

Local Plan for Derby Regulation 18 Responses Part 1



Derby City Council

Chief Planning Officer
Derby City Council
The Council House
Corporation Street
Derby
DE1 2FS

Dear

Response to Draft Local Plan for Derby Regulation 18 Consultation

Thank you for formally consulting Amber Valley Borough Council on the Draft Local Plan for Derby (Regulation 18).

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 strategy development between the three local authorities. We would wish to continue to maintain this ongoing cooperation to allow for appropriate delivery of housing across the Derby HMA.

Housing Market Area Context

The draft Derby 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.

It indicates that through ongoing, collaborative working, particularly with the neighbouring Derby HMA local authorities, 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.

It highlights that the City's ongoing housing needs (determined through the standard method) are not currently able to be met wholly within the City's boundaries, with work last updated in 2024 and covering the period to 2039, having identified the City capacity to be approximately 12,500 homes to 2039.

Paragraph 184 of the draft Plan highlights *‘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 on sites within South Derbyshire and Amber Valley in sustainable locations.’*

Notwithstanding the above reference to “Derby City’s unmet needs” (as queried below), in general, this strategic approach is supported. However, the Borough Council provides comments on the following issues:

Policy H1: Housing Delivery

The policy states that:

‘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 within the city, and within sustainable urban extensions to the city in South Derbyshire and Amber Valley.

New housing will be provided to meet a range of housing needs including market and affordable homes, across a range of sizes and which are capable of meeting a range of specialist needs. In particular, 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...’

The supporting text notes that Derby’s housing needs are set through the Government’s ‘Standard Method’ calculation which currently identifies a need of 917 net new dwellings per annum, which over the 20 year plan period equates to a need for a minimum of 18,340 net new homes. The plan includes provision of 12,591 homes as shown in Table 2 – Housing Supply Position (01/04/2025).

The “Derby HMA Sustainability Appraisal of Housing Options” (2024) which was commissioned by all the HMA partners references a previously intended local plan period of 2023-2039. Section 1.1 of this document states that *“Derby City’s most recent assessment of its housing capacity is 12,500 dwellings. Given a housing requirement from the standard methodology, of 21,522 homes over an agreed 17- year local plan period (2023-2039), this results in a current shortfall of 9,022 homes”*.

In paragraph 188, the draft Local Plan states *‘The Housing requirement for Derby set out in this Plan is that a minimum of 12,500 new homes will be delivered within the city over the Plan period (2023-2043). This consists of a range of sources including dwellings already completed and delivered since 1 April 2023, developable sites with planning permission, new allocations in this plan and a windfall allowance.’* The draft Plan also includes a proposed windfall allowance of 120 dwellings per annum (2028 – 2043).

It is not clear how the change to the end of the plan period (from 2039 to 2043) has been dealt with in the housing figures. The Aecom report that concluded 12,500 could be delivered to 2039 does not appear to be available in the evidence base and it is not clear if

this has been updated since July 2024 to reflect any change in position on deliverable sites or to reflect the longer plan period.

As the plan period has been pushed back by 4 years (whilst maintaining the same 2023 start date), a windfall allowance of 120 dwgs pa is included for the period between 2039 and 2043. As the previous Derby City capacity study is seemingly still being utilised, would there be an additional windfall allowance of 480 dwellings for the extra 4 years? If so, these 480 dwellings would help to meet unmet housing need across the HMA. If not, is there an explanation for this and/or is there any later / updated capacity work, which could be referenced to help clarify this?

The figure of 917 dpa is the most up to date figure using the Governments standard method and dates from May 2025. If this figure is used, it should only be applied from 2025-26 as evidenced from the Inspectors Report into the Amber Valley Local Plan. This will mean the under delivery of housing against target for the period 2023-2025 can also be removed from the supply figures.

As has been discussed at our officer and Member meetings, the City should ensure all sources of supply are exhausted to meet its own housing needs, and should demonstrate how it has explored increasing densities, use of brownfield land, consideration of green space and green / grey belt.

Unmet need references

As referred to above, Paragraph 184 notes '*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 on sites within South Derbyshire and Amber Valley in sustainable locations.*'

Wherever possible, references to Derby City unmet need should be changed to "unmet HMA housing need" as this is the approach agreed by the HMA partners in the Statement of Common Ground and acknowledged by the Planning Inspectors in their examination of the Amber Valley Local Plan.

Brun Lane, Mackworth

Policy SGS1- Brun Lane, Mackworth of the Adopted Amber Valley Borough Local Plan (2022-2040) identifies land at Brun Lane Mackworth as an 'Area for Future Growth' which is estimated to have potential for 2,000 homes and related infrastructure within Amber Valley beyond the plan period. It is noted that this area is also identified as a sustainable location for future growth within South Derbyshire's Local Plan Part 1 review. However, the Borough Council does not rely upon delivery from this area within its housing supply.

It is made clear in the above policy that the development of the Area for Future Growth must come forward through a strategic and comprehensive master plan approach, prepared in

conjunction with neighbouring Authorities ensuring the coordination of development with the delivery of required infrastructure and services to meet the needs of the development, nearby developments and the immediate area of Derby.

Indeed, Derby City Council made representations to the Amber Valley Local Plan examination stressing the need for sustainable connections into Derby. The City Council hearing statement says “Fundamental to the sustainability of the site is the delivery of the road link through the site between the A52 and B5020”. We are unable to see any reference in the Reg 18 Plan to this connection, or reference to improved connectivity to parts of the Derby Urban Area that lie beyond the City administrative boundary.

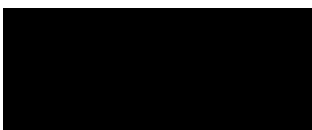
The Borough Council welcomes engagement with the Derby City Council to help bring forward the Area for Future Growth and meeting associated infrastructure requirements. The Borough Council would be happy to work the City Council on policy wording addressing the Area for Future Growth to ensure its delivery and the provision of appropriate infrastructure both within and beyond the City administrative boundary.

Amber Valley Borough Local Plan Review

Policy MR1 – Monitoring and Review, of the adopted Amber Valley Borough Local Plan (2022-2040) requires the Borough Council to commence work on a new plan. It will seek to address any unmet housing need within the Derby Housing Market Area, which will require strong working relationships with adjoining and nearby authorities.

The Borough Council therefore welcomes positive engagement and collaboration with Derby City Council to address various policy issues and any unmet housing need across the HMA.

Yours sincerely

A large black rectangular redaction box covering the signature of the Head of Planning.A small black rectangular redaction box covering the name of the Head of Planning.

Head of Planning



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Hello,

I'm emailing to provide comments in relation to the draft local plan for Derby. Please see comments below.

Policy H6 Accommodation for Older People and People with Disabilities

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 supports only residential care homes and Extra Care housing for older people. Retirement/sheltered specialist housing types should be supported, to accord with national planning policy. Your housing needs assessment says you need 2,346 by 1,333.

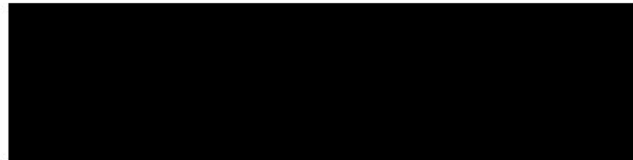
We recommend making specific site allocations for older persons' housing, rather than relying on M4(2) or M4(3) standards, which are not tailored to, or reserved for, older people. Allocations should consider the minimum viable scale for such housing. In Anchor's experience, this is at least 65 units per development.

Policies H2 Residential Development General Criteria and H4 Affordable Housing

We support the flexible approach to housing mix and tenure. 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 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.

Many thanks

Kind Regards,



anchor.org.uk



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Hello [REDACTED],

Thank you for including us in the consultation process moving towards a replacement Local Development Plan.

Community safety and security is well integrated throughout the document, with 111 references to safety in it's broadest sense, and 43 references to security, although all but 2 of these are concerned with securing other processes rather than the existence or sense of a secure environment.

What is of concern is the apparent removal of specific policy E24 which requires new developments to provide a safe and secure environment inherently through design and structure.

This policy has been retained through recent local plan reviews, but isn't referenced or replaced specifically in the current draft

I appreciate that there are other general policies in GD1 and GD5 which touch upon this area, with GD5 being specifically set out to tackle Resilient Places and Community Safety, albeit set mostly in the realm of counter terrorism measures rather than wider community safety, but the removal of a specific policy for requiring set design criteria to tackle the incidence and fear of crime in my view weakens this policy area.

Taking account of the narrative of an identified weakness in the table summary of part 2.3 with crime in the city contributing to lower than average life expectancy, and the aspirations within the City Vision Objective OBJ2, the removal of saved policy E24 would seem to weaken rather than strengthen these strategic aims.

Looking at other policy areas, the current Polic and Crime Commissioner has an interest in seeking developer contributions from major development, and whilst we wouldn't comment on the content of draft policy GD9, it may well be that the PCC's office will be corresponding separately for this part of the draft plan.

There is a minor content amendment needed for technical references to glazing within policy GD5(g) and CC6(p) of the tall buildings policy.

Both refer to the inclusion of ASF (glazing) for counter terrorism purposes.

Anti-shatter film is a supplemental for existing glazing, and seen as suitable for retrospective fitting only in CT environments.

The use of laminated glazing would be recommended for new build projects, with the specification drawn up by structural engineers to suit the building design.

Can I ask that the ASF references are replaced with one for laminated glazing please.

Regards

Force Designing Out Crime Officer
Prevention and Partnerships Team

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Comments from Chamber of Commerce

I've focused entirely on pages 90 – 108 / 185:

- 'respondents emphasised that jobs and training opportunities should be a key priority of the Local Plan, particularly with respect to employing local people' – the Chamber's quarterly economic survey (latest results can be viewed at <https://www.emc-dnl.co.uk/wp-content/uploads/2026/03/east-midlands-report-12.html>) continues to inform that despite unemployment levels, employers still find recruitment challenging, suggesting that skills shortages are the primary driver.
- Derby members and the wider business community continue to inform that growth on space is scarce, particularly mid-sized units between 5,000 – 10,000 sq ft. Businesses also feel there is a distinct lack of 'A grade' office space in the City (whether they want to pay A Grade office space costs may be a different story!).
- The importance of the key city employers is well made – however, the importance of SMEs, including those in the supply chain of the key employers feels like this should be emphasised more.
- In regard to skills development – a link to the Local Skills Improvement Plan, led by FSB, feels like an important omission – LSIPs are informed by employers as to future skills needs.
- On the same note, DWP's Jobs Guarantee service feels like this should be referenced when considering how to reduce the volume of NEETs across the city.
- Retail will remain challenging – the commercial marketplace for retail has fundamentally changed since the pandemic. While most Derbyshire market towns feel like they are thriving, with a different offer to the city centre, the challenge of attracting recognised brands into areas of declining footfall will remain problematic. Retail success in the city is going to be largely dependent on the cultural and events offer, which Derby does well. However, some of the cornerstones of the cultural offer are currently challenged regarding their future

viability – these need to be bolstered to shore up the cultural offer to drive footfall to benefit retailers. Unfortunately, a good retail offer alone no longer feels to be the only solution to city centre vibrancy.

- City centre safety (or the perception of) continues to be brought up by city centre businesses as a barrier to growth and the recruitment / retention of employees.

I hope that's the kind of feedback sought – let me know if you need more.

[REDACTED] Planning Policy

Derby City Council
The Council House
Corporation Street
Derby
DE1 2FS

10 March 2026

Dear [REDACTED]

Marketing Derby is the Queen's Award-winning Investment Promotion Agency for Derby, supported by our 350+ business Bondholders.

This letter is written in relation to the emerging Local Plan of Derby City Council after consultation with members of Derby Economic Development Advisory Committee (DEDAC).

The overarching ambition in Derby City Council's 'Towards a New City Vision 2022' states:

"[The city] should be sustainable, attractive and provide an overall experience that encourages social interaction and inspire more people to spend more time and money in it. It should also inspire greater civic pride and provide a recognisable, positive image and identity for Derby".

This DEDAC response is entirely focused on Section 12, the City Centre chapter of the draft Local Plan and its relation to Derby City Council's delivery objectives and the ambition statement above.

Three main priorities have been identified by DEDAC as important considerations against each policy in the chapter.

1. Safety
2. Experience
3. Wayfinding

The relevance of these priorities to the emerging Public Realm Strategy, on which this consultation is running in parallel, was noted as integral to the improvement of the city centre.

However, whilst the emerging Public Realm Strategy addresses some of the disconnections across the city, it is felt that it falls short of providing an overarching and effective solution to the current condition of the streets and spaces.

Policy CC10: Streets and Spaces

Paragraph 739 of this policy states: *'The quality of the public realm directly affects perception of place... People avoid unattractive and unsafe streets and as a result, footfall declines, values fall, and places begin to fail. Significant investment in good quality public realm in the city centres is therefore essential to its transformation and future success'.*

This should inform how the emerging Public Realm Strategy is interpreted and which aspects are adopted by the Local Plan.

There are some aspects of the emerging Public Realm Strategy that are fully supported by DEDAC. For example:

Overarching principles: *'Connect key destinations, activities and uses, with legible wayfinding'* and *'Introduce an abundance of trees, planting and nature throughout the city...'*

Priority Location 2 - The Civic Heart & Life of the River

Priority Location 5 - High Street to Green Street

Priority Location 7 - A Blue Green Arrival

However, there are some obvious omissions from the strategy, which could prove detrimental to the overall delivery. These are outlined below:

Priority Location 1 - The Welcoming Forest Edge does not attempt to *'Connect key destinations, activities, and uses, with legible wayfinding'*. The route from the train station is of significant importance to the perception and experience of the visitor - whether they are a business or pleasure traveller. This proposition neglects to join up and curate the route from the train station into the city centre.

Priority Location 3 - Living Heritage -

This location is currently utilised as a gathering place and performance space for city events, with neighbouring redevelopment in the imminent pipeline. This feels like an unnecessary priority, with more immediate public realm issues in other parts of the city, such as Becketwell.

Priority Location 4 - The Cultural Core - this aspect of the proposition fails to acknowledge Sadler Gate and the Market Place as crucial anchors to the nighttime economy and the movement of pedestrians between popular locations such as Vaillant Live, Electric Daisy and the Market Hall.

Equally, making the Wardwick into a two-way street not only cuts off the Becketwell Neighbourhood from the Cathedral Quarter it also does not seem to consider the intention to move the Museum entrance on to Museum Square (**Policy CC5 - Non-Residential Regeneration Opportunities**).

The omission of the Becketwell neighbourhood from Priority Location 6 - Re-imagined Arrival Experience seems shortsighted.

The proposed strategy does not reflect the requirement of the emerging Becketwell Neighbourhood or assist to fulfil the Ambition of Derby City Council in regenerating underused parts of the city to diversify the daytime and night-time economies. The omission will further degrade an area in need of investment. It will deter new uses of empty buildings and entrepreneurship, plus directly affect the confidence, experience and belief of the local business community. (A separate response has been submitted outlining the economic case for including this area on behalf of the Becketwell Neighbourhood group)

DEDAC supports **Policy CC7: Business, Creativity & Learning**. Attracting and enabling the daytime office operation through conversion of existing buildings or new build Grade-A office development encourages diversification and increases mid-week, daytime use of the city centre. This will contribute positively to the critical mass required to successfully maintain and strengthen a daytime economy and prevent retailers and hospitality venues being forced to close during the week.

Policy CC9: Active and Inclusive Frontages acknowledges the requirement to detract gambling operations including casinos, bookmakers and adult gaming centres. However, no reference is made to the cumulative impact of low grade uses such as vape shops/ charity shops/ beauticians with closed frontages. The inclusion of curation of certain streets would assist in raising the quality of the offer.

There was strong consensus amongst DEDAC members that **parking** provision is critical to the survival of Derby City Centre.

Parking locations and capacity should be proportionate to the incoming customer demand - well-positioned to diffuse capacity across the city and for continuous flow around the ring road, with safe, well-signposted pedestrian routes, regardless of time of day.

In the absence of the commissioned Parking Strategy, the group was eager to ensure that the views of city's businesses and residents were heard; that parking is not a luxury, the car is not the enemy. Parking is an essential factor in the success of retail/leisure businesses in the city centre and also key in supporting the office strategy. It is essential that the car-driving customer is catered for. There was some agreement that a Parking Strategy should work alongside, or as part of, a long-term transport strategy to improve public transport networks.

Policy CC7: Business, Creativity and Learning states '*direct investment in office floorspace associated with the rail industry into the Railway Station Quarter*'.

This would seem to imply a preference for rail industry offices to be located in the Station Quarter as opposed to ensuring recognition is given to the wider city centre as an attractive location for this key sector in Derby in line with ongoing partnership discussions about Rail Campus Derby.

DEDAC recognises the need to protect and conserve the city's heritage assets. Therefore, it is encouraging to see **Policy CC1: City Centre Strategy** encourages that heritage acts as a catalyst to regeneration. Members commented that proactive enforcement to prevent the deterioration of heritage buildings in private ownership is as important as supporting new build regeneration.

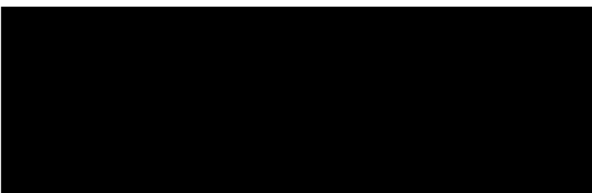
We are hopeful that this comprehensive plan can expedite the planning process, especially to enable the smaller scale developer.

In conclusion, the emerging Local Plan lays out a robust platform for decision-making within the planning system.

Policy CC1 prioritises the city centre as '*the single most important location for investment, renewal and regeneration...*'. and we are supportive of that emphasis.

With the exception of the points made above, Marketing Derby, on behalf of DEDAC, is fully supportive of the content of the City Centre section as part of the wider Plan.

Yours sincerely



Inward Investment Executive, Marketing Derby

On behalf of the Derby Economic Development Advisory Committee (DEDAC)

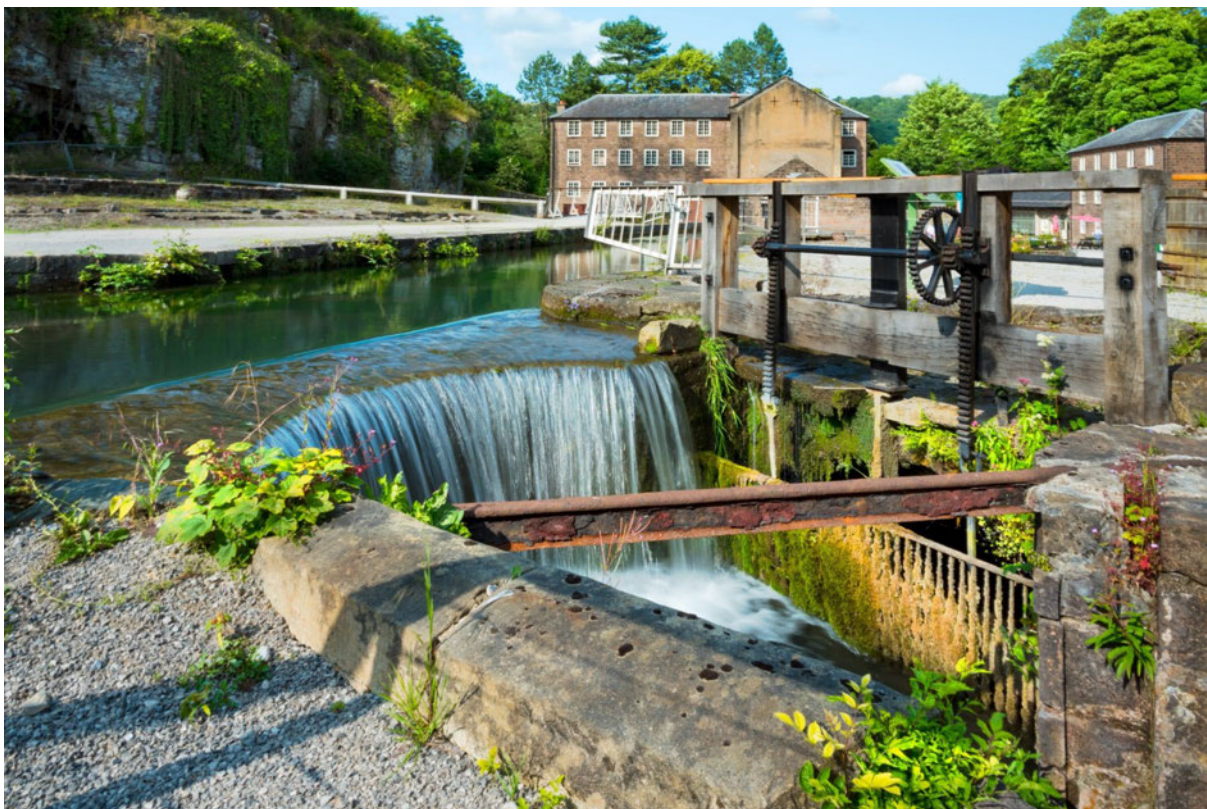
Derby Civic Society

Response to the Draft Derby Local Plan 2023–2043 (Regulation 18 Consultation)

Submitted to: Derby City Council

Prepared by: Derby Civic Society

1. Introduction





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Derby Civic Society welcomes the opportunity to comment on the Draft Local Plan covering the period **2023–2043**.

The Society supports the Council’s strategic aim to deliver approximately **12,500 new homes by 2043**, including **significant city centre development** alongside allocations in Littleover, Chaddesden, Spondon and Mickleover.

However, the Society believes the plan requires strengthening in several key areas:

- Protection and enhancement of the historic environment
- Design quality and urban form
- Heritage-led regeneration
- Landscape protection through Green Wedges and Green Gaps

The following sections provide **policy-specific comments and suggested amendments**.

2. Strategic Spatial Strategy

Relevant policies: SP1 – Spatial Strategy

SP2 – Housing Delivery

The Society supports the principle of **directing a large proportion of growth to the city centre**, helping to:

- reduce greenfield development pressure
- support the retail and cultural economy
- encourage sustainable transport.

However, the Society recommends strengthening policy wording to ensure development enhances Derby's historic urban structure.

Suggested amendment to Policy SP1

Current approach (summary)

Encourages development within the city centre and urban area.

Proposed additional wording

Development proposals within the City Centre must demonstrate that they:

- Respect the historic street pattern and urban grain of Derby.
- Protect and enhance key views including those towards Derby Cathedral and the Derwent Valley.
- Preserve or enhance the character of conservation areas and heritage assets.

3. Historic Environment Policies

Relevant policy: HE1 – The Historic Environment





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Derby contains heritage assets of national and international importance including:

- Darley Abbey Mills
- Derby Cathedral
- Derby Silk Mill

These assets form part of the wider Derwent Valley Mills World Heritage Site.

The Society welcomes the strengthened focus on heritage but considers the policy insufficiently robust.

Suggested amendments to Policy HE1

Add the following clauses:

Development affecting heritage assets and their settings must demonstrate:

1. A clear understanding of the significance of the asset.
2. That harm to significance has been avoided wherever possible.
3. That demolition of heritage assets will only be permitted in exceptional circumstances where:
 - The asset is demonstrably incapable of viable repair, and
 - The public benefits substantially outweigh the loss.

Additional recommendation

Introduce a requirement for **Heritage Impact Assessments** for:

- major developments in conservation areas
 - development affecting the World Heritage Site buffer zone.
-

4. Design Quality

Relevant policy: D1 – Achieving High Quality Design

The Society strongly supports the intent of Policy D1 but considers it **too general**.

Experience across the UK shows that high-quality development requires **clear design governance mechanisms**.

Suggested amendments to Policy D1

Add the following wording:

Major development proposals will be required to undergo independent design review through the Derby Design Review Panel.

Development proposals should demonstrate compliance with an adopted **Derby Design Code** and should reflect the scale, massing and architectural character of surrounding development.

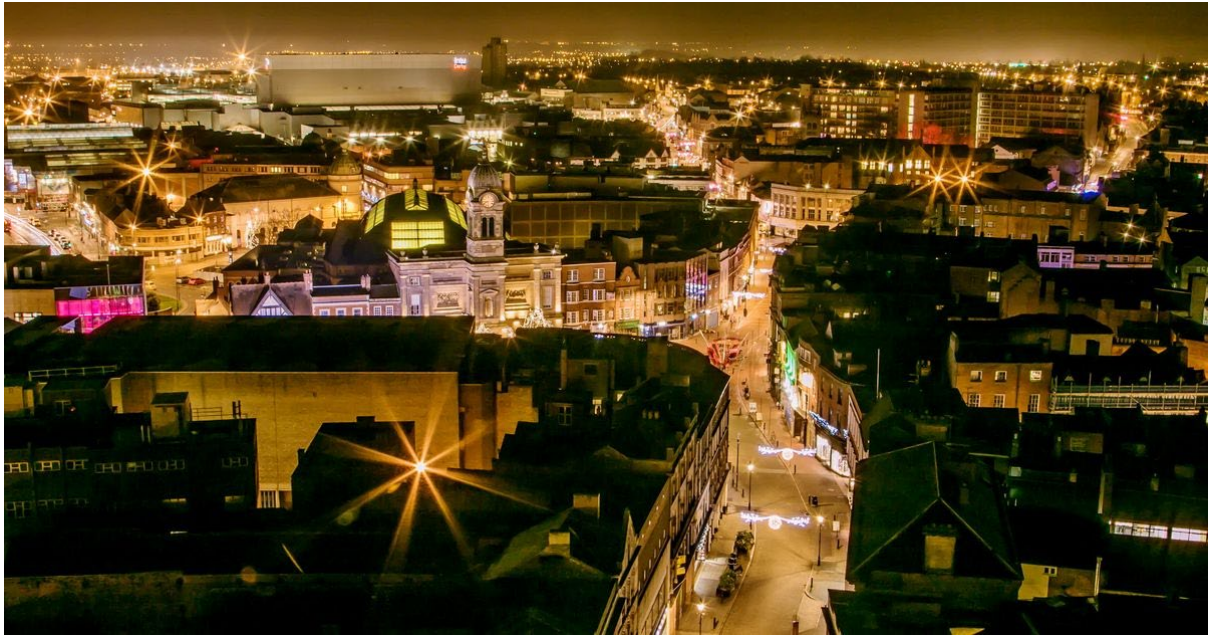
Additional recommendation

Include the **Tall Buildings Policy** to protect key views, particularly those towards Derby Cathedral.

5. City Centre Regeneration

Relevant policies:

- **CC1 – Derby City Centre Regeneration**
- **CC12 – Derby Riverside**





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The Society strongly supports the principle of increasing residential population in the city centre.

However, development must avoid creating a monoculture of residential blocks.

Suggested amendment to Policy CC1

Add:

Development proposals should incorporate active ground-floor uses such as retail, cultural facilities, hospitality, and workspace in order to maintain a vibrant city centre.

Suggested amendment to Policy CC12 (Derby Riverside)

Add:

Development must preserve and enhance the historic relationship between the city and the River Derwent, including public access, views, and interpretation of the city's industrial heritage.

6. Strategic Housing Allocations

Littleover



Development at Littleover should avoid the creation of car-dependent estates.

Suggested policy requirement

Add to relevant allocation policy:

Development must include:

- a walkable neighbourhood centre
- integrated green infrastructure
- landscape buffers to maintain the transition between urban and rural environments.

Chaddesden







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The Society supports regeneration where it improves the built environment.

Suggested policy addition

Development proposals should improve connectivity with existing neighbourhoods and prioritise pedestrian and cycle links.

Spondon





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Spondon retains a historic village character that must be protected.

Suggested amendment

Development must maintain clear separation between Spondon and surrounding settlements through permanent landscape buffers.

Mickleover





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Mickleover has expanded significantly in recent decades.

Future growth must be supported by infrastructure.

Suggested amendment

Development proposals must include:

- enhanced public transport provision
- new local services and employment opportunities
- improvements to the local centre.

7. Green Wedges and Green Gaps

Relevant policy: EN4 – Green Wedges and Green Gaps

The Society is concerned that replacing traditional Green Wedges with Green Gaps may weaken landscape protection.

Suggested amendment to Policy EN4

Add:

Development within Green Gaps will only be permitted where it:

- preserves the visual separation of settlements
- maintains landscape character

- does not contribute to urban coalescence.
-

8. Climate Change and Heritage

Relevant policy: CC5 – Climate Change Mitigation

Historic buildings should be recognised as part of the climate solution.

Suggested addition

Proposals for the retrofit of historic buildings should prioritise the retention and reuse of existing structures, recognising the embodied carbon benefits of conservation.

9. Conclusion

The Society welcomes the overall direction of the Draft Local Plan, particularly:

- emphasis on city centre regeneration
- brownfield redevelopment
- protection of key heritage assets.

However, the plan must be strengthened to ensure that Derby's growth enhances rather than diminishes its historic character.

The Society therefore recommends:

- stronger heritage protection policies
 - clearer urban design requirements
 - robust landscape protection
 - recognition of culture and heritage as drivers of regeneration.
-

Assembly Rooms Site – Detailed Commentary and Proposed Alternative

Relevant Local Plan Policies: CC1 – Derby City Centre Regeneration, CC6 – Cultural Uses, HE1 – The Historic Environment, D1 – Achieving High Quality Design





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The site of the Derby Assembly Rooms occupies one of the most prominent civic locations in the city centre at the north side of Market Place.

The Assembly Rooms building, opened in 1977, was designed by the modernist architect Hugh Casson. While the building is not currently listed, it is widely recognised as a significant example of **late-twentieth-century civic architecture** and has strong historic associations with Derby's cultural life.

The Civic Society considers that **any Local Plan approach to this site must recognise its strategic civic and cultural importance.**

1. Strategic Importance of the Site

The Assembly Rooms site sits within the **historic civic heart of Derby**, immediately adjacent to:

- Derby Market Place
- the Cathedral Quarter conservation area
- major pedestrian routes connecting the city centre.

Historically the building functioned as the city's **primary civic performance venue**, hosting:

- concerts
- conferences
- community events

- large civic gatherings.

The Society believes that **continued cultural and civic use is appropriate for this site**, consistent with Policy CC1.

2. Civic Society Position

The Society believes that **demolition or purely commercial redevelopment of the Assembly Rooms would represent a major loss of civic infrastructure**.

Instead, the Society proposes a **comprehensive refurbishment and adaptive reuse strategy**, consistent with:

- Policy HE1 (conservation of heritage assets)
 - Policy CC6 (cultural infrastructure)
 - Policy CC1 (city centre vitality).
-

3. Proposed Reuse Strategy

The Society proposes that the building be refurbished to create a **multi-purpose civic and cultural hub**.

Ground Floor

The ground floor should be opened up to create an active public frontage onto Market Place.

Proposed uses:

- **Children's Library** operated by Derby Libraries
- **Public café** opening onto the square
- Small **independent retail units**
- Flexible community space for events and workshops.

This approach would ensure **constant daytime activity and visibility**, addressing long-standing concerns about inactive frontages in the Market Place area.

Main Performance Space

The large auditorium should be refurbished and reused as a **flexible performance and events venue**.

Potential uses include:

- concerts
- theatre
- conferences
- community events

- festivals.

This would complement existing cultural venues including:

- Derby Theatre
- QUAD
- Museum of Making at Derby Silk Mill.

Restoring the Assembly Rooms as a functioning venue would significantly strengthen Derby's **cultural ecosystem**.

Darwin Suite

The Darwin Suite provides a large secondary hall that could support a major civic use.

The Society proposes its reuse as the **headquarters and meeting venue for the South Derbyshire Assembly**.

This would create a **regional civic presence within Derby city centre**, strengthening the city's role as the administrative and cultural centre of the wider Derbyshire area.

Benefits include:

- regular civic activity within the building
 - increased weekday footfall
 - strengthening of inter-authority collaboration.
-

4. Urban Design and Public Realm

The Society recommends that refurbishment should include:

1. Opening the building visually to Market Place

Current entrances are relatively closed and defensive.

Refurbishment should introduce:

- glazed entrances
- visible internal activity
- improved pedestrian connections.

2. Public realm improvements

The Market Place surrounding the building should be redesigned to provide:

- improved seating
- trees and planting
- flexible event space.

This would reinforce the square as Derby's **primary civic gathering space**.

5. Sustainability and Embodied Carbon

Demolition of the Assembly Rooms would result in the loss of significant **embodied carbon**.

Adaptive reuse aligns strongly with **Policy CC5 – Climate Change Mitigation**.

Suggested addition to Policy CC1:

The Council will prioritise the reuse and refurbishment of the Assembly Rooms building, recognising the environmental benefits of retaining existing structures and the importance of maintaining civic cultural infrastructure within the city centre.

6. Suggested Local Plan Policy Wording

The Society recommends adding a **specific site allocation policy** for the Assembly Rooms site.

Proposed new policy: CCX – Assembly Rooms Cultural Quarter

Suggested wording:

The Assembly Rooms site will be redeveloped as a major civic and cultural destination within Derby City Centre.

Development proposals must:

- retain and refurbish the existing Assembly Rooms building where feasible
 - provide cultural and community uses including performance and event space
 - include a children's library and family-focused cultural facilities
 - provide active ground-floor uses including cafés and retail
 - improve connections with Market Place and the Cathedral Quarter
 - enhance the public realm surrounding the building.
-

7. Economic and Cultural Benefits

The proposed reuse strategy would deliver several benefits:

Cultural

- restoration of Derby's major civic performance venue
- support for local arts organisations
- improved cultural infrastructure.

Economic

- increased city centre footfall

- tourism and conference activity
- support for local businesses.

Social

- accessible family and community spaces
 - civic pride and identity.
-

8. Conclusion

The Assembly Rooms site is one of the most important civic sites in Derby.

The Society strongly believes that its future should be based on **refurbishment and cultural reuse rather than demolition or purely commercial redevelopment**.

By creating a **children's library, public café, retail units, refurbished performance venue, and civic meeting facilities**, the building could become a **revitalised civic hub at the heart of Derby**.

This approach would be fully consistent with the Local Plan's objectives for:

- city centre regeneration
 - cultural development
 - sustainable reuse of existing buildings.
-

Name: [REDACTED]

Email: [REDACTED]

Company: Derby Energy Network Limited

Created: 06/03/2026, 16:11:59

Draft Local Plan for Derby

Summary

Answered 0/2

Do you agree with our Summary?

× Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 3?

× Not answered

Derby City Vision

Answered 0/2

Do you agree with our Vision for Derby City?

× Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 5?

× Not answered

Our Specific Vision for the City Centre

Answered 0/2

Do you agree with our Vision for the City Centre?

× Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 7?

× Not answered

Our vision for the parts of the city outside the City Centre

Answered 0/2

Do you agree with our Vision for parts of the City outside of the City Centre?

× Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 9?

× Not answered

Plan Objectives

Answered 0/2

Do you agree with our Plan Objectives?

× Not answered

- ☐ Yes
- ☐ No

Please say why you gave the answer to Question 11?

× Not answered

Housing Market Area Context

Answered 0/2

Do you agree with the Housing Market Area Context?

× Not answered

- ☐ Yes
- ☐ No

Please say why you gave the answer to Question 13?

× Not answered

The City's Spatial Strategy

Answered 0/2

Do you agree with the City's Spatial Strategy?

× Not answered

- ☐ Yes
- ☐ No

Please say why you gave the answer to Question 15?

× Not answered

Our Response

Answered 2/18

Do you agree with our policy on Placemaking Principles?

× Not answered

- ☐ Yes
- ☐ No

Please say why you gave the answer to Question 17?

× Not answered

Do you agree with our policy on Character and Context?

× Not answered

- ☐ Yes
- ☐ No

Please say why you gave the answer to Question 19?

× Not answered

Do you agree with our policy on Amenity?

× Not answered

- ☐ Yes
- ☐ No

Please say why you gave the answer to Question 21?

× Not answered

Do you agree with our policy on Accessible Places?

× Not answered

- ☐ Yes
- ☐ No

Please say why you gave the answer to Question 23? × Not answered

Do you agree with our policy on Resilient Places and Community Safety? × Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 25? × Not answered

Do you agree with our policy on Health and Wellbeing? × Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 27? × Not answered

Do you agree with our policy on Comprehensive and Coordinated Development? ✓ Answered

- ☒ Yes
☐ No

Please say why you gave the answer to Question 29? ✓ Answered

Policy GD7 We support this policy but feel that there is an opportunity to amend it to support the development of important infrastructure for which there are no corresponding site allocations – for instance energy centres to support district heating networks. To do this, we propose to include commentary on the site selection exercise for unallocated developments. This would provide an opportunity to build a case around why certain sites have been chosen that would be backed up by planning policy. We would seek to include some policy wording around the Council's support for the site selection exercise. Some proposed wording would include: "Where bespoke forms of development are not supported by specific site allocations but are proposed on other allocated or designated sites, applicants will be expected to provide information demonstrating the site selection process undertaken. The Council will work proactively with applicants to support this".

Do you agree with our Enforcement policy? × Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 31? × Not answered

Do you agree with our policy on Infrastructure and Developer Contributions? × Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 33? × Not answered

Our Response Answered 2/22

Do you agree with our policy for New Employment Locations? × Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 89? × Not answered

Do you agree with our policy for Existing Employment Locations? × Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 91?	× Not answered
Do you agree with our policy for Local Labour Agreements?	× Not answered
☐ Yes ☐ No	
Please say why you gave the answer to Question 93?	× Not answered
Do you agree with our policy for Office Development?	× Not answered
☐ Yes ☐ No	
Please say why you gave the answer to Question 95?	× Not answered
Do you agree with our policy for Land South of Wilmore Road?	× Not answered
☐ Yes ☐ No	
Please say why you gave the answer to Question 97?	× Not answered
Do you agree with our Smartparc Employment Allocation?	✓ Answered
☒ Yes ☐ No	
Please say why you gave the answer to Question 99?	✓ Answered
Policy E6 retains SmartParc's allocation for employment development and notes that proposals for supporting energy generation or decentralised green energy production will be supported where serving the site or forming part of a wider network. This is a supportive position for the development of an energy centre on that site to support a wider heat network and does not necessarily require heat energy to be used on-site. As such, the Policy as drafted is supported.	
Do you agree with our policy for the Indurent Park Employment Allocation?	× Not answered
☐ Yes ☐ No	
Please say why you gave the answer to Question 101?	× Not answered
Do you agree with our Defined Centres policy??	× Not answered
☐ Yes ☐ No	
Please say why you gave the answer to Question 103?	× Not answered
Do you agree with our policy for Main Town Centre Uses Outside of Centres?	× Not answered
☐ Yes ☐ No	
Please say why you gave the answer to Question 105?	× Not answered

Do you agree with our policy for Tourism and Culture? × Not answered
☐ Yes
☐ No

Please say why you gave the answer to Question 107? × Not answered

Do you agree with our policy for Managing the Proliferation of Specific In-Centre Uses? × Not answered
☐ Yes
☐ No

Please say why you gave the answer to Question 109? × Not answered

Our Response Answered 2/48

Do you agree with our policy for Green and Blue Infrastructure? × Not answered
☐ Yes
☐ No

Please say why you gave the answer to Question 111? × Not answered

Do you agree with our policy for Dark Infrastructure? × Not answered
☐ Yes
☐ No

Please say why you gave the answer to Question 113? × Not answered

Do you agree with our policy for Open Space, Sport and Recreation Buildings? × Not answered
☐ Yes
☐ No

Please say why you gave the answer to Question 115? × Not answered

Do you agree with our policy for Allotments and Community Gardens? × Not answered
☐ Yes
☐ No

Please say why you gave the answer to Question 117? × Not answered

Do you agree with our Green Belt policy? × Not answered
☐ Yes
☐ No

Please say why you gave the answer to Question 119? × Not answered

Do you agree with our Green Wedge policy? ✓ Answered
☒ Yes
☐ No

Please say why you gave the answer to Question 121?

