review	Object		No	*Policy M1 and the Monitoring Framework is not considered to be sound as it is not justified, not effective and not consistent*		Policy M1 requires annual reporting through the Authority Monitoring Report against the indicators

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						with national policy for the following reasons: Monitoring is essential to see if the Plan is delivery housing as was expected. The current monitoring indicators are inadequate as they fail to set any targets against which performance would be judged. The Plan should instead include a comprehensive Monitoring Framework which sets out the targets for housing (and other matters) that will be monitored and the triggers for action being taken, and what that action will be. HBF do not support the inclusion of policies within a Local Plan that merely triggers a review of the Local Plan if monitoring shows housing delivery is not occurring as expected. Such a policy does nothing to address the housing crisis or undersupply of homes. There are other more effective and immediate measures that could be introduced into policy that would enable the Council		in Appendix 1, which use data available each year, including net completions and the five-year housing land supply. Paragraph 752 sets out the circumstances that would require a review or the bringing forward of alternative or additional sites, including a failure to maintain a rolling five-year supply, and the delivery of Derby's unmet need in neighbouring authorities will be monitored with those authorities through the Statement of Common Ground. It's also important to note that over the lifetime of the plan it is expected that Local Government Reorganisation will occur, therefore monitoring indicators should be based on

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						to address housing under deliver, much more quickly than would be possible through the production of another plan, or plan review. Derby City should also monitor the delivery of any unmet need being provided by neighbouring authorities and actively participate in local plan consultation and examination to ensure the need for other authorities to meet their need is robustly supported in neighbouring Local Plans. The Plan needs to set out how and when monitoring will be undertaken, and more information is needed on what action(s) will be taken when if monitoring shows under delivery of housing. Not doing so means the plan will be ineffective and therefore unsound.		statistics that are regularly and commonly collected to ensure continuity of reporting.
OR235	Little Ships Housing CIC	Policy MH1: Monitoring and Review	Object	Yes	No	The Council has described 12,500 homes as the limit of the city's capacity (Council statement, November 2025). The evidence for that limit is	Modification 1: Policy H1 supporting text (new paragraph after paragraph 77) and Policy MH1.	The Housing Requirement and Spatial Strategy Topic Paper confirms that the 2021 capacity

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the call for sites and the Strategic Housing Land Availability Assessment. Both assess land that owners choose to promote. Land in public ownership is different. The Council and other public bodies own a substantial estate in the city: surface car parks, depots, and the airspace above low-rise civic, health and education buildings and car parks. Whether such land is offered for housing is a landowner decision, taken on grounds wider than planning. The Council's Planning Policy team confirmed to us on 4 September 2026 that Council land has been assessed where it came forward through the call for sites, and that the one estate-wide review of Council-owned sites was carried out for gypsy and traveller provision. There has been no estate-wide assessment of the public estate's capacity for housing. The Plan therefore exports part of the city's need without	"The Council will assess the capacity of land and buildings in the ownership of the Council and other public bodies within the city, including surface car parks, depots and the airspace above existing and replacement public buildings and car parks, to accommodate new homes without displacing existing uses. The assessment will be completed within 12 months of adoption, reported through the Authority Monitoring Report, reflected in the Brownfield Land Register and the housing land supply, and used to inform any review of the Plan." Add a corresponding	work assessed Council-owned and public sector assets, and SA Appendix G shows Council-owned land already being brought forward at Policies HA9, HA11, HA13, HA14 and HA16 and at the Chappel Street and Abbey Street car parks (Policy CC4(f)). Policy CC3 and paragraph 674 also support the conversion of under-used upper floors in the City Centre. Despite this, it is important to be realistic when assessing capacity and assess the evidence of what is realistically deliverable within the plan period. This must factor in which proposals have been promoted are available and achievable. There is a

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						having tested a source of supply that sits within the city, in single public ownership, on previously developed land, in the most sustainable locations, and which can be developed without displacing the existing use where homes are built above it. In our view this engages three of the tests of soundness: • Positively prepared. The strategy should seek to meet the area's needs as a minimum. Capacity within the city was not fully established before part of the need was passed to neighbouring authorities. • Justified. The reasonable alternative of intensifying the public estate does not appear to have been assessed among the spatial options in the Sustainability Appraisal (we have not found it in Appendix C).	indicator to Appendix 1: homes permitted on or above land in public ownership.	limited amount of public funding for sites which would otherwise be unviable. Therefore (other than a windfall allowance) public sites which are not available or are not being released for housing use (because for example they are in other uses) have not been added to the capacity. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						• Effective. Land in public ownership is among the most deliverable in the city: single ownership, no land assembly and no purchase price. The City Centre figure of around 5,500 homes rests largely on sites outside the Council's control. National policy points the same way. The NPPF asks plans to promote the effective use of land, to support the development of under-utilised land and buildings, especially where land supply is constrained, and to support the use of the airspace above existing premises for new homes (NPPF paragraphs 124 and 125, December 2024 edition). The Plan describes Derby as a constrained authority (paragraph 20).		
OR41	Councillor Tim Prosser	Policy MH1: Monitoring and Review	Objects		No	A number of new policy tests and technical standards appear in the document published for		The Regulation 19 consultation was carried out on the

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Regulation 19 consultation that were not in the agreed draft, including: New criteria under Policy M1 (Monitoring and Review), including a new trigger for plan review where the Council fails "to maintain a rolling 5-year supply of deliverable housing sites," and a new mechanism for a "stepped trajectory" reduction to the housing requirement in the latter part of the plan period. Para 752 None of these are corrections of the draft text — each is new policy substance, imposing new obligations on developers or committing the Council to new positions, that a consultee reading only the agreed draft version would not have seen and that were not passed by cabinet or council. It's been explained to me that these changes were made under delegated powers to **"make minor changes for the purposes of presentation, error**		published Plan, and all parties, including councillors, have had the opportunity to comment on its content. The Council is satisfied that the Plan has been prepared in accordance with the relevant legal and procedural requirements, which will be set out in its submission documents. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						correction and clarity" to the document approved by cabinet and council before its publication for Regulation 19 consultation. This objection concerns whether that delegation has been exceeded and the documents contents altered substantially from the regulation 18 consultation and the agreed draft.		
OR266	Fisher German on behalf of Bloor Homes	Paragraph 752	Objects		No	Part F of the reasoned justification at 752 of the Plan states "Should delivery in the first part of the plan period significantly exceed the annualised housing requirement, and capacity constraints remain evident, the Council will seek to make an equivalent reduction to the housing requirement in the latter part of the plan period through a stepped trajectory, to be introduced at review". Whilst noted this is the reasoned justification, not within the Policy, it is pertinent to note as set out above that any new Plan would need to have due regard for an updated LHN, and that would include housing delivery.		Paragraph 752(f) is supporting text that indicates how the Council would approach the trajectory at review, and any future plan will be prepared against the national policy and housing need figures that apply at that time. It does not alter the housing requirement in Policy H1. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						As such, this part of the reasoned justification should be deleted for clarity and to comply with National Policy		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
15. Appendix 1: Monitoring Indicators								
C507	Community Campaigner David Barton	Monitoring Indicators	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be	Entirety of Document- Traditional Architecture will provide the greatest contributing influence on combatting the Climate Crisis through its rich Carbon capacity/ embodied carbon alongside appropriate retrofitting of Old Builds.	Noted. Design quality is secured through Policy GD1 and the Plan's other design and heritage policies, which respond to local character without prescribing a single architectural style. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can withstand local, regional, national and international pressures.		
16. Appendix 2: Housing Trajectory								
No representations were received for this Appendix.								

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
17. Appendix 3: Table of Strategic and Non-Strategic Policies								
OR260	Carney Sweeney on behalf of Peveril Homes Limited*	Appendix 3	Support			It is also noted that Appendix 3 confirms which of the proposed policies are strategic in nature, in accordance with the requirements of Paragraph 22 of the NPPF. This clarity on the nature and scope of the emerging Local Plan, and its policies, is welcomed.		Support welcomed.
C507	Community Campaigner David Barton	Paragraph 753	Objects	Yes	No	Traditional Architecture Design Codes should be a central component across this entire consultation and its various chapters and sections especially concerning new construction. It performs strongly on economic, ecological and environmental grounds as can be attested to by leading figures and organisations with academic studies that corroborate this. Please see my PDF Umbrella Representation for the various merits outlined including Placemaking and Greenery Proposals. A ban on demolition of buildings constructed prior to 1950 should be enacted as soon as possible with reconstructions of previously demolished	Entirety of Document- Traditional Architecture will provide the greatest contributing influence on combatting the Climate Crisis through its rich Carbon capacity/ embodied carbon alongside appropriate retrofitting of Old Builds.	Noted. Design quality is secured through Policy GD1 and the Plan's other design and heritage policies, which respond to local character without prescribing a single architectural style. No change required

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						historic buildings listed or not given full support for restoration and reuse. Non-Designated Heritage Assets and unclassified historic buildings should also be given full protection and support against their demolition, such as selling of publicly owned historic buildings that will be demolished otherwise. Historic buildings should be duly reconstructed authentically as they were. Whilst present points are mostly find the shift to utilising authentic Traditional Architecture based Design Codes will mitigate concerns facing all key stakeholders ranging from incumbent local residents to the Local Authority and House Builders and prospective new residents and businesses alike. It does this by directly addressing the need for housing, the otherwise avoidable strain on the environment and surrounding biodiversity whilst enabling the complete Derby Area to shine and stand out as a source of economic activity that can		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						withstand local, regional, national and international pressures.		
18. Appendix 4: Guidance on Parking Provision								
C507	Community Campaigner David Barton	Paragraph 762	Object	Yes	No	Free Car Parking should be provided en masse with all prohibitions and associated restrictions removed to provide the best possible opportunity for everyone including residents and outsiders to support the area.	Entirety of Document- Free Car Parking en masse and the removal of prohibitions and associated restrictions will unlock newfound economic opportunities for everyone.	Noted. The Plan's approach to parking follows the City Centre Parking Study and the transport hierarchy in Policy T1, while charges and restrictions on parking are managed through the Council's parking and highway functions rather than the Local Plan. No change required.
OR41	Councillor Tim Proser	Appendix 4: Parking Standards	Object		No	A number of new policy tests and technical standards appear in the document published for Regulation 19 consultation that were not in the agreed draft, including: A wholly new appendix of cycle parking standards, based on DfT guidance note LTN 1/20, setting quantified minimum cycle parking ratios by land use type. Page 278		The Regulation 19 consultation was carried out on the published Plan, and all parties, including councillors, have had the opportunity to comment on its content. The Council is satisfied that the Plan has been prepared in

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						None of these are corrections of the draft text — each is new policy substance, imposing new obligations on developers or committing the Council to new positions, that a consultee reading only the agreed draft version would not have seen and that were not passed by cabinet or council. It's been explained to me that these changes were made under delegated powers to **"make minor changes for the purposes of presentation, error correction and clarity"** to the document approved by cabinet and council before its publication for Regulation 19 consultation. This objection concerns whether that delegation has been exceeded and the documents contents altered substantially from the regulation 18 consultation and the agreed draft.		accordance with the relevant legal and procedural requirements, which will be set out in its submission documents. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
19. Appendix 5: Open Space Standards								
C507	Community Campaigner David Barton	Open Space Standards	Object	Yes	No	Space is too restrictive	Entirety of Document- Quality spacious surroundings are required that cannot solely rely upon quotas and targets.	Noted. The open space standards in Policy EN3 and Appendix 5 are long-standing standards which support high quality, accessible open space, and Policy EN3 also has regard to the size, type and form of provision needed locally. No change required.
OR104 & C519	George Fletcher*	Open Space Standards	Object	No	No	Destroying Wilmorton Park will be detrimental to these objectives for the residents of Wilmorton.	An alternative location needs to be found that does not involve destroying the key green space of the approx. 320 households of Wilmorton.	Policy HA16 retains the land beyond the fenced pitches as accessible public open space, to be improved with further planting, so the park will remain available to local residents. The site selection process is set out in the Gypsy and Traveller Site Provision Topic Paper. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
20. Appendix 6: List of Wildlife Sites and Locally Important Geological Sites — List of Wildlife Sites and Locally Important Geological Sites								
C507	Community Campaigner David Barton	List of Wildlife Sites and Locally Important Geological Sites	Object	Yes	No	Housing Targets conflict with Natural sites and so must be reconsidered utilising TA to ensure that these are as ecologically and environmentally accommodating whilst economially strong.	Entirety of Document- Traditional Architecture will strengthen each theme and so must be encouraged.	Noted. The Local Wildlife Sites and Locally Important Geological Sites listed in Appendix 6 are protected under Policy EN8, and the Sustainability Appraisal assessed effects on biodiversity when the allocations were selected. No change required.
21. Appendix 7: Superseded Policies								
OR260	Carney Sweeney on behalf of Peveril Homes Limited*	Appendix 7: Superseded Policies	Object			Appendix 7 of the Draft Local Plan is clear in setting out that, on adoption, the Local Plan for Derby (2023-2040) will supersede the Derby City Local Plan Part 1 – Core Strategy (2017) and the remaining 'saved' policies of the City of Derby Local Plan Review (2006).	However, we would encourage the Council to include details on the former point in the Introduction section of the Draft Local Plan, for the sake of clarity.	Appendix 7 sets out clearly the policies that will be superseded on adoption, and as the Plan is read as a whole, repeating this in the Introduction is not necessary. No change required.
C507	Community Campaigner David Barton	Paragraph 763	Support	Yes	Yes	No text submitted	No text submitted	Support Welcomed