✓ Answered

Policy EN6 seeks to protect Green Wedges, limiting development on these sites to specific uses including renewable energy facilities and climate change mitigation measures, provided it can be demonstrated that an alternative suitable site cannot be identified. This is supportive and provides a positive policy position for the development of an energy centre on a Green Wedge, supported by a site selection exercise that takes into account a reasonable location around the site and required distances to customers, etc. The Policy goes on to say that development in the renewable energy category (among others) must be, "small scale, essential and ancillary to the operation of the main use". Whilst this makes sense for other development types that are also considered acceptable (e.g. ancillary educational / sports / residential buildings associated with an existing education / sport or recreation / residential site) clearly this is not applicable to renewable energy developments. As such, we request that the policy makes clear these criteria will not apply to renewable energy developments. It is therefore proposed to amend the wording from "The built development associated with categories 3 – 6 will be small scale, essential and ancillary to the operation of the main use" to "The built development associated with categories 3, 4 and 6 will be small scale, essential and ancillary to the operation of the main use".

Do you agree with our Green Gap policy?

× Not answered

- ☐ Yes
- ☐ No

Please say why you gave the answer to Question 123?

× Not answered

Do you agree with our Biodiversity and Geodiversity policy?

× Not answered

- ☐ Yes
- ☐ No

Please say why you gave the answer to Question 125?

× Not answered

Do you agree with our Trees and Hedgerows policy?

× Not answered

- ☐ Yes
- ☐ No

Please say why you gave the answer to Question 127?

× Not answered

Do you agree with our Biodiversity Net Gain policy?

× Not answered

- ☐ Yes
- ☐ No

Please say why you gave the answer to Question 129?

× Not answered

Do you agree with our policy for the Historic Environment?

× Not answered

- ☐ Yes
- ☐ No

Please say why you gave the answer to Question 131?

× Not answered

Do you agree with our Derwent Valley Mills World Heritage Site policy?

× Not answered

- ☐ Yes
- ☐ No

Please say why you gave the answer to Question 133?

× Not answered

Do you agree with our policy for Darley Abbey Mills?

× Not answered

- ☐ Yes
- ☐ No

<i>Please say why you gave the answer to Question 135?</i>	× Not answered
<i>Do you agree with our Conservation Areas policy?</i> ☐ Yes ☐ No	× Not answered
<i>Please say why you gave the answer to Question 137?</i>	× Not answered
<i>Do you agree with our policy for Listed Buildings and Locally Listed Buildings?</i> ☐ Yes ☐ No	× Not answered
<i>Please say why you gave the answer to Question 139?</i>	× Not answered
<i>Do you agree with our Heritage Statements of Significance policy?</i> ☐ Yes ☐ No	× Not answered
<i>Please say why you gave the answer to Question 141?</i>	× Not answered
<i>Do you agree with our policy for Uses Within Buildings of Architectural or Historic Importance?</i> ☐ Yes ☐ No	× Not answered
<i>Please say why you gave the answer to Question 143?</i>	× Not answered
<i>Do you agree with our Archaeology policy?</i> ☐ Yes ☐ No	× Not answered
<i>Please say why you gave the answer to Question 145?</i>	× Not answered
<i>Do you agree with our policy for Historic Parks and Gardens and Designed Landscapes?</i> ☐ Yes ☐ No	× Not answered
<i>Please say why you gave the answer to Question 147?</i>	× Not answered
<i>Do you agree with our Advertisements policy?</i> ☐ Yes ☐ No	× Not answered
<i>Please say why you gave the answer to Question 149?</i>	× Not answered
<i>Do you agree with our Shopfronts policy?</i> ☐ Yes ☐ No	× Not answered

<i>Please say why you gave the answer to Question 151?</i>	× Not answered
<i>Do you agree with our Air Quality policy?</i> ☐ Yes ☐ No	× Not answered
<i>Please say why you gave the answer to Question 153?</i>	× Not answered
<i>Do you agree with our Land Contamination policy?</i> ☐ Yes ☐ No	× Not answered
<i>Please say why you gave the answer to Question 155?</i>	× Not answered
<i>Do you agree with our Pollution policy?</i> ☐ Yes ☐ No	× Not answered
<i>Please say why you gave the answer to Question 157?</i>	× Not answered

Our Response

Answered 4/10

<i>Do you agree with our Flood Risk and Water Management policy?</i> ☐ Yes ☐ No	× Not answered
<i>Please say why you gave the answer to Question 159?</i>	× Not answered
<i>Do you agree with the Our City Our River policy?</i> ☐ Yes ☐ No	× Not answered
<i>Please say why you gave the answer to Question 161?</i>	× Not answered
<i>Do you agree with our Sustainable Design and Construction policy?</i> ☒ Yes ☐ No	✓ Answered

Policy CL3 confirms that proposals should embed the Energy Hierarchy within scheme design, and whilst it touches on what that would entail, it largely defers to the supporting text to provide full commentary. We think it would be beneficial to bring text on the Energy Hierarchy into the Policy wording. We also feel that the Policy wording and Energy Hierarchy could include reference to bespoke solutions for Derby, for example district heat networks, given that work that 1Energy has been doing with the Council (and outside of that) to develop the Derby Energy Network. In doing so, it would improve the Policy position for the development of the DEN as developers would be encouraged to seek out district heat networks to provide decentralised heat to their developments. Some example wording could be “applications should demonstrate how design has methodically followed the steps in the Energy Hierarchy which are: firstly through reducing energy use; using energy efficiently; and then meeting all energy needs through renewable or low-to-zero carbon sources generated onsite or by provision of a suitable offsite source (e.g. a district heating network). Conventional energy sources would be a last resort and associated offsetting would be required”. Please note we are also requesting the addition of a ‘heating hierarchy’ within the supporting text of Policy CL4 where any future Heat Network Zoning takes place, which follows the London Plan’s example – please refer to that section of our representations for further details.

The Policy also includes requirements for information for “all development”, including the consideration of providing solar PV and energy storage, and for applications to be supported by an energy assessment. Whilst we are supportive of the principle of this, “all development” is very broad and we feel the requirements of the Policy would not be applicable to all development, e.g. energy-related development. We are therefore seeking to include some wording to note that the policy would apply to most developments but that energy related developments would generally be given an exemption given the focus should be on generation rather than their own requirements. Example wording could be: “All proposals (with the exception of energy-generating uses) should...”.

To note – we are supportive of the Policy’s acknowledgement of, and support for, retrofitting of sustainable energy efficiency measures including for heritage assets.

Do you agree with our Renewable and Low Carbon Energy policy?

✓ Answered

☒ Yes

☐ No

We feel it would be helpful for the policy to reference energy centres given they are the key overground component of heat networks that will ultimately face most scrutiny in getting the principle of the development accepted on a site, given there are no allocations for energy centres and they would therefore have to compete with land allocations / designations. Proposed wording to be added: "Proposals for the delivery of renewable and low carbon energy generating and distribution networks (including decentralised energy schemes, community led schemes and district heat and power schemes) and their associated energy centres, energy storage, and the associated infrastructure..."

We are also proposing the addition of a new bespoke energy-centre Policy that will follow via email as there is not the opportunity to include it via the online form.

The government's plans in relation to heat network zoning to accelerate heat network delivery are likely to come into effect this year. Given the imminence of zoning, we are keen to ensure the Local Plan includes reference to this, working in adequate flexibility given that a plan has not yet been developed for Derby. It is not unusual for planning policies to reference emerging trends, government guidance or legislation, and it is therefore felt that some appropriate text could be included in the Policy to reflect upcoming changes to heat network zoning. Proposed text for inclusion:

"Subject to Heat Network Zoning being implemented in Derby, development within identified 'priority areas' or in proximity to existing or planned networks will be expected to connect to a heat network as the priority heating solution. Where immediate connection is not possible, proposals should demonstrate how they have been designed to be heat network ready. This may include, for example, allocating space in plant rooms for heat exchangers and thermal stores, safeguarding suitable routes for pipework from the site boundary and making provision for connections to the future network at the site boundary. Where Heat Network Zoning is implemented, development within 'priority areas' or in proximity to existing or planned networks will be expected to follow the a 'heating hierarchy' which involves: connecting to local existing or planned heat networks in the first instance; or where there is no such available network, allowing for connection at a later date; or as a last resort... Any departure from securing a connection to a heat network would need to be suitably justified within the Energy Statement to support the application. The Heating Hierarchy would sit alongside the Energy Hierarchy for developments falling outside of identified zones".

This is akin to the London Plan's approach to supporting heat networks, where heat network zoning is already in operation. We propose that the supporting text includes detail on what should be covered in an energy assessment for developments in these areas, including the requirement for robust evidence of active correspondence with the heat network operator/s where one is available in the vicinity or research into planned networks in the area; and a cost analysis where economic reasons are cited as to why a connection would not be feasible.

The supporting text for Policy CL4 confirms 1Energy's plans to create a low-to-zero carbon heat network utilising waste heat from SmartParc. Whilst this is still the intention, as discussed in a meeting with WSP, Fei Zheng (1Energy) and Dave Brown of the Council's Planning Policy team, Derby Energy Network Limited (a subsidiary of 1Energy) are drawing up plans to create a heat network across the City with multiple energy centres to serve different sections of the network. It would therefore be useful to make reference to this expansion in 1Energy's plans.

We are also keen to include some supportive wording within the policy supporting text that relates to the delivery of heat networks given the challenges they face: "Heat networks often involve long lengths of pipe network covering large swathes of a city or urban area and therefore encounter significant challenges in relation to crossing major infrastructure such roads, railways, rivers, as well as interfaces with green space and trees. The Council acknowledges the importance of heat networks in the transition to low carbon, as well as the complexity of the delivery of these networks, and will work proactively with applicants to support this. This will involve establishing a joined-up approach to collaboration encompassing multiple technical teams to work towards solutions for the development, including the aforementioned green and grey infrastructure encounters, acknowledging the trade-offs that need to happen between the protection of assets and the delivery of this essential infrastructure. Pre-application enquiry is highly encouraged to ensure this process begins early on and can be streamlined throughout the development management process".

Do you agree with the Embodied Carbon policy?

× Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 167?

× Not answered

Our Response

Answered 2/10

Do you agree with Social and Community Facilities policy?

× Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 169?

× Not answered

Do you agree with the Cemetery policy?

× Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 171?

× Not answered

Do you agree with our policy for Education Provision?

× Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 173?

× Not answered

Do you agree with our Higher and Further Education policy?

✓ Answered

- ☒ Yes
☐ No

Please say why you gave the answer to Question 173?

✓ Answered

Policy IC4 confirms that the Council will support development which allows the University to work towards delivering their sustainability ambitions, with particular reference to achieving net zero carbon. It is felt that this could go further to articulate that support through tangible means of achieving its aims such as the provision of energy centres and heat networks. We therefore propose to include some wording that supports energy centres and heat networks as part of this Policy, and that the use of University land would be supported for this where available and where its use would not cause any harm to surrounding environmental receptors. Example wording could be: "h) encourage the delivery of or connection to district heat networks and support the use of appropriate parcels of land within the University campus and surrounding area to deliver the infrastructure to facilitate this, subject to compliance with other relevant Local Plan Policies".

Do you agree with our Communication Infrastructure policy?

× Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 175?

× Not answered

Our Response

Answered 0/14

Do you agree with our Active and Sustainable Transport policy?

× Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 177?

× Not answered

Do you agree with our Transport Infrastructure policy?

× Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 179?

× Not answered

Do you agree with our Servicing, Accessibility and Parking policy?

× Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 181? × Not answered

Do you agree with our Protected Routes policy? × Not answered

- ☐ Yes
- ☐ No

Please say why you gave the answer to Question 183? × Not answered

Do you agree with our policy for Electric Vehicle Charging Facilities? × Not answered

- ☐ Yes
- ☐ No

Please say why you gave the answer to Question 185? × Not answered

Do you agree with our Transport Mobility Hubs policy? × Not answered

- ☐ Yes
- ☐ No

Please say why you gave the answer to Question 187? × Not answered

Do you agree with our Safeguarded Areas around Aerodromes policy? × Not answered

- ☐ Yes
- ☐ No

Please say why you gave the answer to Question 189? × Not answered

Our Response Answered 2/30

Do you agree with our City Centre Strategy? × Not answered

- ☐ Yes
- ☐ No

Please say why you gave the answer to Question 191? × Not answered

Do you agree with our policy for Defining the City Centre? × Not answered

- ☐ Yes
- ☐ No

Please say why you gave the answer to Question 193? × Not answered

Do you agree with our City Centre Living policy? × Not answered

- ☐ Yes
- ☐ No

Please say why you gave the answer to Question 195? × Not answered

<i>Do you agree with our Residential Led, Mixed Use Site Allocations policy?</i> ☐ Yes ☐ No	× Not answered
<i>Please say why you gave the answer to Question 197?</i>	× Not answered
<i>Do you agree with our policy for Non-Residential Regeneration Opportunities?</i> ☐ Yes ☐ No	× Not answered
<i>Please say why you gave the answer to Question 199?</i>	× Not answered
<i>Do you agree with our Tall Buildings?</i> ☐ Yes ☐ No	× Not answered
<i>Please say why you gave the answer to Question 201?</i>	× Not answered
<i>Do you agree with our Business, Creativity and Learning policy?</i> ☐ Yes ☐ No	× Not answered
<i>Please say why you gave the answer to Question 203?</i>	× Not answered
<i>Do you agree with our Shopping, Eating and Drinking policy?</i> ☐ Yes ☐ No	× Not answered
<i>Please say why you gave the answer to Question 205?</i>	× Not answered
<i>Do you agree with our Active and Inclusive Frontages policy?</i> ☐ Yes ☐ No	× Not answered
<i>Please say why you gave the answer to Question 207?</i>	× Not answered
<i>Do you agree with our Streets and Spaces policy?</i> ☐ Yes ☐ No	× Not answered
<i>Please say why you gave the answer to Question 209?</i>	× Not answered
<i>Do you agree with our Quiet Zone policy?</i> ☐ Yes ☐ No	× Not answered
<i>Please say why you gave the answer to Question 211?</i>	× Not answered

Do you agree with our Derby Riverside policy?

× Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 213?

× Not answered

Do you agree with our University of Derby, City Centre Hub policy?

✓ Answered

- ☒ Yes
☐ No

Please say why you gave the answer to Question 215?

✓ Answered

Policy CC13 is concerned with the creation of a new City Centre campus for the University and requires new development in the defined area to, "explore opportunities to integrate with decentralised energy networks and deliver on-site or near-site energy generation". This Policy supports the connection of the new campus to a heat network and explicitly notes that on/near-site energy generation would be supported. Nevertheless, we feel that the policy wording relating to connecting to a heat network could be made more tangible through a requirement to connect unless a reasonable alternative is available that would achieve the same or increased benefit. We are therefore seeking to amend the policy wording to: "integrate with an existing decentralised energy network where one is available and viable, unless a clearly evidenced favourable low carbon alternative energy solution can be demonstrated. Where no immediate network connection is possible, proposals must incorporate the necessary infrastructure to enable a future connection when a network becomes available. Development should also assess and, where feasible, incorporate opportunities for on site or near site low carbon energy generation as part of the overall strategy for reducing emissions". This removes the speculative nature of the policy regarding connecting to a heat network and makes it more explicit that such opportunities should be taken (rather than just being explored), whilst retaining a level of flexibility for potential on/near-site energy generation for any potential future energy centre to come forward on this site.

Do you agree with our Railway Station Quarter policy?

× Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 217?

× Not answered

Do you agree with our North Castleward policy?

× Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 219?

× Not answered

Appendix 3: Parking Standards

Answered 0/2

Do you agree with our Parking Standards?

× Not answered

- ☐ Yes
☐ No

Please say why you gave the answer to Question 221?

× Not answered

Appendix 6: Evidence Base

Answered 0/4

Do you wish to comment on the Evidence Base?

× Not answered

- ☐ Yes
☐ No

Please provide comments on the Evidence Base

× Not answered

We have published a Sustainability Appraisal (SA) which examines the potential impact of the Local Plan. Do you wish to comment on the SA?

× Not answered

- ☐ Yes
- ☐ No

Please provide comments on the Sustainability Appraisal.

× Not answered

From: [REDACTED]
To: [Planning Policy](#)
Cc: [REDACTED]
Subject: Derby Regulation 18 Local Plan Representations - On Behalf of Derby Energy Network Limited (1Energy)
Date: 06 March 2026 16:15:58
Attachments: [image001.png](#)
[image002.jpg](#)
[Derby Reps \(online form\).pdf](#)

CAUTION: This email originated from outside of the organisation. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

Good Afternoon

I am getting in touch to provide some background to the representations that have been submitted via the Council's online portal service on the Regulation 18 draft of the Local Plan (attached), as well as some draft wording for an additional policy we are proposing for inclusion in the Local Plan.

WSP submitted representations earlier today on behalf of Derby Energy Network Limited (DENL) through the online portal that made requests for additional wording to be added to various draft policies. I wanted to get in touch via email to give some more background on why we submitted the representations and what we hope to achieve by doing so. This email also provides the details of an additional Policy that we are seeking to include in the Local Plan, for which there was not the opportunity to include via the online portal.

For context: DENL is a subsidiary of 1Energy Group Ltd., which is the UK leader in the development and deployment of low-to-zero carbon (LZC) heat networks. DENL have secured £23m of Green Heat Network funding and over £100m in additional private investment which they have committed to deliver the Derby Energy Network (DEN) – a LZC district heat network across Derby. The DEN will be served by a single energy centre in the first phase and underground pipe network, with anticipated growth across the City involving more energy centres, pipe network, and major infrastructure crossings as the project develops.

The draft Local Plan is highly supportive of heat networks and low carbon energy generation. However, we consider it can be bolstered to further this support and create the most positive policy position as possible for when DENL come to submit planning applications to deliver the DEN.

As mentioned above, in addition to the proposed Policy representations that we have submitted online, we are proposing the inclusion of a bespoke energy centre policy as drafted below:

"The Council supports the principle of the development of low carbon energy centres to produce heat to heat networks. Proposals will be supported where applications are accompanied by information on:

- The heat network or area that the energy network intends to serve;*
- The proposed energy source (e.g. Air / Water Source Heat Pump Technology, solar / geothermal, offtake heat from other uses etc);*
- The site selection exercise that has taken place to arrive at the proposed site;*

and where they accord with other relevant policies in the Local Plan.

The Council will work proactively with applicants to address site-specific constraints and to ensure that proposals are designed and located to minimise adverse impacts on amenity, environmental quality and local character. Early engagement with the

Council is encouraged”.

We would use the Policy supporting text section to provide further context and explanation around energy centres including:

How they work: Energy Centres act as the ‘powerhouse’ for heat networks, providing the thermal energy that is distributed across an (typically large) area. Within an Energy Centre, heat is generated and often stored in large insulated vessels before being circulated through a network of highly insulated pipes. These pipes carry hot water to residential, commercial, and public buildings, where the heat is transferred for space heating and hot water use.

Energy Centres can operate using a myriad of low and zero-carbon technologies. Common technologies used include air or water source heat pumps, solar thermal arrays, geothermal energy and heat recovered from industrial or commercial processes. This flexibility allows heat networks to evolve over time as new technologies and energy sources become available.

A heat network may rely on a single Energy Centre or a series of interconnected centres. While smaller or standalone networks often operate from one Energy Centre, larger strategic networks – particularly those designed to expand across urban areas – frequently incorporate multiple centres. This multi-node approach supports network resilience, enables phased expansion, allows new heat sources to be integrated as they come forward, and helps distribute generation capacity more evenly across the network area. As heat networks grow to serve new neighbourhoods or strategic growth areas, additional Energy Centres are typically introduced to ensure operational efficiency and maintain reliable heat delivery to customers.

The site selection exercise: The Council recognises that the identification of suitable locations for Energy Centres is inherently dependent on a wide range of operational, technical and spatial considerations. These include but are not limited to: proximity to existing or potential heat network customers; the availability, size and configuration of land parcels; interactions with competing land allocations or designations; feasibility of connecting to existing or planned heat network infrastructure; and the broader technical requirements associated with the chosen energy technologies. Many of these factors are project-specific and cannot be reliably anticipated at the plan-making stage.

Given the complexity and interdependence of these considerations, it is not practicable to allocate specific sites for Energy Centres without detailed feasibility studies, design development and commercial assessments having first been undertaken. The suitability of any site is highly contingent on the scale, routing and phasing of the heat network it intends to serve, all of which typically materialise only as individual projects come forward. As such, the Council considers that the most appropriate mechanism for assessing the suitability of Energy Centre locations is through the development management process, informed by robust, project-specific evidence.

Accordingly, applicants will be expected to demonstrate the appropriateness of a proposed site through submission of a comprehensive Site Selection Assessment or equivalent evidence. This approach ensures that proposals are assessed on their individual merits, while providing sufficient flexibility for networks to evolve, expand and respond to technological advances or emerging heat opportunities over the lifetime of the Local Plan.

We would also be open to the Council's input on whether they feel there is any additional information it would be helpful to have from 1Energy regarding the functionality of energy centres that could be included in the Policy supporting text.

Kind regards



Senior Planner – Planning Consultancy



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Local Plan Consultation response

1. Introduction

The University of Derby welcomes the opportunity to respond to the Draft Derby Local Plan (2023–2043). As one of the city's major employers, a driver of innovation, an anchor civic institution and the home of approximately 20,000 students, the University plays an essential role in Derby's economic, cultural and social wellbeing. The Draft Plan strongly recognises this contribution, and we are pleased to offer constructive feedback to support its refinement.

2. General Support for the Spatial Vision and Objectives

The University strongly endorses the Draft Plan's vision of Derby as a thriving, high-tech, innovative, culturally rich and inclusive city. The Plan's explicit recognition of the importance of higher education to economic growth, skills development and cultural vitality aligns well with the University's mission.

We particularly support:

- The emphasis on advanced manufacturing, rail, aerospace and knowledge-based industries.
- Commitments to inclusive growth, health improvement, sustainability and green infrastructure.
- The prioritisation of the City Centre as the focus for regeneration, innovation and creative activity.

These themes are fully consistent with the aspirations set out in the University's Estate Strategy 2025-2030.

3. Support for the University City Centre Hub (Policy CC13)

We strongly support Policy CC13, which recognises the University's City Centre Hub as a critical anchor for regeneration, skills development, innovation, public realm enhancement and place-making.

The University welcomes the Plan's ambition to:

- Consolidate our presence across Agard Street, Markeaton Brook and Bridge Street.
- Establish a recognisable University District as a major civic, cultural and economic asset.

- Enhance walking, wheeling and cycling connectivity between our city centre and Kedleston Road campuses.
- Elevate the role of learning, creativity and business collaboration in the heart of the city.

We consider this policy essential to achieving Derby's wider regeneration goals and encourage its retention and strengthening at Regulation 19.

4. Economic Growth and Industrial Strategy (Policies E1–E7)

The University fully supports the economic direction set out in the Draft Plan and sees major opportunities for collaboration with the city, particularly in:

4.1 Strategic Employment Zones

We welcome the identification of strategic employment sites - especially Infinity Park, SmartParc and Indurent Park - as future drivers of advanced manufacturing, logistics, food technology and R&D.

These align with our academic strengths in:

- advanced manufacturing
- data science and AI
- supply chain management
- environmental sciences
- business innovation

We encourage the Plan to explicitly reference the role of higher education in supporting these innovation ecosystems. We would strongly support the Plan designating Infinity Park as a strategic site for the development of advanced manufacturing and associated R&D activities.

4.2 Skills and Workforce Development

The University strongly supports the use of Local Labour Agreements (Policy E3). These agreements present significant scope for:

- apprenticeships
- FE/HE pathways
- applied learning and work placements
- professional upskilling and reskilling

We request that higher education is referenced alongside schools and colleges as a key delivery partner in local labour and skills pipelines.

5. City Centre Regeneration (Policies CC7, CC12, CC13)

We fully endorse the Plan's intention to:

- create a vibrant daytime and evening economy
- strengthen cultural and creative industries

- improve public realm and active travel access
- increase footfall through mixed-use development

The University stands ready to play a prominent role in shaping the new cultural economy, including through collaborations with Derby Theatre and other cultural partners. These policies mirror our own ambitions to embed arts, creativity and public engagement at the heart of the University offer.

We would encourage emphasis the Local Plan to emphasise and be considerate to the needs, wants, and requirements of young people. Feedback from our students suggests that the night-time, and indeed twilight, economy is poor, with early closing time for bars and clubs cited as not being reflective of changed behaviour patterns in young people. This results in many choosing to socialise in Nottingham with the resultant loss of income and vibrancy in our city.

6. Transport, Connectivity and Active Travel (Policies T1–T6)

We support the Draft Plan's prioritisation of:

- walking, wheeling and cycling routes
- increased public transport usage
- mobility hubs
- improved pedestrian permeability in the City Centre

The proposed improvements along the Markeaton Brook corridor and surrounding the City Centre Hub will directly benefit staff, students and the wider community.

We encourage the Council to work closely with the University on:

- active travel route design,
- safety and lighting improvements,
- wayfinding and placemaking,
- ensuring accessibility for all.

7. Sustainability, Climate and Environment (Policies EN1–EN24, CL1–CL5)

The University strongly supports the Plan's emphasis on:

- biodiversity net gain
- green/blue infrastructure
- climate resilience
- flood adaptation, especially via the Our City Our River programme
- sustainable design and construction

These commitments align with our academic and operational strengths in environmental science, sustainability, biodiversity and energy efficiency.

We encourage the Council to consider explicit opportunities for education and research partnerships that could:

- monitor biodiversity and ecological health,
- contribute expertise to flood modelling,
- support low-carbon energy innovation.

8. Housing and Student Accommodation (Policies H1–H8)

We support the Draft Plan's balanced approach to housing growth and note the following:

- The Plan correctly identifies that current PBSA capacity is adequate.
- However, the University appreciates the flexible policy framework that allows for future student accommodation expansion if student numbers increase or new programme needs arise.

We also welcome the Plan's strong emphasis on accessible, high-quality, well-designed housing—important for both staff recruitment and student retention.

9. Education Provision (Policy IC4)

We support Policy IC4's protection of higher education functions from inappropriate development that could compromise campus expansion, accessibility or amenity.

We recommend strengthening the supporting text to:

- explicitly recognise the University's role in driving innovation and economic competitiveness;
- acknowledge future space and infrastructure needs relating to the University City Centre Hub;
- encourage collaboration between the Council and the University on future spatial planning for higher education.

10. Civic and Community Engagement (OBJ2, OBJ11, CC7, IC1)

The University's Civic University commitments align closely with the Draft Plan's priorities for:

- compact, connected, inclusive neighbourhoods
- reduced health inequalities
- safe and active public spaces
- increased cultural participation

We support policies that empower the University to play a larger role in improving public health, community cohesion and cultural life across Derby. These include Health Impact Assessments (HIA requirements), public realm design priorities and community facility protection.

11. Recommendations for Strengthening the Plan

The University proposes the following enhancements:

11.1 Explicit recognition of higher education as a strategic delivery mechanism

Higher education should be referenced across economic, cultural, skills and regeneration policies, not only those directly relating to education provision.

11.2 A dedicated cross-sector innovation and skills partnership

We recommend establishing a formal partnership between the Council, industry and the University to deliver shared economic and skills ambitions.

11.3 Stronger narrative around the University's role in culture and placemaking

Given Derby's ambitions for a vibrant cultural economy, the University's cultural assets and expertise should be more explicitly cited.

11.4 Strengthening connectivity commitments

The Plan should identify the City Centre–Kedleston Road corridor as a priority movement and public realm axis, retaining and developing the green wedge as an exemplar in supporting city living, nature connectedness and active travel.

11.5 Further clarity on the University District concept

We welcome opportunities to co-develop frameworks and branding for a recognisable University District supporting civic and economic vibrancy.

12. Conclusion

The University of Derby is strongly supportive of the Draft Local Plan and its ambitious, forward-thinking vision for the city. We welcome the clear recognition of the University's role in driving Derby's innovation, cultural identity, workforce development and civic life.

We look forward to working closely with Derby City Council, industry partners and the wider community to help deliver the aspirations of the Plan and to shape Derby's future as a prosperous, inclusive and high-tech city.



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Derby City Council –

By email

Telephone:

Ref: DC/2026/015691
Date: 9th March 2026

Dear

Consultation on the Draft Local Plan for Derby

Thank you for inviting Derbyshire County Council to comment on the draft Local Plan for Derby City. The following points set out Derbyshire County Council's provisional technical comments from both Members and officers.

Member Comments

The local County Councillors with electoral divisions bordering Derby City were consulted on the Draft Plan.

Councillor Rachael Hatchett has the following comments:

If this plan does not include the latest housing numbers required by the Labour government, then we can expect it to be updated with additional housing sites in the near future.

As it stands, it looks like Derby intends to meet most of its housing needs within the city boundary and is not expecting to put pressure on the villages in my division, to the north and west of Derby, for housing growth. I welcome this.

I am pleased that the City's green belt will continue to act as a buffer between the city and settlements in Amber Valley, especially the village of Quarndon which should be maintained as a rural settlement, outside the conurbation of Derby. I also welcome the continued commitment to the Derwent Valley Mills World Heritage Site, and the buffer zone which provides additional protection for Quarndon.

I am concerned for other villages in my area which are less well-protected by green belt, including Duffield, and especially Mackworth and Kirk Langley. I hope that the review of the green belt, currently under review by Amber Valley Borough Council, will provide stronger protection for these villages, help to maintain their rural character and prevent Derby's urban sprawl into the farmland west of the city.

I am pleased to see that Derby City is making a firm commitment to low-carbon, climate-resilient homes, with the aim of reducing greenhouse gas emissions, making sure that new developments are energy efficient and are resilient to climate change impacts and are requiring that neighbourhoods are designed for environmental

performance. I welcome the draft Plan's emphasis on protecting, conserving and enhancing natural assets, habitats and promoting increased biodiversity. It is good to see that the City recognises the vital role planning plays in addressing all aspects of today's climate and environmental catastrophe.

I welcome the Plan's commitment to a more sustainable transport system, and would encourage the City to plan for and provide public transport and active travel routes, before new housing developments are constructed so that residents can choose their new homes in the knowledge that they will be able to live in these places without having to rely on a car. It is sad to see new housing developments where sustainable travel options are provided as an after-thought, if at all, by which time residents have already based their lives around car ownership.

Similarly, I support the City's plan to ensure that new housing developments are provided with day-to-day services and community infrastructure within a short walk/cycle ride, and existing facilities are retained whenever possible. Not only will this enable people to fulfil their everyday needs without travelling more than a short distance, it will also help to create new communities with all the social benefits they bring. It astonishes me that housing developments of hundreds of houses have been constructed without thought to creating a community of residents.

No additional comments have been received at the time of writing from other local County Councillors, however I will forward any comments received at a later date for your consideration.

Officer Comments

The Draft Local Plan is a very well thought out document, presenting many complex policies in a clear and transparent manner. Following an internal consultation, Derbyshire County Council has some thoughts and suggestions which are listed below.

Housing

Through the lens of Adult Social Care and Health, we would like to commend Derby City Council for the strength and clarity of its proposed housing delivery policies and express our support for several key elements. In particular, we welcome the proposed minimum densities of 35 dwellings per hectare outside the city centre and 80 dwellings per hectare within the city centre. We also support the requirement for all new-build homes to be constructed to M4(2) standards, alongside the 15% provision of M4(3)(a+b) homes and the expectation that all dwellings meet national space standards. While we endorse the proposed affordable housing percentages, we would be keen to see a higher proportion delivered within the city centre—ideally 15% rather than 5%—as we believe older adults, particularly those within the PVI sector, would benefit from affordable homes located close to key amenities. However, we also acknowledge that a 15% requirement may not be viable in all cases. Furthermore, we support the inclusion of communal supporting uses within residential care homes and extra care schemes, and we welcome the focus on locating extra care developments in or near city centres to enhance residents' access to amenities and public transport. In addition, we would like to see aspirational retirement apartments delivered in proximity to extra care schemes, thereby fostering opportunities for social interaction and enabling potential shared use of facilities.

Policy H1: Housing Delivery

Derbyshire County Council fully supports the approach set out in Policy H1.

Derbyshire County Council has been working jointly with Derby City Council, Amber Valley 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 are also considering 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 planned growth across the HMA and has 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:

- 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 Draft Derby City Local Plan has been prepared and drafted to reflect the considerable and extensive joint working that has taken place between the four HMA authorities and the key strategic issues that have been identified and join approaches that have been agreed on key strategic cross boundary planning matters. This joint working is fully reflected in Chapter 4: The City's Spatial Strategy and Policy H1.

Housing Provision and Meeting Derby City's Unmet Need

Paragraph 69 of the NPPF requires strategic policy-making authorities to establish a housing requirement figure for their whole area, showing the extent to which identified housing needs (including any unmet needs from neighbouring areas) can be met over the plan period.

In this context, Derbyshire County Council has, as noted above, been working jointly and collaboratively with the District Councils in the Derby HMA for some time to consider cross-boundary housing matters, particularly the future housing requirements of the HMA as a whole and of the individual local authority areas to be set out in their local plan reviews. This collaboration has taken place as the three authorities prepare Local Plan Reviews to aligned timescales but slightly different plan periods, with Amber Valley's plan being the most advanced, having recently undergone examination and received a final Inspectors' report

confirming that it is sound and legally compliant; the implications of this are considered further below.

This joint work has established that the overall Derby HMA housing requirement using the standard method for 2022–2039 is around 36,500 homes.

Derby City Council has recently undertaken extensive work to assess the City's capacity to accommodate future housing needs, supported by the other HMA authorities including the County Council. This work, which has been completed and robustness-checked through peer review by AECOM, concludes that the City can only accommodate around 12,500 new homes over the Local Plan Review period, compared with a standard-method housing need of around 18,000 homes.

In light of this, the three HMA authorities, supported by the County Council, commissioned consultants Clearlead to undertake a Sustainability Appraisal of a range of options for accommodating Derby City's unmet need within Amber Valley Borough and South Derbyshire District.

The HMA authorities identified three alternative scale options to be test through the SA which included:

- Scale 1: Standard method in full (including 35%); 36,584 dwellings;
- Scale 2: Standard method (no 35% uplift); 31,008 dwellings; and
- Scale 3: Standard method (no 35% uplift) + 10%; 34,109 dwellings.

Within each scale option, the SA assesses different apportionment choices between the three local authority areas, including distribution to sites adjoining Derby (the Derby Urban Area, or DUA), towns, and key villages. The assessment was informed by the HMA Growth Options Study, and the Broad Areas of Search identified in that study were compared with sites submitted to the SHELAA for Amber Valley and South Derbyshire to indicate potential residential development capacity.

The overall conclusion of the SA is that meeting Derby's unmet need as close to the City as possible represents the most sustainable development option.

Accordingly, Derbyshire County Council considers the City Council's assessment of its future housing needs—and its Draft Plan proposal to provide a minimum of 12,500 dwellings over the plan period, with the City's unmet need accommodated through large sustainable urban extensions on the edge of Derby in Amber Valley and South Derbyshire—to be robust, well-justified, supported by up-to-date evidence, and appropriately aligned with the Government's standard method for assessing housing need.

As noted in paragraph 186 of the Draft Plan, the South Derbyshire Regulation 19 Pre-Submission Local Plan proposes two large strategic allocations to help meet part of Derby's unmet need: land at Infinity Garden Village for 2,000 homes and land south of Mickleover for 2,500 homes. These locations fully reflect the SA conclusion that the most sustainable solution is to locate development as close to the City boundary as possible.

In principle, therefore, the County Council has supported the allocation of these two sites in its response to the South Derbyshire Regulation 19 consultation and has committed to working with the District Council to ensure timely delivery of the key strategic infrastructure required for these urban extensions, including a new A50 junction and link road, a new secondary school at the IGV allocation, and a new primary school at the Mickleover allocation.

Statement of Common Ground

Based on the 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. In particular, the SoCG sets out agreement between the four HMA authorities that:

Derby City's minimum annual need of 917, calculated using the December 2024 Standard Method with May 2025 inputs, means that for the proposed plan period 2023-2043 a minimum of 18,340 homes will be needed. The current identified capacity of 12,500 homes, would therefore mean a shortfall of 5,840 homes.

The South Derbyshire Local Plan requirement of 14,500 homes over the period 2022-2041 is sufficient to accommodate its own annual need using either the 2023 or 2024 Standard Method (507 and 592 respectively).

To ensure that these identified minimum needs can be met, the HMA local authorities will continue to work collaboratively under current joint working arrangements.

Policy H10: Gypsies, Travellers and Travelling Showpeople

Derbyshire County Council welcomes and supports the Draft Local Plan's policy approach to Gypsy and Traveller site provision, which is appropriately informed by the recently completed Derby, Derbyshire, Peak District National Park and East Staffordshire Gypsy and Traveller Accommodation Assessment (GTAA). In 2019, the County Council commissioned an update to the 2015 GTAA on behalf of all partner authorities, including Derby City, the eight Derbyshire districts and boroughs, the Peak District National Park Authority, and East Staffordshire District Council. Although progress was severely delayed by Covid-19 restrictions on public engagement, the final GTAA was completed in July 2023 and published in September 2024, setting out updated pitch requirements for all areas between 2020 and 2040.

It is welcomed that the Regulation 18 Local Plan uses the GTAA findings to inform the City's pitch requirement for 2020–2040, as referenced in paragraph 250, which identifies a need for 14 permanent Gypsy and Traveller plots in Derby. The GTAA's methodology is based on national policy in *Planning Policy for Traveller Sites* and wider best practice, providing a sound and robust basis for planning Traveller pitch provision in the Draft Plan.

The GTAA also includes recommendations relevant to Derby City, particularly the need to consider negotiated stopping places across the Study Area, an issue that will be taken forward by the Derbyshire Traveller Issues Working Group. The Draft Plan's policy approach includes assessment criteria for such uses should planning applications come forward, and the criteria in Policy H10 appear to align with GTAA recommendations, which is supported.

To help meet the GTAA-identified need, Policy HA17 allocates land west of Pride Parkway in Wilmorton as a Gypsy and Traveller site providing a minimum of 17 permanent caravan pitches, with development expected to accord with Policy H10. While not commenting on the site's detailed design, the location appears well placed to meet many of the requirements in both Policy H10 and the GTAA.

Housing Allocations

It is noted that the Draft Plan proposes the allocation of nine housing site allocations (HA8 to HA16) to help meet the City's future housing 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:

Ryknel 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

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.

Policy HA7: Land east of Stoney Lane, Spondon: Green Belt Implications

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: The Nottingham – Derby Green Belt, that 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 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.

Paragraphs 145 and 146 of the NPPF (December 2024) provide guidance on the release of Green Belt and the exceptional circumstances which could be justified to release land from

the Green Belt as below:

145. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans

146. Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means.

Changes to the NPPF published in December 2024, also set out that some land within the green belt can now be considered to be 'grey belt' land if it meets certain criteria and where development may be considered acceptable. In this regard, it is noted in paragraph 306 of the Draft Plan that:

'an assessment of the Derby Green Belt has established that the land to the east of Stoney Lane meets the definition of Grey Belt land. The NPPF further provides 'Golden Rules' which should apply when releasing Green Belt land for housing which include providing open space on-site and delivering new affordable homes at a higher rate than the standard affordable housing policy'.

In principle, therefore, there appears to be a well justified and robust case set out in the Draft Local 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 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 paragraph 146 of the 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.

Green Belt in the context of Stoney Lane:

Policy EN5: Green Belt The principal, general extent and permanence of the Nottingham-Derby Green Belt within the city is supported and maintained. Measures to improve public access to the Green Belts and improve connectivity to the built-up areas adjacent to the Green Belt will be encouraged. There is a presumption against inappropriate development within the Green Belt and development proposals received within the Green Belt will be assessed against national policy.

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 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.

Policy HA1: Rykneld Road

The shared footway serving the Toyota site requires users to navigate the complex Strategic Road Network (SRN) grade-separated roundabout at the Findern Interchange. This arrangement necessitates cyclists mixing with general traffic, and there is no pedestrian infrastructure that would allow people on foot to safely traverse the junction. While the proposed internal network may connect to this shared footway, the existing external provision is significantly below standard and does not comply with LTN 1/20. It is therefore recommended that active travel provision at the Findern Interchange – and along the wider A38 corridor – is comprehensively reviewed and enhanced. In addition, proposals should incorporate a new active travel crossing of the A38 to establish a direct link between the Land South of Mickleover and The Hallow development sites, improving permeability and enabling continuous, safe walking and cycling routes into Derby without reliance on the Findern Interchange. Furthermore, the existing hourly Derby-Burton bus service (Trentbarton V3) should be reviewed to include stops within the development site, thereby improving public transport accessibility for future residents and supporting the uptake of sustainable travel modes.

Policy HA3: East of Moorway Lane

Consideration should be given to the potential increase in private car movements through Findern and Willington, as drivers may choose to route through these villages when accessing the A38 and A50 south of the site. In addition, Bakeacre Lane is identified as part of Derbyshire's Local Cycle Network, and therefore opportunities should be explored to provide active travel connections from the development to the south. Such links would facilitate access to the Trent and Mersey Canal towpath and integrate the site with the wider strategic walking and cycling network.

Policy HA5: The Hallow

Opportunities to provide a bus service to this site should be fully explored, and it may be appropriate to consider this in a joined-up, cross-boundary context with the Land South of Mickleover site in South Derbyshire to ensure a coordinated and efficient public transport offer for both developments. The site is currently severed by the A38 and A516 dual-carriageway roads, and therefore consideration should also be given to the provision of safe, high-quality active travel infrastructure to enable pedestrians and cyclists to move safely and conveniently between key destinations.

Environment

From a Landscape Architect point of view, there are no specific policies within the draft Local Plan that relate directly to the conservation or enhancement of the landscape. However, the plan does set out clear objectives to protect and enhance the natural environment through the development of a connected network of green infrastructure. This includes an objective to enhance and strengthen the role of Green Wedges and Green Gaps within the city as part of that wider green infrastructure network. A further objective focuses on protecting Derby's character and heritage. Although this is more closely aligned with the built environment, it requires development to be "of the highest quality, accessible, have regard to local context

and be appropriate in terms of scale, density and design”, which is welcomed.

Support for high-quality design that respects and shapes the urban environment was a key finding of the Local Plan Priorities Consultation, with 448 respondents emphasising that new housing development must respect the character and context of adjoining areas. It is therefore positive to see this clearly reflected in the Local Plan’s objectives and policies. Support for the natural environment was also exceptionally strong, and was identified as the area of greatest support for the emerging plans, with almost 92% of respondents endorsing the role and importance of Green Wedges.

The policies that collectively deliver the objectives outlined above include GD1 on Placemaking Principles and GD2 on Character and Context. The latter could be strengthened further by referencing the *Landscape Character of Derbyshire* publication. Policy EN1 on Green and Blue Infrastructure has been updated to reflect the recently published Local Nature Recovery Strategy for Derbyshire, while EN2 on Dark Infrastructure seeks to support the naturalisation of green spaces. EN6 and EN7 set out the roles of Green Wedges and Green Gaps, respectively, and EN8 addresses biodiversity and geodiversity. Policy EN9 on Trees and Woodlands includes reference to Derbyshire’s Heartwood Community Forest, which covers large parts of Derby, and EN10 establishes requirements for Biodiversity Net Gain, again with explicit regard to the Local Nature Recovery Strategy.

Overall, this is a comprehensive suite of policies that clearly articulates the Local Plan’s aims for protecting and enhancing the remnant landscape and natural environment within the city. The objectives are well supported by the draft policies, and the approach taken is broadly welcomed.

Derbyshire County Council’s Heritage Officer has highlighted slight discrepancies from definitions given in the NPPF and LBCA, and the Draft Local Plan. For example, the definitions included at paragraph 411 of the Draft Plan may not reflect the terminology used in national policy, given that not all components of the historic environment can be characterised as ‘built forms’ – for instance, registered parks and gardens do not primarily comprise built structures. Furthermore the Draft Local Plan introduces terms such as ‘areas of heritage significance’ (paragraph 125) and ‘designated areas of significance’ (paragraph 411). These terms are not recognised within national policy or guidance. Historic England’s guidance HEAG023 uses established terminology such as ‘large heritage asset’ when referring to conservation areas, World Heritage Sites and comparable designations. We therefore consider that the terminology within the Plan would benefit from review to ensure consistency with nationally recognised definitions.

EN11(j) and E10(f) are very similar in scope; however, the wording used in E10(f) is potentially ambiguous. In particular, the phrase ‘take advantage of’ lacks clarity in a planning context. We therefore suggest that E10(f) is either omitted, given the inclusion of EN11(j), or re-worded to ensure it cannot be misinterpreted or applied in unintended ways. Similarly, in Policy EN12(d), the word “contemporary” is vague and could be re-worded to avoid misrepresentation.

It is encouraging to see in policy EN11(m) that the City Council will ‘continue to prepare, monitor and review conservation area appraisals and management plans for existing and potential conservation areas’. However, we also consider that the City Council should commit to implementing these management plans, and we would advise that the wording in the Local Plan be amended to reflect this.

Policies EN11 and EN12 refer to requirements for heritage impact assessment. We also note that it may be helpful to state that the City Council should be satisfied that these requirements align with its Local List of Validation Requirements (2025).

We have received a suggestion that policies EN11 to EN21 be presented as a standalone Historic Environment chapter. This approach could help reinforce the prominence of the World Heritage Site and other significant heritage assets in and around Derby.

Green Wedges

Green Wedges – OBJ8: To enhance and strengthen the role of Derby’s Green Wedges and Green Gaps by reviewing, 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 County Council fully supports this objective and recognises the significant role of the City’s Green Wedges. Derbyshire County Council has historically supported the City Council’s long-standing approach to defining and protecting Green Wedges, dating back to the 1990 and 2001 Derby and Derbyshire Structure Plans. These plans acknowledged the essential contribution that Green Wedges make in shaping the identity of neighbourhoods, providing green corridors that extend from the urban area into the open countryside and Green Belt beyond, and offering valuable recreational spaces for residents.

The County Council is also aware that, in recent years, the City’s Green Wedges have been subject to considerable development pressure, particularly from new housing proposals arising from the City’s limited capacity for further housing land. In this context, the County Council strongly supports the Plan’s objective to enhance and reinforce the function of the remaining Green Wedges, ensuring their continued role in defining place, supporting biodiversity, and providing accessible green spaces for communities.

Green Belt

Policy EN5 – Green Belt: The principal, general extent and permanence of the Nottingham-Derby Green Belt within the city is supported and maintained. Measures to improve public access to the Green Belts and improve connectivity to the built-up areas adjacent to the Green Belt will be encouraged. There is a presumption against inappropriate development within the Green Belt and development proposals received within the Green Belt will be assessed against national policy.

As noted above, two Green Belt Reviews/Assessments have previously examined the Nottingham–Derby Green Belt. Both concluded that the section of Green Belt lying between Derby and Nottingham – and extending northwards towards the settlements in Amber Valley – is of the highest strategic importance. This area plays a crucial role in fulfilling the core Green Belt purposes set out in national policy, particularly in limiting the eastward expansion of Derby and preventing the coalescence of Derby and Nottingham with one another, with the intervening settlements in Erewash, and with the villages in Amber Valley to the north.

In light of these findings, and notwithstanding the earlier comments regarding the Stoney Lane, Spondon allocation, Derbyshire County Council fully supports Policy EN5. The policy’s intention to safeguard the general extent and permanence of the Nottingham–Derby Green Belt within the city is strongly welcomed.

However, while Policy EN5 acknowledges the importance of the Green Belt, its absence from the Plan’s overarching Objectives is a notable omission. Although the City contains only limited areas of Green Belt – primarily to the north-west, north-east, east, and south-east (as illustrated on page 16) – these areas have been consistently identified in previous reviews as

being of significant strategic value, particularly in meeting key purposes of the Green Belt as set out in the NPPF.

It is therefore suggested that the City Council consider adding a specific objective recognising the strategic importance of the City's Green Belt and committing to its protection and enhancement. Such an objective would better reflect the policy emphasis already placed on the Green Belt within Policy EN5 and acknowledge the integral role these areas play as part of the wider Nottingham–Derby Green Belt extending into Amber Valley and South Derbyshire.

Finally we note that policies EN5 and EN6 limit development within the Green Belt and the Green Wedge respectively, and these measures are likely to support the continued protection of the Outstanding Universal Value of the World Heritage Site. We consider this a positive outcome that the Local Plan may wish to highlight.

City Centre

It is advised that site allocations are accompanied by appropriate Heritage Impact Assessments (HIAs), consistent with established guidance such as Historic England's Advice Note 3 (HEAN3), Chesterfield Borough Council's published HIA methodology (2018), and UNESCO's 'Guidance and Toolkit for Impact Assessments in a World Heritage Context' (2022).

The draft Local Plan proposes high-density development at Derby Riverside (1,500 homes) and North Castleward (1,000 homes), both of which would include tall buildings. In each case, the Plan acknowledges the potential for impacts on the Outstanding Universal Value (OUV) of the World Heritage Site. To ensure these implications are fully understood, HIAs for both allocations should be undertaken prior to adoption of the Local Plan. The Derby City Digital Twin could support this work, for example by modelling the potential effects of tall buildings on key views from the World Heritage Site. Where modelling indicates that tall buildings may harm OUV, it may be necessary to consider adjustments to the scale of development proposed.

With regard to North Castleward, while this site is not located in close proximity to the World Heritage Site, it remains possible that tall buildings could affect important views, including from Darley Abbey Park, as outlined in the Skyline Study (2019) and Tall Buildings Study (2021). We therefore suggest that Policy CC15 could clarify that harm may arise where tall buildings affect these wider views.

The National Planning Practice Guidance (NPPG) states that proposals should 'avoid or minimise harm to the significance of a heritage asset'. The draft policies CC12, CC13, CC14 and CC15 refer to the need to 'minimise any heritage harm'; however, they do not explicitly reference the expectation to avoid harm where possible. It may be beneficial to update the policies to reflect this national guidance more clearly.

Transport and Movement

In developing the Transport chapter, it is important to reflect a number of overarching principles highlighted by the Council's Transport Strategy Team. Future development should integrate public transport within site layouts wherever possible, with larger schemes designed to accommodate bus services routed directly through their internal networks. On-site active travel infrastructure must also connect seamlessly with existing strategic walking and cycling links to ensure residents can access everyday destinations sustainably. Consideration should be given to applying the Department for Transport's Connectivity Tool, as referenced in the draft NPPF, to assess the sustainability of development sites and identify interventions required to support sustainable travel behaviour. In addition, the delivery of Phase 2 of the

South Derby Integrated Transport Link should be supported to facilitate planned growth to the south of Derby and into South Derbyshire. More broadly, the transport impacts and requirements of development will need to be fully assessed using the available transport modelling tools to ensure an evidence-based approach to mitigation and infrastructure planning.

Policies T1 and T2: Active and Sustainable Transport, and Transport Infrastructure

An important factor in the City Council's emerging policy approach is the joint work undertaken by the four HMA authorities—Derbyshire County Council, Derby City Council, Amber Valley Borough Council and South Derbyshire District Council—with support from National Highways. Together, the authorities commissioned Systra Consultants to carry out comprehensive transport modelling of all strategic housing and employment sites either proposed for allocation in the emerging Local Plans or already committed through the planning process.

It is therefore welcomed that paragraph 646 of the Draft Plan acknowledges that transport modelling commissioned by the HMA will assess the impact of new development on the local road network, with the findings informing future mitigation measures to be set out in Policy T2 and the Infrastructure Delivery Plan. However, since the Draft Plan and paragraph 646 were prepared, Systra has completed the modelling work, and the final report was issued to the authorities in January 2026. Using the East Midlands Gateway Model, the assessment tested a range of scenarios to understand the likely impacts of the strategic sites and the mitigation required:

- **2044 Do Minimum** – baseline with committed development only
- **2044 Do Something 1** – Local Plan development without mitigation
- **2044 Do Something 2** – Scenario 1 with “Known Mitigation” measures
- **2044 Do Something 3a/3b** – Scenario 2 with public transport, active travel and further highway mitigation
- **2044 A38 Sensitivity Test** – removal of the A38 Grade Separation to assess implications for the HMA strategy
-

The findings will play an important role in shaping the City Council's emerging transport policies T1 and T2 as it progresses towards the Regulation 19 Pre-Submission Plan. The results strongly reaffirm the need for the A38 Derby Junctions Grade Separation scheme and the South Derby Integrated Transport Link, including the new A50 junction—both of which are fully supported by Derbyshire County Council—to enable planned housing and employment growth across the HMA.

Specifically, the modelling concludes that, without the identified mitigation schemes (A38 improvements, EMIP mitigation and the A50 junction), the existing network would struggle to accommodate additional HMA traffic, causing some non-development traffic to divert from the A38 and A50 onto less suitable routes. Development-related traffic would also increase congestion at numerous junctions across the HMA, with those within Derby City experiencing the greatest impact. Conversely, the Known Mitigation package is expected to significantly influence route choice and reduce congestion, improving access to key development sites including Infinity Garden Village, EMIP and Boulton Moor, and strengthening longer-distance connectivity via the A38, A50 and M1.

The modelling also identifies a clear need for substantial public transport improvements to support growth within the City and the wider HMA. It recommends a series of enhancements to existing services in and around Derby. In particular, the modelling shows that public transport improvements would lead to higher passenger numbers—especially from the larger strategic sites—while active travel enhancements would shift a proportion of trips away from the car. However, the latter is expected to have only a modest impact on overall highway flows

and congestion.

Regarding Policy T1 specifically, our Transport Strategy team pointed out that permeability could be improved, not only within individual development sites, but also between adjacent clusters. For example, connections between the Land South of Mickleover site and the Rykneld Road development areas should be enhanced to support coherent, continuous walking, cycling, and public transport links.

Regarding Policy T2 specifically, our Transport Strategy team emphasised that focus should be given to both Phase 1 and Phase 2 of the South Derby Integrated Transport Link, ensuring improved connectivity from key housing allocations such as Rykneld Road, Littleover and The Hollow, Mickleover through to the South Derby Growth Zone via Phase 1 of the scheme. Active travel infrastructure should be planned and delivered alongside the transport link to provide safe, convenient and direct walking and cycling options as part of the overall corridor design, embedding sustainable travel from the outset. In addition, Key Cycle Network connections should be strengthened, including links to existing and proposed cross-boundary routes in South Derbyshire, to support seamless active travel between authority areas and enhance the wider strategic cycle network.

Policy T4: Protected Routes

Derbyshire County Council supports the protection of these routes. Consideration should be given to how new routes can integrate with existing cross-boundary active travel links, enabling longer-distance journeys and supporting seamless movement between Derby and neighbouring authorities.

Policy T6: Mobility Hubs

Opportunities should be explored to use mobility hubs to strengthen cross-boundary connections between Derby and its surrounding villages and rural areas, incorporating both public transport and active travel provision to help reduce private car trips into the city centre and support more sustainable travel choices. Consideration should also be given to integrating components that promote community activity at mobility hub locations – such as cafés, small-scale retail, Wi-Fi access and co-working spaces – to create vibrant, multifunctional places that encourage the use of sustainable transport modes. In addition, mobility hubs should be located close to areas with high population densities to ensure they are easily accessible and able to serve the greatest number of residents.

I hope these comments are helpful.

Kind regards,

[Redacted signature]



[Planning Policy](#)

Subject: Derby Draft Local Plan - Derwent Valley Mills World Heritage Site Partnership comments
Date: 16 February 2026 13:44:02
Attachments: [image001.gif](#)

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Thank you for consulting the Derwent Valley Mills World Heritage Site (DVMWHS) Partnership about the draft local plan for Derby. In accordance with the operational guidance in Section 20 of the DVMWHS Management Plan, I have consulted with Derbyshire County Council's Conservation, Heritage and Design Service (which advises the World Heritage Site Partnership in planning matters), and have received the following assessment:

Heritage impact assessments (HIAs) should be prepared for site allocations CC12 and CC15 prior to adoption of the local plan. If the HIAs identify harm to the OUV of the world heritage site, then it may be necessary to reduce the amount of development proposed. Otherwise, the local plan (as it relates to the world heritage site) appears sound, subject to the following observations.

Structure of the draft local plan

Heritage is not easy to find in the core list of contents.

For preference, policies EN11 to EN21 should form the basis of a separate chapter ('historic environment'). As proposed, chapter 8 ('environment') contains 24 policies, which is unwieldy.

Terminology

S72 of the LBCA 1990 refers to "the desirability of preserving or enhancing" heritage assets, including conservation areas. Chapter 16 of the NPPF refers to "the desirability of sustaining and enhancing the significance of heritage assets" (paragraphs 203 and 210).

The draft local plan refers to a desire "to protect and enhance"; it refers to "historic assets" (paragraphs 71, 74, 90, 417ff, 479ff, 484 and 487 and policies EN11 and EN12). These terms do not align with the act or the NPPF. The plan objective "to protect and enhance Derby's character and heritage [including] its historic assets" does not align with the act or the NPPF.

The NPPF defines the term "historic environment"; it defines the terms "heritage asset" and "designated heritage asset". The definitions offered in paragraph 411 of the draft local plan are unhelpful and should be omitted. Not all elements of the historic environment are "built forms" (for example, registered parks and gardens are not primarily "built forms").

The draft local list refers to “areas of heritage significance” (paragraph 125) or “designated areas of significance” (paragraph 411), which are not recognised terms. Historic England HEAG023 uses the term “large heritage asset” to refer to a conservation area, world heritage site etc.

The draft local plan twice refers erroneously to “conversation areas” (not conservation areas).

Green belt and green wedge

In Derby, the greater part of the world heritage site is open and it is subject to green belt or green wedge designations. The draft local plan does not cross-reference (e.g.) the world heritage site and the Upper Derwent Valley green wedge. Policies EN5 and EN6 limit development in the green belt and the green wedge respectively; these policies are likely to sustain the outstanding universal value of the world heritage site. This is a positive outcome that the local plan should highlight.

City centre policies

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).

Chesterfield Borough Council published an HIA methodology to support the preparation of its new local plan (2018). UNESCO has published a “guidance and toolkit for impact assessments in a world heritage context” (2022).

The City Council proposes high density development at Derby Riverside (1500 homes) and North Castleward (1000 homes). In each case development would include tall buildings. In each case the draft local plan acknowledges a potential impact upon the OUV of the world heritage site.

HIAs for these two site allocations should be prepared prior to adoption of the local plan. 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 world heritage site would be harmed by (e.g.) tall buildings, then for either site allocation it may be necessary to reduce the amount of development proposed.

North Castleward is not “nearby” to the world heritage site. Notwithstanding the above advice, policy CC15 should say that harm may arise from the erection of tall buildings in a manner that would affect views from Darley Abbey Park, as per your skyline study (2019) and tall buildings study (2021).

The NPPG says that proposals should “avoid or minimise harm to the significance of a heritage asset”. Draft policies CC12, CC13, CC14 and CC15 say that development should “minimise any heritage harm”, but they do not say that development should avoid harm. This is undesirable.

Environmental policies

Policy EN11(j) appears to repeat policy E10(f); both refer to the world heritage site in the context of tourism. Policy E10(f) is poorly worded; the phrase “take advantage of”

is equivocal. This wording should be omitted while the wording in policy EN11(j) should be retained.

Policy EN11(m): The City Council would prepare appraisals and management plans for potential conservation areas; it would monitor and review appraisals and management plans for existing ones. It does not say that it would implement management plans in either case; it should.

Policies EN11 and EN12 refer to requirements for heritage impact assessment. The City Council should be satisfied that these requirements would align with their local list of validation requirements (2025). In policy EN12(d) the word “contemporary” is equivocal and its use should be avoided.

Policy EN21 resists “solid external roller shutters ... where negatively impacting the outstanding universal value of the ... world heritage site”. In practice this element of the policy appears to relate to two shop fronts in the Darley Abbey conservation area. This is the only element of policy EN21 that refers to the world heritage site. The reference is disproportionate and should be omitted; a general reference to the impact upon designated heritage assets would suffice.

These comments will be taken to the next meeting of the DVMWHS Conservation and Planning Group on 4th March for verification by members.

Best wishes

[Redacted signature]

Heritage Coordinator
Derwent Valley Mills World Heritage Site

[Redacted contact information]

www.derwentvalleymills.org



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[REDACTED]
Plan & Policies Planning Team
Derby City Council
Council House
Corporation Street
DERBY
DE1 2FS

[REDACTED]
Your ref:

Date: 09 March 2026

Dear [REDACTED]

Derby City Council Draft Local Plan Regulation 18 Consultation

Thank you for consulting us on the above consultation.

Subsequent to the review of the details submitted we have the following comments to make.

Our work on development plans covers a range of topics including, but not limited to:

Net Gain - an approach to managing the environment that leaves it in a measurably better state

Flood risk management - ensuring development is steered towards areas of lowest flood risk, underpinned by a robust and up-to-date strategic flood risk assessment that follows our guidance. Securing contributions to flood risk management infrastructure to unlock development potential

Climate change - ensuring policies, site allocations and design of development takes climate change into account

Strategic water planning - quality, quantity and efficiency to support new development and safeguard the environment

Drainage and infrastructure - ensuring new development has adequate infrastructure to manage waste water and surface water disposal

Green and blue infrastructure - for flood risk management, water quality management and biodiversity

Contaminated land - bringing land back into beneficial use

Water Framework Directive objectives - no deterioration and water body improvements

Biodiversity - safeguarding protected species and habitats, highlighting opportunities for habitat creation and

Waste management - advising on waste management strategies and providing advice that spans the planning and permitting interface

Design - influencing local design policies, codes and guides to ensure development delivers better environmental outcomes.

FLOOD RISK

Policy CL1 - Flood Risk & Water Management

Supporting text paragraph 571 states that it will sometimes be required to locate development in areas at higher risk of flooding. The paragraph states that *"action must be taken to reduce the impacts and particularly to protect people and property from harm"*. The wording here appears to be a little weak – we do not consider that development in areas of higher flood risk (flood zone 3) is acceptable unless it is safe from flooding and does not increase flood risk elsewhere, for example by reducing flood storage by including a new built footprint in flood zone 3. Sites should also have dry access and egress during the 'design flood'.

Watercourse buffer

We recommend that a policy is included regarding buffers around watercourses. The following example is from the draft Greater Nottingham Strategic Plan (suggested main modifications November 2025) [suggested-main-modifications-to-the-gnsp.pdf](#)

Environment Agency
Trent Side North, West Bridgford, Nottingham, NG2 5FA.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

Policy: Where physically feasible, development in close proximity to a watercourse should be set back by 10 metres from the top of the bank to provide an appropriate buffer to allow for biodiversity enhancement, access and maintenance.

Justification text: Watercourses for the purposes of this policy are Main Rivers which are rivers designated by the Environment Agency and Ordinary Watercourses, which are other rivers. (The Main Rivers are River Trent, River Soar, River Erewash, River Leen, River Devon, River Smite, Fairham Brook, Tottle Brook, Day Brook, Nethergate Brook, Greythorne Dyke, Boundary Brook and Nethergate Stream). Development in close proximity to watercourses can cause problems if there is insufficient space to construct flood risk management measures or to be able to adequately access watercourses for proper maintenance. In order to achieve this, a separation distance of at least 10 metres will normally be required, free from built development, parking areas and private gardens. Exceptions may be made where there are site constraints or physical limitations such as existing development, existing infrastructure, topography or legal boundaries. Where a watercourse runs through a proposed development, a buffer should be provided on both banks. New development on previously developed sites should seek to reinstate a buffer zone wherever feasible. As well as allowing for maintenance, such areas can reduce sediment entering the water course, provide scope for re-meandering the river and may provide biodiversity opportunities through natural or seminatural habitat creation and for passive recreation. They can also provide for active travel links in appropriate cases. Where relevant, there should be a long term landscape and ecological management plan for this buffer.

Flood Defence buffer

We recommend that a policy is included regarding buffers around flood defences, in order to enable access for maintenance and any future climate change uplift these defences may require. In line with Our City Our River (OCOR) defence development.

Culverting

We consider the Culverting policy is not very strong and could go further. Suggest the draft new National Planning Policy Framework (NPPF) text is included:

"Development proposals should not enclose existing watercourses where this is not already the case, unless there are compelling reasons to do so; and should where possible remove existing culverts and re-naturalise existing river channels, unless to do so would increase flood risk or result in other environmental harm."

Policy CL2: Our City Our River

Add the word 'only' shown in bold below to paragraph 576:

576. To allow key riverside development sites to be developed, some of the existing flood defences will need to be set back from their existing positions to create a wider corridor to allow conveyance of water through the city during extreme weather events. Land within the flood defences will form the River Derwent's functional floodplain. Therefore, development within the defences should **only** be essential infrastructure or water compatible, in line with national policy. This will enable the creation of a high-quality river corridor that makes the most of the river corridor's recreational, tourist and waterside potential, utilising its rich cultural and natural heritage. It will also create significant opportunities for new businesses, investment and city living associated with the river.

Site allocations comments

Development should be located in flood zone 1 where possible in accordance with the sequential test. If development is required in flood zone 3 the Local Planning Authority should find out whether the site has areas of flood zone 3b functional floodplain where most types of development are prohibited. This information is available on request from the Environment Agency.

We have noted where sites are shown to be at flood risk on the Environment Agency reservoir breach mapping. Reservoir breach risk is a residual risk and mitigation measures should focus on safety and risk to life (for example with an on-site safe refuge) rather than ensuring that development is free of flooding from this source.

Policy HA1 - Rykneld Road, Littleover – small area of flood zone 3 along watercourse to north of site

Policy HA2 - Brook Farm, Chaddesden – flood zone 3 to northern and western boundary of site, and a greater extent of reservoir risk to west of site

Policy HA3 – East of Moorway Lane, Littleover - flood zone 3 to south east corner of site

Policy HA4: Royal Hill Road, Spondon – flood zone 1

Policy HA5: The Hollow, Mickleover – the southern parcel of land has an area in flood zones 2 and 3.

Policy HA6: Former Manor/Kingsway Hospital – flood zone 1

Policy HA7: Stoney Lane, Spondon – flood zone 1

Policy HA8: Former Police Station, Cotton Lane – the site has areas of flood zone 2 and 3 around the site boundaries including a potential access location in flood zone 3

Policy HA9: Bramblebrook House/Humbleton View, Littleover – flood zone 1

Policy HA10: Elton Road Works, Osmaston – flood zone 1

Policy HA11: Former Shaftesbury Leisure Centre – a small area of the southern boundary of the site is in flood zone 2

Policy HA12: North of Sinfin Moor Lane – flood zone 1

Policy HA13: Bembridge Drive, Alvaston – the top half of the site is in flood zone 2 and the whole site is within the reservoir breach extents.

Policy HA14: Former Beaufort Business Centre, Chaddesden – this site is entirely within flood zone 2. We checked the flood risk here in more detail and although the site is within flood zone 2, it is fully within the 1 in 100 year plus 29% climate change flood extent, which is the ‘design flood’ used for ‘vulnerable’ development such as residential and also for assessing third party impacts in terms of flood storage. Any buildings or land raising on site would occupy flood storage and would therefore be at risk of increasing flood risk to third party land and property. It is likely to be very difficult to resolve this issue (loss of flood storage) with the whole site being located within the design flood extent and the site may not therefore be developable without an Environment Agency objection on this point. The text in this section of the Local Plan states that the flood risk to this parcel of land will reduce when the OCOR phase 2 scheme is implemented. The flood risk would therefore need to be re-assessed at that time.

Policy HA15: Kitchener Avenue/Browning Street – flood zone 1

Policy HA16: Former Ivy House School – areas of flood zone 2

Policy HA17: Gypsy and Traveller Site Allocation – this site is within flood zone 1 but is partially within reservoir flooding extents.

Policy E2 – Existing Employment locations – plans are not provided for these locations but attention should be given to the Sequential Test, Exception Test and development avoided in flood zone 3. If development is required in *undefended* flood zone 3 it will need to be demonstrated both that users of the site can remain safe and also that any increase in built footprint does not increase flood risk elsewhere and any loss of flood storage can be compensated for by lowering land in flood zone 1 or 2. If the whole site is in flood zone 3 this will not be possible and the site may not therefore be suitable for further development without an objection from the Environment Agency. Further advice is available from the Environment Agency on specific sites on a pre-application basis.

Policy E5: Land South of Wilmore Road (Infinity Park) – The majority of this site is in flood zone 3, with flood zone 2 also. This may create significant constraints on new development if development is proposed in *undefended* flood zone 3. The site is also within reservoir flooding extents. Any buildings or land raising (which is not already part of an approved permission with accompanying flood mitigation scheme) within the design flood extent would occupy flood storage and would therefore be at risk of increasing flood risk to third party land and property. It is likely to be difficult to resolve this issue (loss of flood storage) due to the large extents of flood zone 3 at this site and the site may not therefore be developable without an Environment Agency objection on this point. A large amount of development has already occurred in this area, with further areas permitted for further development.

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Policy CC12: Derby Riverside – this area has large areas of flood zone 2 and 3. We would expect any development in flood zone 3 to have safe refuge above the 'design flood' heights on site, including from a breach of defences. Residential finished floor levels should be raised with freeboard above the design flood in a breach of defences scenario. Any new built footprint in *undefended* flood zone 3 will require compensatory floodplain storage; this would not be possible if the whole site were to be in undefended flood zone 3 and this would result in an Environment Agency objection to new built footprint. The Environment Agency are available for advice on specific sites with our pre-application charged service.

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GROUNDWATER & CONTAMINATED LAND

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Policy EN24 on Pollution provides a good broad framework for pollution prevention Policy.

We recommend that an overarching objective be included within the Local Plan to Protect and enhance the wider environment. The policy should include a requirement that development must not result in the deterioration of the status of any water body (both surface and groundwater) as required by the Water Framework Directive (WFD) and the Local Plan support the WFD objectives.

The Environment Agency has been tasked to implement the Water Framework Directive. Under the Water Framework Directive, the environmental objectives for groundwater and surface water bodies are:

- *To prevent deterioration in the status of water bodies, improve their ecological and chemical status and prevent further pollution.*
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Although we note that new developments may need to be built outside of the existing urban area on greenfield sites, the development of brownfield sites is encouraged as it provides an opportunity to remove areas of contamination that would otherwise continue to present a risk to our environment, controlled waters and human health. It is important that adequate site investigation and remediation is carried out and groundwater issues are considered.

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Policy CL1 – Flood Risk & Water Management

Refers to ensuring improvements as a part of Water Framework Directive (WFD) but only mentions improvements to water quality elements under Severn Trent's Water Resource Management Plan. It would be good to have a broader scope in terms of WFD improvements to include hydromorphology, and biological quality elements (including fisheries).

Policy EN1 – Green & Blue Infrastructure

"Where impacts are unavoidable, development will only be supported if suitable mitigation measures are provided." Can enhancement be added to this sentence to further strengthen and link in with Biodiversity Net Gain (BNG) requirements to leave the environment in a better state than when first encountered.

f) Include in this specifics such as; de-culverting rivers and streams, improving geomorphological processes, improving floodplain connectivity and buffering & improving riparian habitat.

Policy EN6 – Green Wedges

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e) Would be good to strengthen this element by making reference to Water Framework Directive (WFD) and specifically the River Basin Management plans targets to improve the ecology, geomorphology and water quality of rivers.

LAND & WATER QUALITY

Policy EN24: Pollution - should include a policy about foul sewer network capacity.

It should state that proposed developments will need to demonstrate that they will not contribute to water pollution by discharging to foul sewer networks that are near to, or at, capacity.

REGULATED INDUSTRY

Policy EN22: Air Quality

Policy EN24: Pollution

The above policies EN22 and EN24 will be the sole responsibility of the Local Authority during any development activities or changes in transport policy in the area.

Regulated Industry Team at the Environment Agency are solely responsible for installations, including waste operations which hold an Environmental Permit or waste exemption; or are in the process of obtaining one.

In the event of a new development being proposed near to an existing permitted installation then we can offer advice via consultations through planning.

No specific developments have been given in this instance.

We trust that the above information is useful in your preparation on drafting Derby City Council's Local Plan and we look forward to working with you.

Yours sincerely


Planning Specialist



[REDACTED]
Plan & Policies Planning Team
Derby City Council
Council House
Corporation Street
DERBY
DE1 2FS

[REDACTED]
Your ref:

Date: 09 March 2026

Dear [REDACTED]

Derby City Council Draft Local Plan Regulation 18 Consultation

Thank you for consulting us on the above consultation.

Subsequent to the review of the details submitted we have the following comments to make.

Our work on development plans covers a range of topics including, but not limited to:

Net Gain - an approach to managing the environment that leaves it in a measurably better state

Flood risk management - ensuring development is steered towards areas of lowest flood risk, underpinned by a robust and up-to-date strategic flood risk assessment that follows our guidance. Securing contributions to flood risk management infrastructure to unlock development potential

Climate change - ensuring policies, site allocations and design of development takes climate change into account

Strategic water planning - quality, quantity and efficiency to support new development and safeguard the environment

Drainage and infrastructure - ensuring new development has adequate infrastructure to manage waste water and surface water disposal

Green and blue infrastructure - for flood risk management, water quality management and biodiversity

Contaminated land - bringing land back into beneficial use

Water Framework Directive objectives - no deterioration and water body improvements

Biodiversity - safeguarding protected species and habitats, highlighting opportunities for habitat creation and

Waste management - advising on waste management strategies and providing advice that spans the planning and permitting interface

Design - influencing local design policies, codes and guides to ensure development delivers better environmental outcomes.

FLOOD RISK

Policy CL1 - Flood Risk & Water Management

Supporting text paragraph 571 states that it will sometimes be required to locate development in areas at higher risk of flooding. The paragraph states that *"action must be taken to reduce the impacts and particularly to protect people and property from harm"*. The wording here appears to be a little weak – we do not consider that development in areas of higher flood risk (flood zone 3) is acceptable unless it is safe from flooding and does not increase flood risk elsewhere, for example by reducing flood storage by including a new built footprint in flood zone 3. Sites should also have dry access and egress during the 'design flood'.

Watercourse buffer

We recommend that a policy is included regarding buffers around watercourses. The following example is from the draft Greater Nottingham Strategic Plan (suggested main modifications November 2025) [suggested-main-modifications-to-the-gnsp.pdf](#)

Environment Agency
Trent Side North, West Bridgford, Nottingham, NG2 5FA.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

Policy: Where physically feasible, development in close proximity to a watercourse should be set back by 10 metres from the top of the bank to provide an appropriate buffer to allow for biodiversity enhancement, access and maintenance.

Justification text: Watercourses for the purposes of this policy are Main Rivers which are rivers designated by the Environment Agency and Ordinary Watercourses, which are other rivers. (The Main Rivers are River Trent, River Soar, River Erewash, River Leen, River Devon, River Smite, Fairham Brook, Tottle Brook, Day Brook, Nethergate Brook, Greythorne Dyke, Boundary Brook and Nethergate Stream). Development in close proximity to watercourses can cause problems if there is insufficient space to construct flood risk management measures or to be able to adequately access watercourses for proper maintenance. In order to achieve this, a separation distance of at least 10 metres will normally be required, free from built development, parking areas and private gardens. Exceptions may be made where there are site constraints or physical limitations such as existing development, existing infrastructure, topography or legal boundaries. Where a watercourse runs through a proposed development, a buffer should be provided on both banks. New development on previously developed sites should seek to reinstate a buffer zone wherever feasible. As well as allowing for maintenance, such areas can reduce sediment entering the water course, provide scope for re-meandering the river and may provide biodiversity opportunities through natural or seminatural habitat creation and for passive recreation. They can also provide for active travel links in appropriate cases. Where relevant, there should be a long term landscape and ecological management plan for this buffer.

Flood Defence buffer

We recommend that a policy is included regarding buffers around flood defences, in order to enable access for maintenance and any future climate change uplift these defences may require. In line with Our City Our River (OCOR) defence development.

Culverting

We consider the Culverting policy is not very strong and could go further. Suggest the draft new National Planning Policy Framework (NPPF) text is included:

"Development proposals should not enclose existing watercourses where this is not already the case, unless there are compelling reasons to do so; and should where possible remove existing culverts and re-naturalise existing river channels, unless to do so would increase flood risk or result in other environmental harm."