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
22. Glossary								
C507	Community Campaigner David Barton	Paragraph 765	Support	Yes	Yes	No text submitted	No text submitted	Support welcomed.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
Green Wedge Review								
OR265	P&DG on behalf of JGP Properties*	Green Wedge Review	Objects			Green Wedge formed a component of the original capacity exercise. Indeed, as noted above, the upper end of the 11,900–13,600 dwelling range of the desktop study expressly assumed, amongst other matters, that such would require '*additional releases from Green Wedges*'. The May 2024 capacity update subsequently removed several Green Wedge opportunities because of concerns regarding the '*technical feasibility*' of bringing those sites forward. Appendix 3 of the Position Paper 2024 nevertheless records 615 dwellings from Green Wedge releases as forming part of the 5,100 dwellings of potential new capacity included within the July 2024 assessment. It is not clear from the Position Paper which individual Green Wedge opportunities were removed, the detailed basis upon which their technical feasibility was assessed, or the extent to which those conclusions have subsequently been reconsidered through the more detailed evidence prepared to support the Reg. 19 draft Local Plan.		For clarification, The Green Wedge review (GWR) was undertaken before regulation 18 and therefore considered an earlier version of the scheme submitted by the promoters which would have effectively closed off the residual Green Wedge. A smaller site area submitted at Reg 18 was not considered in the GWR but the promoters assert that a wedge could be maintained by developing this smaller area. The Housing Requirement and Spatial Strategy Topic Paper explains how the capacity work evolved. Green Wedge land has only been allocated where the Green Wedge

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Where Green Wedge opportunities continue to be excluded, their potential should be assessed on the basis of the detailed evidence now available, including whether identified constraints are capable of satisfactory mitigation. Conversely, where subsequent site-specific assessment identifies areas of Green Wedge land capable of appropriately accommodating residential development, that should be reflected in the City's overall housing capacity. The relevant consideration is, therefore, not simply whether a site is affected by a constraint such as an adjacent Ancient Woodland, but the implications of that constraint for development and whether it can reasonably be addressed and/or mitigated. Land South of Lime Lane, Oakwood provides a particular example of the above Green Wedge capacity issue. As addressed separately JGP considers that the Site represents a suitable, available and deliverable opportunity for residential development on the eastern		Review supports it and / or a viable wedge can be maintained. SA Appendix G explains that the smaller site option was considered at reg 19, but that the site was not allocated even after reviewing the smaller site area, even at the reduced scale on the eastern field, because of concerns about the effect on the Chaddesden Wood ancient woodland and Local Nature Reserve, which Derbyshire Wildlife Trust and the Woodland Trust continue to raise. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						field only, and there is insufficient proportionate evidence to justify the exclusion of residential development here, when considered as part of a comprehensive scheme capable of incorporating appropriate mitigations and enhancements, including on the retained western field. The relevance of the eastern field to the Housing Land Capacity assessment is, therefore, whether the Council's approach has appropriately considered the ability for identified constraints to be addressed through the location, form and design of development along with any mitigation measures that could be incorporated (including on the western field) before excluding otherwise reasonable Green Wedge opportunities from the City's capacity. This is considered in more detail in Section 3 below.		
OR265	P&DG on behalf of JGP Properties*	Green Wedge Review	Objects			The Council's Green Wedge Review assessed SHLAA ref: DER/0209 on the basis of residential development across the entire site south of Lime Lane (both fields). It concluded that development would cause high harm as it would '*span the full width of the GW'* and alter its character from a 'wedge' to a 'green		SA Appendix G considered the reduced scheme on the eastern field and acknowledged that a functional Green Wedge could remain, but did not allocate