Policy CL2: Our City Our River

Add the word 'only' shown in bold below to paragraph 576:

576. To allow key riverside development sites to be developed, some of the existing flood defences will need to be set back from their existing positions to create a wider corridor to allow conveyance of water through the city during extreme weather events. Land within the flood defences will form the River Derwent's functional floodplain. Therefore, development within the defences should **only** be essential infrastructure or water compatible, in line with national policy. This will enable the creation of a high-quality river corridor that makes the most of the river corridor's recreational, tourist and waterside potential, utilising its rich cultural and natural heritage. It will also create significant opportunities for new businesses, investment and city living associated with the river.

Site allocations comments

Development should be located in flood zone 1 where possible in accordance with the sequential test. If development is required in flood zone 3 the Local Planning Authority should find out whether the site has areas of flood zone 3b functional floodplain where most types of development are prohibited. This information is available on request from the Environment Agency.

We have noted where sites are shown to be at flood risk on the Environment Agency reservoir breach mapping. Reservoir breach risk is a residual risk and mitigation measures should focus on safety and risk to life (for example with an on-site safe refuge) rather than ensuring that development is free of flooding from this source.

Policy HA1 - Rykneld Road, Littleover – small area of flood zone 3 along watercourse to north of site

Policy HA2 - Brook Farm, Chaddesden – flood zone 3 to northern and western boundary of site, and a greater extent of reservoir risk to west of site

Policy HA3 – East of Moorway Lane, Littleover - flood zone 3 to south east corner of site

Policy HA4: Royal Hill Road, Spondon – flood zone 1

Policy HA5: The Hollow, Mickleover – the southern parcel of land has an area in flood zones 2 and 3.

Policy HA6: Former Manor/Kingsway Hospital – flood zone 1

Policy HA7: Stoney Lane, Spondon – flood zone 1

Policy HA8: Former Police Station, Cotton Lane – the site has areas of flood zone 2 and 3 around the site boundaries including a potential access location in flood zone 3

Policy HA9: Bramblebrook House/Humbleton View, Littleover – flood zone 1

Policy HA10: Elton Road Works, Osmaston – flood zone 1

Policy HA11: Former Shaftesbury Leisure Centre – a small area of the southern boundary of the site is in flood zone 2

Policy HA12: North of Sinfin Moor Lane – flood zone 1

Policy HA13: Bembridge Drive, Alvaston – the top half of the site is in flood zone 2 and the whole site is within the reservoir breach extents.

Policy HA14: Former Beaufort Business Centre, Chaddesden – this site is entirely within flood zone 2. We checked the flood risk here in more detail and although the site is within flood zone 2, it is fully within the 1 in 100 year plus 29% climate change flood extent, which is the ‘design flood’ used for ‘vulnerable’ development such as residential and also for assessing third party impacts in terms of flood storage. Any buildings or land raising on site would occupy flood storage and would therefore be at risk of increasing flood risk to third party land and property. It is likely to be very difficult to resolve this issue (loss of flood storage) with the whole site being located within the design flood extent and the site may not therefore be developable without an Environment Agency objection on this point. The text in this section of the Local Plan states that the flood risk to this parcel of land will reduce when the OCOR phase 2 scheme is implemented. The flood risk would therefore need to be re-assessed at that time.

Policy HA15: Kitchener Avenue/Browning Street – flood zone 1

Policy HA16: Former Ivy House School – areas of flood zone 2

Policy HA17: Gypsy and Traveller Site Allocation – this site is within flood zone 1 but is partially within reservoir flooding extents.

Policy E2 – Existing Employment locations – plans are not provided for these locations but attention should be given to the Sequential Test, Exception Test and development avoided in flood zone 3. If development is required in *undefended* flood zone 3 it will need to be demonstrated both that users of the site can remain safe and also that any increase in built footprint does not increase flood risk elsewhere and any loss of flood storage can be compensated for by lowering land in flood zone 1 or 2. If the whole site is in flood zone 3 this will not be possible and the site may not therefore be suitable for further development without an objection from the Environment Agency. Further advice is available from the Environment Agency on specific sites on a pre-application basis.

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LAND & WATER QUALITY

Policy EN24: Pollution - should include a policy about foul sewer network capacity.

It should state that proposed developments will need to demonstrate that they will not contribute to water pollution by discharging to foul sewer networks that are near to, or at, capacity.

REGULATED INDUSTRY

Policy EN22: Air Quality

Policy EN24: Pollution

The above policies EN22 and EN24 will be the sole responsibility of the Local Authority during any development activities or changes in transport policy in the area.

Regulated Industry Team at the Environment Agency are solely responsible for installations, including waste operations which hold an Environmental Permit or waste exemption; or are in the process of obtaining one.

In the event of a new development being proposed near to an existing permitted installation then we can offer advice via consultations through planning.

No specific developments have been given in this instance.

We trust that the above information is useful in your preparation on drafting Derby City Council's Local Plan and we look forward to working with you.

Yours sincerely


Planning Specialist



From: [Squire, Sandra](#)
To: [Planning Policy](#)
Subject: Derby City Local Plan Consultation
Date: 06 March 2026 14:52:42
Attachments: [image001.jpg](#)

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Thank you for consulting the Forestry Commission on your draft local plan.

The Forestry Commission encourages local authorities to consider the role of trees in delivering planning objectives as part of a wider integrated landscape approach. For instance through:

- The inclusion of green infrastructure (including trees and woodland) as a requirement in and around all new development. As stated in the Environmental Improvement Plan 2025 it is a strategic government objective to increase the net area of tree canopy and woodland cover to 16.5% of total land area in England by 2050. Therefore, the Forestry Commission is seeking to ensure that tree planting is a consideration in **every** development not just as compensation for loss.
- Promoting the use of home grown timber used in construction as a sustainable building material, therefore reducing the embodied carbon emissions of new builds. In line with the Government's [25 Environment Plan](#) (Page 47), the ["Timber in construction" roadmap](#) and the [Net Zero Strategy](#).

Policy EN9 – Trees and Woodland: You may wish to consider setting a minimum canopy cover target for all new developments, including not just tree lined streets but utilising a variety of planting styles from open grown standards within parklands to small spinneys, orchards and shelterbelts using climate resilient tree species.

You may wish to also consider that where there is reference to retention of trees 'where possible' this could be strengthened to expectation that existing trees are retained unless in "exceptional circumstances".

You may also wish to consider a Tree and Woodland Strategy, which can also be adopted as a supplementary planning document. The Forestry Commission can help and advise with this.

If you require any further information, please do not hesitate to contact me.

Best wishes

Sandra

Sandra Squire

**Local Partnership Advisor
East & East Midlands**

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Derby City Council
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SENT BY EMAIL
planningpolicy@derby.gov.uk
9th March 2026

Dear Planning Policy Team,

Derby (Reg 18) Consultation Jan – March 2026

1. Thank you for consulting with the Home Builders Federation (HBF) on the Derby Local Plan (Reg 18) Consultation.
2. HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. HBF welcomes the Council's efforts to ensure that they have an up-to-date Local Plan. Plan-making is a fundamental part of a Local Authority's role and is essential to support the delivery new homes and jobs. Government policy has clearly set out the for a significant increase in house building in order to deliver the 1.5 million new homes in this Parliament and has also clearly set out its commitment to a plan-led system.
4. It is noted that Draft Local Plan was written before the recent publication of the proposed National Planning Policy Framework (NPPF) reforms, which were published on the 16 December 2025. We recognise that the Council will have to consider how to adapt the plan in light of the proposed changes will be made in the coming months. We have provided some response and suggestions about this issue.
5. The fact that the new standard method results in higher housing requirements in many areas is an important part of that increased delivery and planning for these new homes. It is important that all efforts are made to maximise housing delivery within the Derby City area and that a full range of housing sites are allocated that will deliver the full range of housing needed to meet Derby's housing needs in full.

Impacts of removal of the legal requirement of Duty to Cooperate

6. As you will be aware the Government is not saving the Duty to Cooperate (DTC) requirement as a legal test for new Local Plans. However, there is clearly still an expectation that Councils will work together on effective plan-making and there remains a clear expectation that the housing needs of an area will still be met in full. Although compliance with DTC is no longer a legal compliance it is still part of the tests of soundness for the Plan.

Impacts of the Dec 2025 NPPF consultation

Home Builders Federation

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Broadwall, London SE1 9PL. Company Reg No. 0276 4757 | Vat No. 882
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7. As you are aware the Government published its long-awaited proposed revisions to the NPPF for consultation on 16th Dec 2025. Whilst this is clearly still consultation it clearly sets out the expectations and direction of travel of the Government. The new NPPF clearly shows the importance that is being placed on addressing the housing crisis and the clear move towards a more rules-based planning system that provides more certainty for everyone. It is very clear that the Government is expecting Local Plan to do more to help to address the housing crisis and there is a clear expectation that all Councils should be planning to meet their housing needs in full.
8. Although in the medium term it is anticipated that sub-regional housing numbers and issues of redistribution of any unmet housing needs where they occur will be addressed through SDSs. However, in the interim it is still essential that work with neighbouring authorities to address unmet needs continues. The recognition of the role of neighbouring authorities in helping to meet Derby's need is welcomed.
9. HBF recognise the tightly-bounded nature of the City and longstanding challenges and constraints this has posed to meeting its housing needs in full. The Council will need to provide clear and robust evidence of why this is not possible and demonstrate that everything possible has been done to maximise housing delivery within the area. The Local Plan and its evidence base will also need to clearly show the level of unmet need that remains and how this is being addressed through partnership working with neighbouring authorities.
10. HBF also notes the Government's intention to move towards a new more rules-based approach with consistency across standard common matters being provided at the national level. The Dec 2025 NPPF consultation sets out that Local Plans should not include policies on matters already addressed through Building Regulations and other regulatory regimes except when it comes to parking standards and the percentage of homes locally required to meet the accessibility standards M4(3)a and M4(3)b. HBF would therefore strongly encourage the Council to fully consider the scope and content of this Plan. The proposals clearly set out that the Government view is that Local Policies which conflict with the new NPPF will not be able to be taken into account in decision-making. Committing to the development of a suite of Development Management policies that will be replaced and made redundant by the new NPPF may not be the best way to proceed, especially in a time of scarce resources.

Need for Clarity on Strategic Policies

11. We note that Table Two sets out a list of which policies are strategic and which are not. However, these should be easily identifiable to plan-users using the Plan, and for those submitting, considering and responding to planning applications. There should be no need to refer to an appendix to the Local Plan to establish this. There are several ways this could be expressed for example through design, such as distinguishing and differentiating the text, font and or numbering and/or it could also be address through a pre-fix, for example an S could be added before each of the strategic policies so they are easily identifiable.

Chapter 3 Vision and Strategic Priorities

Vision and Objectives

12. HBF would request that the vision for Derby included meeting the full range of housing needs, including market, retirement housing, family homes etc. not just affordable housing.

13. In light of the current new NPPF consultation proposals, this section may need revisiting to reflect the refocusing of Local Plan on site allocations and matters of local interest, and not reframing or adding to matters already adequately addressed in national policy. HBF would support the aim of ensuring housing needs are met in full as both an objective and a priority for this Plan.

Derby City Vision

14. HBF agree that the Plan needs to deliver sufficient housing to meet the needs of a growing population and ensure that Derby is a destination of choice to live and work. We support the ambitions for a high-quality selection of different types, sizes and tenures of homes, both for market sale and affordable housing to be developed within Derby. This will range a range and choice of sites to be allocated.

Our Specific Vision for the City Centre

15. We support the aspiration for the City Centre to become a place where people will work, play and live, but highlight that there may also be challenges around viability and deliverability that this may bring, especially in relation to brownfield sites.

Our vision for the parts of the city outside the City Centre

16. HBF note that Council's recognition of the need to provide for a range of housing across the City and the recognition of the need to revisit the boundaries of Green Wedges and Green Gaps to enable a range of housing sites to be allocated within the Derby Plan.

Plan Objectives

17. HBF considers that it is appropriate for the Council to identify housing, and the maintenance of the five-year supply as an objective for the Plan.

Chapter 4: Overarching Spatial Strategy

Housing Market Area Context

18. HBF welcome the recognition of the spatial reality that the Derby HMA extends beyond the City boundary into the local authorities of Amber Valley and South Derbyshire. We welcome the recognition of the need for joint working on issues of meeting housing needs.
19. We note again that although the Duty to Cooperate is not being saved as a test for legal compliance, the need for ongoing and collaborative working on key strategic matters affecting the Derby, which clearly includes the cross boundary issue of planning for housing.
20. This section may need revisiting to reflect the emerging role of SDSs as a method to address issues of planning for unmet housing needs across LPA boundaries. Although the SDS may help to address this issue in the medium and longer term there is a clear expectation for LPAs to continue work on ensuring they have up to date Local Plans, without waiting for SDSs to be prepared. HBF therefore welcome the Councils commitment to plan-making and agree that ongoing collaboration

with neighbouring authorities will be an important part of preparing the Local Plan for Derby, and the spatial strategy for the City and the wider Derby HMA.

The City's Spatial Strategy

21. HBF agree that Derby City will need to accommodate its growth requirement by allocating development sites in sustainable locations within the city and through developing a strategy which responds positively to planning applications for sustainable development. We agree that this will require a range of types, tenures and sizes of new homes required including those for sale and rent and those provided to meet affordable and specialist needs. We would however caution that a brownfield first policy approach must not become a brownfield only as in order to deliver a range of sites to provide for a range of housing types both brownfield and greenfield allocations will be needed. This should include a consideration as to whether or Green Wedge, Green Gap and Green Belt release is appropriate or not. A full Green Belt review should therefore form part of the evidence base for this Plan, and it is important that there is a robust and comprehensive evidence to support and explain the spatial strategy and other policy choices made within the Plan.

Chapter 5: General Development Principles

Overarching comments

22. Although HBF recognise the challenges of meeting housing needs in full within the Derby City Council it will be important for the Council to clearly set out how it has maximised the housing that can be delivered within the Plan area. We would caution against any Plan that starts with a pre-determined housing figure before the evidence base has been updated, a Call for Sites and been undertaken, and the Council has fully explored if there are other policy changes, and indeed funding, which could increase the amount of housing that could be delivered within the City.
23. It is important for the standard method to be viewed as the starting point for consideration of the housing requirements for Derby, and, as set out in national policy, it is seen as a minimum requirement. HBF would support more housing than the standard method housing requirement in order to support economic growth, provide a range and type of sites and to support small and medium house builders. There is a need to provide a range and choice of sites, a need for flexibility and viability considerations to be taken into account and a need for the Council to consider whether higher levels of open-market housing are required in order to secure the delivery of affordable housing and/or support economic growth.
24. Only once the correct housing requirement has been established should consideration be given to how much of this accommodation can be accommodated within the City and how much may need to be provided elsewhere within the HMA area. This is a key requirement of current (and future) national planning policy.
25. The Sustainability Appraisal will also have an important role to play in considering different levels of housing and employment growth can be accommodated within Derby. The Council will need to test reasonable options through the SA, as they are required to do.
26. It will also be important for the whole plan viability assessment to fully consider the range of policy requirements, Section 106 asks and CIL payments will have on the

Policy GD1: Placemaking Principles

27. This policy appears to apply to all applications. It is unclear how a developer would show compliance with all of the requirements in this policy, for example how could an application for a small housing scheme demonstrate a range of uses to encourage social inclusion. We also have some concerns about 80dph density requirements for the City Centre, the types of built form this would result in and whether this is appropriate in all cases. Some flexibility may be needed.
28. It is also not appropriate to refer to other documents, such as the draft City Centre Design Guide, as this is seeking to give Local Plan status to these documents which is not appropriate. Any reference to such documents should only be in the supporting text. The content of such documents can also change over time, especially when they are currently in draft form.
29. As we have said elsewhere it is not appropriate for a Local Plan policy to include reference to SPD within the policy. We also note that current SPDs provide further guidance on current policies in the current Local Plan, they do not relate to this Plan and there is now no mechanism for them to be updated and reviewed post-adoption of this new Plan especially as no new SPDs can be adopted post June 2026.
30. We also note that developers of City Centre are also encouraged to use the Council's 3D model, but we question whether this should actually be a policy requirement, rather than a reference in supporting text.
31. It would be more usual for the first strategic policy in the plan to set out that sustainable development will be permitted in accordance with the policies in the Plan. We suggest that the Council may find this way of phrasing this policy helpful. We would also suggest that reference to the importance of pre-applications discussions would be helpful.

General Comments on the remaining policies in this Chapter

32. We note that the wording of these policies are expressed in a way that seems to relate to what the Council will do, rather than what a developer should do, to bring forward an acceptable scheme. We would suggest reframing these policy wordings to say 'planning applications will be granted where...' would be helpful.

Policy GD9: Infrastructure and Developer Contributions

33. This policy talks about the council requiring a claw-back mechanism where a developer can provide robust evidence to demonstrate that it is not viable to deliver the policy requirement. It does not actually say that a lower policy requirement or section 106 agreement will be agreed (as CIL is non-negotiable) where this may assist the viability of a scheme. Usually, such policies refer to the testing of viability appraisals by an independent person for which the developer picks up the costs. Is the Council proposing to do something different here?

Chapter 6 Housing

Overarching comments

34. Again, this section of the policy may need significant revisions and refocusing once the Government's response to the current (Dec 2025) NPPF consultation is known. The NPPF is suggesting a significant change to the content and scope of Local Plans, which is likely to have significant impacts on this chapter of the Plan.

Policy H1: Housing Delivery

35. HBF note that Policy H1 sets out a Plan period of 2023 to 2043. It will be important that this is kept under review as the plan progresses to ensure that there is a 15-year time horizon on adoption on the Plan as required by the PPG.
36. The policy states that Derby's housing needs will be met through the delivery of high-quality new homes in sustainable locations within the city, and within sustainable urban extensions to the city in South Derbyshire and Amber Valley and that new housing will be provided to meet a range of housing needs including market and affordable homes, across a range of sizes and which are capable of meeting a range of specialist needs. HBF supports this ambition and the recognition of the role of neighbouring authorities.
37. HBF note that the Council intends to facilitate the delivery of a minimum of 12,500 new, high quality mixed tenure homes within the city between 2023 and 2043. This should be through allocations which provide the necessary certainty for house-builders to bring forward schemes.
38. We welcome the commitment to 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. We would suggest that as this forms such a key part of the proposed way of delivery Derby's housing needs then monitoring of the delivery of these homes should be included within the Monitoring Framework for this. This is important because any under delivery of housing within the Derby city boundary would be likely to engender a different response to address it than the failure of neighbouring authorities to meet need. We also suggest that the Councils need to work together to carefully consider the size type and mix of housing that should be provided in the neighbouring areas and ensure an agreed position on how the nomination rights for any affordable housing delivered in these neighbouring areas as soon as possible, so this does not hold up delivery.

Policy H2: Residential Development – General Criteria

39. HBF do not support a policy requirement for all development to comply Nationally Described Technical Space Standards, as there may be occasions where this is not possible, such as conversions.
40. We are also concerned with a policy requirement that seeks to require all new build dwellings should be constructed to comply with Part M4(2) Adaptable dwellings of the Building Regulations. The NPPF sets out circumstances where this may not be achievable, the failure to recognize this within the policy would not comply with national policy. The policy should recognise that there may need to be some flexibility.
41. The policy also states that on sites of over 25 dwellings, 5% of all newly erected market homes should be constructed to Building Regulations Part M4(3)a 'Wheelchair adaptable' dwellings and 10% of all newly erected affordable homes should be constructed to Building Regulations Part M4(3)b 'Wheelchair Accessible' dwellings. There should be clear evidence and justification to support how the Council reached this approach. We would suggest requiring 100% of affordable homes to be M(4)3b is not justified, as not all affordable housing residents require this, and note that this would have significant implications on the viability of affordable housing as the costs of complying with M(4)3b is ten times more extensive than delivering M(4)3a.

42. HBF would question the density requirements being sought, we that the mandatory requirement for BNG is impacting on density on some sites, and we would encourage the Council to undertake more work on this issue to ensure the densities being sought are both viable and deliverable.
43. It is also unhelpful for policies to repeat themselves, if a policy requirement is set in a strategic policy applying to all development, it does not then need repeating in other policies. Repetition and cross-references run the risk of undermining the fact that the Plan should be read as a whole.

Policy H4: Affordable Housing

44. Although HBF welcome the flexibility the Council is seeking to utilize in order to ensure that Derby's affordable housing needs as are achievable without unduly constraining general housing delivery, there is a need for policy to set out clear expectations of development. National Policy requires that the affordable housing target should be a figure and not a range. Any policy can not therefore seek "up to a figure". It should specify a clear figure and this should be clearly evidenced as viable (in most cases).
45. It will be important for the Plan to be supported by robust evidence including a whole plan viability assessment. HBF find that these studies are most helpful when they are an iterative document used to test different combinations of policy options and different levels of affordable housing. Whole plan viability testing should form part of the evidence base as the Plan progresses and not simply published to support the Examination after the Reg 19 consultation has concluded.
46. It is costly and time consuming to undertake site-by-site viability appraisals, and this is something strongly discouraged in national policy. This is, however, grounded in the expectation that the whole plan viability has demonstrated the viability of Plan. It is therefore essential that the Derby Plan sets out a clear target for affordable housing on brownfield and greenfield supported by a robust whole plan viability appraisal.
47. This policy only mentions that affordable housing may be reduced, whereas GD9 suggests greater flexibility on 106 and others. It is important that the policies in the Plan work together in a cohesive way and do not conflict with it other or cause confusion.
48. HBF would question is the requirement for 80% of on-site affordable housing to be made available for social rent is appropriate and justified in all cases. The locations of the site and more localised need may suggest a different approach is best.
49. HBF remain concerned that policy does not specifically refer to a site-specific viability appraisal providing justification for a lower, or zero affordable housing contributions, even though this option is allowed for in national policy. Instead, reference is made to other factors which may also impact the Council's aspirations for a site. As with much of the Plan the wording of the policies do not seem to be set up to help developers design acceptable schemes but rather sets out what the Council is thinking. This is not the same thing.
50. Words like 'generally' are not helpful in policy as they do not provide certainty on what is expected. Similarly, the policy requires exceptional circumstances to depart from the affordable housing requirement but then states sites below 25 provide such exceptional circumstances. The term exceptional is therefore unclear. If what the council means is small sites should provide off-site contribution in lieu this is what is should say. That is a policy choice, not an exceptional circumstance. In a similar vein the site specific challenges of a site that mean it departs from a typology tested in the

whole plan viability need not be exceptional. They could include a different kind of housing being proposed, a high baseline for BNG due to open mosaic habitat on a brownfield site, or even things light the higher design costs required because of other policies in this Plan, none of these are 'exceptional'.

51. It is also not appropriate to defer the setting of off-site contributions to another document. These should be set out in the Plan, or at the very least an indicative figure which may then be index-linked.
52. As we have previously highlighted is not appropriate to reference the Council's Planning Obligations Supplementary Planning Document within the Local Plan as this would seek to give it local plan status. Current SPD stem from adopted Local Plan policy and would therefore need to be reviewed once this Plan is adopted, and there is not a mechanism to do this as new SPD cannot be adopted after June 2026.
53. Where a developer can provide robust evidence that it is not viable to provide the maximum policy requirement, the Council will be prepared to negotiate lower percentages of affordable housing provision.
54. We note that the supporting text to this policy references a existing Whole Plan viability, however no date for this study is provided, and in any respect a new one will be needed to support this new Plan. The typologies used in the new whole plan viability will need to reflect the full costs and values challenges facing developers at this time, including for example the Building Safety Levy, the costs of complying with updates to Building Regulations and the emerging Future Homes Standard, and reflect the wider economic challenges facing the whole sector at this time.

Policy H6: Accommodation for Older People and People with Disabilities

55. HBF welcomes the Council's supportive approach to applications which can provide a diverse range of housing accommodation to meet the needs of all members of society including those who are old, frail, mobility impaired or have disabilities. However, this must be grounded in the realities of the viability and deliverability of such schemes. We also suggest that the plan could be doing more on this issues, and would encourage the Council to undertake direct engagement with older persons housing providers to better understand the challenges they face.
56. We have already provided comments about H2 and H3 have already been provided in response to Policy H2: Residential Development – General Criteria. These comments are no repeated here, but this again highlights our concerns about repetition and confusion within the Plan.

Policy H9: Self-Build, Custom Build and Community Build Homes

57. HBF welcome and support the Council's approach to self-build. HBF are concerned about the robustness of self-build registers as evidence of need. We also agree that leaving sites under-utilised and potentially vacant while awaiting a self-build opportunity would reduce the City's supply of deliverable sites. We would also suggest that if any self-build schemes are permitted the planning applications should include clauses that enable self-build plots to revert back to market housing if they remain unsold after a certain period of time, which we suggest should be 6 months maximum, without needing to apply for a variation to the planning permission.

Policies HA10-17 (Site Allocations)

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58. HBF does not comment on individual sites but we would expect the Plan set out a logical site selection process which maximises housing delivery, meets housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. The Plan will also need to 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.

Chapter 7 Economy

59. HBF note that economic growth can be a reason to justify the delivery of a higher number of homes than the standard method through a higher housing requirement. HBF would encourage the Council to consider if the aspirations for growth justify planning for more homes.

Chapter 8 Environment

Overarching comments

60. As we highlighted we would encourage the Council to consider whether these policies are required in light of the new approach in the Dec 2025 NPPF consultation. We note that the consultation is proposing changes to planning to both the Policy Making and Development Management approaches, which are likely to impact the form, scope and content of this Plan.
61. We also note that the DEFRA response to the BNG consultation is currently awaited. It is anticipated that this will exempt sites of under 0.2 Ha from BNG with a further consultation on brownfield land up to 2.5 Ha expected shortly. We suggest that this means that the Plan will need to say more about BNG and the role of LNRS in the future. It also should be reviewed to ensure it does not go into other matters that are already addressed through different regulatory regimes.
62. We also note that the policy will need to reflect the new SUDs guidance and highlight the need to avoid conflict within and between the environmental policies in this chapter and other parts of the Plan.

Policy EN1: Green & Blue Infrastructure

63. HBF are unclear of the evidence that supports the need for an Urban Greening Factor within this Local Plan and how this relates to on-site, and indeed off-site BNG. We would suggest the link between the LNRS and the policy map needs to be clearer and the Council should consider how the LNRS informs the spatial strategy and site allocations.

64. Policy EN5: Green Belt, Policy EN6: Green Wedges and Policy EN7: Green Gaps

65. These policies need to be considered following the findings of a new full green belt review, and the review of green wedges and green gaps, and link better with the LNRS and BNG. The Council also should consider the implications of Green Belt land in its area.

Policy EN8: Biodiversity and Geodiversity

66. Care must be taken to avoid confusion between policies around Biodiversity which relates to species and has its hierarchy of avoid, mitigate, compensate and policy of Biodiversity Net Gain which is about habitat and has a BNG hierarchy requiring on-site, then off-site then statutory credits.

Policy EN9: Trees and Hedgerows

67. The plan needs to be clearer on how this policy relates to BNG for linear features.

EN10: Biodiversity Net Gain

68. HBF was involved in a significant amount of work, being led by the Future Homes Hub, on BNG preparedness for some time, including feeding into the BNG Planning Practice Guidance and the DEFRA BNG Guidance, and continue to be involved in this work through sitting on the FHH BNG Implementation Board. This group seeks to ensure that BNG can deliver the win for nature and the win for housing as intended, by identifying challenges in the implementation of this policy and trying to find solution to them. HBF recognises the role that development can play in helping to support nature recovery. However, it is also important BNG delivers the win-win intended and does not become a barrier to housing delivery.
69. Experience has found that delivering the 10% BNG requirements can be very challenging in some cases, particularly on brownfield site where open mosaic habitat is present, and on some of the smallest sites where on-site BNG provision requires a disproportionate amount of the developable area to be used for BNG. As 10% BNG is mandatory, where viability challenges are encountered then it is usually affordable housing that it reduced to accommodate this.
70. The Government (via DEFRA) recently undertook a consultation on potential revisions to the national BNG requirement and is now intending that sites under 0.2 Ha are exempt from BNG. Further work on other possible improvements to the working of the policy in practice are ongoing and it will be important that the Plan's policy on this issue is kept under review.
71. The current NPPF (Dec 2025) consultation indicates that the only time where it may be appropriate to seek more than 10% BNG through local policy relates to allocations, and even then only where this is clearly evidenced and justified. BNG implementation is an area of work being led by DEFRA and is required under the Environment Act. As such changes to how BNG is operationalised will need to be fully considered in the Local Plan. and reflected in any Local Plan, whichever version of the NPPF (2023, 2024, or 2025) it is being progressed under.
72. In order for Derby his Plan to be sound it must comply with the Environment Act and DEFRA Guidance. This is separate from and in addition to MHCLG advice and the NPPF. Care is therefore needed to ensure that any policy on Biodiversity Net Gain policy complies with the latest policy and guidance on adoption, and it is noted that some of this DEFRA guidance and legislation is currently under review. In Feb 2025 the Government also published additional Guidance on how Local Nature Recovery Strategies should be integrated with/feed into Local Plan Making. It will be important for this Plan to fully reflect any new guidance.
73. It should also be noted that the PPG is clear that there is no need for individual Local Plans to repeat national BNG guidance, and that additional advice on phased development has been provided in the BNG PPG For large and complex sites where the development is phased, the guidance is clear that the 10% must be delivered at the end of the development, and this may not result in 10% BNG on each phase.

74. HBF also notes that there seems to be significant potential for confusion around environmental hierarchy, and suggest particular care is needed to avoid any confusion between the well-established mitigation hierarchy and the new BNG hierarchy. There is need for the policy wording and/or supporting text to be clearer about the differentiation between the mitigation hierarchy (which seeks to avoid harm in the first place, then mitigate and only then compensate it in relation to protected habitats) and the BNG hierarchy (which prioritises on-site BNG delivery, then off-site units and finally allows for statutory credits). There seems to be significant potential for confusion between the two difference hierarchies. HBF therefore suggest that the Derby Plan should do all it can to explain how the two hierarchies work in different ways and that they seek to achieve different aims. We would suggest the use of the term “BNG spatial hierarchy” may help with this issue.

Chapter 9 Climate Change

Policy CL1: Flood Risk and Water Management

75. This policy seeks to require applicants to demonstrate that there is adequate wastewater infrastructure and water supply capacity to serve the development on a case-by-case basis. This is not proportionate or reasonable. HBF consider that the capacity of the sewage network is not a land use planning matter for consideration on an application-by-application basis as Water companies are subject to statutory duties under S37 and 94 of the Water Industry Act 1991 (WIA 1991). Section 37 of the Act, set out below, imposes a statutory duty on all water companies to provide and maintain adequate infrastructure and potable water supplies.

“S37 General duty to maintain water supply system etc. (1) It shall be the duty of every water undertaker to develop and maintain an efficient and economical system of water supply within its area and to ensure that all such arrangements have been made— (a) for providing supplies of water to premises in that area and for making such supplies available to persons who demand them; and (b) for maintaining, improving, and extending the water undertaker’s water mains and other pipes, as are necessary for securing that the undertaker is and continues to be able to meet its obligations under this Part. (2) The duty of a water undertaker under this section shall be enforceable under section 18 above— (a) by the Secretary of State; or (b) with the consent of or in accordance with a general authorisation given by the Secretary of State, by the Director.”

76. Section 106 of the WIA 1991 confers a power to connect to a public sewer. Section 106(1) states that the owner of any premises or the owner of any private sewer which drains premises, shall be entitled to have its drains or sewer communicate with the public sewer of any sewerage undertaker and therefore discharge foul water and surface water from those premises or that private sewer.
77. Specifically, in relation to wastewater, the Supreme Court considered this matter in 2009 – see *Baratt versus Welsh Water* [2009] UKSC 13. Paragraph 23 of the decision is salient. Given its importance in the context of wastewater it is recited in full below:

“The right to connect to a public sewer afforded by section 106 of the 1991 Act and its predecessors has been described as an “absolute right”. The sewerage undertaker cannot refuse to permit the connection on the ground that the additional discharge into the system

*will overload it. The burden of dealing with the consequences of this additional discharge falls directly upon the undertaker and the consequent expense is shared by all who pay sewerage charges to the undertaker. Thus, in *Ainley v Kirkheaton Local Board* (1891) 60 LJ (Ch) 734 Stirling J held that the exercise of the right of an owner of property to discharge into a public sewer conferred by section 21 of the 1875 Act could not be prevented by the local authority on the ground that the discharge was creating a nuisance. It was for the local authority to ensure that what was discharged into their sewer was freed from all foul matter before it flowed out into any natural watercourse.”*

78. Consequently, it is inappropriate to include a policy in the local plan requiring a housebuilder, or other applicants for development, to assess the capacity or otherwise of the water company to provide water supply and wastewater connections as they are an attempt to get applicants to do things for which they are not legally responsible. Rather it is the responsibility of water companies, working with local authorities and the Environment Agency, to plan for the future demand for water services relating to the development requirements proposed in local plans, not applicants. If the water company is unable to supply those needs, this needs to be disclosed in the Water Resource Management Plan (WRMP). HBF recognises that this could represent a significant barrier to the delivery of the local plan, but it should not be addressed through capacity assessments of new development but through plan making. If the Council cannot demonstrate that the housing being planned for can connect to the water and sewage infrastructure that it needs, then the Plan is undeliverable and therefore unsound.

Policy CL2: Our City Our River

79. This policy needs to be clearer on how it relates to the water units requirement of BNG.

Policy CL3: Sustainable Design & Construction

80. Again, HBF note it is not appropriate to seek to give SPD Local Plan policy status.
81. The policy also seeks to require development to ensure an estimated water consumption of no more than 110 litres/person/day. HBF do not believe such a policy is needed in the Local Plan because current Part G Building Regulations require 125 litres per day, and house builders are frequently delivering 115-110 litres per day which means the house building industry is already improving upon the regulations. There is no need for Local Plan policies to repeat Building Regulations and it is in fact unhelpful to do so as Building Regulations may change during the course of the plan period. This part of the policy should also be deleted.
82. The proposed wording suggests that the Council is seeking to move away from the carbon reduction methods set out in Part L of the Building Regulations. HBF supports the Council in seeking to minimise carbon emissions and reduce heat and power demand through energy efficient design. However, the HBF does not consider that the Council setting its own standards is the appropriate method to achieve these outcomes.
83. The HBF is concerned that the Council is adding to the complexity of policy, regulations and standards that housebuilders are already expected to comply with. The key to success is standardisation

and avoidance of individual Councils specifying their own policy approach, which undermines economies of scale for product manufacturers, suppliers and developers. The impact of this requirement along with others in this Plan may have considerable viability implication and may lead to the non-delivery homes and needs to be fully considered within the Viability Assessment.

84. HBF would caution against policies that seek to go further and faster than national legislation and policy changes, which would lead to the creation of a patchwork of differing local policies which could inadvertently undermine the delivery of the wider environmental objectives the Council is seeking and create unnecessary delays to much needed new housing.
85. HBF would highlight the report 'Future Homes, One Plan Building a generation of high quality, affordable and sustainable homes and communities, together' https://irp.cdn-web-site.com/bdbb2d99/files/uploaded/Future%20Homes%20One%20Plan_Future%20Homes%20Hub%20Prospectus-%20FINAL%20WEB.pdf. This was published in Nov 2023 and highlights what actions are needed to support the delivery of sustainable homes.
86. In particular HBF, would highlight 'Issue 9. The Partnership Imperative' on page 15 which states in the Local Government section that "Local planning requirements must align with the overall plan for improving performance standards at national level. For example, avoiding divergence of local energy standards that make it harder to accelerate improvement in standards at national level, and avoiding conflict between local planning conditions and new requirements of building regulations."
87. The Government has provided further advice for local authorities through the Written Ministerial Statement which says "the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale." See <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/HCWS123>
88. Indeed the Dec 2025 NPPF consultation shows the Government clear intention to move towards a more rules based system with DM set out in the NPPF and location variations only allowed in exceptional circumstances. Therefore, to consistent with current and future national policy, HBF request the Council rely on the Building Regulations process as the way to manage improving energy efficiency standards and as such no policy on this issue is needed in the Local Plan.

The need for a Plan Review policy and a Monitoring Framework

89. There is clear need for a Monitoring Framework to be an integral part of the Derby Plan, particularly if this Plan is to deliver its unmet housing need in the HMA but not the City boundary. It is important that the monitoring framework not only shows if there is a problem with housing delivery, but the actions that would result if this were to occur.

Future Engagement

90. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

91. HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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Table 1: Historic England comments on the Emerging Derby Local Plan Regulation 18 consultation version, 9 March 2026

Area of Plan	Historic England Comments
Paragraph 2.2.5.2	We welcome the brief reference to the important heritage assets within Derby City Council area and consider this is important to set the scene about the character and history of Derby.
Page 8	We agree that the rich cultural heritage and heritage assets of Derby are a strength and all efforts should be taken to ensure that they are conserved and enhanced, where possible.
Paragraph 45	We support this paragraph.
Paragraph 56	We support this paragraph.
OBJ10	We support the inclusion of an objective that includes the historic environment. We would recommend that ‘historic assets’ is amended to ‘heritage assets’. The wording of the objective states that to protect the historic environment the best quality design will be required. It is also essential that the Plan ensures that any development that comes forward is in appropriate locations and of an appropriate scale to protect the historic environment and should be based on the principle of avoiding and minimising harm to the significance of heritage assets and their setting.
Paragraph 90	Amend ‘historic assets’ to ‘heritage assets’ and elsewhere in the document so that the term is in compliance with the National Planning Policy Framework (NPPF). We are keen to ensure that the policies are robust enough to ensure the protection of the historic environment and are fully justified by proportionate heritage assessment. Specific details are set out under the appropriate policy numbers.
Policy GD1 Placemaking Principles	The policy covers a broad range of issues, and we have some concerns whether applications can respond to all of the issues or whether some issues may be competing. If so, how will the policy assess which Placemaking Principles will be afforded more weight? We consider that the policy would benefit from a more specific reference to the need to conserve and where possible, enhance the significance of heritage assets including their setting. Page 22 references the Council’s draft Design Guide – what is the timeframe for the completion of this document and what is the weight afforded to it?
Policy GD2 Character and Context	We consider that the policy requires specific wording about heritage and the need to conserve the significance of heritage assets and their setting, protect the historic environment and utilise the impressive history of Derby to produce locally distinctive design which responds to the character of the area. We consider that the policy needs to incorporate these issues

	more specifically within the wording. Additionally, in order for the policy to be effective how will prospective applicants demonstrate compliance and ensure that their applications reflect the character of the area and take account of the significance of heritage assets? Paragraph 123 touches upon this but we consider it would be beneficial for the supporting text to reference any evidence based studies such as character appraisals, conservation area appraisals, the Historic Environment Record, the Skyline Study etc.
Policy GD9 Infrastructure and Developer Contributions	We support clause j and k. We recommend that a general clause be included for heritage which could also consider issues such as Heritage at Risk, interpretation, enhancement of heritage assets through items such as repair, better revealing heritage assets through walkways and cycle paths etc.
Policy H10	The policy would benefit from a clause relating to the need to protect the significance of heritage asses including their setting.
Page 56 + Site Allocation policies Policies HA1-HA17.	We note at present that there is no Heritage Impact Assessment information available for the proposed site allocations. The Sustainability Appraisal does highlight where there are heritage assets in the vicinity of a proposed site allocation, albeit extremely limited detail with reference to ‘a listed building’ and no detail about which heritage asset and how the significance of the heritage asset may be affected by the proposed development. Interestingly, the judgement within the Sustainability Appraisal for the most part lists development as a ‘minor positive’ and requiring a ‘lighting strategy’. We consider that additional information is required to make appropriate judgements and that it is more likely that harm will occur to heritage assets, albeit there may be opportunities to avoid and minimise harm through carefully considered design principles. The majority of the assessment relates only to listed buildings and it is not clear if the Sustainability Appraisal has fully considered all heritage asset types. We are unclear about the mitigation measure suggested each time of a lighting strategy and would require additional detail from the Council regarding this issue. Sustainability Appraisal comments per site: HA1 No issues HA2 Brook Farm Chaddesden - 100m to a listed building and setting could be impacted – SA consider could be an opportunity to enhance setting. Need for lighting strategy. HA3 No issues

	HA4 Royal Hill Road, Spondon – site within 250m of a listed building and setting could be impacted – SA consider could be an opportunity to enhance setting. Need for lighting strategy. HA5 The Hollow, Mickleover site within 250m of a listed building and setting could be impacted – SA consider this as a minor positive and could be an opportunity to enhance setting. Need for lighting strategy. HA6 Former Manor/Kingsway Hospital site within 100m of a listed building and setting could be impacted – SA consider this as a minor positive and could be an opportunity to enhance setting. Need for lighting strategy. HA7 No issues. HA8 No issues. HA9 Bramblebrook House/Humbleton View, Littleover site within 250m of a listed building and setting could be impacted – they consider this as a minor positive and could be an opportunity to enhance setting. HA10 No issues. HA11 Former Shaftesbury Leisure Centre site within 100m of a listed building and setting could be impacted – they consider this as a minor positive and could be an opportunity to enhance setting. Need for lighting strategy. HA12 No issues. HA13 No issues. HA14 No issues. HA15 Kitchener Avenue/Browning Street site within 250m of a listed building and setting could be impacted – they consider this as a minor positive and could be an opportunity to enhance setting. Need for lighting strategy. HA16 Former Ivy House School site within 100m of a listed building and setting could be impacted – they consider this as a minor positive and could be an opportunity to enhance setting. Need for lighting strategy. HA17 Gypsy and Traveller Site Allocation site within 100m of a listed building and setting could be impacted – they consider this as a minor negative and could be an opportunity to enhance setting. Need for lighting strategy. The Council shared an updated spreadsheet in February 2026 which set out which of the site allocations already had planning consent and which site allocations had no planning information recorded at that time. We would request that for any proposed site allocation not yet with planning consent, that has the potential to impact on the historic environment; we are provided with a proportionate heritage assessment in order to be able to assess the suitability of the site from a heritage perspective and if avoidance/ minimisation measures are
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	possible. We would recommend the Council consulting our Site Allocations in Local Plans Historic Environment Advice Note. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/ It is worth stating that currently there is no reference to the historic environment/ heritage assets within any of the site-specific housing policies.
Policy E1 Employment Allocations	Where there is the potential for harm to heritage assets, as outlined through the Sustainability Appraisal and where heritage assets are in the vicinity of proposed site allocations; these sites will require a Heritage Impact Assessment in order to fully understand the potential impacts and whether there are avoidance and minimisation opportunities. For all sites where there is no impact on the historic environment or where the proposed site is already the subject of planning permission, we will not require sight of a Heritage Impact Assessment.
Policy E10 Tourism and Culture	Clause f is positive in its reference to industrial heritage tourism and the Derwent Valley Mills World Heritage Site (DVMWHS). The clause could be further enhanced to seek opportunities for wider heritage led tourism in the Plan.
Policy EN1 Green and Blue Infrastructure	We would request to include a clause on heritage/ the historic environment within this policy, as heritage is a component of landscape.
Policy EN2 Dark Infrastructure	We would request the policy to include a clause referencing the historic environment and where the application of this policy may be beneficial for the historic environment. The Sustainability Appraisal highlights the need for a lighting strategy to be undertaken for all the sites where there could be an impact for the historic environment.
Policy EN11 Historic Environment	Positive opening sentence recognising the importance of Derby's historic environment. Clause 5) Amend 'Historic' to 'Registered'. Next sentence – positive. Before clause a) we consider that it is essential to set out in the first instance developments which cause harm to the historic environment and the significance of heritage assets will be resisted; harm will be avoided and/ or minimised and that

	opportunities will be sought to for enhancements. This is required to be in conformity with Chapter 16 of the NPPF. Clause a) we support the need for a heritage statement accompanying a future planning application. These should be required whenever harm may occur to the significance of a heritage asset, including setting and these should set out how the significance of the heritage asset will be affected by development/ how the development site contributes to the significance of the heritage asset and if harm is likely to occur how this can be avoided/ minimised. b) We support good quality design but in the first instance harm should either require the application to be resisted or avoidance/ mitigation measures in place to reduce harm. c) Add in the minimum this should be recorded on the local Historic Environment Record. d) Confusing wording. Where there is potential for the harm to archaeological assets then applications should be supported by proportionate evidence undertaken by an appropriate qualified professional and including a desk based assessment, and trial trenching where relevant, agreed with the local archaeological officer. Harm should always be avoided/ minimised. e) Where the setting is relevant to the significance of heritage assets. Would also be useful to include cumulative effects. f) could focus on the repair of heritage assets and the reinstatement of architectural features for example. Delete the send half of sentence. g) We support the principle of this policy clause, however, consider that additional wording is required to ensure that where the building is a heritage asset any works will be appropriate and will not harm the significance of the heritage asset for example a listed building. i) Unclear on the intention with the current wording. o) Amend 'historic' to 'heritage'. Remaining clauses support.
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Paragraph 484	This should be clear that harm to heritage assets will be resisted and avoidance/ mitigation measures sought. Only after this would the tests of public benefit be applicable from Section 16 of the NPPF.
Policy EN12 Derwent Valley Mills World Heritage Site	Clause a) The policy should start with the objective to prevent harm to the OUV of the WHS – akin to the wording used re biodiversity in clause d. b) Re-word the first sentence, what is meant by ‘impact’ and should this read prevent harm to the OUV. Fourth sentence after WHS insert ‘or contribution made by...’. The policy clause should also relate to the WHS itself and not only its setting. Also consider key views into and out of the WHS. Next paragraph when it relates to ‘where appropriate’ how will this be defined? After ‘in itself ...’ insert ‘or its setting including’ ... Delete references to ‘or wider setting’ . Insert Capital letter when referencing the UNESCO Toolkit and after ‘Toolkit’ insert Impact Assessments in a World Heritage Context. Last sentence delete ‘but also’, ‘of committed development’ and replace with ‘including’ before cumulative impacts’. Next paragraph, second sentence insert after ‘the site itself...’ ‘or its setting including’ and delete reference to ‘wider setting’. c) second sentence after OUV add ‘of the World Heritage Site’. d) second sentence delete ‘associated’ and insert ‘or its setting, including the defined’ before Buffer Zone. Delete and ‘its wider setting’. Insert before OUV on the last sentence ‘its’ and delete ‘the’. Ensure that the policy wording protects the significance of the heritage asset, as well as the OUV, which is part of its significance. Some confusion within the wording. Ensure the supporting text reflect any amendments. Figure 35 we consider that the Plan is confusing and should refer to the wider WHS boundary and buffer zone. There could be an extra label that stipulates which area of the WHS is in the administrative boundary of the Local Plan but it needs to be clear this map does not illustrate the boundary of the WHS or the buffer zone.
Policy EN13 Darley Abbey Mills Complex	Clause a) should be re-written to conserve the significance of the identified heritage assets, including their setting through their sensitive adaptation and repair. Clause f) replace with wording that prevents harm to the significance of the WHS, including its OUV.

Policy EN14 Conservation Areas	Ensure that clause c is compatible with the earlier paragraphs of the policy. Page 140 penultimate paragraph on this page states about planning permission will not be granted; this sentence should also appear in the other historic environment policies. The later policy wording then discusses the tests in Section 16 of the NPPF. This is not consistent with other historic environment policies; consider how to include this information and ensure that all policies are applied in a consistent manner. A Heritage Statement will also be required where harm to heritage may occur. The final paragraph we support that no demolition will occur until a contract is agreed ensuring that the new development will proceed and any loss of significance should be recorded – this should be added to the HER as a minimum. Consider wording of some paragraphs for clarity and consistency with other policies. It is positive to include a link to the Conservation Area Appraisals.
Policy EN15 Listed Buildings and Locally Listed Buildings	Consider re-writing the policy as currently it duplicated NPPF wording. Set out a hierarchical approach in the policy to ensure that harm in the first instance is avoid and applications that harm the significance of listed buildings/ locally listed buildings and their setting, will be resisted. Then the policy can continue to consider how harm can be minimised and seek enhancement. Then after this the tests of public benefits would apply. Page 142 ‘less than substantial harm’ could also be a reason for refusal. It should be clear for both designated and non designated heritage assets, where harm may occur a Heritage Statement will be required. We are supportive of a Local List and welcome the Council preparing one. Unclear on the wording relating to local listed buildings.

	Unclear on the wording relating to all heritage assets in the final paragraphs – some of the wording is verbatim from the NPPF but as not all of the wording has been included the context of the wording is misleading. Suggest re-wording the policy to be clear on the approach for this type of heritage asset.
Policy EN16 Heritage Statements of Significance	Unclear on the difference between a Heritage Statement of Significance and a Heritage Impact Assessment, within the context of this policy. It is our recommendation that any application where harm could occur to the significance of heritage assets, including their setting, should be accompanied by a Heritage Impact Assessment. As part of this it should set out the significance of the heritage asset and their setting, the contribution of the development site to the significance of any identified heritage assets, key views and vistas, opportunities to avoid and minimise harm, understanding of how design principles undertaken are informed by the heritage asset/ local distinctiveness/ character of the area etc. Also set out when assessments are required for archaeological assets and how this assessment differs including desk based assessment/ trial trenching etc. Consider re-writing the policy to provide clarity about when assessments are required and what detail they need to include.
Policy EN17 Uses within Buildings of Architectural and Historic Importance	First paragraph replace ‘preserves’ with ‘conserves’. Ensure that the policy wording relates to the repair of the heritage asset and specifics such as reinstatement of architectural features. Could this be added as a clause to EN15.
Policy EN18 Archaeology	First sentence the policy should be clear that it is conserving and enhancing the significance of the area’s archaeological assets – Scheduled Monument as well as unknown archaeology that could be of national importance. Second paragraph - consider that an assessment will also be required where a Scheduled Monument may be harmed. Support the need for desk based and field evaluation. Support the need to consult the HER – this will also be relevant for the other policies and varying asset types. Re-order the policy to begin by setting out that harm to archaeological heritage assets will be avoided and minimised and that the Council will resist applications not in line with this approach.

	Final paragraphs repetition of NPPF, though not including all wording. Consider the wording of the policy and consistency with other heritage policies in the Plan. Have the Archaeology Alert Areas been defined on a map and can this be located within the Plan?
Policy EN19 Historic Parks and Gardens	Amend to 'Registered Parks and Gardens'. First sentence to include a reference to 'setting'. Has the Council prepared a list of locally important historic parks and gardens. Supportive of the beginning of the policy which sets out that development will not be permitted where there is harm to ... Consider consistency with other heritage policies and how they may need to be re-written to ensure that they are all compliant with the NPPF. When discussing Statements of Significance and Heritage Impact Assessments there needs to be a consistent approach across all policies. We recommend where harm could occur that a Heritage Impact Assessment is required and the policies should set out the detail of what this would require. Consider rewording of final paragraphs to provide clarity.
Suite of historic environment policies	Overall, we are supportive of the approach to have a suite of historic environment policies and welcome the Council's approach to including a positive strategy that sets out how heritage assets will be considered within the development process. We do, however, have some concerns with the current wording of the policies and the need for them to provide consistency with the NPPF and each other and in parts to provide some clarification about what is meant, in order to achieve the aspirations of the Council. It may be beneficial to have a separate section for the Historic Environment within the Plan, so it is clear to those using the Plan where the heritage policies are located.
Policy EN20 Advertisements	We consider it is positive that the policy already references the historic environment. Suggest re-word of clause e) not cause harm to the significance of the WHS, including its OUV and ensure that the policy refers to heritage assets both designated and non designated (slight re-word from current 'listed heritage assets'.

	Beneficial to reference the Conservation Area and we welcome this. Suggest a separate clause for the key views and a link to evidence so that prospective applicants can understand where the key views are and how advertisements may affect this. Second paragraph after clause g is repetitious but it does have some useful wording in it. We suggest that clause e and f and this paragraph be rationalised into one section that considers the different assets and what is required within a separate clause each. Ensure supporting text reflects and amendments made in the policy text.
Policy EN21 Shopfronts	We welcome a specific reference to heritage assets within the policy and are keen to see this remain. It would be beneficial to consider what requirements are needed per asset type or make it clear that the policy relates to all heritage assets – there will be different requirements. We want to ensure that the policy is clear that inappropriate lighting, signage, roller shutters etc will be resisted.
Policy CL2 Our City Our River	We welcome the reference to heritage within the policy. We consider given the overlap of the Archaeological Alert Areas within this area that the policy should also relate to archaeology and specifically tie in with Policy EN18 Archaeology. For example, the second clause b beginning of page 158 could add in ‘archaeological’ after ‘heritage’.
Policy CL3 Sustainable Design and Construction	Positive that the policy currently includes wording on the historic environment. Currently some cross over of ideas between clause a and b on page 161. We support the need for a Heritage Impact Assessment, including an assessment of significance and an understanding of how harm can be avoided and minimised and whether the potential operation is appropriate in the context of a heritage asset. Should refer to all heritage assets.
Policy CL4 Renewable and Low Carbon Energy	Positive to already include a reference to heritage within the clause – consider rewording 4 th and 5 th sentence of first paragraph as currently unclear what is meant. We recommend that the language refers to avoiding and minimising harm to the significance of heritage assets including their setting and finding the most appropriate solutions.
Policy IC5 Communications Infrastructure	Clause b should relate to resisting harm to the significance of heritage assets, including their setting and seeking the most appropriate solutions that avoid and minimise harm.
Policy T1 Active and Sustainable Transport	We are supportive of clause c. Unclear on clauses j and k and if there will be any potential harm for the historic environment as it is not clear what the proposals are. It would be beneficial to add in a clause relating to the historic environment or a tie in to the heritage policies.

Policy CC1 City Centre	We support the inclusion of clause 10 and the need to protect character and identity within the city centre. We consider that the wording could be strengthened to focus on good design quality that respects the local character and local distinctiveness of the area. Then we would recommend including a separate clause about the need to conserve the significance of heritage assets, including their setting and focus on both individual assets but also the cumulative effect of development in key areas where there are a multitude of heritage assets which often have connecting relationships with each other. Of key here will be to link in the Skyline Study and ensure key views are protected throughout the City Centre. We also consider that a separate clause would be beneficial to relate to the DVMWHS.
Policy CC4 Residential led, Mixed Use Site Allocations	We understand that a number of the sites identified within this policy have already gained planning permission (CC a,b,d,e,h). We would require site of a Heritage Impact Assessment for any sites which do not qualify from any planning involvement and will have an impact on the historic environment. The Sustainability Appraisal for these sites often lists the effects as uncertain. We do not consider that this is an appropriate way forward and instead the assessment should consider what impacts there can be for the historic environment, based on the available information and the proposals within the Plan. The Sustainability Appraisal highlights a number of heritage assets which could be affected but does not then go further in saying how this harm could be avoided or minimised or whether these development sites are appropriate locations. CC4c Northern Gateway – a number of heritage assets could be affected by this proposed development including listed buildings, Conservation Area, the DVMWHS views into and out of, locally listed buildings, new development could affect the character of the area. We would request site of a Heritage Impact Assessment and then we will be able to provide a judgement regarding this site. We support the retention of heritage assets and are keen to understand what the archaeological potential of the site is. CC4f we note this location is considered suitable for a tall building; has this been informed by the Tall Buildings Study and if so, we would recommend a link to the Study or the area in the study which highlights the suitability of this area.

	CC4g unclear from the Sustainability Appraisal about the potential impacts for this site. If there are any implications for heritage these will need to be assessed.
Policy CC5 Non residential regeneration opportunities	The Sustainability Appraisal says that there are potential effects for the historic environment and cites these as ‘minor positive’. We are unclear based on the information provided if this is accurate. We cannot read the whole text within the Sustainability Appraisal which has also made understanding the assessment difficult. We will require sight of the Heritage Impact Assessment, especially for site a where there is the potential for harmful effects for the historic environment. We are keen to ensure that appropriate development comes forward and there may be avoidance/ minimisation opportunities that can be included within the policy text. Clause b enhancements for the historic environment are welcomed; will development in this area achieve this and what specific wording can safeguard the potential of this.
Policy CC6 Tall Buildings	We welcome a policy on tall buildings and information relating to how this will be navigated within the Council area. The opening sentence states that ‘tall buildings are those which are at least twice the prevailing context height’. Whilst this may be accurate as a definition for when a building becomes ‘tall’ rather than ‘large’ within the Tall Buildings Study, we consider that there also needs to be some guidance around a maximum height, depending on various locations around the City. This information is provided within the Tall Buildings Study and should be reflected in the policy. Clause b would benefit from clarity around what may be acceptable. The Tall Buildings Study provides an evidence base for where tall buildings may be acceptable, which is cited in Figure 47. Tall buildings outside of these locations should be resisted as the evidence base already exists to locate tall buildings in the most appropriate locations. We support a clause for the historic environment and consider that it should reference the need to avoid harm to the significance of heritage assets and their setting. The policy would also benefit from a clause relating to the DVMWHS and how tall buildings will avoid harm to the significance of the WHS including its OUV.

	Additionally, we consider that a clause is required relating to the skyline of Derby and key views. The Skyline Study identified 31 key views across the City and these views need to be protected through this policy and a link to the evidence base to assist developers in preparing suitable applications. Currently the wording is too generic for the historic environment and would benefit from strengthened wording to provide clarity. We support clause y. What is the status of the Tall Buildings Study and Skyline Study? We consider a link should be provided to the documents and additional information drawn through in the supporting text to clarify what is meant by the policy clauses.
Policy CC10 Streets and Spaces	Support clause m.
Policy CC12 Derby Riverside	It is unclear from the information provided currently what type of development and where development will be sited within the Derby Riverside boundary. We welcome clause j relating to the historic environment and would request some wording amendments to strengthen the policy. The first sentence should relate to the need to avoid harm and minimise harm to the significance of heritage assets, including their setting. The policy should also consider the need to respect the character and local distinctiveness of the area and assess if proposals can better reveal the significance of heritage assets and seek any opportunities to enhance heritage assets and their relationships with each other. Protecting key views and reflecting the evidence of the Skyline Study should also be included here. Further, given the potential for archaeological remains in this area and for any proposed works to impact on archaeological remains we would welcome adding a reference to archaeology in clause j. There could also be a tie in to Policy 18 Archaeology. Clause k we recommend rewording to state that heritage assets will be retained within developments, harm will be minimised and opportunities sought for their appropriate reuse and repair, if required.

	We would require site of a Heritage Impact Assessment that provides some information about what development may come forward and what harm may occur. This information will then allow the policy to be refined to include any relevant mitigation measures. The Sustainability Appraisal currently states effects are uncertain as it is not clear what the policy is proposing. We consider that the Sustainability Appraisal needs to make judgements about the potential effects and then seek opportunities to avoid negative effects. There are a significant number of heritage assets that could be affected as a result of this policy.
Policy CC13 University of Derby, City Centre Hub Site assessment says effects are uncertain and a number of heritage assets could be affected.	The Sustainability Appraisal identified effects as uncertain but that there were a number of heritage assets that could be affected. We consider that the Sustainability Appraisal needs to make judgements about the potential effects and then seek opportunities to avoid negative effects. We consider that a Heritage Impact Assessment will also be required that considers what heritage assets are likely to be affected and how harm to the significance of heritage assets can be avoided/ minimised. Clause j can then be re-worded to take consideration of any recommendations in the Heritage Impact Assessment and provide more specific wording. We note that clause h requires a Masterplan to be prepared and Historic England would be keen to be a consultee on any future Masterplans linked to the Local Plan allocations.
Policy CC14 Railway Station Quarter	We have concerns regarding this policy and the potential development in this area and how heritage assets may be harmed through development in this area. The Sustainability Appraisal states that the effects will be 'minor positive' but we question this as there is limited detail available and what we do know could cause harm which will need to be avoided/ minimised. We would require a Heritage Impact Assessment to understand what implications there may be for the historic environment and if there are opportunities to avoid harm. We support the opening paragraph of the policy. We are supportive of the principle of the second paragraph and consider that heritage led regeneration could be a positive tool

	for the area, building on the benefits that the historic environment can bring for an area. We have some concerns regarding clause b and what is meant by a multi modal hub? The Interim Planning Guidance sets out aspirations for a multi storey car park but we would require additional information about how this could come forward as it would potentially harm heritage assets, particularly Grade II* Roundhouse and block key views between assets in this area. We are unclear about the intentions of clause c and the redevelopment referenced. There are a number of important heritage assets in this vicinity including the Railway Terraces, and we want to ensure their retention, repair and appropriate reuse. We would welcome clarification on the approach. We require additional detail about what is proposed in clause i. The wording needs clarification on how it can both be respectful of the character of the area and encourage an increase in density of development. The policy should be informed by evidence from the Tall Buildings Study and the Skyline Study to set out what may be appropriate in this context and what issues prospective developers will have to take into consideration. We recommend a re-wording of clause j. The sentence should relate to the need to conserve the significance of heritage assets including their setting, such as but not limited to the Railway Station Conservation Area and a variety of listed buildings and non designated buildings. How can new development be brought forward in this area whilst respecting the character and local distinctiveness of the Conservation Area, individual heritage assets and their relationship with each other, including consideration of views to and from notable heritage assets in the landscape. Any harm should be avoided or minimised in the first instance. What is the status of the Interim Planning Guidance and what consultation has it been subject to? How will the Council's draft/ emerging Design Code reflect the proposed ate/ area development policies? Update paragraph 766 once the policy wording has been assessed.
Policy CC15 North Castleward	The Sustainability Appraisal sets out that the effects are uncertain for the historic environment, even through the area

	could potentially affect the DVMWHS and its buffer zone, the Railway Station Conservation Area and a number of listed buildings. We would require a Heritage Impact Assessment to understand what implications there may be for the historic environment and if there are opportunities to avoid harm. Clause f, is the landmark intending to be a tall building or a large building? And how has this been informed by the Tall Buildings Study and the Skyline Study, if applicable. Clause I will need amending based on the results of the heritage assessment. Additionally, the clause needs re-wording to ensure that it is referencing the need to conserve the significance of the DVMWHS, including its OUV and the significance of other heritage assets including their setting. There could be opportunities to better reveal the significance of the Conservation Area and for new design to respect the character and local distinctiveness of the area.
Any other comments	Glossary: Designated Heritage Asset definition – we consider that this should refer to designated as such under the relevant legislation or UNESCO Convention. Same edit for Heritage Asset. Heritage Impact Assessment definition – we consider this should now refer to ‘avoid/minimise’ rather than ‘mitigate’. We would welcome a meeting with the Council to discuss our representation and in particular to discuss the key areas of our representation that relate to proposed site allocations which could impact on the significance of heritage assets and their setting. There is very limited detail in the Plan regarding archaeology and referencing archaeological assets that may be affected. Additionally, within the Sustainability Appraisal there is very limited detail relating to archaeology. We would welcome the Council ensuring that the assessments are fully reflective of the potential impacts on archaeology and inclusive of any necessary avoidance and minimisation requirements. We are keen to understand how the emerging Design Code relates to the Local Plan and has informed the approach. As a general point we are keen to understand the status of the Tall Building Strategy and the Skyline Study and how the

	evidence has informed the selection of sites and design considerations.
--	---

Derby City Council
Council House
Corporation Street
Derby
DE1 2FS

Our ref: PL00795206

Email: kezia.taylerson@historicengland.org.uk
Date: 9 March 2026

Dear Sir, Madam,

Re: Emerging Regulation 18 Local Plan consultation for Derby City Council, March 2026.

Thank you for consulting Historic England in relation to the Emerging Regulation 18 Local Plan consultation for Derby City. As the Government's adviser for the historic environment, we are keen to ensure that conservation and enhancement of heritage assets are taken into account at all stages and levels of the planning process.

Please note that as the new Local Planning Regulations are not yet published, and the NPPF is also currently under review, this response represents an interim position. We reserve the right to suggest adjusted or alternative policies and evidence as approaches to planning reform are confirmed and/or if new issues emerge.

How we wish to engage

Our first point of contact for Derby City Council in relation to the emerging Local Plan is our regional Historic Environment Planning Adviser: Kezia Taylerson Historic Environment Planning Adviser kezia.taylerson@historicengland.org.uk

We would be grateful if you could also add our general casework email address to the consultation database. This should be used for consultations and to get hold of us when our Planning Adviser is unavailable: [Midlands Casework e-midlands@HistoricEngland.org.uk](mailto:Midlands_Casework@HistoricEngland.org.uk).

All consultations should be directed to our regional email address in the first instance.

Emerging Regulation 18 Local Plan Derby City consultation

We welcome the opportunity to respond to this consultation and our full response is appended to this letter, in Table 1.

Given the highly sensitive nature of the historic environment within Derby and the opportunities that are available through heritage led placemaking we are keen to meet with the Council to understand how we can best work together to address our concerns and offer any assistance in the process.

We are grateful for the opportunity to meet with Council colleagues on Friday 6 March and consider that once the Council has had the opportunity to consider our response, then another meeting will be appropriate.

We have made representation relating to the Derwent Valley Mills World Heritage Site (DVMWHS) and we are keen to ensure that the Plan has a positive strategy in place and the appropriate evidence base is available to support appropriate development, in the right directions, which do not harm the DVMWHS. Our international colleagues at Historic England will liaise with UNESCO and I will be in touch shortly regarding the notification process and timeframes.

We understand that the Council has a short timeframe between the Regulation 18 consultation and the Regulation 19 consultation, and we understand the reasons for this. We do have some concerns about the opportunity to ensure that all of the issues are considered and responded to in the timeframe, however, we are available to assist where we can, to ensure that the historic environment is fully embedded in the Plan.

We have made representation on a number of policies and specific policy wording, as well as proposed site allocations. We are particularly keen to discuss the proposed site allocations where there may be harm for the significance of heritage assets, including their setting.

Further we have made some specific comments relating to the Sustainability Appraisal Assessment within the body on our response in Table 1.

If you have any questions regarding our response, please contact us.

Kind regards

Kezia Taylerson

Historic Environment Planning Adviser

Midlands Region



Homes
England

The Housing and Regeneration Agency

5th March 2026,

Planning Policy Team

Derby City Council

Dear Sir/Madam,

Draft Local Plan for Derby Regulation 18 Consultation Document January 2026

Re: Policy HA6 – Former Manor/Kingsway Hospital

Homes England welcomes the proposed allocation of the Former Manor/Kingsway Hospital site under Policy HA6. As the landowner bringing this site forward, Homes England has submitted an outline planning application for residential development, which proposes up to 135 new homes.

We are supportive of the policy and the intention to deliver a high-quality, well-integrated extension to the established Manor/Kingsway community. The policy's focus on design quality, green infrastructure, active frontage along Kingsway Boulevard, appropriate access arrangements, and necessary infrastructure contributions is fully supported.

Given the advanced position of the outline application, we would welcome the policy being updated to reflect the live proposals, specifically by amending the stated capacity to "up to 135 homes". This would ensure alignment between the Local Plan and the emerging development, providing clarity and certainty for all parties.

Homes England looks forward to continuing to work positively with the Council to secure delivery of much-needed new homes in this well-connected and sustainable location.

Yours faithfully,

Claire Hemus

Senior Planning and Enabling Manager

5th Floor
3 Arena Central
Bridge Street
Birmingham, B1 2AX

0300 1234 500
@HomesEngland
www.gov.uk/homes-england



15th May 2026

Dear Phil,

Re: Draft Local Plan for Derby, January 2026

East Midlands Combined County Authority (EMCCA) welcomes the publication of the Draft Local Plan for Derby and supports Derby City Council's positive progress towards adopting a local plan as soon as possible. An up-to-date Local Plan for Derby, alongside our emerging Spatial Development Strategy and Mayor's Transport Plan, is essential to realising our regional vision for growth set out in EMCCA's Growth Plan, Vision for Growth and Inclusive Growth Framework.

We support the Local Plan's vision, objectives and spatial strategy. This strongly aligns with our ambition for the Trent Arc, which Derby forms a critical part of. The 'brownfield and City Centre first' approach, the framing of Derby as a high-tech, advanced manufacturing and knowledge-based economy, and the commitment to a true 'living' City Centre are reflected directly in the Inclusive Growth Framework's ambitions for growth, skills, homes and place. The proposed delivery of a minimum of 12,500 new homes to 2043, with over 40% accommodated within the City Centre, makes an important contribution to the wider regional need for new homes.

The Local Plan's economic strategy is particularly welcome, which notes its alignment with EMCCA's Vision for Growth. The portfolio of strategic employment locations, anchored by Infinity Park within the East Midlands Investment Zone, provides the resilient and diversified land supply the region needs.

We strongly support the approach taken in Policy E5 to limit B8 floorspace to 50% across the Infinity Park site. This protects the long-term potential of this nationally significant employment location for the higher value uses that the East Midlands Investment Zone designation was created to support, including the advanced manufacturing, clean energy and R&D activity. Without policy protection of this kind, demand for logistics floorspace risks crowding out the very sectors that drive higher GVA, productivity and good jobs, which are all priorities in EMCCA's Growth Plan.

We also welcome Policy E2 protecting existing employment areas of regional importance, and Policy E3 on Local Labour Agreements, which complements the Get East Midlands Working Plan and our wider approach to skills and opportunity.

We strongly support the Local Plan's vision for the City Centre, which places the City Centre as the most important location for investment, renewal and regeneration. This includes policies on Derby Riverside, the Railway Station Quarter, the University of Derby City Centre Hub and North Castleward. Across these policies, the collective emphasis on heritage-led placemaking, new homes, jobs, public realm transformation and sustainable transport integration create a city-centre offer that helps attract and retain talent, investment and visitors. This is fully consistent with the placemaking outcomes set out for the Trent Arc in the Mayor's Vision for Growth.

EMCCA is already working in partnership with Derby City Council and key delivery partners to support the implementation of these city centre ambitions, including through investment planning, transport integration and coordinated programme delivery across the Trent Arc. We see Derby City Centre as a critical focus for collaborative delivery, bringing together public and private sector partners to accelerate site assembly, unlock infrastructure constraints and ensure a pipeline of deliverable mixed-use schemes, including providing economic, civic and cultural activities, new residential areas, and a thriving daytime and evening economy. This partnership approach will be key to translating the Plan's ambition into a realistic, phased delivery programme.

Looking ahead, EMCCA will continue to work closely with Derby City Council to deliver for the East Midlands. The success of the EMCCA's Growth Plan and its vision depends in



significant part on the success of Derby's regeneration ambitions, and we look forward to delivering them together.

If you have any questions, please do not hesitate to contact me via the details below.

Yours sincerely,

Adele Maher,
Head of Planning and Chief Planner.

Spatial Development | East Midlands Combined County Authority (EMCCA)
SpatialDevelopment@eastmidlands-cca.gov.uk | 0300 500 80 80 |

East Midlands Combined County Authority



www.eastmidlands-cca.gov.uk



contact@eastmidsdevo.org.uk

Join the conversation and keep up to date through social media channels: @mayoreastmids and @eastmidscga

From: [Scott Knowles](#)
To: [Philip Stephenson](#)
Subject: RE: Chamber of Commerce, request for comments on the Draft Local Plan for Derby
Date: 27 April 2026 12:31:39
Attachments: [image115297.png](#)
[image143870.jpg](#)
[image324569.png](#)
[image606267.png](#)
[image575787.png](#)
[image140637.png](#)

You don't often get email from scott.knowles@emc-dnl.co.uk. [Learn why this is important](#)

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Hi Phil,

Please find below some commentary as requested.

I've focused entirely on pages 90 – 108 / 185:

- 'respondents emphasised that jobs and training opportunities should be a key priority of the Local Plan, particularly with respect to employing local people' – the Chamber's quarterly economic survey (latest results can be viewed at <https://www.emc-dnl.co.uk/wp-content/uploads/2026/03/east-midlands-report-12.html>) continues to inform that despite unemployment levels, employers still find recruitment challenging, suggesting that skills shortages are the primary driver.
- Derby members and the wider business community continue to inform that grow on space is scarce, particularly mid-sized units between 5,000 – 10,000 sq ft. Businesses also feel there is a distinct lack of 'A grade' office space in the City (whether they want to pay A Grade office space costs may be a different story!).
- The importance of the key city employers is well made – however, the importance of SMEs, including those in the supply chain of the key employers feels like this should be emphasised more.
- In regard to skills development – a link to the Local Skills Improvement Plan, led by FSB, feels like an important omission – LSIPs are informed by employers as to future skills needs.
- On the same note, DWPs Jobs Guarantee service feels like this should be referenced when considering how to reduce the volume of NEETs across the city.
- Retail will remain challenging – the commercial marketplace for retail has fundamentally changed since the pandemic. While most Derbyshire market towns feel like they are thriving, with a different offer to the city centre, the challenge of attracting recognised brands into areas of declining footfall will remain problematic. Retail success in the city is going to be largely dependent on the cultural and events offer, which Derby does well. However, some of the cornerstones of the cultural offer are currently challenged regarding their future viability – these need to be bolstered to shore up the cultural offer to drive footfall to benefit retailers. Unfortunately, a good retail offer along no longer feels to be the only solution to city centre vibrancy.
- City centre safety (or the perception of) continues to be brought up by city centre businesses as a barrier to growth and the recruitment / retention of employees.

I hope that's the kind of feedback sought – let me know if you need more.

Kind regards,

Scott

Scott Knowles DL
Chief Executive

(t) 0333 320 0333 (m) 07855 742088 (e) Scott.Knowles@emc-dnl.co.uk

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East Midlands Chamber (Derbyshire, Leicestershire, Nottinghamshire)
Commerce House, Millennium Way, Dunston Road, Chesterfield S41 8ND



From: Scott Knowles DL
Sent: 21 April 2026 18:31
To: 'Philip Stephenson' <Philip.Stephenson@derby.gov.uk>
Subject: RE: Chamber of Commerce, request for comments on the Draft Local Plan for Derby

Hi Phil,

Thank you for the note below and sight of the plan.

I'll respond by the end of April well ahead of your 8 May deadline.

Hope that helps.

Kind regards,

Scott

From: Philip Stephenson <Philip.Stephenson@derby.gov.uk>
Sent: 21 April 2026 17:43
To: Scott Knowles DL <Scott.Knowles@emc-dnl.co.uk>
Cc: EMC Information <information@emc-dnl.co.uk>
Subject: Chamber of Commerce, request for comments on the Draft Local Plan for Derby

[Caution: External Sender]

Dear Scott,

Hope you are well; I was wondering if you could help me?

Derby is one of the authorities working hard to submit our plan before the December 2026 government deadline.

We just concluded our Draft Local Plan consultation, but I was just wondering, would it be possible for you to have a quick look over it and make a short comment on the general principles of the policies, we would especially value support for our retail and economic strategies (Ch7 pg 90 to 108 and the focus on City Centre regeneration is set out at (Ch12 pg 185)

Here is the plan: derby.gov.uk/media/derbycitycouncil/content/documents/environmentandplanning/localplan/draft-local-plan-for-derby.pdf

If there are specific elements you suggest adding or amending this is the last opportunity for us to do this, as after May it will go out to final publication and will pass to the examiner at submission.

Because our timescale to publication is so short, could I ask for a **response by the 8th of May?**

Do let me know if you have any questions or would like any further information

Kind regards,

Phil



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East Midlands Chamber (Derbyshire, Nottinghamshire, Leicestershire)
Registered in England no. 1785710
Commerce House, Millennium Way, Dunston Road, Chesterfield, Derbyshire. S41 8ND

From: [Philip Stephenson](#)
To: [Planning Policy](#)
Subject: FW: Extension of time to submit representations to the Derby City Regulation 18 consultation
Date: 18 March 2026 08:59:35
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Hi Sheila,

Just checking you had a copy of this as an official response. Could you add it to the system with the rest?

With thanks,

Phil

From: Philip Stephenson <philip.stephenson2@derby.gov.uk>
Sent: 18 March 2026 08:53
To: Phil Stephenson <philipstephenson1@outlook.com>
Subject: FW: Extension of time to submit representations to the Derby City Regulation 18 consultation

From: Amanda Hammond <Amanda.Hammond@southderbyshire.gov.uk>
Sent: 13 March 2026 15:53
To: Philip Stephenson <philip.stephenson2@derby.gov.uk>; Paul Clarke <paul.clarke@derby.gov.uk>
Cc: Steffan Saunders <Steffan.Saunders@southderbyshire.gov.uk>; Stephen Taylor (Councillor) <Stephen.Taylor@southderbyshire.gov.uk>
Subject: RE: Extension of time to submit representations to the Derby City Regulation 18 consultation

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Dear Paul

Thank you for consulting South Derbyshire District Council (SDDC) on the Regulation 18 Derby City Council Local Plan. SDDC forms part of the same Housing Market Area (HMA) as Derby City Council and the authorities have a history of effective cross-boundary working to achieve sustainable development as set out in the recently updated and published Derby HMA Statement of Common Ground. SDDC supports the City Council in the preparation of their Local Plan, and the following comments are intended to assist with this.

SDDC support the growth and development purported to within the City boundary (as set out in the vision and objectives) and the minimum of 12,500 new homes to be delivered as set out in policy H1. SDDC recognise that some city centre sites are challenging to bring forwards but believe that this should not influence the ambition to deliver growth within the administrative boundary. Given that the housing to be delivered within the City is a minimum figure, SDDC consider it is not useful to refer to housing delivery being 'capped' within the city and would suggest that these references should be removed. In addition, some specific reference to Derby Capacity work being an ongoing effort involving Derby, its HMA partners, the private sector including market housing developers, infrastructure providers and public sector bodies including Homes England would be a helpful reference to include in the local plan. This would articulate the point that Capacity is not a static issue but will change as sites, funding, private sector input, successful regeneration efforts and other matters all evolve over the plan period.