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						gap' surrounded by development. As explained herein, JGP is now promoting the whole site as a comprehensive allocation, but with residential development confined to the eastern field with the western field retained and enhanced as described above. An annotated aerial view (Appendix 4) depicts the retained mouth of the Green Wedge as just over 350m wide taking account of the neighbouring POS to the west and the NE corner of the eastern field. Therefore, the principal concern identified in the Green Wedge Review would simply not arise i.e. built form would not span the full width of the Green Wedge. This is recognised by the Council's own evidence. To reiterate, Appendix G of the Reg.19 Sustainability Appraisal recognises that the retention of the western field would allow ***'functional Green Wedge to remain'.*** JGP supports this finding. JGP also notes that the revised scheme would additionally meet Green Wedge aims regarding recreational provision, habitat creation and tree planting.		the site because of continuing concerns, raised by Derbyshire Wildlife Trust and the Woodland Trust, about its effect on the Chaddesden Wood ancient woodland. The comparison with East of Moorway Lane (Policy HA3) is therefore not like for like, as the reason for not allocating Lime Lane is the ancient woodland rather than Green Wedge function alone. The SA assessment is being revised to take into account the revised site boundary, which does not include, but is next to the ancient woodland. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						<u>Comparison with Other Green Wedge Sites</u> The Council's Reg.19 SA's conclusion that housing restricted to the eastern field will allow a functional Green Wedge to remain is consistent with its assessment of other sites within the Green Wedge that have subsequently been allocated for residential development. Most notably, land East of Moorway Lane, Littleover (**draft Policy HA3**) has been allocated for approximately 335 dwellings within the Littleover/Sunnyhill Green Wedge. The Council's assessment of that site recognises that this development can be accommodated whilst retaining the wider function of the Green Wedge. The width of retained Green Wedge land is not dissimilar to the extent of Green Wedge that would be retained at the Lime Lane Site with residential development restricted to the western field. Overall, the Green Wedge conclusions reached for the East of Moorway Lane can be equally applied to this Lime Lane proposal. The Lime Lane site has the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Ancient Woodland consideration, but as outlined herein, any potential development impacts in this respect can be mitigated alongside certain betterment. Accordingly, JGP considers that the Council has not adequately justified the omission of Land South of Lime Lane (with housing on the eastern field only) from the Reg.19 draft Local Plan. In particularly, the omission of the eastern field for housing is not consistent with the Council's own Sustainability Appraisal regarding Green Wedge functionality and its approach to the assessment and allocation of other sites within the Green Wedge.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
Sustainability Appraisal								
OR236	Caddick Land*	Sustainability Appraisal	Objects	Yes	No	Evidence base and associated documents – Sustainability Appraisal The Sustainability Appraisal conclusions are reliant on the A38 Junctions project, and it therefore follows the Sustainability Appraisal is not robust if the A38 project is cancelled. On that basis alone the plan would not be based on reasonable or up to date evidence and would be unsound. For example, the Sustainability Appraisal identifies potential benefits of the plan, under indicator SA11 'Air, Noise, and Light Pollution' on the basis: 'A further positive cumulative effect could result from a reduction in journey times and congestion on the highway network as a result of the A38 Derby Junctions in combination with the local plan and neighbouring local plans / transport plans' Evidently, if the A38 project did not progress the benefits would not be realised and there is a risk of potentially significant adverse impacts on SA11.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The same conclusion applies to indicator SA15 (transport and accessibility).		
OR260	Carney Sweeney on behalf of Peveril Homes Limited*	Sustainability Appraisal	Support			The Sustainability Appraisal Regulation 19 Report, Rev 2, dated 27 July 2026 ('the SA') sets out an assessment of sites within Chapter 7, with the full Site Assessments provided in Appendix E. Two sets of sites are assessed; 'Preferred Sites' and 'Omission sites'. The latter are those sites which did not pass the Site Assessment carried out by the Council and are excluded from allocation in the Draft Local Plan. The second set of sites are noted to be 'reasonable alternatives', with all 'Preferred Sites' proposed for allocation in the Draft Local Plan. As detailed elsewhere, our client has a land interest in 'Site HA5: The Hollow, Mickleover', with the site assessment included at Appendix E of the SA. Overall, the SA assessment demonstrates that Site HA5 performs well against a number of the Sustainability Appraisal Objectives, with significant positive effects identified in relation to SA1: Population and Equalities, SA6: Housing and SA7: Leisure and Recreation, with minor positive effects identified for SA2: Human Health, SA3: Economy, SA4:		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Employment, SA5: Crime and Safety, and SA8: Biodiversity and Natural Capital. A neutral effect is identified against SA10: Historic Environment and SA17: Waste. Minor negative effects are noted to be identified against SA9: Landscape and Townscape, SA11: Air, Noise and Light Pollution, SA12: Water Environment, SA13: Climate Change, SA14: Greenhouse Gases and SA15: Transport and Accessibility. No uncertain effects have been identified in the SA in relation to Site HA5. A significant negative effect is identified against SA16: Geology and Soils. This is noted to be the case for all seven of the 'Preferred Sites' allocated for housing in the Draft Local Plan which comprise greenfield land (HA1, HA2, HA3, HA4, HA5, HA7 and HA12). Overall, it is noted that the SA concludes the following in relation to site assessments: *"Overall, the site alternative options have resulted in fewer significant positive effects, across a range of* objectives*, including population and*		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						equalities, human health*, economy, employment, housing, leisure and recreation, and landscape and townscape. There are also a higher proportion of significant negative effects associated with site alternatives, mainly in relation to leisure and recreation, landscape* *and townscape, and geology and soils. There is also a higher quantity of uncertain effects, due to lack of information surrounding scheme level design."* (SA Section 7.3, Page 54) We agree with the Council's approach to the allocation of Land at The Hollow, Mickleover under proposed allocation Policy HA5 which is reflective of the assessment of the sites against the Sustainability Appraisal Objectives, and the findings of the Council's Site Assessment, as detailed in the SA.		
OR260	Carney Sweeney on behalf of Peveril Homes Limited*	Sustainability Appraisal	Supports	Yes	Yes	We note that the Derby HMA Sustainability Appraisal of Housing Options – Site Options and Alternatives, Rev 4, dated 9 September 2024 ('HMA SA') study area and scope exclude any		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						assessment of capacity within the Derby City Council area. In terms of the distribution options assessed, it is noted that a range of alternative options were considered within the HMA SA under four main approaches (D1-D4) and within each, a range of apportionment options between Amber Valley and South Derbyshire were considered. The HMA SA details how the options assessment was informed by the Growth Options Study (Derby Housing Market Area Growth Options Study, dated August 2021), which includes four 'Broad Areas of Search' identified as 'Suitable Areas for Strategic Growth'. The area within South Derbyshire immediately adjacent to proposed allocation Policy HA5: The Hollow, Mickleover is noted to be within one such Broad Area of Search (C1). All the distribution options in the HMA SA include the urban fringe to a greater or lesser extent. The HMA SA outlines the following conclusions on the distribution of growth options (Page 43), which we support: "The study concludes that the distribution options which perform most		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						positively are those which distribute the Derby unmet need to the Urban Fringe areas (S1_D4A-E, S2_D2A-E and S3_D4A-E), with an apportionment between AVBC and SDDC. Development in the SDDC urban Fringe performs more positively than development in the AVBC Urban Fringe for sustainable transport as there is higher potential for transport infrastructure improvements and more existing routes into Derby…". The Draft Local Plan has been positively prepared, reflecting the findings of the HMA SA, which is the result of collaborative working between the Derby HMA authorities to address Derby's unmet housing need.		
OR266	Fisher German on behalf of Bloor Homes	Sustainability Appraisal	Objects			The reasons why the Locko Road site were excluded are set out in the SA and summarised in the Council's Sites Assessment Rationale Overview (2026) document. These can be generally summarised as per the below, with BHL response. Green Belt The SA suggests the site did not meet the definition of Grey Belt thus did provide some important Green Belt functions. As set out above this conclusion is based on		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						a flawed methodology and inconsistent assessment in the DGBA. For reasons articulated above and in the Define GBA the site should have been assessed as Grey Belt. Regardless, the Framework is clear that where Grey Belt land has been fully utilised, non-Grey Belt Green Belt land should be used. The site scored marginally worse than Stoney Lane, and even if not Grey Belt it is not critically important Green Belt. Thus regardless of ultimate conclusion on Grey Belt, Green Belt is not sufficient cause to exclude the site from allocation. Detached from the urban form on the eastern side This argument, which is also raised in the SHLAA assessment of the site, is that the site is disconnected from the urban form on the eastern side of Locko Road. This separation is due to the presence of allotments and Spondon Cricket Club. These uses, whilst mostly 'green', are clearly urbanised due to the presence of fencing, a pavilion, nets, sheds and other paraphernalia. Moreover, these are uses which are regularly located within settlements, and it is not considered the position in a post development scenario this arrangement would be unusual,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						incongruous or mean that development is not well related to the existing urban area. Furthermore, active travel improvements are proposed to ensure links between new development and the existing urban area are available including along Lousie Greaves Lane (which is adopted highway) and on existing public rights of way. These links could form part of any policy requirement for the allocation of the Locko Road site. Connectivity of Site from services and facilities The SA and SHLAA challenge the sustainability of the site. However, the sustainability of this area has already been explored at appeal. Whilst admittedly of a differing scale, the West of Royal Hill Road, Derby application for 90 dwellings (23/01631/OUT) (as shown at Appendix 3) is located physically very close to the application site, being located only a couple of hundred meters south west of the Locko Road land. Whist the Royal Hill Road site is acknowledged to be slightly closer to some of Spondon's schools, particularly Springfield Primary and West Park Secondary, it is however further away from a direct bus service into Derby for example. In overall terms,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						accepting differing quantum of development, BHL would assert it would be reasonable to state they were similar in terms of spatial sustainability. Whilst ultimately refused locally, the Committee report pertaining to the application sets out: "the main benefits would be the provision of a large number of new homes in a sustainable location, adjacent to, and therefore forming a new part of the built area of Spondon, and a quantum of affordable housing units, which would be provided in the context of a very significant housing need, resulting from increased dwelling numbers required in the standard method" [our emphasis]. Paragraph 25 of the appeal decision (Appeal ref: 33564765), which allowed the scheme, states: "Recent bus service improvements have facilitated new/extended services from bus stops that include those sited on Locko Road adjacent to its junction with Royal Hill Road. Whilst it is my understanding that long-term funding has yet to be secured for these service improvements, it cannot be reasonably		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						asserted that future occupiers of the development would necessarily not have the realistic option to choose bus travel as a sustainable alternative to private car use". Locko Road has good connections to existing bus routes, following the precedent set by the Royal Hill Road appeal decision, a similar improvement to bus services is proposed as part of the application and there would be no objection to this being required in policy as part of the Site's allocation. Looking to the east, the Inspector of the Erewash Core Strategy Review raised no fundamental concerns in relation to the sustainability credentials of the Dale Road, Spondon proposals (Erewash Core Strategy Review Strategic Policy 1.4 – North of Spondon, Planning Application Ref: App ref: 0923/0024 – again shown at Appendix 3), only technicalities relating to the provision of education contributions. Again, it would be reasonable to assert that the Dale Road proposals were of a similar level of sustainability of this application site and would be difficult to argue one was acceptable whilst the other was not and it is clear the Inspector		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						of the Erewash Core Strategy Review had no issue with the sustainability of the site. Furthermore, the Council's own Plan proposes circa 400 dwellings to the east of Spondon. Again, this urban extension is considered to have a similar level of sustainability as the application site and the aforementioned approved sites. The Council's assertion that the Locko Road site was unsustainable, whilst accepting that Stoney Lane, Royal Hill Road (both of which the Council concluded through the application and proposed allocation to be sustainable) and Dale Road Proposals were all sustainable, is contrived and indefensible. Furthermore, in the context of Derby City's unmet needs, a site being located slightly beyond optimal walking distances from a complete set of services and facilities does not amount to reason to preclude development. Impact on "potentially sensitive landscape and setting of Locko Park historic estate" Evidence produced in support of the application and appended to these Regulation 19 response (Appendix 4)		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						confirms that whilst the site plays some role in the wider setting of Locko Park, any impacts on the park are limited, on the lower end of the less than substantial spectrum of harm. Views from the parkland, house and gatehouses to the site are limited, and where can be seen are in the context of the existing built form of Spondon. The SA acknowledges that harm arising is only of a minor negative in respect of townscape and landscape and neutral against historic environment. Harm is, by the Council's own assessment, low. This is reflected in the evidence collated in support of this document and appended to these representations. As such, impacts on Locko Park or wider Landscape reasons clearly do not constitute a reason to preclude an allocation. Spatial Strategy The SA concludes in relation to the Locko Road site that "due to green belt sensitivity and these other constraints, as well as the spatial strategy of seeking to maximise use of brownfield land to meet need wherever possible during the allocations process, and only then turning to allocate Green Wedge or Green Belt sites if need could not be accommodated		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						elsewhere, the site was not selected for allocation in the Regulation 19 plan". This is another contrived position and again highlights a fundamental misunderstanding of the NPPF by the Council. BHL accept that there should be a hierarchical approach to development, utilising brownfield and Grey Belt first, however, in the context of 6,500 homes unmet need, it is clear that the Council's spatial strategy cannot maximise its supply without Green Belt. Paragraph 148 is clear that "plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations" [our emphasis], where those needs cannot be met in sequentially preferable locations, Green Belt land should be used. Conclusions on SA It is telling when comparing Locko Road and Stoney Lane, that both receive the same Significant Negative in respect of geology and soils. Whilst Stoney Lane does admittedly score better on some matters, the two sites are broadly comparable. If this Plan was meeting needs in full, and if the according to a sound spatial hierarchy Spondon needed		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						only one site to meet its requirement, then it would be difficult to argue that the Stoney Lane site being allocated was unsound. However, that is not the case, Derby City is declaring unmet needs and is required to maximise its housing delivery prior to exporting it to the wider HMA. As explored above, there is nothing within the SA assessment that suggests Locko Road should be excluded and its potential housing delivery exported elsewhere, which may require Green Belt release in Amber Valley to meet. The Council's decision is evidentially based on Green Belt rationale, and as set out above and in the appended Define GBA, this position is unsound.		
OR35 & OR237	Johnson Mowat on behalf of Harworth Group*	Sustainability Appraisal	Supports			Harworth Group note that the site assessment of the HA7 site allocation (Stoney Lane, Spondon) contained within Appendix E of the Sustainability Appraisal Regulation 19 SA Report (items SA12 and SA13) indicates the site to be in Flood Zone 3 and within 50m of flood defences.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Our review of the published 'flood maps for planning' and preceding advice of environmental consultants acting for Harworth Group indicates the site to be in Flood Zone 1 and with no areas at surface water flood risk other than the ditch/watercourse to the east boundary. It is requested that this aspect of the Sustainability Appraisal report is reviewed and any corrections made as necessary.		
OR265	P&DG on behalf of JGP Properties*	Sustainability Appraisal	Objects			The main Sustainability Appraisal gives the headline reason for excluding the Site as an allocation as '*Ancient Woodland impacts'* (Page 49). The Site Assessment Overview of the Sustainability Appraisal (Appendix G) confirms that the retention of the western field would allow a '***functional Green Wedge to remain'***. However, alongside this it is stated that: *'There are still significant concerns about the impact of residential development in this*		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						location on the ancient woodland, including increased footfall through the area which would adversely impact the woodland. Derbyshire Wildlife Trust and the Woodland Trust continue to raise concerns about development in this location, even if reduced to 50 dwellings, as it would adversely affect the ancient woodland. Given these constraints the site was not identified for allocation due to deliverability concerns.' [Our emphasis added] Firstly, contrary to that stated in SA8 , it is important to note that whilst the Site is adjacent to Chaddesden Wood, it does not contain Ancient Woodland itself. This is demonstrated on the extract below from Natural England's open data mapping of Ancient Woodland. The SA is, therefore, factually incorrect in this regard.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						 Figure 1 - Natural England Open Data Publication - Ancient Woodland (England) This factual error raises concerns as to the basis upon which the 'Significant Negative' assessment of SA8 has been reached. If the assessment proceeds on the incorrect basis that development would take place on land containing Ancient Woodland, rather than adjacent to it, there is a risk that the significance of the likely effect has been misunderstood and overstated. More generally, it is not clear that in considering the 49 dwelling scheme (rounded to 50 in the SA) the Sustainability Appraisal has fully accounted for:) The materially different nature of the reduced housing proposal relative to the original promotion for housing on both fields (i.e. the 2024 SHLAA ref		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						DER/0209); The likely lesser ecological impact of a smaller scheme alongside an increased potential for appropriate mitigation measures; The ecological and recreational opportunities presented by the retention of the western field as Green Wedge in terms of mitigations and enhancements in relation to the Ancient Woodland. Derbyshire Wildlife Trust's positive comments regarding the provision of green space to take the pressure off the woodland and provide complementary habitat, and how if such were to happened it would make an improvement to the wood's condition more secure (quoted in full in the introduction). The submitted Reg.18 scheme proposed enhanced wildlife corridors between the wood and the open countryside north of Lime Lane, including bolstering existing linear north south corridors. This was coupled with woodland expansion, new species rich grassland and semi natural wetland habitat/SuDS on the western		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						field. As quoted above, the Sustainability Appraisal refers to the Woodland Trust and Derbyshire Wildlife Trust having continuing concerns to even a 50 dwelling scheme (i.e. on the eastern field). However, it is not clear from the Sustainability Appraisal what those precise concerns are or their significance; and whether residual concerns take proper account of the mitigations set out in the Reg.18 scheme. Additionally, the certain positive comments of DWT are not reported. Copies of the mentioned responses are not included as appendices to the SA nor publicly available elsewhere. Importantly, as noted above, the continued existence of concerns does not in itself demonstrate that the Site is unsuitable for allocation; rather, there should be a clear understanding of the nature and significance of any residual effects and whether these are capable of being mitigated. This is a particularly important issue in the context of the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						tests of soundness. Indeed, in the context of the acknowledged constraints on housing land capacity within the city, the exclusion of a site otherwise capable of contributing sustainably towards Derby's housing should be supported by clear and proportionate evidence. In this respect, how the issues raised by the Woodland Trust and DWT (including positive aspects) have been considered by the Council should be clearly set out in the published evidence base. In the above context it appears remiss of the Council not to have forwarded the responses by the Woodland Trust and DWT to P&DG upon receipt to allow raised comments to be suitably considered and responded to. Instead, P&DG received copies on them on 2nd September 2026 after requesting such after noting references to them in Appendix G of the Reg.19 SA. Notwithstanding the above, since the Reg. 18 promotion, further assessment and technical work has been		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						undertaken on JGP's behalf, including a detailed assessment of the development capacity of the eastern field. This has demonstrated that the eastern field can accommodate approximately 60-65 dwellings using a density of 35dph, whilst maintaining the fundamental principles of the reduced development strategy alongside the above proposals for the western field. Importantly, this increased number of dwellings does not represent an expansion of built form into the wider landholding but instead reflects a more detailed understanding of the capacity of the eastern field itself and what mitigations are needed on the western field (including to address potential increased footfall in the woodland from 60-65 new dwellings). JGP is, therefore, now promoting the eastern field for an allocation of up to **60-65 dwellings** including a **30m woodland buffer** with substantial habitat creation, woodland expansion and associated new recreational public open space on the western field. The latter would include new paths through new woodland and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						grassed areas, a community woodland and a community orchard, as shown on the illustrative land use plan in Appendix 2. This illustrates **circa 3ha of new woodland** at the Site, including a regenerative area along the woodland edge. Contrary to concerns raised by the Woodland Trust, areas of natural and semi natural open space including woodland can function well as a mix of wildlife habitat, wildlife corridors and public recreation space, which DWT appears to accept. The Council's Allestree Park rewilding project provides an example of such. Indeed, it is the existence of wildlife within the Chaddesden Wood LNR that justifies the provision of improved wildlife corridors across the Site to the open countryside north of Lime Lane. Fundamentally, the scheme now being promoted by JGP is not simply residential development. It instead comprises residential development on the eastern field together with the retention and positive management of the western field as an integral part of the mitigation and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						enhancement strategy. Alongside this, funds would be provided towards targeted improved management measures in Chaddesden Wood, focusing on ecology and hydrology through a Woodland Management Sum. The woodland and broader environmental effects of the proposal should be considered by the Council on this basis. Overall, it is considered that this amended proposal represents a significant opportunity to not only meet Derby's identified housing needs (including affordable housing needs), but also to secure a comprehensive scheme of habitat creation, **significant woodland creation/expansion** and natural and semi natural public open space, plus improved woodland management measures. Such would benefit Chaddesden Wood by helping to address its ongoing deterioration, including reducing recreational pressures on it as an LNR. This appears to align with DWTs comments. It is understood that, without positive intervention and improved long-term ecological and recreational		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						management, the condition of Chaddesden Wood will continue to deteriorate. Importantly, the proposed measures will not only mitigate potential increased recreational pressure from the proposed development itself (60-65 dwellings) but also significantly assist in reducing the effects of the **existing** well documented recreational pressure on the woodland. The POS would be created as a standalone alternative recreational offer to the woodland LNR with hedging/fencing to secure the wood's northern boundary. New grassland areas and paths would provide immediate opportunities for public leisure activities including walking. In the longer term the new woodland areas with various paths would represent an increase of **up to 30%** of new public woodland relative to the Chaddesden Wood (circa 10ha). This is a significant amount relative to the potential percentage increase in footfall from 60-65 new dwellings. Together the new areas for public recreation across the western field (covering a total area of		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						circa 5ha) would greatly assist in lessening the recreational pressure on the woodland, particularly in the longer term. The precise measures would be subject to further detailed design, ecological, arboricultural and landscape work and discussion with relevant stakeholders. However, the extent of undeveloped land across the Site (including a 30m woodland buffer on the eastern field) provides clear scope for measures to protect Chaddesden Wood from development pressure and reduce the existing recreational pressure, whilst simultaneously delivering ecological and recreational betterment. A 30m buffer between the new dwellings and the Ancient Woodland with no gardens backing on to the woodland to mitigate against adverse effects e.g. noise and light pollution and/or invasive species. There is no technical justification for a wider buffer, as discussed in the Site Assessment section below.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						There is also the potential to redirect some surface water at the Site towards the woodland edge. Overall, the western field provides clear scope for mitigation and far more enhancement than would ordinarily be available through a standalone residential parcel. Indeed, the proposal has the ability to go materially beyond simply achieving statutory minimum biodiversity requirements and instead deliver measures specifically responding to the sensitivities and management requirements of Chaddesden Wood, including its Local Nature Reserve status and the pressures this brings. This would be cross funded by the development on the eastern field. In respect of the above, JGP stresses that where an existing ecological asset is already subject to pressures and deterioration, the assessment of mitigations and enhancements should not simply consider the proximity of residential development, but also whether development can provide a		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						mechanism to secure measures that protect, enhance and assist with the long-term management of that asset. JGP continues to welcome the opportunity to engage constructively with the Council, Derbyshire Wildlife Trust, Woodland Trust and other relevant stakeholders to better understand any residual concerns and explore how these could be addressed through the design of the development and a comprehensive woodland, habitat and ecological management scheme for the western field. Attempts to engage with Friends of Chaddesden Wood earlier this year resulted in one in-person meeting with P&DG but a second meeting was sadly not agreed to by FoCW. In JGP's view, the above matters are directly relevant to, and should hence be properly reflected in, the conclusions reached in relation to SA8. Similarly, the Site should not be excluded on the basis of '*Ancient Woodland impacts'* and ongoing concerns raised by the Woodland Trust and DWT without such being		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						properly justified and evidenced taking account of potential mitigations and enhancements.		
OR267	P&DG on behalf of Wheeldon Brothers Ltd*	Sustainability Appraisal	Object	No		Wheeldon Brothers control land to the east of Sir Frank Whittle Way. The current promotion is materially narrower than the historic mixed-use promotion and is directed towards a contained commercial and employment allocation along the western frontage of the land, between Sir Frank Whittle Way and the Great Northern Greenway. It is not a continuation of the historic proposal to develop the wider 7.2-hectare site. Development would be focused within a defined frontage envelope, with its depth, scale and height controlled so as to retain an effective open and landscaped relationship with the Great Northern Greenway and the wider Green Wedge. The frontage is promoted for a flexible mix of smaller industrial and employment units, including light industrial, research and development, workshop, trade and storage and distribution uses. There is also potential for a limited element of complementary commercial and roadside retail	**Suggested Modifications** Wheeldon Brothers consider that the Plan is not presently justified insofar as it excludes the western frontage of Land East of Sir Frank Whittle Road without assessing the materially reduced development proposition now promoted. The omission rationale also does not accurately reflect the Green Wedge Review's moderate-high harm assessment of the wider Site 0406 in isolation and is not supported by proportionate evidence	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						development, of a scale and composition that responds to the character of the corridor. The land is available, under the control of an experienced developer and capable of contributing to the Plan's employment portfolio within the plan period. It occupies a prominent and accessible position on the A61/Sir Frank Whittle Road corridor, adjoining an established concentration of commercial, retail, leisure and employment uses and with good connections to the A38, A52, Derby city centre and public transport. The Council's Regulation 19 site assessment nevertheless excludes the land as an 'Employment Omission Site'. That conclusion does not distinguish between the wider 7.2-hectare mixed-use proposal assessed through the evidence base and the substantially more contained frontage development now promoted. Several of the stated constraints are capable of being addressed through the definition of the development envelope, allocation criteria, detailed design and mitigation. Some are also materially overstated when compared with the findings of the	demonstrating that ecology, contamination, heritage, access or viability represent insurmountable constraints. The following modifications are therefore requested. Policy E1: New Employment Locations Policy E1 should be amended to identify Land East of Sir Frank Whittle Way as an employment-led commercial allocation comprising the western frontage between Sir Frank Whittle Way and the Great Northern Greenway. The allocation should support an appropriate mix of	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Council's own Sustainability Appraisal and Green Wedge Review. The omission of the frontage parcel has therefore not been justified by a proportionate assessment of the reasonable alternative now before the Council. **Soundness Concerns** The National Planning Policy Framework ('NPPF') requires a sound plan to represent an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence. It must also be deliverable over the plan period and enable the delivery of sustainable development. National policy further requires plan policies to be underpinned by relevant and up-to-date evidence and places significant weight on supporting economic growth and productivity. Wheeldon Brothers consider that the omission of land to the east of Sir Frank Whittle Way is insufficiently justified because the Regulation 19 conclusion materially overstates the environmental and viability constraints recorded in the underlying SA, appears to rely on Green	smaller industrial, workshop, storage, service and employment units, with complementary mixed commercial and roadside retail uses. Site-specific criteria should secure landscape containment, Greenway enhancement, ecological mitigation and BNG, proportionate heritage and archaeological investigation, safe access and appropriate drainage and water-quality measures. A new criterion should be added after criterion (e) as follows: *Western frontage of Land East of Sir Frank Whittle Road,*	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Wedge evidence prepared for a materially wider development proposition, and adopts an unnecessarily narrow approach to the economic role of the site that lacks the ambition that the plan must fully harness for the benefit of the city as a whole. Appendix G to the Regulation 19 SA gives four principal reasons for excluding the site: high harm to the Chaddesden / Derwent Industrial Area Green Wedge and concern regarding the separation of communities; ecological constraints, including the Croft Wood Local Wildlife Site ('LWS'), with asserted implications for Biodiversity Net Gain ('BNG') and viability; concerns regarding contamination and consequential viability implications; and the promotion of office development in a context where the adopted and emerging Plans seek to direct new office floorspace to the City Centre in the first instance, coupled with an asserted absence of identified need for office development in this location.	*approximately 4 hectares, for a frontage-focused mix of smaller industrial and employment units, including Use Classes E(g)(ii), E(g)(iii), B2 and B8, together with limited complementary commercial and roadside retail uses where these would not undermine the vitality, viability or investment priorities of the City Centre or defined centres.* The overall employment land figure in the opening sentence of Policy E1 and the accompanying land-supply table should be amended to include the confirmed developable area of the allocation.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Those matters require careful consideration. However, they do not, individually or cumulatively, demonstrate that the contained western frontage is unsuitable or undeliverable for employment development. **Green Wedge** Wheeldon Brothers acknowledge that the promoted land lies within the Chaddesden/Derwent Industrial Area Green Wedge and that Green Wedge function is a material planning consideration. However, the Green Wedge Review does not assess the contained western frontage proposal now advanced as a separate development option. Its conclusions relate to the materially wider DER/0406 site and should not be treated as demonstrating that development of a limited frontage parcel would, in isolation, cause high harm to Green Wedge purposes. The relevant question is whether an appropriately contained allocation west of the Great Northern Greenway could be accommodated while retaining the principal openness, continuity and recreational and ecological functions of the wider wedge.	The following site-specific criteria should be inserted within Policy E1 or included within a separate site allocation policy: Development of Land East of Sir Frank Whittle Road shall: the containment of built development to an appropriate western frontage parcel between Sir Frank Whittle Way and the Great Northern Greenway, with the Greenway forming a strong and defensible eastern boundary and the wider land east of it remaining within the Green Wedge maintain an effective open, landscaped and ecologically functional corridor adjoining the Great Northern Greenway;	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The 2025 Green Wedge Review assessed Site 0406 as the full linear 7.2-hectare parcel between Sir Frank Whittle Road and the Great Northern Greenway, promoted at that time for mixed residential and commercial development. That is materially different from the current proposition. The present promotion would limit the depth and extent of built development, retain the remainder of the land as part of an effective open corridor and secure landscape, habitat and green infrastructure enhancements alongside the Greenway. This distinction is central to the reasonable-alternatives assessment. The relevant question is not whether development of the whole of Site 0406 would affect the Green Wedge, but whether a defined and contained frontage allocation can be accommodated while retaining the principal structural, landscape, ecological and recreational functions of the land to the rear and alongside the Great Northern Greenway.	confirmation of the alignment, survival and archaeological significance of the former Little Eaton branch of the Derby Canal and an appropriate design and mitigation response, which may include incorporating parts of the alignment within landscaping or localised development setbacks, or preserving, recording or interpreting remains as appropriate; proportionate archaeological assessment and, where justified, targeted field evaluation of the conjectured route of Ryknield Street, followed by avoidance,	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The Council's omission rationale does not demonstrate that the Green Wedge Review has separately assessed that reduced proposition. Instead, it moves from the identified harm associated with development of the site to an absolute conclusion against allocation. That risks applying evidence prepared for a different scale and form of development without adequately considering a reasonable, materially reduced alternative. There is also an important discrepancy in the Council's description of the Green Wedge Review. Paragraphs 4.56 and 4.57 of the Review conclude that development of Site 0406, as then promoted in its wider mixed-use form, would result in 'moderate-high harm'. The Review states that this would increase to high harm only if Site 0406 were developed in conjunction with Site 0315. The Regulation 19 Sustainability Appraisal and omission rationale instead refer to Site 0406 itself as resulting in a high degree of harm. That does not accurately reflect the underlying evidence and materially overstates the assessed effect of the wider site, before any allowance is made for the	preservation, recording or interpretation appropriate to the significance of any remains identified; provide structural planting, habitat enhancement, biodiversity net gain and long-term management of the retained green infrastructure; protect and appropriately buffer Croft Wood Local Wildlife Site and other habitats of identified importance; adopt an appropriate low-rise scale, building height, roof form, materials and lighting strategy, informed by proportionate landscape and heritage assessment,	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						substantially reduced frontage proposition now promoted. That approach is particularly difficult to reconcile with the wider strategy of the Submission Draft. The Council's own Green Wedge Review proposes boundary changes across the city and records a reduction of approximately 9.38 hectares to the Chaddesden / Derwent Industrial Area Green Wedge. The Regulation 19 allocations also demonstrate that Green Wedge effects are not treated as an automatic bar to development where a controlled form of development and mitigation can be secured. A frontage allocation can be framed so that built development remains contained against the established A61 commercial corridor rather than extending across the width of the Green Wedge. The allocation can define a maximum development envelope and require the balance of the land to remain open. This would retain a clear green corridor associated with the Great Northern Greenway, preserve the physical and visual separation between the contained commercial development along the western frontage and	including consideration of the setting and Outstanding Universal Value of the Derwent Valley Mills World Heritage Site; provide safe and suitable vehicular, pedestrian and cycle access, including appropriate connections with the Great Northern Greenway; incorporate appropriate drainage, flood-risk, source-protection and, where demonstrated to be necessary, land-remediation measures; and ensure that any office, commercial or roadside retail floorspace complies with Policies E4, E9 and E10, where	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						residential areas to the east and maintain a continuous green infrastructure connection through the wider wedge. The allocation would also create the opportunity to secure positive enhancements which would be less certain if the site remains unallocated. These could include strengthened structural planting, habitat creation, improved woodland and grassland management, biodiversity net gain, improved drainage and sustainable pedestrian and cycle connections to the Greenway. Building height, development depth, roof form, external materials, lighting, servicing and boundary treatment could all be controlled through the allocation criteria. On this basis, the proposal would not close the mouth of the Green Wedge in the manner assessed for the full 7.2-hectare site. It would consolidate a limited area of development against the existing commercial corridor while retaining and enhancing the principal open, ecological and recreational functions of the land adjoining the Greenway.	applicable, and remains complementary to the principal employment function of the allocation.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The correct conclusion is therefore not that Green Wedge harm is absent. It is that the extent of harm associated with the reduced promotion requires proportionate assessment and can potentially be materially reduced through the form of allocation and mitigation. In the absence of a clear assessment of that reduced alternative, exclusion is not adequately justified. **Ecology, Local Wildlife Site and BNG** The Council's conclusion describes *'considerable environmental constraints'* arising from biodiversity and the LWS and goes further by suggesting that the scale of mitigation and compensation required may undermine the viability of employment development. That conclusion is not supported by the Regulation 19 SA assessment provided for the site. Under SA Objective 8, the site is recorded as lying within the Croft Wood LWS and within 250 metres of a Local Nature Reserve. The SA recognises potential effects on biodiversity and green-corridor functionality, but the assessed effect is only 'Minor Negative'.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Importantly, the SA itself identifies the policy response: development would be required to contribute to biodiversity enhancement and meet the minimum 10% BNG requirement under Policy EN10. There is, therefore, a material disconnect between technical appraisal and the subsequent omission rationale. The SA does not identify a significant adverse biodiversity effect that is incapable of mitigation; nor does it contain evidence demonstrating that BNG would render the scheme unviable. A statement that viability may be affected by the 'scale' of mitigation and compensation is not a substitute for evidence of what mitigation would be required, what land would be retained, what on-site or off-site BNG options are available, or what effect those requirements would have on a commercially realistic scheme. By concentrating development within the western frontage strip and retaining the Great Northern Greenway as a firm eastern boundary, there is substantial scope to retain, buffer and enhance habitats within the remainder of the wider landholding. The development		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						frontage could be of controlled depth and designed alongside new structural planting, habitat creation and Greenway enhancement. Any future application could be required to provide proportionate ecological surveys, a biodiversity metric, application of the mitigation hierarchy, habitat buffers, long-term management and a BNG strategy. These are conventional assessment and mitigation requirements and, on the available evidence, do not constitute insurmountable constraints or justify rejection of the site in principle. The proportionate ecological assessment undertaken to date has not identified an ecological constraint which makes a contained frontage scheme unacceptable in principle or incapable of mitigation. The allocation can require the development envelope to avoid the most important habitats, maintain an appropriate buffer to Croft Wood LWS and the Great Northern Greenway and provide habitat creation and enhancement within the retained land. The presence of ecological features does not, without evidence of an unavoidable		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						adverse effect, establish that the site is unsuitable or undeliverable. Nor does the evidence demonstrate that statutory BNG would render an appropriately scaled scheme unviable. The extent of the wider landholding provides scope to address the mitigation hierarchy and deliver a coherent long-term habitat management strategy alongside the proposed frontage development. Indeed, the SA does not identify biodiversity as a 'significant negative' effect. The overall planning judgement should reflect the appraisal undertaken, rather than elevate a minor negative effect that could be mitigated into an unevidenced deliverability barrier. **Contamination** The treatment of contamination is a further significant concern. Appendix G states that there are *'concerns about contamination on the site*' and refers to further viability implications. However, the site-specific SA does not identify evidence of existing contamination on the promoted land. Under SA Objective 16, the appraisal records that the site is greenfield land		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and lies within Source Protection Zones 2 and 3. The stated concern is the potential for contamination of the source protection zone during construction works. The mitigation identified is a Construction Environmental Management Plan to protect the source protection zone from contamination. That is materially different from evidence that the land is contaminated and requires costly remediation. On the documents presently available, the omission rationale appears to conflate pollution risk at construction phase with an existing land contamination and then relies on that proposition to raise viability concerns. Unless the Council has separate site-specific evidence demonstrating contamination and abnormal remediation costs, that element of the exclusion rationale is not supported by proportionate evidence. If further investigation is considered necessary, the appropriate response is an allocation criterion requiring proportionate ground investigation and remediation where necessary. It is not a sound basis for excluding an otherwise available employment opportunity.