Table 1 of the plan recognises the decline of the high street as a weakness and the decline in high street viability as a threat. SDDC support the City Council in their objective to deliver taller buildings at appropriate locations within the City Centre which would support the City Council to deliver much needed homes in a sustainable location and would support the vitality and viability of the City Centre. SDDC consider that there should be greater focus/ primacy on residential development within the vision for the City Centre. Consideration should also be given to the emerging National Decision Making Policies which encourage high density development within close proximity to stations.

SDDC support the City's vision of extending the green network beyond the City's boundaries which will support City residents gain access to the countryside. SDDC would request that this should be two-way and the City should also consider inwards movements to provide access for residents of the new urban extensions in SDDC to key locations in the City Centre including the railway station, the city centre retail areas and key employers within the City. To assist in delivering this aspiration SDDC considers that there should be reference in the Local Plan to support the restoration of the Derby Canal which would provide an attractive walking and cycling route into the city centre. Developments should also contribute towards the delivery and enhancement of cross-boundary walking and cycling routes in line with the Derbyshire Key and Local Cycle Network plan identified by Derbyshire County Council.

3.10 – Due to the sensitivity of the expansion of the urban fringe of Derby into SDDC, we would request that this paragraph is amended to ***"The Derby Urban Area will expand beyond its current boundaries into the 2040s as Derby is unable to meet all its own housing needs within its administrative limits, collaborative working with neighbouring authorities will ensure that as the City grows development will take place sustainably and infrastructure will be delivered to support each change"***

Table 3 – SDDC considers that 'up to' should be removed from the table. Having a fixed figure provides more certainty regarding expectations and the 'up to' is not considered necessary due to the existing following text that allows for downwards negotiation based on viability evidence.

HA1: Rykneld Road, Littleover – SDDC welcomes the reference to high quality pedestrian and cycle connectivity between the Derby City site and the SDDC Highfields farm site, although it is considered that this should be a requirement and not simply something to consider. In addition, there should also be a requirement for the site to be designed in such a way so as pedestrian and walking routes could be provided to link to the STRA2 allocation in the emerging SDDC Local Plan Part 1 Review which extends to the south of this allocation, the supporting text should also be updated to reflect the change to the policy.

HA5: The Hollow, Mickleover – SDDC welcomes the reference to a cross-boundary comprehensive masterplanned approach to development to be achieved through a Development Framework including green links, pedestrian and cycling connections and highways access arrangement and improvements between Derby City and South Derbyshire.

SDDC supports the Heartwood Community Forest and its ambitions to link to the National Forest in South Derbyshire. It is considered that the title for the Heartwood Community Forest in Policy EN9 may need to be underlined to be consistent with the other sub-titles in the policy.

Please feel free to contact me should you wish to discuss any of these issues further.

Kind Regards

Amanda Hammond MRTPI
Planning Policy Team Leader
Place and Prosperity
South Derbyshire District Council

Tel: 07919 897691



www.southderbyshire.gov.uk



From: Philip Stephenson <philip.stephenson2@derby.gov.uk>
Sent: 09 March 2026 15:20
To: Amanda Hammond <Amanda.Hammond@southderbyshire.gov.uk>
Cc: R&C Regen P&P Policy <R-CRegenP-PPolicy@derby.gov.uk>
Subject: RE: Extension of time to submit representations to the Derby City Regulation 18 consultation

Hi Amanda,

Yes, that's no problem. Look forward to reading them then

Kind regards,

Phil

Philip Stephenson MRTPI | Team Leader, City Growth & Vibrancy | Derby City Council, The Council House, Corporation Street, Derby, DE1 2FS | 01332 647869 | www.derby.gov.uk

Draft Local Plan for Derby: Between 12 January and 9 March 2026 we are seeking your views on the Draft Local Plan for Derby. For more information, including how to give us your feedback, please visit the [Emerging Local Plan for Derby webpage](#).

From: Amanda Hammond <Amanda.Hammond@southderbyshire.gov.uk>
Sent: 09 March 2026 15:05
To: Philip Stephenson <philip.stephenson2@derby.gov.uk>
Subject: Extension of time to submit representations to the Derby City Regulation 18 consultation

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Afternoon Phil

Please could South Derbyshire request an extension of time to submit representations to your Regulation 18 Local Plan

consultation until the end of the week.

I've just spoken to Jon on the phone who said he thought that would be fine but I wanted to put it in writing so that there was an audit trail.

Kind Regards

Amanda Hammond MRTPI
Planning Policy Team Leader
Place and Prosperity
South Derbyshire District Council

Tel: 07919 897691



www.southderbyshire.gov.uk



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Our Ref: NH/26/14477

Your Ref: N/A

Philip Stephenson

Local Plan for Derby
Derby City Council
FREEPOST
MID24259
Derby
DE1 2BR

planningpolicy@derby.gov.uk

Brittany Grosvenor

Assistant Spatial Planner

Operations Directorate Midlands
National Highways
Three Snowhill
Snow Hill Queensway
Birmingham
B4 6GA

www.nationalhighways.co.uk

13 February 2026

Dear Sir/Madam,

Draft Local Plan for Derby: Regulation 18 Consultation

National Highways welcomes the opportunity to be involved in the consultation on the Local Plan being prepared by Derby City Council. The draft Local Plan, when adopted, will replace the existing Local Plan (2017) to shape how the City will grow and change in the period 2023 - 2043 and will set out the planning framework for the City over the next 20 years.

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

In relation to this consultation, National Highways' principal interest is in safeguarding the operation of A38 and A52 trunk roads which are located within the City, and the A50 trunk roads and M1 Motorway Junctions 24 and 25 which are adjacent to the City.

In responding to Local Plan preparation, we give consideration to the Department for Transport (DfT) revised Circular 01/2022 – *Strategic Road Network and the delivery of sustainable development* ('the Circular'), which sets out how interactions with the

SRN should be considered in the making of Local Plans. Paragraph 28 of the Circular sets out that:

The policies and allocations that result from plan-making must not compromise the SRN's prime function to enable the long-distance movement of people and goods. When the company assists local authorities in the development of their plans and strategies, the local authority should ensure that the SRN is not being relied upon for the transport accessibility of site allocations except where this relates to roadside facilities or SRN-dependent sectors (such as logistics and manufacturing). The company will also work with local authorities to explore opportunities to promote walking, wheeling, cycling, public transport and shared travel in plan-making, in line with the expectations set out in the NPPF and the Transport Decarbonisation Plan.

The Circular also encourages early collaboration to identify opportunities for sustainable travel, including walking, cycling, public transport and shared travel, in accordance with the NPPF and the DfT's Transport Decarbonisation Plan.

Our response is made in line with these policy frameworks and aims to support the soundness and deliverability of the Local Plan from a strategic transport perspective.

Housing Requirement

The minimum housing requirement set out in the draft Local Plan is 12,500 new homes to be delivered within the City over the Plan period (2023-2043), of which approximately 2,700 and 2,569 will be delivered within and outside City Center allocations respectively. The new homes will be delivered within the city, and within urban extensions to the city in South Derbyshire and Amber Valley. The minimum provisions for the allocation site outside the City Centre are summarised as follows:

ID	Site / Location	Minimum Dwellings
HA1	Rykneild Road, Littleover	800
HA2	Brook Farm, Chaddesden	214
HA3	East of Moorway Lane, Littleover	335
HA4	Royal Hill Road, Spondon	Up to 90
HA5	The Hollow, Mickleover	150
HA6	Former Manor / Kingsway Hospital	130
HA7	Stoney Lane, Spondon	400
HA8	Former Police Station, Cotton Lane	100
HA9	Bramblebrook House / Humbleton View, Littleover	90

HA10	Elton Road Works, Osmaston	80
HA11	Former Shaftesbury Leisure Centre	20
HA12	North of Sinfin Moor Lane	40
HA13	Bembridge Drive, Alvaston	30
HA14	Former Beaufort Business Centre, Chaddesden	30
HA15	Kitchener Avenue / Browning Street	25
HA16	Former Ivy House School, Osmaston	25
Total (outside City Center allocations):		2,569

Four of these allocated sites are relatively large scale, accommodating more than 200 dwellings. They are:

HA1: Rykneld Road, Littleover

The site is estimated to have the potential to accommodate 800 dwellings, with associated community and education facility. Based on the highway network layout and its proximity to the SRN, it is likely that a large portion of development traffic from the site would route onto the A38/ Rykneld Road roundabout (Findern Interchange), which is the nearest part of the SRN. National Highways has engaged with the developers for the allocations at the Land south of Mickleover, which are part of the Strategic Policy for South Derbyshire Council, to facilitate the assessments required to determine the need for mitigation on the SRN. With the proximity to the Findern Interchange, the cumulative traffic impact to the SRN for the allocation sites both in the Derby City Council and South Derbyshire Council shall be assessed.

HA2: Brook Farm, Chaddesden

This site has the potential to accommodate 214 dwellings. The primary highway access for the site will be taken from Oregon Way and no vehicular access to the site is taken from Tennessee Road. The site was allocated in the existing Derby City Local Plan Part 1 for a minimum of 275 dwellings. The site had planning permissions but these have now lapsed.

HA3: East of Moorway Lane, Littleover

The site is estimated to have the potential to accommodate 335 dwellings with a new on-site local shopping centre. The new housing site will have two points of highway access onto Moorway Lane, and improvements will be required to Moorway Lane itself subject to further assessment which is part of the local highway network. The site is likely to impact the A38/ Rykneld Road roundabout (Findern Interchange) and A50 at its south which is part of the SRN.

HA7: Stoney Lane, Spondon

The site will deliver a minimum of 400 new homes with a minimum of 40% affordable housing. Vehicular access is proposed via a new access from Stoney Lane, which is owned and operated by Derbyshire County Council as the local highway authority at this location.

The site is likely to impact the A52/Derby Road roundabout (Spondon Roundabout) and the A52 at its south. In addition to, the existing Stoney Lane A52 eastbound junction located approximately 60m north of the site access, and Victoria Avenue junction located approximately 800m northbound of the site.

The Victoria Avenue A52 junction is likely to experience additional movements as a result of Policy HA7. Vehicles leaving the site and travelling towards Derby or other destinations to the west may use the existing Victoria Avenue A52 junction as a U-turn facility to access the westbound carriageway of the A52 trunk road.

The forthcoming transport evidence base should therefore assess the impact of these additional trips on the operation of the junction, including the potential for increased queueing and any associated queue back from the A52 junction.

In relation to active travel facilities, there is an existing pedestrian bridge at this location connecting Borrowash Road to Stoney Lane, providing a north–south link. However, the bridge is limited to pedestrian use only and does not provide ramped access for cyclists or wheelchair users. Consideration should therefore be given to this and the increased desirability to cross at this location with the introduction of Policy HA7.

Additional comments on the draft plan's residential allocations:

Policy HA5: The Hollow, Mickleover

The site will deliver a minimum of 150 new homes. The development in this area will form part of a wider cross-boundary strategic housing extension South of Mickleover within South Derbyshire.

National Highways has received several customer complaints and reports regarding pedestrians crossing the A516 trunk road slips (which form part of the SRN at this location) between Littleover Community School and Brookfield Primary School.

The proposed introduction of Policy HA5, has the potential to exacerbate this issue by increasing pedestrian movements and the desire to cross at this location.

National Highways are currently developing potential mitigation measures to prevent crossings of the A516 trunk road. Initial early proposals have suggested the need to install a fence along the northern side of the A516 south (west). However, timescales to deliver this mitigation have not yet been identified.

City Centre Allocations

For the 2,700 new dwellings to be provided within the City Centre, 1,400 dwellings will be classified as “Residential Led, Mixed use allocations” that locate adjacent to A601 at the City centre. In addition, there are “new and enlarged neighbourhoods” at Derby Riverside to provide 600 dwellings (including 200 dwellings with permission), the Railway Station Quarter to provide 500 dwellings and North Castleward to provide 400 dwellings. An assessment to understand the potential impact to the SRN including the A52, A61 and A38, is required to determine the need for wider mitigation on the SRN.

National Highways supports the principle that all allocations require infrastructure contributions in line with Policy GD9 of the draft local plan. It is essential that all the allocations are supported by a robust and proportionate transport evidence base. We welcome early sight of this once available.

Windfall Sites

National Highways acknowledges that the Local Plan includes an assumption of up to 1,800 dwellings to be delivered as a windfall allowance over the period 2028 to 2043. National Highways anticipates that these windfall sites will come forward through individual planning applications. As such, appropriate transport assessments will be required to accompany each application, with the impacts on the SRN assessed and submitted to National Highways for review and consideration where necessary.

Employment allocations

The Local Plan allocates 130 hectares of employment land over the Plan period (2023–2043). The majority of employment growth is focused on four strategic locations: Central Activity Area (CAA) and Wider City Centre (2ha), Land South of Wilmore Road – Infinity Park Derby (75ha), SmartParc, Spondon (35ha) and Indurent Park, Chaddesden (18ha).

National Highways requests further details of the proposed sites to be provided in the form of land uses and floor area, such that the potential traffic impacts, including vehicle types, routing and phasing and the need for mitigation can be determined.

Transport Evidence Base

Any proposed allocations or sites that may impact the SRN must be accompanied by clear, site-specific evidence of the impacts on key junctions. This includes a full assessment of the cumulative impact of all development proposed in the Plan. Such assessments must be prepared in consultation with National Highways and fully aligned with the requirements of the Department for Transport (DfT) Circular 01/2022. Depending on the scale and nature of the identified impacts, appropriate mitigation measures must be identified and secured where necessary. New development should be supported primarily through existing infrastructure and sustainable transport options. Where this is not sufficient, new highway interventions may be necessary to maintain the safety and efficiency of the SRN.

Transport and Movement

Policy T2: Transport Infrastructure

The policy states that the Council will work with partners to deliver a long-term transport strategy for the city and the wider region. It will support the implementation of strategic proposals and initiatives that contribute to the creation of an economically and environmentally sustainable transport network, including the delivery of National Highways' A38 Derby Junctions Grade Separation Scheme.

We are currently working with the Department for Transport to identify the most efficient delivery times for the A38 Derby Junction scheme, and these will be published in Road Investment Strategy 3 later this year.

Duty to Co-operate

We acknowledge Derby City Council's commitment to engaging with relevant stakeholders to deliver sustainable development. For sites that may affect infrastructure in neighbouring authorities, a coordinated and cross-boundary approach is encouraged. This should include engagement with National Highways, neighbouring local planning authorities, and relevant developers to ensure transport impacts are fully understood and appropriately addressed.

Subject to the points above, National Highways would welcome continued engagement with the Derby City Council's in order to support the delivery of the targeted growth.

In the meantime, if you have any questions or comments then please do not hesitate to contact me on the details provided, and through our email address

Yours sincerely,

Brittany Grosvenor

Brittany Grosvenor

Assistant Spatial Planner

Email: brittany.grosvenor@nationalhighways.co.uk

Date: 02 March 2026
Our ref: 537757
Your ref: none



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BY EMAIL ONLY

Dear Shelia,

Derby City Draft Local Plan – Regulation 18 consultation

Thank you for your consultation on the above dated 08 January 2026 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England welcomes the opportunity to comment on the Draft Local Plan and our detailed response has been set out below.

If you have any queries relating to the advice in this letter please contact me on 02080268500

Yours sincerely

Roslyn Deeming
Senior Planning Adviser – Strategic Plans for Places
East Midlands Area

Draft Local Plan for Derby City – Regulation 18

2. Spatial Portrait

2.2.2 Health and Wellbeing

Within this section, Natural England would like to see the natural environment embedded into the text in paragraph 30: *'The health and wellbeing of Derby residents is influenced by social determinants of health such as income, education, living conditions, **natural environment**, and employment opportunities.*

2.3 Summary

Natural England welcomes the Summary table presenting a spatial portrait of characteristics of Derby's city, people and environment. We recommend strengthening the inclusion of the natural environment within the Opportunities section of the table with the following points:

'Addressing unequal access to natural greenspace, experienced particularly by those in areas of deprivation, has the potential to alleviate health, social and economic inequalities.

"Ensuring Biodiversity Net Gain (BNG) offset sites are retained within the City area to connect with the green infrastructure network and enhance nature recovery for local benefit."

3.1.1 Derby City Vision

Natural England welcomes this vision particularly paragraphs 46 – 48 which envisages a greener city with connected green and blue infrastructure with ecological links beyond the city boundaries helping to build resilience to climate change.

In paragraph 42 we would like to see a greater emphasis of green infrastructure as critical for the city's future, for example: *"By 2043, Derby will be an attractive, thriving, **green**, healthy, lively city of growth, opportunity and innovation for all."*

We would also value an ambition for natural environment to be part of the tourism offer and for Derby to be *'recognised as a regional centre for tourism led by an international reputation for creativity in technology and the arts, **and as a gateway to the Peak District**'*.

We would also like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature. We suggest the wording in paragraph 47 could include the following addition: *"The green network will have been extended beyond the City's boundaries, providing ecological benefits and **contributing to the Nature Recovery Network** whilst improving access to the countryside and important areas within it."*

3.2 Our Specific Vision for the City Centre

We welcome the aspiration set out in this section to create a vibrant and inclusive city. We would like to see GI linking throughout the city centre and easy access for residents to high quality connected green spaces. We suggest that within paragraph 55 there could be greater reference to creating a healthy environment using Nature-based solutions. These include measures such as city trees, strategic sustainable drainage solutions (SuDS), urban rain gardens as well as additional greenspace and natural habitats which reduce urban heat, improve air quality and reduce flooding, to create a more liveable urban environment. GI should be prioritised in areas where most needed in areas of High index multiple deprivation for benefits to health and well-being.

We also suggest that the Local Plan may be an opportunity to highlight the Nature Connectedness Network, led by Derby University. This is the lead on nature connection research and practise development and encourages nature connection for nature recovery and human wellbeing [HOME | Nature Connectedness Network](#).

3.3 Our vision for the parts of the city outside the City Centre

Within this section of the overall vision, we particularly welcome the 'Our City Our River' which will be a catalyst for further nature recovery and green infrastructure provision, including the provision of parks and wetlands.

Plan Objectives

It should be clearer what the reference to the "Council Plan Objective" means and how the "outcome measures" fit in with the Local Plan.

- 63. OBJ2** - We suggest adding in the list: '*natural greenspace*' rather than just open space.
- 64. OBJ3** - Whilst Natural England welcomes this objective, we suggest that it should include nature-based solutions for climate change resilience.
- 68. OBJ7** - As well as improving biodiversity and nature recovery there will be other benefits to health, recreation and flooding alleviation.
- 69. OBJ8** - Natural England supports this objective
- 70. OBJ9** - Natural England supports this objective
- 72. OBJ11** - Natural England supports this objective
- 73. OBJ13** Add 'green' i.e. '*practical green and attractive active travel routes*'.
- 74. OBJ14** Natural England supports this objective

4.2 The City's Spatial Strategy

Natural England welcomes the inclusion of paragraphs 92, 94 & 95 within the explanatory text which set out the protection of Green Wedges and the protection and enhancement of green infrastructure and wildlife.

Policy GD1: Placemaking Principles

Natural England welcomes this policy particularly the Nature section (j to m). We would emphasise the importance of Green Infrastructure being considered at the outset of development and fully incorporated into the design of a masterplan. Natural England recommends that reference should be made to Natural England's Green Infrastructure Planning and Design Guide 2023 [GI Design Guide](#). This Guide provides details of what good GI design looks like linked to the ten characteristics of well-designed places as set out in the National Model Design Code and the National design guide. It provides evidence based practical guidance on how to plan and design good green infrastructure and can be used to help planners and designers develop local design guides and codes with multifunctional green infrastructure at the heart. This will help to inspire the creation of healthier, nature-rich, climate resilient and thriving places to live, learn, work and play.

We suggest that the co-benefits of joining up health care centres/ schools combined with good quality green space provisions that can be activated through the community provision of nature-based health initiatives should be considered.

Policy GD4 Accessible Places

We suggest that within this policy that accessible places and inclusive environments are also understood in terms of the natural environments of Derby to allow and encourage access to parks, landscapes and accessible green infrastructure in the city for the well-being of residents.

Policy GD6: Health and Wellbeing

Natural England welcomes this policy and acknowledges that it references the provision of access to the natural environment and the importance of life-affirming infrastructure such as green spaces.

Green infrastructure supports active lifestyles, community cohesion and nature connections that benefit physical health, mental health & wellbeing and quality of life. Green infrastructure also helps to mitigate health risks such as urban heat stress, noise pollution, flooding and poor air quality. Increased access to green and blue spaces The [Environmental Improvement Plan](#) sets a commitment that everyone should live within 15 minutes' walk of a green or blue space. An analysis of accessible

green space in England is available through [Natural England's Mapping Database](#), with the Accessible Green Space Standards detailed in Chapter 2 of its [Green Infrastructure Planning and Design Guide](#).

Spending time in green and blue spaces has been shown to encourage physical activity and promote better mental health and wellbeing. Such spaces create opportunities for recreation, community gatherings, connecting with nature, and social interaction. For more information, see Natural England's [Review of Nature Exposure and Human Health and Wellbeing](#), the *Natural and Sustainable Environments* chapter of [Spatial Planning for Health](#), and [The Nature Connection Handbook](#).

We note that in paragraph 146 of the explanatory text that social determinants of health are discussed. We suggest that you may want to reference the [Green Infrastructure Map \(naturalengland.org.uk\)](#) and [GI Mapping Analysis \(naturalengland.org.uk\)](#) that can be used to help assess deficiencies in greenspace provision linked with social deprivation indices and identify priority locations for new GI provision.

Policy GD7: Comprehensive and Coordinated Development

Natural England emphasise the importance of considering Green Infrastructure and Biodiversity Net Gain at the earliest stages of a masterplan so that they are fully integrated into the design of the development.

Housing Allocations

All the housing allocations should incorporate opportunities for Green Infrastructure and biodiversity enhancement. We recommend that the guidance within the Green Infrastructure Framework: Principles & Standards ([Green Infrastructure Home](#)) is followed to support planning for good quality GI and that this is considered at the earliest stages of the planning process.

Whilst we welcome the inclusion of the large green infrastructure areas shown on the illustrated layouts (HA1 – 7), such as green buffers and corridors, we emphasise that green infrastructure should also be connected throughout the proposed built-up areas to allow residents easy access to green spaces and to provide ecological links for wildlife.

We would also advise that BNG should be considered at the outset of the development proposals and should be delivered on the development site where possible.

We also emphasise the importance of agreeing the future management of green spaces within new developments so that it can be maintained at a high quality. It is suggested that if local communities are involved at the outset of development during the planning of local green spaces that this can help to reduce behaviours such as littering and boost involvement in care of green space. This in turn, has the potential to reduce maintenance costs.

We have specific comments on the following housing sites:

Policy HA8: Former Police Station, Cotton Lane

The site would offer an opportunity to improve GI links within this area of high-density housing and help achieve the “Green in 15” target.

Policy HA11: Former Shaftesbury Leisure Centre

We agree that the deciduous trees on the site should be retained. The site would offer an opportunity to improve GI links within this area of high-density housing and help achieve the “Green in 15” target.

Policy HA12: North of Sinfin Moor Lane

We note that this site was originally intended to include an area of open space we therefore suggest that any future housing development should incorporate a high-quality green space with connecting green infrastructure that is accessible to local residents.

Policy HA13: Bembridge Drive, Alvaston

We note that this site comprises open space including football pitches and the intention is retain an element of this in the area. We advise that it is important that as much green space is retained in this location which is an area of high-density housing and would offer an opportunity to improve GI links and help achieve the “Green in 15” target.

Policy HA14: Former Beaufort Business Centre, Chaddesden

We note that this site was is an area of green space within a high-density housing area we therefore suggest that any future housing development should incorporate a high quality green space with connecting green infrastructure that is accessible to local residents.

Policy HA15: Kitchener Avenue/Browning Street

We agree that BNG would be required on the site and the deciduous trees retained. The site would offer an opportunity to improve GI links within this area of high-density housing and help achieve the “Green in 15” target.

Policy HA16: Former Ivy House School

Natural England notes that this site is a green area in a high-density housing area within the high deprivation index. We therefore suggest that this site could offer an opportunity to create a valuable area of green space or linear walkway incorporating the deciduous tree which bound the site and help achieve the “Green in 15” target.

7. Economy

Policy E5: Land South of Wilmore Road (Infinity Park)

Natural England welcomes the provision set out in point e to protect and enhance the biodiversity resources and rights of way within the site and the amenity of the surrounding residential areas and a network of green infrastructure throughout the site.

Policy E6: SmartParc, Spondon

We advise that the development of this site should demonstrate that the proposal would contribute to the extension and enhancement of the green infrastructure network. We suggest that opportunities are taken to enhance green linkages to the River Derwent.

Policy E7: Indurent Park

This proposed site is immediately adjacent to the River Derwent, which is a Local Wildlife Site and the Sanctuary Local Nature Reserve is on the opposite bank. We reiterate the importance of protecting and enhancing Local Wildlife Sites and Local Nature Reserves and incorporating them into the wider green infrastructure network of the area.

E10. Tourism and Culture

Natural England welcomes sustainable tourism that would benefit communities and visitors and which enhance rather than damage Derby’s green and blue spaces. Well planned, cultural offers such as festivals and markets, as mentioned at point e, can provide valuable health and wellbeing benefits through connection with Derby’s natural environment.

Policy EN1: Green & Blue Infrastructure

Natural England generally welcomes this policy and supports its content but we advise that it should make reference to Natural England's Green Infrastructure Framework: Principles & Standards [Green Infrastructure Home \(naturalengland.org.uk\)](https://www.naturalengland.org.uk). The Framework, published in January 2023, follows from the commitment within the Government's 25 Year Environment Plan and outlines principles and standards for delivering good green and blue infrastructure (GBI) as part of new development. It is accompanied by a GI Planning and Design Guide, underpinning the National Design Guide, setting out detailed guidance for incorporating GBI within development proposals, which should be considered at the outset of scheme design.

We are very supportive of the inclusion of the recommendations to use the Urban Green Factor standard points (j, k & l and paragraph 430). Where the baseline biodiversity is low, the Urban Greening Factor can ensure development still promotes more nature-rich environments that increase the functionality, sustainability, and climate resilience, particularly in dense urban areas.

We would however also like to see reference to the other standards set out within the Green Infrastructure Framework - The five Headline Green Infrastructure Standards are:

S1: Green Infrastructure Strategy Standard

S2: Accessible Greenspace Standard

S3: Urban Nature Recovery Standard

S4: Urban Greening Factor Standard

S5: Urban Tree Canopy Cover Standard

These standards can provide the output measures so that developers have certainty over what green infrastructure is needed on site. They can be included as site specific and area-based requirements in site allocation policies. To help the GI standards to be delivered local authorities should set green infrastructure targets. These should include delivery levels over time. For instance, the % of people having good quality publicly accessible greenspaces within 15 minutes' walk from home by 2030. A GBI Strategy or Plan will be required to be submitted for all major development proposals, demonstrating how the development will deliver the GI Framework's 15 GI Principles and local GI Standards. GBI delivered within, or associated with, new developments should be managed, maintained and monitored for a minimum of 30 years.

We are pleased to note at point (b) that this policy requires that development should help deliver the aims and objectives of the Local Nature Recovery Strategy for Derbyshire.

We also draw your attention to the Nature Towns & Cities programme [Home - Nature Towns & Cities](#). This is a major UK initiative launched in 2025 to transform urban landscapes by embedding nature into the heart of communities, addressing the fact that 47% of people currently lack easy access to green space within a 15-minute walk of their home. Led by a coalition including Natural England, The National Lottery Heritage Fund, and the National Trust, the 10-year mission aims to improve mental/physical health, boost local economies, and create climate-resilient cities.

Policy EN2: Dark Infrastructure

Natural England supports this policy and the protection it would offer to nocturnal species and wildlife corridors.

Policy EN3: Open Space, Sport and Recreation Buildings

Natural England advises the new [Accessible Greenspace Standard](#) could also be considered within this policy which is included within the Green Infrastructure Framework and replace the ANGSt standards.

We suggest that there should be a cross reference to the Green Infrastructure policy as Open Spaces form part of the GI network.

Policy EN4: Allotments and Community Gardens

Natural England welcome this policy and the acknowledgement that they are an important resource for local food production, support biodiversity and promote sustainable and healthy communities. We also agree that they should connect to the wider Green Infrastructure network.

The provision of community gardens and urban food-growing spaces (such as allotments) offer opportunities for physical activity and promotes mental health and well-being. These spaces encourage social interaction and social cohesion, including more opportunities for doorstep or nearby nature access for communities with highest social need. For information about food growing sites, we refer you to p71 of [Natural England's Green Infrastructure Planning and Design Guide](#) and p30 of [Spatial Planning for Health](#).

EN5. Green Belt

We suggest that this policy should include provision to positively enhance land within the Green Belt and consider opportunities for habitat enhancements and potentially off-site sites for Biodiversity Net Gain (BNG)

Policy EN6: Green Wedges

Natural England particularly supports the point that Green Wedges should include nature conservation and off-site Biodiversity Net Gain enhancements, including improvements which provide multiple benefits to Derby's Green Infrastructure network, or which link the Green Wedge to the wider Green Infrastructure network.

Policy EN7: Green Gaps

Natural England particularly supports the point that Green Gaps should include Nature conservation and off-site Biodiversity Net Gain enhancements, including improvements which provide multiple benefits to Derby's Green Infrastructure network, or which link the Green Wedge to the wider Green Infrastructure network.

Policy EN8: Biodiversity and Geodiversity

Natural England generally welcomes this policy which establishes a framework for the protection of designated nature conservation sites across the Plan area. We suggest that the application of the mitigation hierarchy i.e. that development should first avoid, then mitigate, and as a last resort compensate for adverse impacts on biodiversity, should be made clearer within the policy wording. The current wording gives the impression that the mitigation hierarchy would only be applied to local sites. The following sentence could be used within the policy wording:

If significant harm to biodiversity resulting from development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission will be refused.

We acknowledge that the Local Nature Recovery Strategy has been mentioned across the Plan notably in Policy EN1 but we consider that it should also be mentioned here for the context. The Nature Recovery Network is a major commitment in the UK Government's 25-Year Environment Plan and intends to improve, expand and connect habitats to address wildlife decline and provide wider environmental benefits for people.

Your authority may consider making specific reference to LNRS section *iv. Description of potential opportunities for nature recovery in Derby City* (DE1 to DE6) which outlines ways to enhance nature within this urban area.

Policy EN9: Trees and Hedgerows

Natural England welcomes this policy. The Urban Tree Canopy Cover Standard set out within the Green Infrastructure Framework could also be referred to in the policy text.

Policy EN10: Biodiversity Net Gain

Natural England welcomes this policy and the comprehensive guidance it includes in both the policy wording and the accompanying text. We welcome the reference to the Derbyshire Local Nature Recovery Strategy.

Policy EN22: Air Quality

Emissions from increased road traffic resulting from new development, transport schemes, or industrial developments can impact biodiversity as well as people's health. Green Infrastructure makes places more resilient and adaptive to climate change and helps to meet zero carbon and air quality targets.

Trees can also play a vital role in improving air quality by reducing pollution through absorbing harmful gases and particles in the air. Your authority may be interested to use the Tree Equity Score which links tree coverage and health and how air quality can be improved with greater tree equity [Tree Equity Score UK - NHS Forest](#)

9. Climate Change

We are pleased to note that this section recognises climate change is not a single issue but a complex network of interdependent factors that must be addressed holistically. We also appreciate that various other aspects of climate change are explored in greater detail throughout different chapters of the Local Plan. We would suggest however that nature-based solutions are included more fully within this chapter. Natural England is keen to promote nature-based solutions for climate change, through the implementation of local plan policies. These measures include the installation of green roofs and walls in new buildings; the provision of Sustainable Urban Drainage Systems (SuDS) and wetlands; planting of street trees; habitat creation and enhancement to provide increased connectivity between fragmented areas of habitat to build up resilience to climate change and contribute to the Nature Recovery Network.

Policy CL1: Flood Risk and Water Management

The policy should positively contribute to reducing flood risk through SuDS (sustainable urban drainage systems), incorporating these as part of green infrastructure. A multi-functional approach to SuDS should be encouraged and take opportunities to incorporate features that enhance and maintain biodiversity as part of a coherent green and blue infrastructure approach. GI reduces flood risk, improves water quality and natural filtration, helps maintain the natural water cycle and sustainable drainage at local and catchment scales, reducing pressures on the water environment and infrastructure, bringing amenity, biodiversity, economic and other benefits.

Sponge Cities - Your authority may be interested to refer to the concept of "Sponge Cities" – this term comes from the idea that parts of urban areas can be designed to absorb and store rainwater, like a sponge, both to slow down surface water flow into drains (thus reducing the risk of storm event flooding), and to keep water available for the planting in green spaces to thrive in hotter summers. This capacity for storage is a sustainable way to tackle the challenges of climate change including the mitigation of urban flooding and higher temperatures. This approach utilises various green infrastructure elements which support the absorption, storage and reuse of rainwater, including: rain gardens, permeable pavements, urban trees and wetlands. This approach is also reflected in [Natural England Green Infrastructure Planning and Design Guide 2023](#).

Policy CL2: Our City Our River

Natural England supports this policy and is pleased to note that it will seek opportunities to provide environmental enhancements along the River Derwent Corridor, including enhancements to green infrastructure and biodiversity networks and will link in with the City's existing green network.

Policy T1: Active and Sustainable Transport

Embedding green infrastructure into walking and cycling routes can encourage the uptake of active travel, supporting increased physical activity, improved air quality and the reduction in vehicular traffic. Creating green corridors assists with urban cooling and increases people's opportunities to connect with nature and improve mental wellbeing. For more information we refer you to page 76 of the [Natural England Green Infrastructure Planning and Design Guide](#) and [The Healthy Streets approach](#).

Natural England would like to see green and safe active travel options to key nature conservation sites within Derby, particularly improved access to Allstree Park as it is currently separated from the city by the A38.

Policy T4: Protected Routes

Linkages should be made between urban areas and surrounding countryside to improve access to nature for all e.g. improved Public Rights of Way (PROW), access by public transport and active travel routes.

We suggest a route to the Peak District along the Derwent valley should be considered within this policy.

City Centre

Policy CC1: City Centre Strategy

Natural England generally welcomes this policy particularly point (5) which encourages the greening of streets and buildings. We encourage building in success factors including: planning for ecological effectiveness (e.g. tangible ecological gain) and strong engagement of city residents for effective buy-in and pride in place.

We also suggest that cross reference should be made to Policy EN1 to encourage the use of the Urban Greening Factor to focus on the provision of green roofs & walls, urban trees and connecting green infrastructure.

Policy CC10: Streets and Spaces

Natural England welcome the provision in this section to improve access to nature, enhance links to the GI network and integration of SuDs. We suggest that planting of city trees should also be included. Trees in urban areas planted along streets and in parks to create shade, clean the air, sequester carbon, reduce flood risk, and provide sensory interaction with nature.

We draw your attention to the [Tree Equity Score UK - NHS Forest](#) - Tree equity ensures all people, regardless of income or race, enjoy the health, climate, and economic benefits of trees. It addresses the disparity where lower-income, urban, and minority neighbourhoods often have fewer trees, resulting in higher temperatures, pollution, and poorer health.

Policy CC12: Derby Riverside

The River Derwent is a key green/blue corridor within the GI network of the City. Natural England welcome this policy particularly point (e) and (u) which aim to create new green spaces and nature conservation areas along the River Derwent.

Policy CC14: Railway Station Quarter

Natural England consider that this site is a great opportunity to design the station and its surroundings as an exemplar for green infrastructure within an urban environment and we are pleased to note point (p) which aims to make a significant contribution to the greening of the City Centre.

Policy CC15: North Castleward

We welcome the provision for tree planting and greening of the public realm in this policy.

Habitat Regulations Assessment - Screening

Natural England welcomes the opportunity to comment on the Habitats Regulations Assessment of the Derby City Local Plan.

We are satisfied that the Screening Report follows accepted methodology and is in line with appropriate legislation and guidance.

We can therefore confirm that we agree with the HRA report's conclusions that the Derby City Local Plan would not be likely to have a significant effect on a European Site either alone or in combination with other plans or projects, and no further assessment work is required.

Sustainability Appraisal Regulation 18 Interim Report

Natural England generally welcomes this SA interim Report and acknowledges that it follows accepted methodology and legislation.

We note that the SA has included an assessment of plan alternatives which consider the objectives and the geographical scope of the plan and have been satisfactorily described and evaluated. We also consider that the objectives and appraisal criteria that have been used in the SEA/SA framework are appropriate and cover Natural England's interests in the natural environment.

We note that at paragraph 1.7.4 a data gap is acknowledged regarding the Derbyshire Local Nature Recovery Strategy (LNRS). This document has now been completed [Homepage - Derbyshire's Nature Recovery Strategy](#). We look forward to seeing the added detail regarding sites and opportunities for Biodiversity Net Gain in the next iteration of the SA.



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7th March 2026

Our ref: TP/LNE/2026-030

Dear Sir/Madam,

Draft Local Plan for Derby Consultation - Representations of Network Rail

Please find below our comments on the Regulation 18 consultation on the Derby Local Plan. Our comments focus on two specific areas: the Station Quarter and, in particular, policy CC14; and the green Wedge designation of the Lower Derwent Valley and Chaddesden Sidings. A minor comment is also made in respect of housing allocation HA10.

With respect to Policy CC14 (Railway Station Quarter) you will be aware of representations made by Lichfield's on behalf of the Derby Station Quarter Board, outlining broad support for the policy and comments on associated relevant other city centre policies. Whilst it is recognised that the Station Board has been set up to represent the broad interests of the public sector bodies with a stake in the station, in matters concerning policy CC14 and car parking provision it does not fully represent the Rail Industry position. This was made clear to the Board in February 2026 and is repeated here in the form of an objection to the Policy as currently worded.

Our chief concern is that the Policy, in seeking to replace on a like for like basis the existing number of spaces, is inconsistent with the rail industry's view of the need to maintain and where possible increase car parking capacity at stations.

Rail passenger numbers generally continue to increase as a result of various capacity and linespeed improvements, allowing for the introduction of new or faster services. Coupled with employment growth in the main urban centres and worsening road congestion, this has improved the competitiveness of rail versus other modes.

As a result, the availability of existing parking at stations has reduced with many full before the end of the AM peak period. If parking is not available, there is a perception that some may choose to make their entire journey by car rather than use rail. Alternatively, the length of the access leg by car could be extended if there is a lack of parking at some stations. Extending station car parks with a competitive rail service that operate parallel to congested roads can also attract new users.

The ease and efficiency of parking significantly influence a commuter's journey choice, especially for time critical journeys. Additionally, the introduction of smart parking technologies allows customers to find or book a parking space in advance, adding peace of mind and saving time finding a space in the station parking facility.

East Midlands Railway's own parking data confirms that existing provision across the Derby station car parks is currently operating at an average occupancy of approximately 83 %, with forecast demand reaching 100 % by 2031. On this basis, the rail industry considers that an additional 200 car parking spaces will be required within the next ten years, alongside other appropriate sustainable transport interventions. The recent introduction of ANPR technology at the car parks will help to refine the current assessment by more accurately detailing the addresses of current car park users, to give a fuller picture of the hinterland served by the station. It is the rail industry's position that Derby station is an important railhead for not only the city but for much of the surrounding areas in South Derbyshire and Amber Valley as well, and as such will see an increase in demand in the next decade and beyond.

The rail industry would consider a phased approach to delivering additional car parking capacity within the following parameters:

- An increase of approximately 97 spaces above current provision by 2030; and
- Delivery of the full 200-space increase by 2035.

However, this position is subject to the following important points:

- The above figures do not account for existing ancillary "pockets of parking" outside the existing station car parks, nor for any additional parking demand arising from the wider development proposals. These would need to be taken into account as proposals develop.
- A firm, defined proposal, including deliverability assurance for all 200 spaces would be required before the rail industry could agree to the release of the car park at Hlland Street (known as Zone 3 land). While later delivery of the remaining circa 103 spaces could be phased, an undefined or unresolved position on how and where this capacity would ultimately be delivered would not be acceptable.
- The rail industry's strong preference remains for a **single, decisive car parking intervention** that delivers long-term resilience and minimises the need for future disruption, rather than incremental changes.

We should point out that the release of station car parking requires the approval of the ORR and must clearly demonstrate that it does not result in passenger detriment,

operational impact, or constraint on future growth. Based on our current assessment, the options presented to date by the Station Board do not meet these requirements. Furthermore, several matters remain unresolved, including proposed construction phasing to minimise impact, treatment of existing ancillary parking, and congestion impacts on the Pride Park side of the station.

As such, whilst we can accept much of the spirit of policy CC14 (Railway Station Quarter) we do not consider that criteria (b) & (i) of the policy are capable of addressing our concerns, given that it would require a substantial MSCP structure on the Pride Park part of the station to meet future car parking estimates, which would seem to be at odds with those criteria. Additionally, we are confused by criterion (k) which clearly states that there would be no additional public parking spaces – but it does not define whether a public parking space is one which the public can park in or whether it is a space owned and administered by a public authority. Given that Network Rail is in effect a public company is criterion (k) applicable to station car park spaces as well? If that is the intention, then we must object to the inclusion of criterion (k) since it would clearly stifle any future expansion of station car parking. The criterion either must be deleted or re-worded to make it clear it does not apply to station car parking.

Similarly, we cannot agree to the wording of policy T1 (k) which seeks to preclude any additional car parking at the station. This should be amended to delete the reference to no increase in spaces.

Our second representation concerns the Green Wedge and in particular the retention of its boundaries in the Lower Derwent Valley and our previous site tabled in the Call For Sites exercise (DER/00289).

We note the report on the Green Wedge by LUC on behalf of the Council (September 2025) which indicates that the Lower Derwent green wedge only makes a moderate contribution to defining and enhancing the urban structure of the city. It goes on to state that the site in question (00289, south of Chequers Road) *“would not significantly undermine the function of the GW as it would continue to provide some openness, and the connection to the countryside provided by the multi-user riverside path on the south bank of the river would remain. As a result, there would be **low-moderate harm** to the primary function of the GW.”*

A key point which is not picked up in the Green Wedge study is that the land on the north side of the Wedge as part of the suggested allocation is already classed as operational railway land, including a strategic freight site. As such, under Network Rail’s permitted development privileges a number of buildings and structures could be erected without the need for planning consent, thereby reducing the width and openness of the current Green Wedge in any event.

A key objective of the Local Plan as identified is to promote strategic proposals “that help create an economically and environmentally sustainable transport network” (policy T2 of

the Local Plan), and the promotion of the Chaddesden Sidings site for freight by rail would be consistent with that policy. There would also be the opportunity to retain the majority of the Chaddesden Sidings area as a significant area for bio-diversity enhancement and possible improved public access to the north bank of the river, consistent with the OCOR proposals.

As such we would wish to see the green wedge boundaries in the vicinity of the Chaddesden Sidings area to be amended to allow for rail-related employment development, in line with the previous submission in the “Call For Sites” exercise and mirroring the approved restoration plans of the former sand and gravel quarry, which created two development platforms set above the flood plain.

Finally, in respect of allocation HA10 (Elton Road works, Osmaston), we would appreciate clarification whether it is intended to create a link to the existing footpath that traverses part of the northern boundary of the allocation which in turn crosses the railway by means of a footbridge. Additionally, as well as ensuring the design of the housing mitigates against adjacent railway noise, adequate trespass-proof fencing of a minimum 1.8m height will be required alongside the railway boundary and this should be mentioned in the text of the policy.

Please let me know if you require any further information.

Yours Faithfully,

Tony Rivero
Town Planning & Heritage Manager Eastern (North)



DADLAF

Chair - Ian Else

By email to:

planningpolicy@derby.gov.uk

Dear Sir/ Madam

Draft Local Plan for Derby

Thank you for the opportunity to comment on the emerging Local Plan for Derby.

The Derby and Derbyshire Local Access Forum (DADLAF) was established under the Countryside and Rights of Way Act 2000 as an independent statutory advisor to decision making authorities (local authorities and other bodies) on the improvement of public access to land in its area for the purpose of the enjoyment of open-air recreation. It is dedicated to the promotion and improvement of public access and rights of way, as well as encouraging more sustainable and active forms of travel.

The Forum consists of individuals representing a wide range of interests in outdoor activities, including walking, cycling, horse riding and recreational motor vehicles, along with disabled access, health promotion, conservation, volunteering, rural/ public transport, local communities and landowners/ managers. The remit of the Forum is to consider matters which affect its geographical area which is the City of Derby and Derbyshire's County Districts of South Derbyshire, Erewash, Amber Valley, Bolsover, Chesterfield, NE Derbyshire and Derbyshire Dales, which lie outside the Peak District National Park.

Overall, the DADLAF welcomes the new plan which sets out a positive long-term vision and overarching spatial strategy for Derby through until 2043. Forum members also recognise it is a crucial document for assessing future planning applications which will help shape the future of the city.

As far as the Plan Objectives are concerned, we particularly support the inclusion of OBJ 7,8,9,13 and 14 which specifically seek to encourage better transport links by bus, rail and active travel (this should include walking, wheeling, cycling and horse riding wherever possible) and the continuing

Derby and Derbyshire Local Access Forum

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development of a network of attractive and accessible blue/ green infrastructure and open spaces connecting directly with the surrounding countryside, Derby's Green Wedges. These objectives will have positive outcomes in terms of reducing reliance on the private car, improving people's health and sense of wellbeing and helping nature to regenerate. They are also relevant given that 34% of Derby's population are obese compared to 22% nationally; 29% are inactive and 20% undertake no physical activity and 45.9% commute < 10Km for work and 49% drive to work. As the City grows there will be more demand for access to these open spaces.

General Development Principles

We welcome the General Development Principles set out in the document with **Policies GD4 and GD6** being of particular importance in terms of improving accessibility for everyone and contributing to people's health and wellbeing by providing facilities which encourage physical activity and social interaction and access to the natural environment. It is essential that any development proposals include a comprehensive and permeable network of active travel routes which are well connected to surrounding areas and everyday destinations, including integration with public transport. With regard to **Policy GD3**, it would be useful if the criteria to be observed by developments in relation to impacts on amenity could be expanded to include routes for accessible walking, wheeling and cycling.

We support the approach in **Policy GD9** to ensure that the necessary infrastructure is provided as part of the development. In terms of infrastructure to support walking, wheeling and cycling, consideration should also be given to the needs of horse riders in appropriate locations. If people are to be encouraged to use them, routes should feel safe eg for an eight year old to travel to school on and have properly constructed surfaces of sufficient width to minimise conflict where there is shared use. In order to help design out crime, they should be routed through areas of attractive public open space which are overlooked rather than being confined or hidden behind the fences to properties etc. We also strongly support the Council seeking developer contributions wherever possible towards infrastructure which encourages accessible sustainable/active travel, more green open space and nature recovery.

Housing Policies

We appreciate that there is a need to provide new housing as the population of Derby continues to grow and agree that the city's Green Wedges and Greenfield sites should be protected as far as possible. With more people living in Derby, this makes it even more important to have open spaces for recreation. As far as the housing allocations are concerned, we encourage the Council to strengthen its requirements wherever possible and practicable in terms of the provision of high-quality active travel connectivity through the development and beyond, linking into any adjacent existing housing, as well as with the wider strategic network and public rights of way in the open countryside, improved or new local bus services and pedestrian links to bus

stops, safe road crossings eg where sites are severed by busy main roads and junctions which are friendly for all non-motorised users.

Economy Policies

We welcome the recognition given to the vital role of culture and tourism and would stress the importance of facilitating and encouraging sustainable/ active travel between visitor destinations across the city, including the Derwent Valley Mills World Heritage Site, along with retail, places to eat and drink etc. Better connectivity with new and existing employment locations would help to reduce reliance on the use of the private car for commuting and the benefits this can bring in terms of reduced congestion and improved air quality.

Environment Policies

The DADLAF supports the inclusion of the policies to safeguard the natural environment, helping to support wildlife/ nature recovery and create attractive places for visitors and local communities. These in turn will have a positive impact on people's enjoyment of the outdoors, as well as their mental health, sense of well-being and connection with nature. Ensuring there are good, well-connected routes through the Green Wedges and Green Gaps into the surrounding countryside will encourage more people to access these areas.

As far as the historic environment is concerned, we particularly welcome the recognition given to the Derwent Valley Mills World Heritage Site in **Policy EN12**. This provides an opportunity for tourism and the local visitor economy using Derby City as a base. It would be further enhanced by the successful delivery of a continuous traffic free multi-user trail through the valley (useful to make reference here to Amion Consultants "Derwent Valley Cycleway-Value for Money" a favourable report prepared for Derby City Council in 2017). The Local Plan ought to specifically mention the Derwent Valley Trail, a key strategic route which is also being put forward as a competitive bid to be selected as one of the Government's proposed new National River Walks. We would also encourage the City Council to explore opportunities for developer contributions from proposed developments towards the completion of the cross-boundary section of the route between Haslams Lane, Darley Abbey and Ford Lane, near Little Eaton for which funding is also being sought from EMCCA and National Highways in relation to the A38 Derby Junctions Scheme. There is also a need to improve access to the DVMWHS by sustainable means using bus and rail as an alternative to the private car.

With regard to **Policy EN19**, consideration should be given to appropriate public access through the City's Historic Parks and Gardens and Protected Landscapes. Opportunities to improve local air quality through new development proposals (**Policy EN22**) were also considered to be very important.

Climate Change Policies

Whilst we welcome the inclusion of policies to address the impact and causes of climate change, some thought needs to be given in relation to **Policy CL2**:

Our City Our River to safe access and egress arrangements for the public from areas protected by flood defences for example in an emergency when the river is in flood and the floodgates are closed. At present some routes require people to scramble up steep banks. Also, during flood conditions, the Ring Road becomes a route which people want to use on foot or to cycle.

Infrastructure and Community Facilities

We support the provision of any infrastructure which facilitates bringing people together in a setting which helps to foster social cohesion/inclusion and improve their health and well-being.

Transport and Movement

We fully support the inclusion of **Policy T1** relating to active travel and sustainable transport. Again, we would like to see provision for horse riding referenced alongside walking, wheeling and cycling as part of the transport hierarchy. Improving permeability and connectivity for all users within new development sites is important but also crucial between adjacent areas to ensure that public transport and active travel routes are fully integrated to provide continuous links. The DADLAF particularly welcomes the reference to protecting and enhancing the public rights of way network which is often overlooked by developers, with footpaths or bridleways being diverted onto estate roads or pushed to the edge of a new development. Providing facilities for cyclists, such as secure cycle parking and local bus services from the outset is also important.

We welcome the references in **Policy T2** for Transport Infrastructure relating to the implementation of the 'Statement of Actions' in the Rights of Way Improvement Plan and implementation of the Key Cycle Network which requires close partnership working with a variety of different organisations and surrounding local authorities, including Derbyshire County Council for the successful delivery of strategic cross boundary routes. With regard to rail travel there is a need for trains to be capable of carrying mobility scooters and cycles adequately. As well as permeability for buses, there needs to be improved coordination between bus and rail services, along with better information eg about train times for multi-modal journeys and onward journeys by bus. For example, in Derby not all buses go from the bus station but from bus stops nearby. There is a faster, more frequent service from Derby to Burton leaving from outside Derby Bus Station rather than the bus station itself, but you would need to know that already as there is no obvious information to tell potential passengers this. The challenge is how best to get this information to people – google maps and travel apps are an obvious way (but not everyone has a smartphone) or through the use of travel information totems. All buses going to Derby Railway Station used to appear on the boards at the bus station with a train symbol, which was extremely useful but is no longer used.

As far as the implementation of National Highways A38 Derby Junctions Grade Separation scheme is concerned, there will be a considerable amount

of disruption for people travelling through these areas either by car or by bus while this work, which is expected last for about 3 years, is underway. The situation needs to be carefully managed to help reduce any negative impact on local businesses and educational institutions as a result of potential employees and students being put off coming to Derby for work or university.

Policy T4: Protected Routes – we support the protection of the multi-user routes which are identified in this section. It is also encouraging to note that the Council will seek to create new, and improve existing, footpath, cycle and bridleway links throughout the city and will support proposals which will deliver the infrastructure or schemes contained within the Rights of Way Improvement Plan and the Local Cycling and Walking Infrastructure Plan. Consideration should be given to providing better promotion for this network of different routes, along with improved signage/wayfinding to make it clear who can use them.

Policy T6: Transport Mobility Hubs – The DADLAF welcomes the creation of new transport mobility hubs and the benefits they can bring to encourage more sustainable/ active travel modes. Consideration should be given to where best they can be located so they are easily accessible and serve the greatest number of people, along with the possibility of including other facilities in some locations, such as cafes and Wi-Fi access.

City Centre Policies

CC12: Derby Riverside – we acknowledge that the full potential of this area has been long overlooked and support the overarching aims for its regeneration, particularly in relation to the creation of new and improved pedestrian and active travel links, the creation of new green spaces and enhanced public realm which respect the historic environment and have regard to the nature conservation and landscape value of the River Derwent.

We trust you will find these comments useful and look forward to receiving any feedback in due course.

Yours faithfully



**DIRECTOR OF LEGAL AND DEMOCRATIC SERVICES
ACTING AS SECRETARY TO THE FORUM**

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By email: planningpolicy@derby.gov.uk

Date: 9 March 2026

Our ref: 41544/17/JF/AG/40673547v7

Dear Sir / Madam

Representations to the Consultation on the Draft Local Plan for Derby

We write in response to the above consultation on behalf of our client Wilmslow (No.3) GP (Nominee A) Limited & Wilmslow (No.3) GP (Nominee B) Limited ('Derbion'), who own and operate the Derbion Centre and several other key sites within Derby City Centre. These include the former Eagle Market site, Riverside Car Park and Bradshaw Way Retail Park.

Executive summary

Derbion supports the draft plan's overarching focus on encouraging growth in Derby City Centre, delivering new homes, diversifying uses, and strengthening the city's economic role. The strategy is positive and aligns with Derbion's ongoing investment in key regeneration sites.

The plan must retain sufficient flexibility to allow for new uses to come forward in different parts of the City Centre if they will promote vitality and footfall. Policies should not avoid being overly prescriptive, as this risks constraining the natural evolution of the City Centre and limiting opportunities to enhance activity.

To ensure the plan is sufficiently ambitious, flexible, and deliverable, several amendments are required, as follows:

- 1 Clarification to be added to Policy GD1 specifying which types of applications will be required to use the Council's 3D model;
- 2 Greater clarity in Policy CC6 on existing context heights and whether taller 'local landmarks' or 'district landmarks' will be considered acceptable;
- 3 Removal of the requirement in Policy CC6 for all proposals for tall buildings to be submitted as full planning applications;
- 4 Policy EN1 to be updated to require proposals meet the stated Urban Greening Factor targets unless robust, site-specific evidence demonstrates that this cannot reasonably be achieved;

- 5 Land within Derbion's ownership to be added to the Central Activity Area boundary and therefore removed from the 'Quiet Area';
- 6 Amendments to Policy CC4 to update the site capacities and remove the requirement for 'taming' the ring road from the Bradshaw Way allocation;
- 7 Update Policy T1 to ensure that proposals account for impact on traffic flow;
- 8 Remove restrictions relating to Class E uses from Policy CC9;
- 9 Remove discouragement of vinyls from Policy EN20; and
- 10 Update Policy EN21 to be less prescriptive and ensure requirements relating to fascia signage only apply where relevant.

Ownership interests in Derby City Centre

Derbion is a major retail and leisure destination, occupying a prominent part of Derby City Centre. It continues to evolve through ongoing investment in new brands, customer experiences, and projects such as the Eastern Gateway. Derbion plays a central role in the economic success of Derby, generating significant footfall and attracting a significant regional draw to the shopping centre. As such, the owners of Derbion have a long-term interest in the future of the City Centre and the planning policy that will guide its evolution.

Derbion plays an active role in delivering major regeneration projects across the city. The Derbion Masterplan refers to the long-term vision for the redevelopment of key sites under their ownership: Eagle Quarter ('EQ') (comprising the former Eagle Market) and Bradshaw Way Retail Park ('BW'). Derbion has also explored options for the redevelopment of the former Riverside Car Park. The masterplan is designed to complement and support the existing centre and its significant position within Derby. It represents a clear commitment to supporting Derby's regeneration ambitions, in alignment with the Council's vision for the City Centre.

Derbion has already secured outline permission for the redevelopment of Bradshaw Way (ref. 24/01738/OUT), with permission granted in October 2025 for up to 478 homes. On the Eagle Quarter site, there is an outline application with resolution to grant (ref. 25/01315/OUT), which allows for up to 674 homes. The Section 106 agreement is currently being finalised.

City Centre development

Derbion supports the draft plan's strategy for focusing investment, renewal and regeneration activity within the City Centre (Policy CC1). We agree that the City Centre should be prioritised as the most important and sustainable location for growth, and welcome the emphasis placed on encouraging the City Centre as a location for new housing. We recognise that this is the first Local Plan for Derby to plan for significant new residential development in the City Centre and this approach is fully supported.

Design and placemaking

Derbion supports the emphasis in the draft plan towards high quality placemaking and well considered architectural and urban design (Policy GD1). Getting these elements right is central in ensuring the correct development comes forward in Derby.

Policy GD1 states that applicants proposing development in the City Centre are encouraged to use the Council's 3D model / digital twin to help demonstrate compliance with policy requirements. The supporting text states that this will be required for 'emerging proposals within areas of particular sensitivity or change'. This approach is supported on the largest redevelopment schemes in Derby, however, we consider it would be unduly onerous on other schemes. Clarification should be added to the policy on when the Council expects this modelling work to be carried out.

Tall buildings

Derbion welcomes the acknowledgement in Policy CC6 that tall buildings will increasingly contribute to accommodating growth and supporting the legibility and vibrancy of the City Centre. Tall buildings should play a key role in the development of the City Centre and allowing for its evolution into a 21st century city.

However, we consider this policy should be modified. It is too conservative in its interpretation of tall buildings and should be more ambitious. The policy definition of 'tall buildings' provided is those 'at least twice the prevailing context height'. This is modest for the key City Centre locations identified in the policy as suitable for accommodating tall buildings, where larger scale development is appropriate and will contribute to enhanced legibility and entirely appropriate. There is no reference in the policy to the potential for local or district landmarks, as was the case in the Tall Buildings Study, which were defined as 2-3 x context height and 3-5 x context height respectively. These tallest buildings will play an important role in Derby's townscape and ensuring differentiation amongst new development.

The policy also requires further clarification on how prevailing heights are identified across different parts of the City Centre. It is unclear whether this will use the same prevailing heights identified in the Tall Buildings Study, and this should be clarified in the next revision of the plan.

We do not support the policy requirement for all proposals for tall buildings to be submitted solely as full applications, rather than in outline form. It is common practice for large masterplan developments to be submitted as outline applications to establish the principle of development without the requirement to provide the full level of detail required by a full planning application.

Government guidance notes that an outline application 'allows for a decision on the general principles of how a site can be developed'. This form of application therefore helps to manage risk for developers, increasing the likelihood that new schemes will come forward on complex brownfield sites. Detailed design is then subsequently provided for the Council's approval at reserved matters stage once the key principles have already been agreed. The Council therefore retains full control over detailed design matters at reserved matters stage, making the blanket restriction unnecessary and potentially harmful to deliverability. This requirement should be removed from Policy CC6.

Green & blue infrastructure

Policy EN1 outlines the approach to safeguarding, enhancing and providing new green and blue infrastructure. This includes an expectation for development proposals to maximise the use of green roofs and walls. 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 to provide an Urban Greening Factor ('UGF') score of at least 0.3 for mixed-use or commercial development and 0.4 for residential sites.

We support the principle of promoting further urban greening in new development and recognise that this reflects wider national policy trends, based on the adoption of UGF standards elsewhere. However, it is essential that Policy EN1 retains sufficient flexibility to ensure that these requirements do not act to stifle development from coming forward because of viability issues. We therefore recommend policy wording that requires proposals to meet the stated UGF targets unless robust, site-specific evidence demonstrates that this cannot reasonably be achieved. This would ensure that greening objectives are pursued wherever feasible while avoiding a rigid approach that could compromise deliverability.

City Centre boundary and Primary Shopping Area

Policy CC1 defines the City Centre boundary, and Derbyon supports the extent of the area identified. The Primary Shopping Area ('PSA') is shown in Figure 49 and covers a much smaller part of the centre. Policy E8 sets out the sequentially preferable location for new uses. The wording of this policy requires refinement, as it is currently unclear whether comparison retail should be directed to the wider City Centre or to the PSA. Greater clarity is needed to ensure that the sequential approach is applied correctly.

Central Activity Area and Quiet Zone

The Central Activity Area ('CAA'), as per Figure 29, is the preferred location for new office floorspace (Policy E4), new food, drink and leisure uses (Policy CC8), and uses that may generate night-time noise and disturbance, such as pubs, bars, takeaways, etc (Policy CC11). The CAA boundary excludes much of the land within Derbyon's ownership, including the Derbyon Centre and the EQ and BW sites. This is despite the Derbyon Centre falling within the PSA.

The CAA boundary should be extended to include the entirety of the PSA and also the EQ and BW sites. The PSA comprises retail uses, which fall under Class E and can be interchanged between retail, office, and food and drink uses. It therefore is illogical that part of the PSA should fall outside of the CAA boundary. The CAA should capture all the key activity of the City Centre and therefore should include all the core retail function. The EQ and BW sites already operate as major commercial destinations and are entirely suitable locations for the commercial activities that are to be focused in the CAA. The caption for Figure 29 should also be corrected, as it refers to "Derby's City Centre" whereas it in fact shows the CAA boundary.

By contrast, Policy CC11 proposes a "Quiet Zone" for areas outside the CAA, with restrictions on opening hours for certain uses. It would be illogical for Derbyon's sites, which are commercial, high-footfall locations with established retail, leisure and evening-economy roles, to fall within this zone. Incorporating these sites within the CAA would resolve this and prevent inappropriate restrictions that could undermine their contribution to the vitality and economic success of the City Centre.

Residential-led, mixed-use site allocations

Derbyon supports the allocation of BW and EQ for residential-led mixed-use development under Policy CC4 and the plan's recognition of these sites as suitable locations for housing and mixed-use growth.

The draft allocations identify a capacity of 400 homes on each site. While this broadly aligns with the approved outline permission for 478 homes at BW, it does not reflect the position at EQ, where there is a resolution to grant outline permission for up to 674 homes. It is not logical for the two sites to be assigned identical capacity figures given their differing scale and development potential. Policy CC4 should be amended so that the stated capacities match the figures in the permissions.

The BW allocation refers to opportunities to enhance connectivity through ‘taming’ of the inner ring road in this location. This does not form part of the approved outline permission and therefore cannot be secured. Moreover, the phrase ‘taming’ is overly ambiguous in what measures should be introduced. This should be addressed during a future revision of the policy.

Derby Riverside

Derbion is the owner of the Riverside Car Park, which is an underutilised site in a key location. We support the recognition of this site’s potential redevelopment under Policy CC12, which includes the car park site in the Derby Riverside area, referred to as a significant brownfield regeneration opportunity.

Significant design and technical work was recently carried out by Derbion regarding the redevelopment of the car park site to provide up to 420 residential units and new areas of landscaping. Derbion would welcome the opportunity to engage with the Council further in discussions about the future of the car park site and its relation to the wider Derby Riverside area.

City Centre employment and education

Derbion welcomes the plan’s support for the development of new office floorspace and the growth of creative industries within the City Centre (Policies E4, CC1, CC7). A stronger office market will play a key role in growing Derby’s economic prospects and assist in attracting a diverse workforce to the city.

Derbion also supports the ambition to work with educational establishments to grow the role that the City Centre plays in education provision. Reference in Policy CC13 to a new City Centre Campus for the University of Derby would assist in attracting more young people to the centre. This represents a long-term opportunity to drive footfall, support complementary uses and reinforce the vibrancy of the area.

Traffic flow

Derby has long experienced challenges with traffic flow, much of which stems from problems relating to the Inner Ring Road. These issues constrain movement into and around the city centre. With the Draft Local Plan encouraging significant new residential, office, and commercial development within the centre, it is essential that these ambitions are supported by a coherent and coordinated approach to managing traffic flow. Policy T1 requires clear recognition that proposals must be considered as part of an integrated strategy, accounting for cumulative effects, to ensure that city centre development does not exacerbate congestion problems.

Development beyond the City Centre

Derbion supports the proposals outlined in Policy H1 to work with neighbouring local authorities to allow for new urban extensions to meet the City’s needs. To meet Derby’s housing needs over the Plan

period and allow for the city to continue to grow and develop, it is necessary to allow for development outside the city's boundaries.

Notwithstanding this, the brownfield and City-Centre-first strategy is appropriate, and the continued prioritisation of the City Centre for retail, commercial, and residential development is fully supported. A careful balance needs to be struck between allowing for necessary new urban extensions and ensuring the City Centre remains the key focus for development and accommodating as much housing growth as possible given its strategic and sustainable location.

Management of City Centre assets

Derbion supports the draft plan's overarching aim for reducing vacancy rates, promoting active frontages and increasing the diversity of uses within the centre, in particular supporting the focus on leisure and meanwhile or other temporary uses (Policies CC1, CC8, and CC9). These uses are playing an increasing role in sustaining City Centre vitality, and it is important that they have clear policy support. These policy aims align with emerging retail and leisure trends and support the long-term stewardship of the Derbion Centre and other assets. However, in our view, there are some policies that are unduly restrictive in how they would control City Centre uses.

Class E restrictions

Policy CC9 seeks to impose conditions that restrict uses for Class E permissions. 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 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 restrictions proposed in Policy CC9 run counter to this and risk undermining efforts to revitalise Derby City Centre. We therefore recommend that this restriction is removed from Policy CC9 in the next iteration of the Local Plan.

Advertisements

Policy EN20 places multiple restrictions on advertisements in the city, including limiting the use of poster display boards and vinyl stickers. 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. The discouragement of vinyls is not necessary and should be removed from the policy to allow for their use, where serving a clear functional or visual purpose.

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. The Local Plan should explicitly acknowledge this shift and ensure that policies remain proportionate, enabling well-designed digital displays in appropriate locations rather than inadvertently deterring major occupiers through overly restrictive controls.

Shopfronts

Policy EN21 lists a number of requirements relating to shopfronts, such as for signage to be accommodated only within the fascia above the façade, and canopies or shutters to be integrated into the shopfront. These requirements are overly prescriptive and do not reflect the variety of buildings and frontages in the City Centre. Many units in the Derbion Centre don't have a defined fascia and couldn't meet this requirement. The policy should therefore be amended to clarify that such requirements apply only where they are appropriate to the building's design and context.

Conclusion

Derbion welcomes the Draft Local Plan's strong commitment to supporting sustainable, mixed-use regeneration within Derby City Centre. We are supportive of the overall vision and many of the policies that underpin it. The refinements suggested in these representations are necessary to ensure that the plan remains flexible, deliverable and capable of supporting the investment that is essential to securing the city's long-term growth and economic success.

Derbion looks forward to the next version of the plan and the opportunity to discuss the matters outlined above with the Council between now and then. We would be happy to arrange a meeting to discuss these representations. Please contact me with any questions about these representations.

Yours faithfully



Alison Bembenek

Associate Director

BA (Hons) MA MRTPI

Derby City Council
Council House
Corporation Street
Derby
DE1 2FS

By email: planningpolicy@derby.gov.uk

Date: 9 March 2026

Our ref: 70708/04/JK/DHo/40751720v6

Dear Sir / Madam

Draft Local Plan for Derby Consultation - Representations on behalf of the Derby Station Quarter Board

We write on behalf of the Derby Station Quarter Board. The Derby Station Quarter Board has been brought together to join public sector partners to focus upon the delivery of ambitious regeneration proposals developed for Derby station. It comprises Network Rail, Platform4, Derby City Council, Homes England, East Midlands County Combined Authority and East Midlands Railway. Derby City Council and Platform4 jointly chair the Board, and Platform4 is providing a development management role for the rail related land, as well as being a landowner within the Station Quarter red line boundary.

These representations account for the broad interests of the Board in relation to the proposed regeneration of the Station Quarter. Separate representations are being prepared by Network Rail and East Midlands Railway, focusing on specific operational matters relevant to the rail industry.

Platform4 is a government-owned regeneration company formed through the merger of London & Continental Railways Ltd and Network Rail's property development business. It acts as a national regeneration business focused on unlocking development opportunities across the railway estate and surrounding land. Platform4 is 100% owned by Network Rail.

Platform4 has been working in regeneration partnership with Derby City Council since 2021, with the objective of bringing forward residential-led regeneration of the land surrounding Derby East Midlands Railway Station, known as the Railway Station Quarter.

Development at the Railway Station Quarter is guided by the Station Quarter Interim Planning Guidance document (the IPG), adopted in June 2025.

The predominant land ownership within the Station Quarter rests within the rail estate; the extent of which is illustrated by the Ownership Plan included at Annex 1 of this letter. Platform4 owns the freehold to Midland House and a separately located car park at the southern extent of the red line boundary, whilst the bulk of the residual land lies within Network Rail freehold and East Midlands Railway leasehold ownerships.

All car parks (Zones 1, 2 and 3) rest within Network Rail freehold and East Midlands Railway (EMR) leasehold. EMR, as Train Operating Company and leaseholder, operates the station car parks. The Zone 2 car park is identified in the IPG as sub area B, whilst the Zone 3 car park is identified as sub area A.

Train Operating Companies in Great Britain are being brought under public ownership and transitioning to Great British Railways (GBR) as contracts expire, a process that began in 2025 and is expected to be completed by October 2027. The new structure will centralise control of rail services and infrastructure, with full integration of operators anticipated within that timeframe. It is currently anticipated that EMR will be nationalised in December 2026. It is anticipated that this move will simplify landownership structures across the Station Quarter.

These Representations focus on the strategic matters that are contained within the consultation document and relate specifically to the rail estate's land interests at the Railway Station Quarter.

Policy CC14: Railway Station Quarter

The Derby Station Quarter Board strongly supports the Council's strategy to secure the residential-led regeneration of the Railway Station Quarter. Platform 4 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 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 CC14 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.

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 strongly accords with the clear shift in emphasis set out in the emerging National Planning Policy Framework [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 CC14 therefore aligns closely with the overarching direction of the emerging 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

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 Appendix 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 allow 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 forthcoming simplification of rail ownership structures through GPR, 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 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 regeneration in surrounding Sub-Areas.

The principle of the car park, and the broad approach to its design, are established through the IPG and 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 hub, 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. 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 partnership with private developers, local authorities, and transport agencies. It has an established working relationship with Derby City Council and has been actively 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 and credible basis for meeting the plan period target of 500 homes.

Conclusion on Policy CC14

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.

In summary:

- Sub-Area A is suitable for residential-led redevelopment of up to 530 dwellings in this highly sustainable location;
- 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 identified as an integral component within the adopted IPG, and is supported by a clear funding and delivery pathway; and,
- Residential development can realistically be delivered within a ten year time frame.

The allocation of the Railway Station Quarter is therefore robust, comprehensive and deliverable, with Sub-Area A forming a substantial and credible component of the anticipated housing trajectory.

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.

Policy CC1: City Centre Strategy

The Derby Station Quarter Board welcomes the draft 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 both the current and emerging draft NPPF, reflecting the requirements to make efficient use of land, prioritise previously developed land, and to increase the density of development in 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. Platform 4 considers that this strategy is consistent national policy and represents a sound basis for accommodating growth within the plan period.

Policy CC2: City Centre Boundary

Policy CC2 sets out the updated City Centre boundary, incorporating the full Railway Station Quarter, including the Zone 2 and Zone 3 car parks. Platform 4 fully supports this boundary, 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.

Policy CC3: City Centre Living

Policy CC4 sets out the intention to transform the city centre into an attractive, safe and healthy place to live, and reiterates the intention for the Railway Station Quarter to provide a minimum of 500 new homes.

This is the first Local Plan for Derby to actively plan for substantial residential development in the city centre, and this approach is strongly endorsed.

As set out in our representations in respect of Policy CC14, the concentration of residential development within the Railway Station Quarter aligns with the direction of the emerging 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 CC14, the land required to deliver 500 homes is within rail industry control, and is suitable, available and deliverable.

Policy CC6: Tall Buildings

The Derby Station Quarter Board welcomes the recognition that tall buildings have an important role to play in accommodating growth and supporting the legibility and vibrancy of the city centre (Policy CC6). We agree that tall buildings should contribute positively to the development of the city centre and facilitate its evolution into a 21st century city.

The board also supports the identification in Figure 47 of the two locations within the Station Quarter as having potential for development of tall buildings, in accordance with the IPG.

However, we consider that the policy could be more ambitious in its interpretation of tall buildings. The current definition, identifying tall buildings as those “*at least twice the prevailing context height*” is relatively modest for the key city centre locations highlighted as suitable for such development. Further clarity would also be beneficial regarding how prevailing heights are determined across the city centre. It is not clear whether the figures in the Tall Buildings Study will be used as the basis for this, and we suggest this is clarified in the next iteration of the plan.

We also note the policy requirement that all proposals for tall buildings must be submitted as full planning applications. For large-scale masterplan developments, it is common practice for outline applications to be used to establish the principle of development without requiring full detailed proposals. This approach helps reduce risk for developers and attract investment, increasing the likelihood that large and often complex brownfield sites will come forward. Detailed design can then be addressed at the reserved matters stage, allowing the Council to retain full control over height and other design matters. Accordingly, we consider that Policy CC6 as currently drafted is not justified or effective, and the blanket requirement for full applications could be counterproductive to delivery and should be reconsidered. Should the Council consider it necessary to retain such a requirement, we would advise that should allow for exceptions, for example where an outline application would facilitate the delivery of comprehensive regeneration on sites allocated for such development.

Finally, it is noted that the policy seeks to define the validation requirements for applications for tall buildings. Platform 4, on behalf of the Board, is of the view that such requirements should serve as a

guide and be applied on a site by site basis, as the nature, scale and context of individual sites and proposals can vary significantly, meaning a rigid application of the requirements could unnecessarily constrain regeneration proposals.

This is particularly relevant in light of the clear direction of travel in the emerging NPPF (DM2), which seeks to limit the scope of local validation checklists. DM2 states that where Development Plan policies requiring specific further assessments are introduced, such additional information requirements should not be applied equally to all applications but should be proportionate to the scale of the development of its potential impact.

In this context, it will be important for the Council to clearly justify the need for any tall building-specific validation requirements and to ensure that they are applied flexibly and proportionately, rather than uniformly to all proposals. We would suggest that the wording of CC6 is updated to clarify this flexibility, to ensure that Policy CC6 is justified and effective.

Policy CC7: Business, Creativity and Learning

The Derby Station Quarter Board supports the intent of Policy CC7 to encourage a more vibrant and diverse office market within the City Centre and to strengthen the role of the creative industries sector. We particularly welcome the focus on directing new office floorspace associated with the rail industry to the Railway Station Quarter. The Council will be aware that Midland House, the anchor asset within the Station Quarter, is a contender for Great British Railways Headquarters (HQ). If chosen, a rail industry HQ would maximise the strong agglomeration benefits with the existing rail industry supply chain present throughout Pride Park. This approach is supported as it helps to generate footfall, support complementary businesses, and create potential synergies with the railway uses as well as the learning sectors already present in Pride Park, reinforcing the Station Quarter as a vibrant area to live and work.

Policy EN1: Green and Blue Infrastructure

Policy EN1 sets out the Council's strategy for the protection, enhancement and delivery of green and blue infrastructure. EN1 requires development proposals to optimise opportunities for green roofs and green walls, with major schemes required to demonstrate that their incorporation and long term management have been properly considered. The policy also introduces minimum Urban Greening Factor thresholds, requiring a score of at least 0.3 for mixed use or commercial development and 0.4 for residential schemes.

We are supportive of the objective to increase urban greening as part of new development and acknowledge that this aligns with broader national policy direction, including the application of UGF standards in other authorities. However, it is important that Policy EN1 is applied with an appropriate degree of flexibility so that the requirements do not inadvertently constrain otherwise sustainable development on viability grounds.

Planning policies should not undermine the deliverability of the Local Plan. Given that this will invariably change design solutions for some key city centre sites, it will be critical that the Local Plan be supported by a Viability Assessment that cumulatively tests the impact of policy requirements on the viability of sites allocated in the Local Plan in due course.

We also suggest that the policy wording is revised to make clear that the stated UGF benchmarks should be achieved unless it can be demonstrated, through robust site-specific evidence, that it would not be reasonable or feasible to do so.

Such an approach would secure meaningful greening outcomes wherever practicable, while ensuring that the deliverability of regeneration proposals is not undermined by an unduly inflexible framework.

Policy EN10: Biodiversity Net Gain

Platform 4 supports the principle of delivering measurable Biodiversity Net Gain [BNG] as part of new development and recognises its contribution to creating habitats. However, BNG and the associated requirements are already defined in national legislation and statutory guidance, meaning the need for additional local policy and validation requirements is unclear.

We therefore suggest that the policy is clarified to remove any unnecessary or duplicative local validation or policy requirements for BNG, ensuring that the policy remains consistent with statutory requirements and does not impose unnecessary burdens that could constrain the deliverability of sustainable development.

Policy CL3: Sustainable Design & Construction

Platform 4 supports the overarching objective of Policy CL3 in seeking to reduce carbon emissions and embed sustainable design principles within new development. The emphasis on the Energy Hierarchy and fabric-first approach is supported in principle.