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Heritage The archaeological interest of the land is recognised. The Derbyshire Historic Environment Record identifies the former Little Eaton branch of the Derby Canal under reference MDR9110. Its recorded alignment is understood to pass beneath or close to the western frontage adjoining Sir Frank Whittle Way. The wider land is also crossed by the conjectured route of Ryknield Street, also referred to as Rykneld Street, which formed part of the Roman road network serving Little Chester. These records justify proportionate archaeological assessment but do not establish that either feature represents an insurmountable constraint to allocation. The precise survival, condition and significance of any below-ground remains would need to be established through an archaeological desk-based assessment and, where justified, targeted field evaluation. Previous geophysical work close by did not identify positive evidence of the Roman road. While that does not remove the possibility of remains within the promoted land, it reinforces		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the need for proportionate site-specific investigation rather than an assumption that the conjectured route prevents development. The former canal alignment also presents a positive masterplanning opportunity. Subject to confirmation of its precise route, survival and archaeological significance, its presence could inform the layout and landscape treatment of the western frontage. Where justified, parts of the alignment could be incorporated within landscaped areas or localised development setbacks, while other sections could be addressed through preservation, recording or interpretation as appropriate. This would allow a proportionate response to the archaeological interest of the former canal without requiring its entire route to be retained as an undeveloped corridor. The conjectured line of Ryknield Street similarly provides an opportunity to investigate and better understand the historic route. Any remains identified could be avoided, incorporated into the landscape framework, recorded or interpreted as appropriate to their		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						significance. An allocation criterion requiring proportionate heritage assessment, evaluation and mitigation would therefore provide an effective response. The available information does not demonstrate that archaeological considerations make the western frontage unsuitable or undeliverable. **Landscape and Access** The frontage approach would be materially different from the substantially larger mixed residential and commercial proposals previously considered. By limiting development depth, maintaining structural planting and retaining an open and enhanced corridor alongside the Great Northern Greenway, the relationship between the site, the wider landscape and the World Heritage Site can be appropriately addressed. The site also benefits from direct proximity to an established strategic highway corridor, bus services and the Great Northern Greenway. The proportionate access assessment undertaken to date has not identified any fundamental constraint preventing		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						safe and suitable access from being achieved. Detailed junction design, servicing arrangements and pedestrian and cycle connections would properly be resolved through a future planning application. Ecology, heritage, landscape and access are therefore matters requiring detailed assessment, design and mitigation. The evidence does not identify them as insurmountable constraints or demonstrate that the reduced frontage parcel is unsuitable for allocation in principle. **Economic Role of Sir Frank Whittle Way Corridor** Development contained between Sir Frank Whittle Way and the Great Northern Greenway would be read in that context as a logical continuation of the established commercial corridor. The allocation could support a mix of smaller local industrial and employment units, workshops, trade or service uses and complementary mixed commercial or roadside retail development, rather than being dependent upon a single large office or strategic employment scheme.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The site benefits from strong strategic highway accessibility to the A38 and A52, together with bus and cycle connections. The Regulation 19 SA itself records a 'Minor Positive' effect under Transport and Accessibility because the site lies within 400 metres of a cycle network and bus stop, and a 'Minor Positive' effect under Human Health because access to employment is a key determinant of health. The Submission Draft should provide a resilient and genuinely varied portfolio of employment opportunities rather than rely almost entirely on a small number of strategic sites. The Council's Employment Land Review records that three strategic sites account for approximately three-quarters of Derby's realistic employment land supply. Although the overall quantitative supply is substantial, only approximately 35.35 hectares was identified as being particularly suited to meeting the needs of local businesses. The Employment Land Review also identifies strong demand for industrial premises of a range of sizes, including		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						smaller units of 0–300 sqm and good-quality premises capable of meeting the requirements of local businesses. It identifies a shortage of suitable units of up to approximately 1,500 sqm, including premises capable of accommodating specialist power and operational requirements. Large strategic allocations intended principally for national and multinational occupiers are not necessarily substitutes for this form of locally focused provision. The frontage parcel is capable of addressing that qualitative requirement through a mix of smaller industrial, light industrial, workshop, trade, research and development and storage and distribution units. A limited element of complementary commercial and roadside retail development could respond to the established mixed character of the Sir Frank Whittle Road corridor, support the viability and attractiveness of the frontage and provide services to businesses and passing trade. Any such uses could be controlled in scale and made subject to the Plan's defined-centre and sequential requirements.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						This is not principally a proposal for a conventional speculative office park. Any office floorspace could be limited to ancillary accommodation, smaller flexible workspace or development with a specific locational requirement which satisfies Policy E4. The allocation would therefore complement rather than compete with the Plan's priority for Grade A office investment within the City Centre. The Council's own evidence consequently supports a distinction between overall quantitative employment land supply and the qualitative availability of smaller, accessible sites capable of serving local businesses. A modest frontage allocation would increase choice, flexibility and resilience without undermining the role or delivery of the strategic employment allocations. National policy requires planning policies to help create the conditions in which businesses can invest, expand and adapt and places significant weight on economic growth and productivity. In a city with nationally important engineering, rail and aerospace sectors,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the Plan should retain sufficient flexibility to respond to changing occupier requirements and supply-chain investment over a plan period extending to 2043. **Consistency of Evidence** The most important soundness concern is the lack of a clear evidential bridge between the SA findings and the decision to exclude the site. The SA records: Minor Positive effects for Human Health, Crime and Safety and Transport and Accessibility; Minor Negative effects for Biodiversity, Air/Noise/Light, Water Environment and Greenhouse Gases; Significant Negative effects for Landscape/Townscape and Geology/Soils, principally reflecting the assessment of the full 7.2-hectare Green Wedge and greenfield site; Uncertain effects for Population and Equalities, Economy, Employment, Historic Environment and Climate Change because the development proposition and detailed mitigation were not specified; and Neutral effects for Housing, Leisure and Recreation and Waste.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The SA therefore identifies matters requiring further definition, assessment and mitigation, but does not establish that the reduced frontage is inherently unsuitable or undeliverable. Its landscape conclusion is based on the full 7.2-hectare proposal and incorrectly describes the Green Wedge Review as identifying high harm for Site 0406 in isolation. Its ecology assessment is only Minor Negative; its contamination discussion concerns the protection of groundwater during construction; and its economic, employment and heritage effects are *uncertain*, not that unacceptable effects were identified. The current promotion provides the basis for resolving those uncertainties. It comprises a contained frontage development, a locally focused mix of employment uses, retention and enhancement of the Greenway corridor and criteria requiring proportionate ecological, heritage, landscape, transport and drainage assessment. The appropriate response to the previous uncertainty is to assess that defined alternative, not to treat uncertainty as evidence that the site is unsuitable. It is		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						not robust to translate uncertainty into a negative conclusion without the intervening evidence. Similarly, where effects are capable of mitigation through policy, the Council should explain why such mitigation is insufficient before relying on those effects to reject a reasonable alternative. The site selection process would be more robust if the contained western frontage were assessed as the reasonable alternative now promoted. That assessment should consider an employment-led commercial mix, including smaller local industrial and employment units and complementary roadside commercial or retail uses, together with explicit landscape, Green Wedge, ecological, heritage and access mitigation assumptions. This would allow a like-for-like comparison with the preferred employment portfolio and provide a transparent basis for the Council's planning judgement.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
Sustainability Appraisal								
OR236	Caddick Land*	Sustainability Appraisal	Objects	Yes	No	Evidence base and associated documents – Sustainability Appraisal The Sustainability Appraisal conclusions are reliant on the A38 Junctions project, and it therefore follows the Sustainability Appraisal is not robust if the A38 project is cancelled. On that basis alone the plan would not be based on reasonable or up to date evidence and would be unsound. For example, the Sustainability Appraisal identifies potential benefits of the plan, under indicator SA11 'Air, Noise, and Light Pollution' on the basis: 'A further positive cumulative effect could result from a reduction in journey times and congestion on the highway network as a result of the A38 Derby Junctions in combination with the local plan and neighbouring local plans / transport plans' Evidently, if the A38 project did not progress the benefits would not be realised and there is a risk of potentially significant adverse impacts on SA11.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The same conclusion applies to indicator SA15 (transport and accessibility).		
OR260	Carney Sweeney on behalf of Peveril Homes Limited*	Sustainability Appraisal	Support			The Sustainability Appraisal Regulation 19 Report, Rev 2, dated 27 July 2026 ('the SA') sets out an assessment of sites within Chapter 7, with the full Site Assessments provided in Appendix E. Two sets of sites are assessed; 'Preferred Sites' and 'Omission sites'. The latter are those sites which did not pass the Site Assessment carried out by the Council and are excluded from allocation in the Draft Local Plan. The second set of sites are noted to be 'reasonable alternatives', with all 'Preferred Sites' proposed for allocation in the Draft Local Plan. As detailed elsewhere, our client has a land interest in 'Site HA5: The Hollow, Mickleover', with the site assessment included at Appendix E of the SA. Overall, the SA assessment demonstrates that Site HA5 performs well against a number of the Sustainability Appraisal Objectives, with significant positive effects identified in relation to SA1: Population and Equalities, SA6: Housing and SA7: Leisure and Recreation, with minor positive effects identified for SA2: Human Health, SA3: Economy, SA4:		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Employment, SA5: Crime and Safety, and SA8: Biodiversity and Natural Capital. A neutral effect is identified against SA10: Historic Environment and SA17: Waste. Minor negative effects are noted to be identified against SA9: Landscape and Townscape, SA11: Air, Noise and Light Pollution, SA12: Water Environment, SA13: Climate Change, SA14: Greenhouse Gases and SA15: Transport and Accessibility. No uncertain effects have been identified in the SA in relation to Site HA5. A significant negative effect is identified against SA16: Geology and Soils. This is noted to be the case for all seven of the 'Preferred Sites' allocated for housing in the Draft Local Plan which comprise greenfield land (HA1, HA2, HA3, HA4, HA5, HA7 and HA12). Overall, it is noted that the SA concludes the following in relation to site assessments: *"Overall, the site alternative options have resulted in fewer significant positive effects, across a range of* objectives*, including population and*		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						equalities, human health*, economy, employment, housing, leisure and recreation, and landscape and townscape. There are also a higher proportion of significant negative effects associated with site alternatives, mainly in relation to leisure and recreation, landscape* *and townscape, and geology and soils. There is also a higher quantity of uncertain effects, due to lack of information surrounding scheme level design."* (SA Section 7.3, Page 54) We agree with the Council's approach to the allocation of Land at The Hollow, Mickleover under proposed allocation Policy HA5 which is reflective of the assessment of the sites against the Sustainability Appraisal Objectives, and the findings of the Council's Site Assessment, as detailed in the SA.		
OR260	Carney Sweeney on behalf of Peveril Homes Limited*	Sustainability Appraisal	Supports	Yes	Yes	We note that the Derby HMA Sustainability Appraisal of Housing Options – Site Options and Alternatives, Rev 4, dated 9 September 2024 ('HMA SA') study area and scope exclude any		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						assessment of capacity within the Derby City Council area. In terms of the distribution options assessed, it is noted that a range of alternative options were considered within the HMA SA under four main approaches (D1-D4) and within each, a range of apportionment options between Amber Valley and South Derbyshire were considered. The HMA SA details how the options assessment was informed by the Growth Options Study (Derby Housing Market Area Growth Options Study, dated August 2021), which includes four 'Broad Areas of Search' identified as 'Suitable Areas for Strategic Growth'. The area within South Derbyshire immediately adjacent to proposed allocation Policy HA5: The Hollow, Mickleover is noted to be within one such Broad Area of Search (C1). All the distribution options in the HMA SA include the urban fringe to a greater or lesser extent. The HMA SA outlines the following conclusions on the distribution of growth options (Page 43), which we support: "The study concludes that the distribution options which perform most		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						positively are those which distribute the Derby unmet need to the Urban Fringe areas (S1_D4A-E, S2_D2A-E and S3_D4A-E), with an apportionment between AVBC and SDDC. Development in the SDDC urban Fringe performs more positively than development in the AVBC Urban Fringe for sustainable transport as there is higher potential for transport infrastructure improvements and more existing routes into Derby…". The Draft Local Plan has been positively prepared, reflecting the findings of the HMA SA, which is the result of collaborative working between the Derby HMA authorities to address Derby's unmet housing need.		
OR266	Fisher German on behalf of Bloor Homes	Sustainability Appraisal	Objects			The reasons why the Locko Road site were excluded are set out in the SA and summarised in the Council's Sites Assessment Rationale Overview (2026) document. These can be generally summarised as per the below, with BHL response. Green Belt The SA suggests the site did not meet the definition of Grey Belt thus did provide some important Green Belt functions. As set out above this conclusion is based on		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						a flawed methodology and inconsistent assessment in the DGBA. For reasons articulated above and in the Define GBA the site should have been assessed as Grey Belt. Regardless, the Framework is clear that where Grey Belt land has been fully utilised, non-Grey Belt Green Belt land should be used. The site scored marginally worse than Stoney Lane, and even if not Grey Belt it is not critically important Green Belt. Thus regardless of ultimate conclusion on Grey Belt, Green Belt is not sufficient cause to exclude the site from allocation. Detached from the urban form on the eastern side This argument, which is also raised in the SHLAA assessment of the site, is that the site is disconnected from the urban form on the eastern side of Locko Road. This separation is due to the presence of allotments and Spondon Cricket Club. These uses, whilst mostly 'green', are clearly urbanised due to the presence of fencing, a pavilion, nets, sheds and other paraphernalia. Moreover, these are uses which are regularly located within settlements, and it is not considered the position in a post development scenario this arrangement would be unusual,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						incongruous or mean that development is not well related to the existing urban area. Furthermore, active travel improvements are proposed to ensure links between new development and the existing urban area are available including along Lousie Greaves Lane (which is adopted highway) and on existing public rights of way. These links could form part of any policy requirement for the allocation of the Locko Road site. Connectivity of Site from services and facilities The SA and SHLAA challenge the sustainability of the site. However, the sustainability of this area has already been explored at appeal. Whilst admittedly of a differing scale, the West of Royal Hill Road, Derby application for 90 dwellings (23/01631/OUT) (as shown at Appendix 3) is located physically very close to the application site, being located only a couple of hundred meters south west of the Locko Road land. Whist the Royal Hill Road site is acknowledged to be slightly closer to some of Spondon's schools, particularly Springfield Primary and West Park Secondary, it is however further away from a direct bus service into Derby for example. In overall terms,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						accepting differing quantum of development, BHL would assert it would be reasonable to state they were similar in terms of spatial sustainability. Whilst ultimately refused locally, the Committee report pertaining to the application sets out: "the main benefits would be the provision of a large number of new homes in a sustainable location, adjacent to, and therefore forming a new part of the built area of Spondon, and a quantum of affordable housing units, which would be provided in the context of a very significant housing need, resulting from increased dwelling numbers required in the standard method" [our emphasis]. Paragraph 25 of the appeal decision (Appeal ref: 33564765), which allowed the scheme, states: "Recent bus service improvements have facilitated new/extended services from bus stops that include those sited on Locko Road adjacent to its junction with Royal Hill Road. Whilst it is my understanding that long-term funding has yet to be secured for these service improvements, it cannot be reasonably		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						asserted that future occupiers of the development would necessarily not have the realistic option to choose bus travel as a sustainable alternative to private car use". Locko Road has good connections to existing bus routes, following the precedent set by the Royal Hill Road appeal decision, a similar improvement to bus services is proposed as part of the application and there would be no objection to this being required in policy as part of the Site's allocation. Looking to the east, the Inspector of the Erewash Core Strategy Review raised no fundamental concerns in relation to the sustainability credentials of the Dale Road, Spondon proposals (Erewash Core Strategy Review Strategic Policy 1.4 – North of Spondon, Planning Application Ref: App ref: 0923/0024 – again shown at Appendix 3), only technicalities relating to the provision of education contributions. Again, it would be reasonable to assert that the Dale Road proposals were of a similar level of sustainability of this application site and would be difficult to argue one was acceptable whilst the other was not and it is clear the Inspector		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						of the Erewash Core Strategy Review had no issue with the sustainability of the site. Furthermore, the Council's own Plan proposes circa 400 dwellings to the east of Spondon. Again, this urban extension is considered to have a similar level of sustainability as the application site and the aforementioned approved sites. The Council's assertion that the Locko Road site was unsustainable, whilst accepting that Stoney Lane, Royal Hill Road (both of which the Council concluded through the application and proposed allocation to be sustainable) and Dale Road Proposals were all sustainable, is contrived and indefensible. Furthermore, in the context of Derby City's unmet needs, a site being located slightly beyond optimal walking distances from a complete set of services and facilities does not amount to reason to preclude development. Impact on "potentially sensitive landscape and setting of Locko Park historic estate" Evidence produced in support of the application and appended to these Regulation 19 response (Appendix 4)		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						confirms that whilst the site plays some role in the wider setting of Locko Park, any impacts on the park are limited, on the lower end of the less than substantial spectrum of harm. Views from the parkland, house and gatehouses to the site are limited, and where can be seen are in the context of the existing built form of Spondon. The SA acknowledges that harm arising is only of a minor negative in respect of townscape and landscape and neutral against historic environment. Harm is, by the Council's own assessment, low. This is reflected in the evidence collated in support of this document and appended to these representations. As such, impacts on Locko Park or wider Landscape reasons clearly do not constitute a reason to preclude an allocation. Spatial Strategy The SA concludes in relation to the Locko Road site that "due to green belt sensitivity and these other constraints, as well as the spatial strategy of seeking to maximise use of brownfield land to meet need wherever possible during the allocations process, and only then turning to allocate Green Wedge or Green Belt sites if need could not be accommodated		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						elsewhere, the site was not selected for allocation in the Regulation 19 plan". This is another contrived position and again highlights a fundamental misunderstanding of the NPPF by the Council. BHL accept that there should be a hierarchical approach to development, utilising brownfield and Grey Belt first, however, in the context of 6,500 homes unmet need, it is clear that the Council's spatial strategy cannot maximise its supply without Green Belt. Paragraph 148 is clear that "plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations" [our emphasis], where those needs cannot be met in sequentially preferable locations, Green Belt land should be used. Conclusions on SA It is telling when comparing Locko Road and Stoney Lane, that both receive the same Significant Negative in respect of geology and soils. Whilst Stoney Lane does admittedly score better on some matters, the two sites are broadly comparable. If this Plan was meeting needs in full, and if the according to a sound spatial hierarchy Spondon needed		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						only one site to meet its requirement, then it would be difficult to argue that the Stoney Lane site being allocated was unsound. However, that is not the case, Derby City is declaring unmet needs and is required to maximise its housing delivery prior to exporting it to the wider HMA. As explored above, there is nothing within the SA assessment that suggests Locko Road should be excluded and its potential housing delivery exported elsewhere, which may require Green Belt release in Amber Valley to meet. The Council's decision is evidentially based on Green Belt rationale, and as set out above and in the appended Define GBA, this position is unsound.		
OR35 & OR237	Johnson Mowat on behalf of Harworth Group*	Sustainability Appraisal	Supports			Harworth Group note that the site assessment of the HA7 site allocation (Stoney Lane, Spondon) contained within Appendix E of the Sustainability Appraisal Regulation 19 SA Report (items SA12 and SA13) indicates the site to be in Flood Zone 3 and within 50m of flood defences. Our review of the published 'flood maps for planning' and preceding		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						advice of environmental consultants acting for Harworth Group indicates the site to be in Flood Zone 1 and with no areas at surface water flood risk other than the ditch/watercourse to the east boundary. It is requested that this aspect of the Sustainability Appraisal report is reviewed and any corrections made as necessary.		
OR265	P&DG on behalf of JGP Properties*	Sustainability Appraisal	Objects			The main Sustainability Appraisal gives the headline reason for excluding the Site as an allocation as '*Ancient Woodland impacts'* (Page 49). The Site Assessment Overview of the Sustainability Appraisal (Appendix G) confirms that the retention of the western field would allow a '***functional Green Wedge to remain'***. However, alongside this it is stated that: *'There are still significant concerns about the impact of residential development in this location on the ancient woodland, including increased footfall through the area which would adversely impact the woodland. Derbyshire Wildlife Trust and the Woodland Trust continue to raise concerns about*		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						development in this location, even if reduced to 50 dwellings, as it would adversely affect the ancient woodland. Given these constraints the site was not identified for allocation due to deliverability concerns.' [Our emphasis added] Firstly, contrary to that stated in SA8 , it is important to note that whilst the Site is adjacent to Chaddesden Wood, it does not contain Ancient Woodland itself. This is demonstrated on the extract below from Natural England's open data mapping of Ancient Woodland. The SA is, therefore, factually incorrect in this regard.  Figure 1 - Natural England Open Data Publication - Ancient Woodland (England) This factual error raises concerns as to the basis upon which the 'Significant Negative' assessment of SA8 has been		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						reached. If the assessment proceeds on the incorrect basis that development would take place on land containing Ancient Woodland, rather than adjacent to it, there is a risk that the significance of the likely effect has been misunderstood and overstated. More generally, it is not clear that in considering the 49 dwelling scheme (rounded to 50 in the SA) the Sustainability Appraisal has fully accounted for:) The materially different nature of the reduced housing proposal relative to the original promotion for housing on both fields (i.e. the 2024 SHLAA ref DER/0209); The likely lesser ecological impact of a smaller scheme alongside an increased potential for appropriate mitigation measures; The ecological and recreational opportunities presented by the retention of the western field as Green Wedge in terms of mitigations and enhancements in relation to the Ancient Woodland. Derbyshire Wildlife Trust's positive comments regarding the provision of		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						green space to take the pressure off the woodland and provide complementary habitat, and how if such were to happened it would make an improvement to the wood's condition more secure (quoted in full in the introduction). The submitted Reg.18 scheme proposed enhanced wildlife corridors between the wood and the open countryside north of Lime Lane, including bolstering existing linear north south corridors. This was coupled with woodland expansion, new species rich grassland and semi natural wetland habitat/SuDS on the western field. As quoted above, the Sustainability Appraisal refers to the Woodland Trust and Derbyshire Wildlife Trust having continuing concerns to even a 50 dwelling scheme (i.e. on the eastern field). However, it is not clear from the Sustainability Appraisal what those precise concerns are or their significance; and whether residual concerns take proper account of the mitigations set out in the Reg.18		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						scheme. Additionally, the certain positive comments of DWT are not reported. Copies of the mentioned responses are not included as appendices to the SA nor publicly available elsewhere. Importantly, as noted above, the continued existence of concerns does not in itself demonstrate that the Site is unsuitable for allocation; rather, there should be a clear understanding of the nature and significance of any residual effects and whether these are capable of being mitigated. This is a particularly important issue in the context of the tests of soundness. Indeed, in the context of the acknowledged constraints on housing land capacity within the city, the exclusion of a site otherwise capable of contributing sustainably towards Derby's housing should be supported by clear and proportionate evidence. In this respect, how the issues raised by the Woodland Trust and DWT (including positive aspects) have been considered by the Council should be clearly set out		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						in the published evidence base. In the above context it appears remiss of the Council not to have forwarded the responses by the Woodland Trust and DWT to P&DG upon receipt to allow raised comments to be suitably considered and responded to. Instead, P&DG received copies on them on 2nd September 2026 after requesting such after noting references to them in Appendix G of the Reg.19 SA. Notwithstanding the above, since the Reg. 18 promotion, further assessment and technical work has been undertaken on JGP's behalf, including a detailed assessment of the development capacity of the eastern field. This has demonstrated that the eastern field can accommodate approximately 60-65 dwellings using a density of 35dph, whilst maintaining the fundamental principles of the reduced development strategy alongside the above proposals for the western field. Importantly, this increased number of dwellings does not represent an		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						expansion of built form into the wider landholding but instead reflects a more detailed understanding of the capacity of the eastern field itself and what mitigations are needed on the western field (including to address potential increased footfall in the woodland from 60-65 new dwellings). JGP is, therefore, now promoting the eastern field for an allocation of up to **60-65 dwellings** including a **30m woodland buffer** with substantial habitat creation, woodland expansion and associated new recreational public open space on the western field. The latter would include new paths through new woodland and grassed areas, a community woodland and a community orchard, as shown on the illustrative land use plan in Appendix 2. This illustrates **circa 3ha of new woodland** at the Site, including a regenerative area along the woodland edge. Contrary to concerns raised by the Woodland Trust, areas of natural and semi natural open space including woodland can function well as a mix of wildlife habitat, wildlife corridors and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						public recreation space, which DWT appears to accept. The Council's Allestree Park rewilding project provides an example of such. Indeed, it is the existence of wildlife within the Chaddesden Wood LNR that justifies the provision of improved wildlife corridors across the Site to the open countryside north of Lime Lane. Fundamentally, the scheme now being promoted by JGP is not simply residential development. It instead comprises residential development on the eastern field together with the retention and positive management of the western field as an integral part of the mitigation and enhancement strategy. Alongside this, funds would be provided towards targeted improved management measures in Chaddesden Wood, focusing on ecology and hydrology through a Woodland Management Sum. The woodland and broader environmental effects of the proposal should be considered by the Council on this basis. Overall, it is considered that this amended proposal represents a significant opportunity to not only meet		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Derby's identified housing needs (including affordable housing needs), but also to secure a comprehensive scheme of habitat creation, **significant woodland creation/expansion** and natural and semi natural public open space, plus improved woodland management measures. Such would benefit Chaddesden Wood by helping to address its ongoing deterioration, including reducing recreational pressures on it as an LNR. This appears to align with DWTs comments. It is understood that, without positive intervention and improved long-term ecological and recreational management, the condition of Chaddesden Wood will continue to deteriorate. Importantly, the proposed measures will not only mitigate potential increased recreational pressure from the proposed development itself (60-65 dwellings) but also significantly assist in reducing the effects of the **existing** well documented recreational pressure on the woodland. The POS would be created as a		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						standalone alternative recreational offer to the woodland LNR with hedging/fencing to secure the wood's northern boundary. New grassland areas and paths would provide immediate opportunities for public leisure activities including walking. In the longer term the new woodland areas with various paths would represent an increase of **up to 30%** of new public woodland relative to the Chaddesden Wood (circa 10ha). This is a significant amount relative to the potential percentage increase in footfall from 60-65 new dwellings. Together the new areas for public recreation across the western field (covering a total area of circa 5ha) would greatly assist in lessening the recreational pressure on the woodland, particularly in the longer term. The precise measures would be subject to further detailed design, ecological, arboricultural and landscape work and discussion with relevant stakeholders. However, the extent of undeveloped land across the Site (including a 30m woodland buffer on the eastern field)		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						provides clear scope for measures to protect Chaddesden Wood from development pressure and reduce the existing recreational pressure, whilst simultaneously delivering ecological and recreational betterment. A 30m buffer between the new dwellings and the Ancient Woodland with no gardens backing on to the woodland to mitigate against adverse effects e.g. noise and light pollution and/or invasive species. There is no technical justification for a wider buffer, as discussed in the Site Assessment section below. There is also the potential to redirect some surface water at the Site towards the woodland edge. Overall, the western field provides clear scope for mitigation and far more enhancement than would ordinarily be available through a standalone residential parcel. Indeed, the proposal has the ability to go materially beyond simply achieving statutory minimum biodiversity requirements and instead		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						deliver measures specifically responding to the sensitivities and management requirements of Chaddesden Wood, including its Local Nature Reserve status and the pressures this brings. This would be cross funded by the development on the eastern field. In respect of the above, JGP stresses that where an existing ecological asset is already subject to pressures and deterioration, the assessment of mitigations and enhancements should not simply consider the proximity of residential development, but also whether development can provide a **mechanism** to secure measures that protect, enhance and assist with the long-term management of that asset. JGP continues to welcome the opportunity to engage constructively with the Council, Derbyshire Wildlife Trust, Woodland Trust and other relevant stakeholders to better understand any residual concerns and explore how these could be addressed through the design of the development		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						and a comprehensive woodland, habitat and ecological management scheme for the western field. Attempts to engage with Friends of Chaddesden Wood earlier this year resulted in one in-person meeting with P&DG but a second meeting was sadly not agreed to by FoCW. In JGP's view, the above matters are directly relevant to, and should hence be properly reflected in, the conclusions reached in relation to SA8. Similarly, the Site should not be excluded on the basis of '*Ancient Woodland impacts'* and ongoing concerns raised by the Woodland Trust and DWT without such being properly justified and evidenced taking account of potential mitigations and enhancements.		
OR267	P&DG on behalf of Wheeldon Brothers Ltd*	Sustainability Appraisal	Object	No		Wheeldon Brothers control land to the east of Sir Frank Whittle Way. The current promotion is materially narrower than the historic mixed-use promotion and is directed towards a contained commercial and employment allocation along the western frontage of the land, between Sir Frank Whittle Way and the	**Suggested Modifications** Wheeldon Brothers consider that the Plan is not presently justified insofar as it excludes the western frontage of Land	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Great Northern Greenway. It is not a continuation of the historic proposal to develop the wider 7.2-hectare site. Development would be focused within a defined frontage envelope, with its depth, scale and height controlled so as to retain an effective open and landscaped relationship with the Great Northern Greenway and the wider Green Wedge. The frontage is promoted for a flexible mix of smaller industrial and employment units, including light industrial, research and development, workshop, trade and storage and distribution uses. There is also potential for a limited element of complementary commercial and roadside retail development, of a scale and composition that responds to the character of the corridor. The land is available, under the control of an experienced developer and capable of contributing to the Plan's employment portfolio within the plan period. It occupies a prominent and	East of Sir Frank Whittle Road without assessing the materially reduced development proposition now promoted. The omission rationale also does not accurately reflect the Green Wedge Review's moderate-high harm assessment of the wider Site 0406 in isolation and is not supported by proportionate evidence demonstrating that ecology, contamination, heritage, access or viability represent insurmountable constraints.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						accessible position on the A61/Sir Frank Whittle Road corridor, adjoining an established concentration of commercial, retail, leisure and employment uses and with good connections to the A38, A52, Derby city centre and public transport. The Council's Regulation 19 site assessment nevertheless excludes the land as an 'Employment Omission Site'. That conclusion does not distinguish between the wider 7.2-hectare mixed-use proposal assessed through the evidence base and the substantially more contained frontage development now promoted. Several of the stated constraints are capable of being addressed through the definition of the development envelope, allocation criteria, detailed design and mitigation. Some are also materially overstated when compared with the findings of the Council's own Sustainability Appraisal and Green Wedge Review. The omission of the frontage parcel has therefore not been justified by a proportionate assessment of the	The following modifications are therefore requested. **Policy E1: New Employment Locations** Policy E1 should be amended to identify Land East of Sir Frank Whittle Way as an employment-led commercial allocation comprising the western frontage between Sir Frank Whittle Way and the Great Northern Greenway. The allocation should support an appropriate mix of smaller industrial, workshop, storage, service and employment units, with complementary mixed commercial	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						reasonable alternative now before the Council. Soundness Concerns The National Planning Policy Framework ('NPPF') requires a sound plan to represent an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence. It must also be deliverable over the plan period and enable the delivery of sustainable development. National policy further requires plan policies to be underpinned by relevant and up-to-date evidence and places significant weight on supporting economic growth and productivity. Wheeldon Brothers consider that the omission of land to the east of Sir Frank Whittle Way is insufficiently justified because the Regulation 19 conclusion materially overstates the environmental and viability constraints recorded in the underlying SA, appears to rely on Green Wedge evidence	and roadside retail uses. Site-specific criteria should secure landscape containment, Greenway enhancement, ecological mitigation and BNG, proportionate heritage and archaeological investigation, safe access and appropriate drainage and water-quality measures. A new criterion should be added after criterion (e) as follows: *Western frontage of Land East of Sir Frank Whittle Road, approximately 4 hectares, for a frontage-focused mix of smaller industrial and*	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						prepared for a materially wider development proposition, and adopts an unnecessarily narrow approach to the economic role of the site that lacks the ambition that the plan must fully harness for the benefit of the city as a whole. Appendix G to the Regulation 19 SA gives four principal reasons for excluding the site: high harm to the Chaddesden / Derwent Industrial Area Green Wedge and concern regarding the separation of communities; ecological constraints, including the Croft Wood Local Wildlife Site ('LWS'), with asserted implications for Biodiversity Net Gain ('BNG') and viability; concerns regarding contamination and consequential viability implications; and the promotion of office development in a context where the adopted and emerging Plans seek to direct new office floorspace to the City Centre in the first instance, coupled with an asserted absence of identified need for office development in this location.	*employment units, including Use Classes E(g)(ii), E(g)(iii), B2 and B8, together with limited complementary commercial and roadside retail uses where these would not undermine the vitality, viability or investment priorities of the City Centre or defined centres.* The overall employment land figure in the opening sentence of Policy E1 and the accompanying land-supply table should be amended to include the confirmed developable area of the allocation. The following site-specific criteria should be inserted	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Those matters require careful consideration. However, they do not, individually or cumulatively, demonstrate that the contained western frontage is unsuitable or undeliverable for employment development. Green Wedge Wheeldon Brothers acknowledge that the promoted land lies within the Chaddesden/Derwent Industrial Area Green Wedge and that Green Wedge function is a material planning consideration. However, the Green Wedge Review does not assess the contained western frontage proposal now advanced as a separate development option. Its conclusions relate to the materially wider DER/0406 site and should not be treated as demonstrating that development of a limited frontage parcel would, in isolation, cause high harm to Green Wedge purposes. The relevant question is whether an appropriately contained allocation west	within Policy E1 or included within a separate site allocation policy: Development of Land East of Sir Frank Whittle Road shall: the containment of built development to an appropriate western frontage parcel between Sir Frank Whittle Way and the Great Northern Greenway, with the Greenway forming a strong and defensible eastern boundary and the wider land east of it remaining within the Green Wedge maintain an effective open, landscaped and ecologically functional corridor adjoining the Great Northern Greenway;	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						of the Great Northern Greenway could be accommodated while retaining the principal openness, continuity and recreational and ecological functions of the wider wedge. The 2025 Green Wedge Review assessed Site 0406 as the full linear 7.2-hectare parcel between Sir Frank Whittle Road and the Great Northern Greenway, promoted at that time for mixed residential and commercial development. That is materially different from the current proposition. The present promotion would limit the depth and extent of built development, retain the remainder of the land as part of an effective open corridor and secure landscape, habitat and green infrastructure enhancements alongside the Greenway. This distinction is central to the reasonable-alternatives assessment. The relevant question is not whether development of the whole of Site 0406 would affect the Green Wedge, but	confirmation of the alignment, survival and archaeological significance of the former Little Eaton branch of the Derby Canal and an appropriate design and mitigation response, which may include incorporating parts of the alignment within landscaping or localised development setbacks, or preserving, recording or interpreting remains as appropriate; proportionate archaeological assessment and, where justified, targeted field evaluation of the	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						whether a defined and contained frontage allocation can be accommodated while retaining the principal structural, landscape, ecological and recreational functions of the land to the rear and alongside the Great Northern Greenway. The Council's omission rationale does not demonstrate that the Green Wedge Review has separately assessed that reduced proposition. Instead, it moves from the identified harm associated with development of the site to an absolute conclusion against allocation. That risks applying evidence prepared for a different scale and form of development without adequately considering a reasonable, materially reduced alternative. There is also an important discrepancy in the Council's description of the Green Wedge Review. Paragraphs 4.56 and 4.57 of the Review conclude that development of Site 0406, as then promoted in its wider mixed-use form,	conjectured route of Ryknield Street, followed by avoidance, preservation, recording or interpretation appropriate to the significance of any remains identified; provide structural planting, habitat enhancement, biodiversity net gain and long-term management of the retained green infrastructure; protect and appropriately buffer Croft Wood Local Wildlife Site and other habitats of identified importance; adopt an appropriate low-rise	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						would result in 'moderate-high harm'. The Review states that this would increase to high harm only if Site 0406 were developed in conjunction with Site 0315. The Regulation 19 Sustainability Appraisal and omission rationale instead refer to Site 0406 itself as resulting in a high degree of harm. That does not accurately reflect the underlying evidence and materially overstates the assessed effect of the wider site, before any allowance is made for the substantially reduced frontage proposition now promoted. That approach is particularly difficult to reconcile with the wider strategy of the Submission Draft. The Council's own Green Wedge Review proposes boundary changes across the city and records a reduction of approximately 9.38 hectares to the Chaddesden / Derwent Industrial Area Green Wedge. The Regulation 19 allocations also demonstrate that Green Wedge effects are not treated as an automatic bar to development where a controlled form of development and	scale, building height, roof form, materials and lighting strategy, informed by proportionate landscape and heritage assessment, including consideration of the setting and Outstanding Universal Value of the Derwent Valley Mills World Heritage Site; provide safe and suitable vehicular, pedestrian and cycle access, including appropriate connections with the Great Northern Greenway; incorporate appropriate drainage, flood-risk,	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						mitigation can be secured. A frontage allocation can be framed so that built development remains contained against the established A61 commercial corridor rather than extending across the width of the Green Wedge. The allocation can define a maximum development envelope and require the balance of the land to remain open. This would retain a clear green corridor associated with the Great Northern Greenway, preserve the physical and visual separation between the contained commercial development along the western frontage and residential areas to the east and maintain a continuous green infrastructure connection through the wider wedge. The allocation would also create the opportunity to secure positive enhancements which would be less certain if the site remains unallocated. These could include strengthened structural planting, habitat creation, improved woodland and grassland	source-protection and, where demonstrated to be necessary, land-remediation measures; and ensure that any office, commercial or roadside retail floorspace complies with Policies E4, E9 and E10, where applicable, and remains complementary to the principal employment function of the allocation.	

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						management, biodiversity net gain, improved drainage and sustainable pedestrian and cycle connections to the Greenway. Building height, development depth, roof form, external materials, lighting, servicing and boundary treatment could all be controlled through the allocation criteria. On this basis, the proposal would not close the mouth of the Green Wedge in the manner assessed for the full 7.2-hectare site. It would consolidate a limited area of development against the existing commercial corridor while retaining and enhancing the principal open, ecological and recreational functions of the land adjoining the Greenway. The correct conclusion is therefore not that Green Wedge harm is absent. It is that the extent of harm associated with the reduced promotion requires proportionate assessment and can potentially be materially reduced		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						through the form of allocation and mitigation. In the absence of a clear assessment of that reduced alternative, exclusion is not adequately justified. **Ecology, Local Wildlife Site and BNG** The Council's conclusion describes *'considerable environmental constraints'* arising from biodiversity and the LWS and goes further by suggesting that the scale of mitigation and compensation required may undermine the viability of employment development. That conclusion is not supported by the Regulation 19 SA assessment provided for the site. Under SA Objective 8, the site is recorded as lying within the Croft Wood LWS and within 250 metres of a Local Nature Reserve. The SA recognises potential effects on biodiversity and green-corridor functionality, but the assessed effect is only 'Minor Negative'. Importantly, the SA itself identifies the policy response: development would be required to contribute to biodiversity enhancement and meet the minimum		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						10% BNG requirement under Policy EN10. There is, therefore, a material disconnect between technical appraisal and the subsequent omission rationale. The SA does not identify a significant adverse biodiversity effect that is incapable of mitigation; nor does it contain evidence demonstrating that BNG would render the scheme unviable. A statement that viability may be affected by the 'scale' of mitigation and compensation is not a substitute for evidence of what mitigation would be required, what land would be retained, what on-site or off-site BNG options are available, or what effect those requirements would have on a commercially realistic scheme. By concentrating development within the western frontage strip and retaining the Great Northern Greenway as a firm eastern boundary, there is substantial scope to retain, buffer and enhance habitats within the remainder of the		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						wider landholding. The development frontage could be of controlled depth and designed alongside new structural planting, habitat creation and Greenway enhancement. Any future application could be required to provide proportionate ecological surveys, a biodiversity metric, application of the mitigation hierarchy, habitat buffers, long-term management and a BNG strategy. These are conventional assessment and mitigation requirements and, on the available evidence, do not constitute insurmountable constraints or justify rejection of the site in principle. The proportionate ecological assessment undertaken to date has not identified an ecological constraint which makes a contained frontage scheme unacceptable in principle or incapable of mitigation. The allocation can require the development envelope to avoid the most important habitats, maintain an appropriate buffer to Croft Wood LWS and the Great Northern Greenway and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						provide habitat creation and enhancement within the retained land. The presence of ecological features does not, without evidence of an unavoidable adverse effect, establish that the site is unsuitable or undeliverable. Nor does the evidence demonstrate that statutory BNG would render an appropriately scaled scheme unviable. The extent of the wider landholding provides scope to address the mitigation hierarchy and deliver a coherent long-term habitat management strategy alongside the proposed frontage development. Indeed, the SA does not identify biodiversity as a 'significant negative' effect. The overall planning judgement should reflect the appraisal undertaken, rather than elevate a minor negative effect that could be mitigated into an unevidenced deliverability barrier. **Contamination** The treatment of contamination is a further significant concern. Appendix G		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						states that there are *'concerns about contamination on the site'* and refers to further viability implications. However, the site-specific SA does not identify evidence of existing contamination on the promoted land. Under SA Objective 16, the appraisal records that the site is greenfield land and lies within Source Protection Zones 2 and 3. The stated concern is the potential for contamination of the source protection zone during construction works. The mitigation identified is a Construction Environmental Management Plan to protect the source protection zone from contamination. That is materially different from evidence that the land is contaminated and requires costly remediation. On the documents presently available, the omission rationale appears to conflate pollution risk at construction phase with an existing land contamination and then relies on that proposition to raise		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						viability concerns. Unless the Council has separate site-specific evidence demonstrating contamination and abnormal remediation costs, that element of the exclusion rationale is not supported by proportionate evidence. If further investigation is considered necessary, the appropriate response is an allocation criterion requiring proportionate ground investigation and remediation where necessary. It is not a sound basis for excluding an otherwise available employment opportunity. **Heritage** The archaeological interest of the land is recognised. The Derbyshire Historic Environment Record identifies the former Little Eaton branch of the Derby Canal under reference MDR9110. Its recorded alignment is understood to pass beneath or close to the western frontage adjoining Sir Frank Whittle Way. The wider land is also crossed by the conjectured route of Ryknield Street, also referred to as Rykneld Street, which formed part of the Roman road network		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						serving Little Chester. These records justify proportionate archaeological assessment but do not establish that either feature represents an insurmountable constraint to allocation. The precise survival, condition and significance of any below-ground remains would need to be established through an archaeological desk-based assessment and, where justified, targeted field evaluation. Previous geophysical work close by did not identify positive evidence of the Roman road. While that does not remove the possibility of remains within the promoted land, it reinforces the need for proportionate site-specific investigation rather than an assumption that the conjectured route prevents development. The former canal alignment also presents a positive masterplanning opportunity. Subject to confirmation of its precise route, survival and archaeological significance, its presence could inform		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the layout and landscape treatment of the western frontage. Where justified, parts of the alignment could be incorporated within landscaped areas or localised development setbacks, while other sections could be addressed through preservation, recording or interpretation as appropriate. This would allow a proportionate response to the archaeological interest of the former canal without requiring its entire route to be retained as an undeveloped corridor. The conjectured line of Ryknield Street similarly provides an opportunity to investigate and better understand the historic route. Any remains identified could be avoided, incorporated into the landscape framework, recorded or interpreted as appropriate to their significance. An allocation criterion requiring proportionate heritage assessment, evaluation and mitigation would therefore provide an effective response. The available information does not demonstrate that		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						archaeological considerations make the western frontage unsuitable or undeliverable. **Landscape and Access** The frontage approach would be materially different from the substantially larger mixed residential and commercial proposals previously considered. By limiting development depth, maintaining structural planting and retaining an open and enhanced corridor alongside the Great Northern Greenway, the relationship between the site, the wider landscape and the World Heritage Site can be appropriately addressed. The site also benefits from direct proximity to an established strategic highway corridor, bus services and the Great Northern Greenway. The proportionate access assessment undertaken to date has not identified any fundamental constraint preventing safe and suitable access from being achieved. Detailed junction design,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						servicing arrangements and pedestrian and cycle connections would properly be resolved through a future planning application. Ecology, heritage, landscape and access are therefore matters requiring detailed assessment, design and mitigation. The evidence does not identify them as insurmountable constraints or demonstrate that the reduced frontage parcel is unsuitable for allocation in principle. **Economic Role of Sir Frank Whittle Way Corridor** Development contained between Sir Frank Whittle Way and the Great Northern Greenway would be read in that context as a logical continuation of the established commercial corridor. The allocation could support a mix of smaller local industrial and employment units, workshops, trade or service uses and complementary mixed commercial or roadside retail development, rather than being dependent upon a single large office or		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						strategic employment scheme. The site benefits from strong strategic highway accessibility to the A38 and A52, together with bus and cycle connections. The Regulation 19 SA itself records a 'Minor Positive' effect under Transport and Accessibility because the site lies within 400 metres of a cycle network and bus stop, and a 'Minor Positive' effect under Human Health because access to employment is a key determinant of health. The Submission Draft should provide a resilient and genuinely varied portfolio of employment opportunities rather than rely almost entirely on a small number of strategic sites. The Council's Employment Land Review records that three strategic sites account for approximately three-quarters of Derby's realistic employment land supply. Although the overall quantitative supply is substantial, only approximately 35.35 hectares was identified as being particularly suited to		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						meeting the needs of local businesses. The Employment Land Review also identifies strong demand for industrial premises of a range of sizes, including smaller units of 0–300 sqm and good-quality premises capable of meeting the requirements of local businesses. It identifies a shortage of suitable units of up to approximately 1,500 sqm, including premises capable of accommodating specialist power and operational requirements. Large strategic allocations intended principally for national and multinational occupiers are not necessarily substitutes for this form of locally focused provision. The frontage parcel is capable of addressing that qualitative requirement through a mix of smaller industrial, light industrial, workshop, trade, research and development and storage and distribution units. A limited element of complementary commercial and roadside retail development could		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						respond to the established mixed character of the Sir Frank Whittle Road corridor, support the viability and attractiveness of the frontage and provide services to businesses and passing trade. Any such uses could be controlled in scale and made subject to the Plan's defined-centre and sequential requirements. This is not principally a proposal for a conventional speculative office park. Any office floorspace could be limited to ancillary accommodation, smaller flexible workspace or development with a specific locational requirement which satisfies Policy E4. The allocation would therefore complement rather than compete with the Plan's priority for Grade A office investment within the City Centre. The Council's own evidence consequently supports a distinction between overall quantitative employment land supply and the qualitative availability of smaller,		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						accessible sites capable of serving local businesses. A modest frontage allocation would increase choice, flexibility and resilience without undermining the role or delivery of the strategic employment allocations. National policy requires planning policies to help create the conditions in which businesses can invest, expand and adapt and places significant weight on economic growth and productivity. In a city with nationally important engineering, rail and aerospace sectors, the Plan should retain sufficient flexibility to respond to changing occupier requirements and supply-chain investment over a plan period extending to 2043. **Consistency of Evidence** The most important soundness concern is the lack of a clear evidential bridge between the SA findings and the decision to exclude the site. The SA records: Minor Positive effects for Human Health, Crime and Safety and Transport and		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Accessibility; Minor Negative effects for Biodiversity, Air/Noise/Light, Water Environment and Greenhouse Gases; Significant Negative effects for Landscape/Townscape and Geology/Soils, principally reflecting the assessment of the full 7.2-hectare Green Wedge and greenfield site; Uncertain effects for Population and Equalities, Economy, Employment, Historic Environment and Climate Change because the development proposition and detailed mitigation were not specified; and Neutral effects for Housing, Leisure and Recreation and Waste. The SA therefore identifies matters requiring further definition, assessment and mitigation, but does not establish that the reduced frontage is inherently unsuitable or undeliverable. Its landscape conclusion is based on the full 7.2-hectare proposal and incorrectly describes the Green Wedge Review as identifying high harm for Site 0406 in isolation. Its ecology assessment is only Minor Negative; its contamination		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						discussion concerns the protection of groundwater during construction; and its economic, employment and heritage effects are *uncertain*, not that unacceptable effects were identified. The current promotion provides the basis for resolving those uncertainties. It comprises a contained frontage development, a locally focused mix of employment uses, retention and enhancement of the Greenway corridor and criteria requiring proportionate ecological, heritage, landscape, transport and drainage assessment. The appropriate response to the previous uncertainty is to assess that defined alternative, not to treat uncertainty as evidence that the site is unsuitable. It is not robust to translate uncertainty into a negative conclusion without the intervening evidence. Similarly, where effects are capable of mitigation through policy, the Council should explain why such mitigation is insufficient before relying on those effects to reject a reasonable alternative.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						The site selection process would be more robust if the contained western frontage were assessed as the reasonable alternative now promoted. That assessment should consider an employment-led commercial mix, including smaller local industrial and employment units and complementary roadside commercial or retail uses, together with explicit landscape, Green Wedge, ecological, heritage and access mitigation assumptions. This would allow a like-for-like comparison with the preferred employment portfolio and provide a transparent basis for the Council's planning judgement.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
Local Plan Viability Assessment (Residential)								
OR39	NHS Property Services	Local Plan Viability Assessment (Residential)	Supports	Yes	Yes	The draft policy requirements identified in the Plan are supported by the Local Plan Viability Assessment (Residential) (April 2026) and Viability Assessment		The Council welcomes the support from the NHS. The 2018 SPD cannot be updated

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						Addendum (July 2026). Having reviewed the report, we note that where contributions towards healthcare have been identified in the policy requirements for site-specific testing, the assessment includes a specific allowance for contributions towards healthcare. The report tests a lump sum for S106 contributions of £1,000 per dwelling to cover site specific mitigation for health. NHSPS welcomes a specific allowance for healthcare contributions within the viability assessment (for applications proposing 75 dwellings or more). A separate cost input for health means that developers are adequately informed in advance, in accordance with ICB's estate strategy and the development's location and size, that they may be required to make on-site provision or off-site financial contributions to mitigate the impact on healthcare infrastructure resulting from their development. This also supports the effective implementation of Draft Policy GD9 in situations when a viability assessment demonstrates that development proposals are unable to fund the full range of infrastructure requirements.		since no new SPDs can be adopted. An alternative itemised and costed figure has not been provided. It is therefore important to give a clear steer to developers through the plan making system as to the likely contributions required for development.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						However, we would raise concern that the lump sum figure of £1,000 per dwelling for health, as identified in the Local Plan Viabiltiy Assessment and the Planning Obligations SPD (2018) is low. Without prejudice to any future representations the NHS or its partners may make on specific planning applications or applications for CIL funding, in our view the S106 headroom identified as part of the site-specific testing is not sufficient to enable financial contributions to be secured for healthcare. As noted in our general comments above, healthcare facilities are currently experiencing significant strain. Furthermore, if appropriate mitigation is not secured, the growth strategy outlined in the Plan is expected to exacerbate this situation. We would recommend that the viability assessment includes a separate cost input for typologies where a healthcare contribution is expected. This would ensure that healthcare mitigation is appropriately weighted when evaluating the potential planning obligations necessary to mitigate the full impact of a development.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						We would welcome further engagement with the Council to on this issue to determine a reasonable cost assumption that could be used in future viability assessments.		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
Infrastructure Delivery Plan								
OR260	Carney Sweeney on behalf of Peveril Homes Limited*	Infrastructure Delivery Plan				The Draft Infrastructure Delivery Plan dated July 2026 ('IDP') sets out the transport, physical, social and green infrastructure required to support the City's future growth over the plan period. It is noted that the document has been produced in conjunction with the HMA partners and infrastructure partners and remains a live document that will continue to be updated up to submission of the Local Plan for examination. The IDP acknowledges that as Derby cannot accommodate all its planned growth, there are proposals for several sustainable urban extensions, primarily within South Derbyshire (Paragraph 10). The IDP goes on to recognise that development beyond the City boundary will have implications for infrastructure provision within the City. Two of the topics covered in the IDP identify specific infrastructure requirements in relation to proposed allocation Policy HA5, namely Transport and Education. For both elements, developer funding is stated to be via 'Individual negotiations from planning applications in terms of Section 106 and		Noted. Contributions towards education and transport for Policy HA5 will be sought through individual planning applications in line with Policy GD9, and only where they are necessary, directly related and fairly and reasonably related in scale to the development. No change required.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						CIL'. • *Transport* In respect of proposed allocation Policy HA5, the table on Page 12 of the IDP identifies a requirement for *'Provision of, or improvements to public transport, cycling, and pedestrian facilities and/or network capacity improvements on allocated housing sites and their adjacent road networks'.* No specific cost requirement is identified but reference is made to an indicative cost of £200,736 secured through developer contributions - this is understood to relate to the Section 106 Agreement relating to planning approval reference: 24/00425/FUL. It is presumed that any additional funding required towards the '*provision of, or improvements to public transport, cycling, and pedestrian facilities and/or network capacity improvements on allocated housing sites and*		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						their adjacent road networks' will be subject of individual negotiations through the planning application process. • Education The table on Page 16 of the IDP identifies the following requirements in relation to proposed allocation Policy HA5: • *"Provision of, or improvements to, primary education facilities at Brookfield Primary School, The Hollow, Mickleover, or any other primary school suitable for serving the development (27places). Potential for the proposed new primary school at Rykneld Road catchment area to include the Hollow site." An Indicative Cost of £549,720 is stated to be in line with the provision agreed for planning approval ref: 24/00425/FUL.* • *"Provision of, or improvements to, secondary education facilities at Littleover Community School, Pastures Hill, Littleover, or any other secondary school suitable for serving the development (19*		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						places)" An Indicative Cost of £582,160 is stated to be in line with the provision agreed for planning approval ref: 24/00425/FUL. • *It is again presumed that should any additional funding be required towards education, this will continue to be subject of individual negotiations through the planning application process.* • *"To secure financial contributions towards the provision of a new school to serve the entirety of the cross-boundary community (The Hollow and SDDC's Land South of Mickleover allocation). The school should be provided on the South Derbyshire site." No indicative cost is provided, but the IDP states that the funding source will be developer contributions.* • *The requirement for any financial contributions towards primary and secondary education should only arise if the proposed development triggers*		

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						the need for such provision and should be directly related to the level of demand generated by the proposed development		
OR39	NHS Property Services	Infrastructure Delivery Plan	Supports	Yes	Yes	The provision of adequate healthcare infrastructure is in our view critical to the delivery of sustainable development. A sound IDP must include sufficient detail to provide clarity around the healthcare infrastructure required to the level of growth proposed by the Plan, and to ensure that both planning obligations and the capital allocation process for the Community Infrastructure Levy (CIL) effectively support and result in capital funding towards delivery of the required infrastructure. The Draft Infrastructure Delivery Plan (IDP) includes a dedicated health chapter (chapter 8) which demonstrates clear engagement with NHS Derby and Derbyshire Integrated Care Board (ICB), as the local health commissioners. NHSPS supports the Council's engagement with the ICB in drafting the IDP to identify the appropriate form of contribution towards the provision of healthcare infrastructure where this is justified. We request that the Council continue its engagement with the NHS to further refine the identified		Support welcomed. The Council will continue to engage with NHS Derby and the Derbyshire Integrated Care Board and NHS Property Services as the Infrastructure Delivery Plan is updated.

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						healthcare needs and proposed solutions to support the level of growth proposed by the Local Plan, as identified in the draft IDP.		
OR160	National Highways	Infrastructure Delivery Plan	Objects			We also note that the Infrastructure Delivery Plan identifies the A38 Derby Junctions Grade Separation Scheme and the South Derby Integrated Transport Link (Phases 1 and 2, including the A50 junction) as required infrastructure to support the Plan. The IDP however records indicative cost, delivery timeframe and funding source as "to be confirmed" for these schemes. We recognise the IDP remains a live document and as significant growth is dependent on this infrastructure we would highlight the risk to delivery should delivery of this strategic infrastructure be delayed.		The HMA transport modelling includes a sensitivity test without the A38 Derby Junctions scheme, and the Council will continue to work with National Highways on the implications for the Plan, including through a Statement of Common Ground.
OR238	Lucy White Planning Limited on behalf of National Grid	Infrastructure Delivery Plan	Objects			The Infrastructure Delivery Plan accompanying Policy GD9 includes limited information regarding reinforcement of the electricity		The Infrastructure Delivery Plan is a live document, and the Council will continue its engagement with

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						infrastructure network. Derby City Council has engaged with NGED and discussions are ongoing. The IDP is a live document which should be kept up to date through regular engagement with infrastructure providers, including NGED. It is important that the Infrastructure Development Plan reflects current NGED Network Development Plans. The IDP should follow the attached guidance to ensure appropriate coordination across the LPA's and NGED's strategic plans. The LPA must engage through the Distributed Future Energy Scenarios process outlined above to ensure local plan proposals are included in NGED's plans.		National Grid Electricity Distribution, including through the DFES process, so that the Plan's growth is reflected in network development plans. No change required.
OR32	Sport England	Infrastructure Delivery Plan	Support	Yes	Yes	Sport England welcomes sections 9 (social and community infrastructure), and 10 (green and blue infrastructure) which references the need for infrastructure contributions towards provision of indoor and outdoor sports facilities including playing fields to meet the needs of the planned housing growth. Sport England would recommend that reference is added to the development of a technical note to further detail how		Support welcomed. The Council will continue to work with Sport England on the technical note on developer contributions for sport, and the Infrastructure Delivery Plan will be reviewed when the new Playing Pitch and Outdoor

Respondent ID	Respondent Name	Commenting on	Support or Object	Legally Compliant	Sound	Reasons	Suggested Modifications	Council Response
						contributions to meet the needs for sport are to be provided to be consistent with the amendments made in policy GD9 and the associated justification. Sport England welcomes the commitment from the Council to work with Sport England on the content of a technical note for the calculation of developer contributions for sport. In respect of developing an up to date and robust evidence base to help inform the application of this policy to ensure major development proposals meet their needs for sport, we welcome that the Council have commissioned a new Playing Pitch and Outdoor Sports Strategy which should be completed and adopted in accordance with Sport England's Guidance. The drafting of the IDP priorities should therefore be reviewed and updated on the completion of this strategy in due course.		Sports Strategy is complete in line with planning practice guidance.

The following people created accounts in the online software but did not submit any representations:

Andrew Birchall

Serhii Zinkevych

The following representations were received after the stated deadline:

Aliasgar Gulamhussein Policies E1 and E2

Photographs submitted with representations

Photograph submitted by Emma Banks (OR92) to support the representations for Policy HA7: Stoney Lane, Spondon



Photographs submitted by Sharon Cooper (OR87) to support the representations for Policy HA7: Stoney Lane, Spondon







Photograph submitted by Georgie Cox (OR88) to support the representations for Policy HA7: Stoney Lane, Spondon



Photographs submitted by Emma Davis (OR93) to support the representations for Policy HA7: Stoney Lane, Spondon







Photograph submitted by Stephen Peat (OR197) to support the representations for Policy HA7: Stoney Lane, Spondon