However, the requirement for major non-residential development to achieve a minimum BREEAM 'Excellent' rating, and for larger residential schemes to achieve BREEAM Communities 'Excellent', represents a very high policy bar. While aspirational standards are welcomed, it is important that such requirements do not undermine the viability and deliverability of allocated sites, particularly within the city centre where abnormal costs, remediation, and regeneration objectives may already place pressure on scheme viability.

As currently drafted, the policy does not include an explicit viability caveat. This contrasts with approaches taken in other cities, such as Birmingham, where equivalent sustainability standards are subject to viability considerations and site-specific circumstances.

Planning policy must not compromise the deliverability of the Local Plan. It will therefore be essential that the cumulative impact of Policy CL3, alongside affordable housing, urban greening, design, and other infrastructure requirements, is robustly tested through whole-plan viability evidence. Without such testing, there is a risk that the policy may render key regeneration sites undeliverable.

On this basis, the current wording is not considered to be effective or justified. Platform 4 therefore suggests that the policy wording be amended to clarify that BREEAM 'Excellent' (or equivalent) should be achieved unless it can be demonstrated, through robust viability evidence, that this would not be feasible or would compromise the deliverability of the development. This approach would maintain the Council's ambition in respect of sustainable construction, while ensuring flexibility to respond to site-specific constraints and safeguarding regeneration delivery.

Policy H4: Affordable Housing

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. 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.

Conclusion

The Derby Station Quarter Board welcomes the Draft Local Plan's strong commitment to supporting sustainable regeneration within Derby City Centre. We are supportive of the overall vision and many of the policies that underpin it. The refinements suggested in these representations are necessary to ensure that the plan remains flexible, deliverable and capable of supporting the investment that is essential to securing the city's long-term growth and economic success.

Importantly, the rail industry is committed to working together with the local authority and other partners to deliver a suitable and modern gateway that is reflective of an ambitious city like Derby.

The Board looks forward to the next iteration of the Plan and to discussing the matters outlined above with the Council in advance of its publication. We would welcome the opportunity to meet to discuss these representations in more detail.

Should you have any queries in the meantime, please do not hesitate to get in touch.



Yours faithfully

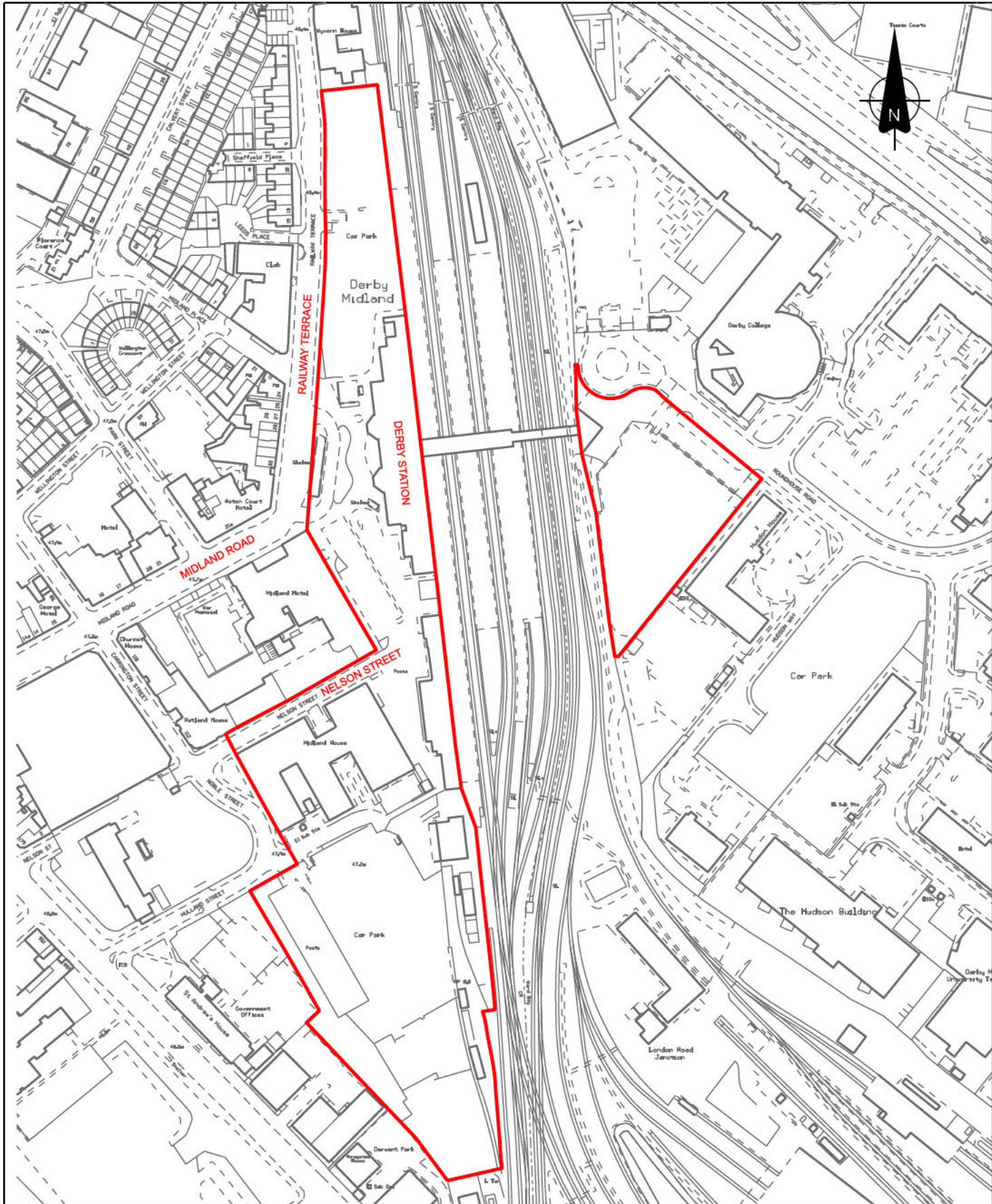
A handwritten signature in blue ink, appearing to read "D Holding". The signature is fluid and cursive, with a large loop at the end.

Dominic Holding
Associate Director
MTCP MRTPI

Enclosures Land Ownership Plan



Annex 1: Rail Industry Land Ownership Plan



Rev.	Description	Drawn	Checked	Approved

Notes

1. This plan has been produced to comply with HMLR Practice Guide 40. Care should be taken when reproducing this plan from a PDF as scaling errors may occur.

Legend

-  Land within Rail Industry Control

PLAT
FORM
4

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Drawing Title

**DERBY STATION
LAND WITHIN RAIL
INDUSTRY CONTROL**

Drawn BR	Checked	Approved
Date 05 March 2026	Original Scale 1:2500	Original Size A4
Drawing Number PF4-DCG-030-00004		Rev. 00

From: clerk@ockbrookandborrowwashparishcouncil.gov.uk
To: [Sheila Mitchell](#)
Subject: Re: Draft Local Plan for Derby Consultation
Date: 17 March 2026 13:40:25

You don't often get email from clerk@ockbrookandborrowwashparishcouncil.gov.uk. [Learn why this is important](#)

CAUTION: This email originated from outside of the organisation. Do not reply, click links or open attachments unless you recognise the sender and know the content is safe.

Hi Sheila,

I'm not too sure if I am too late in responding to your email below. But the Parish Council discussed this in our March meeting and they fully support your plan especially regarding the proposals to our Parish boundary.

Kind regards,

Sarah Kitchener
Clerk/RFO
Ockbrook and Borrowwash Parish Council
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Ockbrook
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Disclaimer: The views expressed are personal and may not reflect those of Ockbrook and Borrowwash Parish Council, unless explicitly stated otherwise. The information contained herein is confidential and may also be subject to legal privilege. It is intended for the addressee only. Anyone reading this e-mail, other than the addressee, is hereby notified that any unauthorised disclosure or copying of its contents is strictly prohibited.

On 16/02/26 11:10, Sheila Mitchell wrote:

Sent on behalf of Philip Stephenson

You will recall that I contacted you at the beginning of January to inform you about the eight-week Draft Local Plan for Derby consultation.

If you have already responded, thank you, your comments are now being processed and considered.

If you have not responded, I am now taking the opportunity to remind you that there are still three weeks remaining for you to send in comments on the content of the document.

To recap, the consultation material is available on-line on our [Emerging Local Plan for Derby](#) webpage, in local libraries and at the Council House.

We have launched our new [consultation portal](#) where you can submit comments on-line. Alternatively, you can send comments on the draft plan to planningpolicy@derby.gov.uk or complete the response form which can be downloaded from the website.

We are also running a drop-in event at the Ordish Room, in the Market Hall, Tenant Street, Derby, DE1 2DB on Saturday 21 February between 9:30am and 3:30pm. Officers will be on-hand to discuss any aspect of the Draft Local Plan for Derby.

If you require any further information on the Draft Local Plan for Derby, please contact a member of the Spatial Planning Team on telephone number 01332 640807.

Sheila Mitchell | Senior Planning Assistant | Planning Services | Derby City Council, Corporation Street, Derby, DE1 2FS| Telephone 01332 642125| Minicom 01332 640666 | www.derby.gov.uk

Please note I am currently working a hybrid system of remote working combined with limited office based work so email is the best way to contact me.

Draft Local Plan for Derby: Between 12 January and 9 March 2026 we are seeking your views on the Draft Local Plan for Derby. For more information, including how to give us your feedback, please visit the [Emerging Local Plan for Derby webpage](#).



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Date 27 February 2026

Our Ref

Your Ref

Dear Richard

City Of Derby Local Plan Review 2026

Thank you for the opportunity to comment on the Local Plan Review. By way of background, Rolls-Royce plc has a significant manufacturing footprint in Derby. With over 11,000 employed at its Sinfin Aerospace Campus to the south of the city and approaching 4,000 at its Submarines Campus to the east on Raynesway. Of those over 1,100 are apprentices. As such, the growth and success of Derby is important to us as a business, as well as to so many colleagues who both work and live locally.

Provision of a range of housing to provide homes for people of all ages and income levels is key. As is a vibrant city centre providing shopping, food & beverage, entertainment and cultural facilities. Sound infrastructure such as roads and public transport are also essential. It is positive that the draft Local Plan Review considers these and as a company Rolls-Royce supports these policies.

We do though wish to pick up on a few specific policies contained in the draft.

HA10 – Elton Road – it remains in our growth planning to relocate the current operations to the wider Sinfin Campus and therefore support this policy that will further support the Osmaston regeneration.

E2 – Existing Employment Areas – we support the policies that include our Raynesway and Sinfin business operations. We ask that the policy for Sinfin Aerospace Campus is widened to cover also the Raynesway Campus. Both are key to Rolls-Royce plc, so policy that supports investment and growth is welcomed.



Rolls-Royce

E7 – Indurent Park – as an occupier of premises here that support our wider business operations, we support the policy to protect employment at this location.

CC12 – OCOR – the threat of flooding is a major business risk to so many in the area and we support the policy to expand the protection of the city and surrounding areas by the OCOR project.

E5 - Infinity Park/Sinfin Moor –Infinity Park is developing into a mature business location covering a range of activities. It is home to the Nuclear Skills Academy that is operated jointly with the University of Derby, as well as the former Nuclear AMRC that is now operated by the University as the Infinity Prototyping Centre. Neither use falls into a Class B2 'General Industrial' Use but these form key components of the growth across the Nuclear sectors of our business that are centred on Derby. We have concerns over the proposals to limit Class B8 'Storage or Distribution' Uses to 50% of the floorspace as this not only conflicts with market demands but also limits the capability of Infinity Park to provide growth.

In recent years we have relocated two businesses to Infinity Park that have been essential for growth at Raynesway. BOC are an industrial gas supplier and in planning terms a Class B8 Use. Similarly for Star Micronics, who supply and support complex machine tools, who are a Class B2 Use. Both provide a range of employment and their use is complimentary to other uses on Infinity Park. There is a need for a flexible policy that encourages growth in the complete range of employment uses in line with market demands that exist, as we leave the first quarter of the 21st century. Further, it is helpful that the policy encourages the further growth of the area with the South Derby Growth Zone and Infinity Garden Village, along with the linked A50 Grade Separated Junction. This will form a key area of employment opportunity and economic growth for the city as well as the wider region, linking to the Trent Arc in the growth plans for the Combined East Midlands Authority.

EN 6 – Green Wedges – At Raynesway to support expansion of the Submarines Campus there are proposals to relocate the Alvaston & Boulton Cricket Club to the former Ramarena on the opposite side of the A5111 Raynesway. A change in policy that allowed development of the current ground but safeguarded the new ground in the green wedge would help in supporting growth and expansion of Rolls-Royce plc.

I hope that you find these comments constructive and supportive in general of the local plan but do please get in contact with any questions.

Yours sincerely

For Rolls-Royce plc

Robert Orgill
Property Manager

R Carruthers
Senior Planning Officer
Derby City Council
The Council House
Corporation Street
Derby
DE1 2FS

Direct Dial +44 (0) 1332 3 33840

Direct Fax

Date 27 February 2026

Our Ref

Your Ref

Dear Richard

City Of Derby Local Plan Review 2026

Thank you for the opportunity to comment on the Local Plan Review. By way of background, Rolls-Royce plc has a significant manufacturing footprint in Derby. With over 11,000 employed at its Sinfin Aerospace Campus to the south of the city and approaching 4,000 at its Submarines Campus to the east on Raynesway. Of those over 1,100 are apprentices. As such, the growth and success of Derby is important to us as a business, as well as to so many colleagues who both work and live locally.

Provision of a range of housing to provide homes for people of all ages and income levels is key. As is a vibrant city centre providing shopping, food & beverage, entertainment and cultural facilities. Sound infrastructure such as roads and public transport are also essential. It is positive that the draft Local Plan Review considers these and as a company Rolls-Royce supports these policies.

We do though wish to pick up on a few specific policies contained in the draft.

HA 10 – Elton Road – it remains in our growth planning to relocate the current operations to the wider Sinfin Campus and therefore support this policy that will further support the Osmaston regeneration.

E2 – Existing Employment Areas – we support the policies that include our Raynesway and Sinfin business operations. We ask that the policy for Sinfin Aerospace Campus is widened to cover also the Raynesway Campus. Both are key to Rolls-Royce plc, so policy that supports investment and growth is welcomed.

E7 - Indurent Park - as an occupier of premises here that support our wider business operations, we support the policy to protect employment at this location.

CC12 - OCOR - the threat of flooding is a major business risk to so many in the area and we support the policy to expand the protection of the city and surrounding areas by the OCOR project.

ES - Infinity Park/Sinfin Moor -Infinity Park is developing into a mature business location covering a range of activities. It is home to the Nuclear Skills Academy that is operated jointly with the University of Derby, as well as the former Nuclear AMRC that is now operated by the University as the Infinity Prototyping Centre. Neither use falls into a Class B2 'General Industrial' Use but these form key components of the growth across the Nuclear sectors of our business that are centred on Derby. We have concerns over the proposals to limit Class 88 'Storage or Distribution' Uses to 50% of the floorspace as this not only conflicts with market demands but also limits the capability of Infinity Park to provide growth.

In recent years we have relocated two businesses to Infinity Park that have been essential for growth at Raynesway. BOC are an industrial gas supplier and in planning terms a Class 88 Use. Similarly for Star Micronics, who supply and support complex machine tools, who are a Class B2 Use. Both provide a range of employment and their use is complimentary to other uses on Infinity Park. There is a need for a flexible policy that encourages growth in the complete range of employment uses in line with market demands that exist, as we leave the first quarter of the 21st century. Further, it is helpful that the policy encourages the further growth of the area with the South Derby Growth Zone and Infinity Garden Village, along with the linked A50 Grade Separated Junction. This will form a key area of employment opportunity and economic growth for the city as well as the wider region, linking to the Trent Arc in the growth plans for the Combined East Midlands Authority.

EN 6 - Green Wedges - At Raynesway to support expansion of the Submarines Campus there are proposals to relocate the Alvaston & Boulton Cricket Club to the former Ramarena on the opposite side of the A5111 Raynesway. A change in policy that allowed development of the current ground but safeguarded the new ground in the green wedge would help in supporting growth and expansion of Rolls-Royce pie.

I hope that you find these comments constructive and supportive in general of the local plan but do please get in contact with any questions.

Yours sincerely



Robert Orgill
Property Manager

09 March 2026

Our ref: Derby City 8

Dear Sir/Madam,

Derby City Draft Local Plan Consultation (March 2026)

Thank you for the opportunity to comment on your consultation, we have summarised our comments within this document. Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.

Position Statement

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments on the impacts of future developments and to provide advice regarding policy wording on other relevant areas such as water efficiency, Sustainable Drainage Systems (SuDS), biodiversity, and blue green infrastructure. Where more detail is provided on site allocations, we will provide specific comments on the suitability of the site with respect to the water and sewerage network. In the instances where there may be a concern over the capacity of the network, we may look to undertake modelling to better understand the potential risk. For most developments there is unlikely to be an issue connecting. However, where an issue is identified, we will look to discuss in further detail with the Local Planning Authority. Where there is sufficient confidence that a development will go ahead, we will look to complete any necessary improvements to provide additional capacity.

Site Assessment: Sewerage Infrastructure

We have assessed the housing allocations named within the plan for any sewerage or drainage constraints; we look at the proposal in context of its surrounding area and the existing infrastructure. We also look at the site's options around surface water and 'runoff destination'.

Any risks identified within the assessment are not considered show-stoppers. Instead, they highlight locations where site-specific policy may be beneficial—particularly focussing on good surface water management and the [National standards for sustainable drainage systems \(SuDS\) - GOV.UK](#).

The following table summarises the risk identified by assessment, a full version of the assessment workbook will be shared with the Local Planning Authority;

LPA Ref	Site Name	Sewerage constraints	Sewerage impact	Surface water constraints	Surface water impact
HA1	Ryknel Road, Littleover	There have been previous reports of sewer flooding in proximity to this site.	High	Sustainable runoff destination exist nearby. Disposal via combined sewer should be avoided. Sustainable Drainage (SuDs) should be used on site.	Low
CC12	Derby Riverside	The site may impact nearby storm overflow spill performance.	High	Sustainable runoff destination exist nearby. Disposal via combined sewer should be avoided. Sustainable Drainage (SuDs) should be used on site.	Low
CC14	Railway Station Quarter	The site may impact nearby storm overflow spill performance.	High	Sustainable runoff destination exist nearby. Disposal via combined sewer should be avoided. Sustainable Drainage (SuDs) should be used on site.	Low

For your information we have set out some general guidelines and relevant policy wording that may be useful to you.

Wastewater Strategy

We have a duty to provide capacity for new development in the sewerage network and at our Wastewater Treatment Works (WwTW) and to ensure that we protect the environment. On a company level we have produced a Drainage and Wastewater Management Plan (DWMP) covering the next 25 years, which assesses the future pressures on our catchments including the impacts of climate change, new development growth and impermeable area creep. This plan supports future investment in our wastewater infrastructure and encourages collaborative working with other Risk Management Authorities to best manage current and future risks. More information on our DWMP can be found on our website <https://www.severntrent.com/about-us/our-plans/drainage-wastewater-management-plan/>.

Where site allocations are available, we can provide a high-level assessment of the impact on the existing network. Where issues are identified, we will look to undertake hydraulic sewer modelling to better understand the risk and where there is sufficient confidence that a development will be built, we will look to undertake an improvement scheme to provide capacity.

Surface Water

Management of surface water is an important feature of new development as the increased coverage of impermeable area on a site can increase the rainwater flowing off the site. The introduction of these flows to the public sewerage system can increase the risk of flooding for existing residents. It is therefore vital that surface water flows are managed sustainably, avoiding connections into the foul or combined sewerage system and where possible directed back into the natural water systems. We recommend that the following policy wording is included in your plan to ensure that surface water discharges are connected in accordance with the drainage hierarchy:

Drainage Hierarchy Policy

New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.

Supporting Text:

Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states:

“Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable:

1. into the ground (infiltration);
2. to a surface water body;
3. to a surface water sewer, highway drain, or another drainage system;
4. to a combined sewer.”

Sustainable Drainage Systems (SuDS)

Sustainable Drainage Systems (SuDS) represent the most effective way of managing surface water flows whilst being adaptable to the impact of climate change and providing wider benefits around water quality, biodiversity, and amenity. We therefore recommend that the following policy wording is included within your plan regarding SuDS:

Sustainable Drainage Systems (SuDS) Policy

All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are included, unless proved to be inappropriate.

All schemes with the inclusion of SuDS should demonstrate they have considered all four areas of good SuDS design: quantity, quality, amenity and biodiversity.

Completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure the SuDS are managed in perpetuity.

Supporting Text:

Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water

quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads.

Blue Green Infrastructure

We are supportive of the principles of blue green infrastructure and plans that aim to improve biodiversity across our area. Looking after water means looking after nature and the environment too. As a water company we have launched a Great Big Nature Boost Campaign which aims to revive 12,000 acres of land, plant 1.3 million trees and restore 2,000km of rivers across our region by 2027. We also have ambitious plans to revive peat bogs and moorland, to plant wildflower meadows working with the RSPB, National Trust, Moors for the Future Partnership, the Rivers Trust, National Forest and regional Wildlife Trusts and conservation groups.

We want to encourage new development to continue this theme, enhancing biodiversity and ecology links through new development so there is appropriate space for water. To enable planning policy to support the principles of blue green Infrastructure, biodiversity and protecting local green open spaces we recommend the inclusion of the following policies:

Blue and Green Infrastructure Policy

Development should where possible create and enhance blue green corridors to protect watercourses and their associated habitats from harm.

Supporting Text:

The incorporation of Sustainable Drainage Systems (SuDS) into blue green corridors can help to improve biodiversity, assisting with the wider benefits of utilising SuDS. National Planning Policy Framework (2021) paragraph 174 States:

“Planning policies and Decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their Statutory Status or identified quality in the development plan);*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;”*

Green Open Spaces Policy

Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.

Supporting Text:

We understand the need for protecting Green Spaces, however open spaces can provide suitable locations for schemes such as flood alleviation schemes to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the local green space through biodiversity and amenity benefits.

Water Quality and Resources

Good quality watercourses and groundwater is vital for the provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that the water quality of our supplies are not impacted by our operations or those of others. Any new developments need to ensure that the Environment Agency's Source Protection Zones (SPZ) and Safeguarding Zone policies which have been adopted by Natural Resources Wales are adhered to. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan as prepared by the Environment Agency.

Every five years we produce a Water Resources Management Plan (WRMP) which focuses on how we plan to ensure there is sufficient supply of water to meet the needs of our customers whilst protecting our environment over the next 25 years. We use housing target data from Local Planning Authorities to plan according to the projected growth rates. New development results in the need for an increase in the amount of water that needs to be supplied across our region. We are committed to doing the right thing and finding new sustainable sources of water, along with removing unsustainable abstractions, reducing leakage from the network and encouraging the uptake of water meters to promote a change in water usage to reduce demand.

New developments have a role to play in protecting water resources, we encourage you to include the following policies:

Protection of Water Resources Policy

New developments must demonstrate that they will not result in adverse impacts on the quality of waterbodies, groundwater and surface water, will not prevent waterbodies and groundwater from achieving a good status in the future and contribute positively to the environment and ecology.

Where development has the potential to directly or indirectly pollute groundwater, a groundwater risk assessment will be needed to support a planning application.

Supporting Text:

National Planning Policy Framework (July 2021) Paragraph 174 states:

"Planning policies and decisions should contribute to and enhance the natural and local environment by: ...

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should wherever possible, help to improve local environmental conditions

such as air and water quality, taking into account relevant information such as river basin management plans;”

Water Efficiency Policy

We are supportive of the use of water efficient design of new developments fittings and appliances and encourage the optional higher water efficiency target of 110 litres per person per day within part G of building regulations. Delivering against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. This approach is not only the most sustainable but the most appropriate direction to deliver water efficiency. We would therefore recommend that the following wording is included for the optional higher water efficiency standard:

New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.

Supporting Text:

National Planning Policy Framework (July 2021) Paragraph 153 states:

“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”

This need for lower water consumption standards for new developments is supported by Government. In December 2018, the Government stated the need to a reduction in Per Capita Consumption (PCC) and issued a call for evidence on future PCC targets in January 2019, with an intention of setting a long term national target. The National Infrastructure Commission (NIC) has already presented a report including recommendations for an average PCC of 118 l/p/d. In Wales, the 110 l/p/d design standard was made mandatory in November 2018. In 2021 the Environment Agency classed the Severn Trent region as Seriously Water Stressed – [link](#).

We recommend that all new developments consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres per minute or less.
- Water butts for external use in properties with gardens.

Water Supply

For the majority of new developments, we do not anticipate issues connecting new development, particularly within urban areas of our water supply network. When specific detail of planned development location and sizes are available a site-specific assessment of the capacity of our water

supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts. If significant development in rural areas is planned, this is more likely to have an impact and require network reinforcements to accommodate greater demands.

Developer Enquiries

When there is more detail available on site-specific developments, we encourage developers to get in contact with Severn Trent at an early stage in planning to ensure that there is sufficient time for a development site to be assessed and if network reinforcements are required that there is time to develop an appropriate scheme to address the issues. We therefore encourage developers to contact us, details of how to submit a Developer Enquiry can be found here -

<https://www.stwater.co.uk/building-and-developing/new-site-developments/developer-enquiries/>

We hope that this information has been useful to you and we look forward to hearing from you in the near future.

Yours Sincerely,

INSERT NAME

Strategic Catchment Planner

GrowthDevelopment@severntrent.co.uk

CONSULTATION NAME Level 1 SCA

Potential impact of proposed developments on sewerage infrastructure assets
Date: 20 July 2016

Common Acronyms	
STW - Sewage Treatment Works	EO - Emergency Overflow
SPS - Sewage Pumping Station	SSO - Storm Overflow
CSO - Combined Sewer Overflow	

NOTE: The purpose of these desktop-based assessments are to indicate where proposed development **may** have a detrimental impact on the performance of the existing public sewerage network taking into account the size of the development proposed.

Note: These are desktop assessments using readily available information and have not been subjected to detailed hydraulic modeling.

[illegible]



Derby City Council

Local Plan for Derby: Regulation 18 Draft Plan Consultation Form

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

Please respond to as many or as few issues as you wish. This may relate to the Draft Local Plan for Derby, the Draft Sustainability Appraisal or our evidence base.

Please complete all of the questions you are comfortable answering. Please fill in a separate response form for each comment you wish to make. You can submit comments through our online portal which can be accessed from the Emerging Local Plan for Derby webpage. All comments should be submitted by midnight on **Monday 9 March 2026**.

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

If you prefer to give your comments by email or letter, please state clearly that you are commenting on the **Draft Local Plan for Derby City** and indicate which section, policy, diagram or table your comment relates to. If you feel your comments would be best discussed in person, we will be holding two events in the Ordish Room at the Market Hall, Tenant Street, Derby, DE1 2DB on the 31 January and 21 February 2026.

How we will use the information you give

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

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

We will use all responses to this consultation to help develop the Local Plan for Derby.

We will make amendments to the plan as a result of this consultation. As the local plan develops it will be subject to a further consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and these responses will be sent in full to the local plan inspector, however the inspector may request details of the reg 18 consultation.

Abusive or unacceptable comments will be rejected by the Council or published as part of the consultation report.

1. Would you like us to let you know when the next phase of the consultation on the Local Plan for Derby will be taking place? Please ☒ one option.

☒ Yes

☐ No



All information provided will be treated in confidence in accordance with the General Data Protection Regulations 2018. It will be used for the purpose of validating comments you have made as a part of this consultation. Any comments you have given will not be linked to your name in documents that we publish. The results of this consultation will help to shape the Local Plan for Derby.

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

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

☐ a resident of Derby?

☐ a representative of a public sector organisation?

☐ a representative of a private sector organisation?

☐ a representative of a community / voluntary organisation?

☒ an agent responding on behalf of your client?

☐ other?

3. Name

Kamaldeep Saini

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

CarneySweeney, on behalf of SmartParc SEGRO Spondon Limited

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

Director

6. Address*

3rd Floor Waterloo House, Waterloo Street, Birmingham

7. Postcode*

B2 5TB

8. e-mail address*

kam.saini@carneysweeney.co.uk

9. Telephone number*

07951770184

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

Your feedback - please select the document you are commenting on and tell us which section, paragraph, policy, diagram or table your comment relates to.

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

- ☒ The Draft Local Plan for Derby
- ☐ The Draft Sustainability Appraisal
- ☐ The Draft Habitats Regulations Assessment
- ☐ The Evidence Base

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

Please refer to response on behalf of SmartParc SEGRO Spondon Limited set out in letter dated March 2026.

12. Do you agree with this part of the strategy? Please ☒ one option.

- ☐ Yes
- ☐ No

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

Please refer to response on behalf of SmartParc SEGRO Spondon Limited set out in letter dated March 2026.

Please continue on a separate sheet if necessary.

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

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

About you

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

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

14. Please tell us your postcode.

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

16. Are you... Please ☒ one box only.

☐ Male

☐ Female

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

☐ Yes

☐ No

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

☐ Asian or Asian British - Indian

☐ Dual Heritage - White and Black African

☐ Asian or Asian British - Pakistani

☐ Dual Heritage - White and Asian

☐ Asian or Asian British - Bangladeshi

☐ Any other Dual Heritage background

☐ Asian or Asian British - Chinese

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

☐ Any other Asian background

☐ White - Irish

☐ Black or Black British - African

☐ White - Gypsy or Irish Traveller

☐ Black or Black British - Caribbean

☐ Any other White background

☐ Any other Black background

☐ Other ethnic group - Arab

☐ Dual Heritage - White and Black Caribbean

☐ Any other ethnic group

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

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

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

Local Plan for Derby Consultation
Derby City Council
FREEPOST
MID24259
DERBY
DE1 2BR



5th March 2026

Local Plan for Derby Consultation
Derby City Council
Council House
Corporation Street
Derby
DE1 2FS

Sent via email only to planningpolicy@derby.gov.uk

Dear Sir/Madam,

LOCAL PLAN FOR DERBY: REGULATION 18 DRAFT PLAN CONSULTATION RESPONSE ON BEHALF OF SMARTPARC SEGRO SPONDON LIMITED

Introduction

CarneySweeney have been instructed by SmartParc SEGRO Spondon Limited (referred to as 'our client' hereafter) to submit a response to the current consultation on the Local Plan for Derby (Regulation 18) Issues and Options Consultation.

Our client is the landowner of the land subject of the proposed allocation under draft Policy E6 in the Regulation 18 Consultation Document ('the Draft Local Plan'). Our response is therefore issued to those elements we consider to be relevant in the context of our client's land interest and the proposed allocation under draft Policy E6.

For elements we have not responded to, we reserve our position to make representations on these matters during later stages of the emerging Local Plan process but at this Issues and Options stage, do not wish to make any specific comments.

Response on Draft Policy E6 – SmartParc, Spondon

As the authority are aware our client is the landowner and developer of the SmartParc site, which has secured outline 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 also been secured for Plot 4 and Plot 6a demonstrating a commitment to the delivery of this site.

Overall, whilst our client is supportive of the principle to allocate the SmartParc site for employment uses there are concerns that the wording of draft Policy E6 is not reflective of the uses approved under the outline planning permission. Therefore, to ensure consistency with the operative planning permission for the SmartParc site, in terms of the approved uses that can come forward (planning permission reference: 23/00148/VAR), we have set out proposed amendments to draft Policy E6 below.

Our proposed insert/s are shown in **green** text, with proposed deletion/s shown in **red** text.



Amendment to Draft Policy E6:

The former Celanese 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 and for associated Use Class E and Class F1 purposes and other ancillary uses ~~where justified~~. New office development (E(g)(i)) will be supported where it meets the provisions of Policy E4, including 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.

It is noted that draft Policy E6 cross refers to draft Policy E4. At this stage we have no specific comments on draft Policy E4 but reserve our position should we wish to do so as part of any subsequent consultation stage/s.

We trust that our representations will be taken into account as part of the ongoing preparation of the emerging Local Plan and would be happy to discuss these if this would be helpful.

Yours faithfully,

Kamaldeep Saini
Director
CarneySweeney



2026-03-06

Planning Policy Team

Derby City Council
The Council House
Corporation Street
Derby
DE1 2FS

Dear Planning Policy Team,

Please find attached a representation submitted on behalf of Soterion Limited in response to the **Regulation 18 consultation on the emerging Derby Local Plan**.

The submission promotes land at Meadow Lane / Chequers Road, Derby (Land Registry titles DY361450 and DY367684) as a potential site for strategic low-carbon energy infrastructure, including hydrogen production and associated technologies.

The following documents are attached for consideration:

- Regulation 18 Representation Letter
- Site Promotion Statement
- Strategic Hydrogen Demand Context Note
- Site Location Plan

We would be grateful if the site could be recorded and assessed within the Council's Housing and Economic Land Availability Assessment as part of the Local Plan evidence base. We would also welcome the opportunity to engage further with the Council to discuss the potential of the site to support Derby's transition toward low-carbon energy infrastructure. Please confirm receipt of this submission.

Yours truly

Neil Roe CEO

info@soterion.co.uk
0121 356 4360 | soterion.co.uk

Soterion House
Northgate Aldridge WS9 8TH
Company No: 07091329



2026-03-06

Planning Policy Team
Derby City Council
The Council House
Corporation Street
Derby
DE1 2FS

Regulation 18 Representation – Emerging Derby Local Plan

Derby Energy Transition Hub

Site Promotion – Land at Meadow Lane / Chequers Road, Derby

Promoted Site: Land at Meadow Lane / Chequers Road, Derby

Land Registry Titles: DY361450 and DY367684 (attached)

Promoter and Land Owner: Soterion Limited

Submitted to: Derby City Council

Consultation Stage: Regulation 18 – Emerging Local Plan

1. Introduction

This representation is submitted on behalf of Soterion Limited, the freehold owner of land located off Meadow Lane / Chequers Road, Derby, comprising approximately 11 acres and registered under Land Registry titles DY361450 and DY367684.

The purpose of this representation is to formally promote the site for consideration within the emerging Derby Local Plan as a Strategic Low-Carbon Energy and Infrastructure Allocation, capable of supporting hydrogen production, clean energy infrastructure, and associated industrial decarbonisation technologies.

Soterion Limited welcomes the preparation of the new Local Plan and supports the Council's ambition to promote sustainable growth, economic development and the transition toward a net-zero carbon future.

2. Site Description and Location

The site lies to the east of Meadow Lane and is adjacent to railway land operated by Network Rail. The land sits within a wider infrastructure corridor close to Derby city centre and is characterised by a mixture of rail infrastructure, industrial uses and undeveloped land parcels.

The site comprises approximately 11 acres of largely undeveloped land, currently vegetated and not in active use. Historically the surrounding area has supported infrastructure and adjoining industrial activities.

info@soterion.co.uk
0121 356 4360 | soterion.co.uk

Soterion House
Northgate Aldridge WS9 8TH
Company No: 07091329



The site is currently accessible via Meadow Lane; however, discussions are ongoing with Network Rail regarding a potential alternative access arrangement via Chequers Road across railway land, which would provide a controlled and purpose-designed access route suitable for infrastructure development.

3. Strategic Context

National and regional policy frameworks place increasing emphasis on the delivery of low-carbon energy infrastructure, including hydrogen production and energy storage.

Relevant national policy objectives include supporting the UK Net Zero Strategy, facilitating the transition to low-carbon fuels, encouraging infrastructure that supports industrial decarbonisation, and promoting sustainable economic growth.

Derby has a strong advanced manufacturing and engineering economy, which will require access to low-carbon energy sources in order to remain competitive during the energy transition.

The promotion of infrastructure capable of supporting hydrogen production and clean energy supply aligns closely with these strategic objectives.

4. Proposed Use

Soterion Limited is exploring the delivery of a clean energy infrastructure facility, potentially including hydrogen production, energy generation and storage, waste-to-energy or resource recovery technologies, infrastructure supporting industrial decarbonisation, and alternative fuel production for transport and industry.

The site is particularly well suited to such uses given its proximity to strategic infrastructure, separation from residential areas and access to transport corridors. Soterion Limited are mindful of the City's Flood alleviation plans for this site and the adjoining Network Rail land and believes that much of the flood scheme proposals could be accommodated as part of a wider site and land use development scheme.

5. Site Suitability

The site demonstrates several characteristics that support its suitability for strategic energy infrastructure including adjacency to existing infrastructure, limited residential interface, the opportunity to regenerate underutilised land, and potential for controlled access via Chequers Road.

6. Deliverability

The site is in single ownership and available for development. Soterion Limited is actively exploring investment in a hydrogen production facility and associated infrastructure on the site, demonstrating a clear intention to bring the land forward within the Local Plan period.

The availability of the land, combined with ongoing access discussions and emerging energy infrastructure proposals, indicates that the site could represent a deliverable opportunity within the plan period.



7. Contribution to the Local Plan Objectives

The allocation of this site for strategic energy infrastructure could deliver several benefits for Derby including supporting net zero ambitions, facilitating industrial decarbonisation, attracting investment in clean technologies, creating skilled employment opportunities, supporting local energy resilience and regenerating underutilised land.

8. Requested Local Plan Approach

Soterion Limited respectfully requests that the Council recognise the strategic potential of the Meadow Lane / Chequers Road site for clean energy infrastructure, consider allocation of the site within the emerging Local Plan for low-carbon energy and infrastructure uses including hydrogen production, and continue engagement with the site promoter to explore the role the site could play in supporting Derby's long-term economic and sustainability objectives.

9. Conclusion

The Meadow Lane / Chequers Road site represents a significant opportunity to support Derby's transition toward a low-carbon economy. Its strategic location within an infrastructure corridor, combined with landowner commitment to delivering energy infrastructure, makes it well suited for allocation as a Strategic Low-Carbon Energy Infrastructure Site within the emerging Derby Local Plan.

Soterion Limited would welcome continued dialogue with Derby City Council to explore the potential of the site as the Local Plan progresses.

Submitted on behalf of:

Soterion Limited

Neil Roe CEO

Please see attached Site Promotion Statement and Strategic Hydrogen Demand Concept



SITE PROMOTION STATEMENT

Land at Meadow Lane / Chequers Road, Derby

Submitted to: Derby City Council

Local Plan Consultation Stage: Regulation 18

Promoter: Soterion Limited

Land Registry Titles: DY361450 and DY367684

1. Introduction

This Site Promotion Statement has been prepared on behalf of Soterion Limited, the owner of land located off Meadow Lane / Chequers Road in Derby.

The purpose of this statement is to promote the site for consideration within the emerging Derby Local Plan as a Strategic Low-Carbon Energy Infrastructure Site capable of supporting hydrogen production, energy infrastructure and associated clean technologies.

The site extends to approximately 11 acres and is located within an established infrastructure corridor close to Derby city centre.

Soterion Limited is actively exploring investment in a hydrogen production facility and associated clean energy infrastructure on the site and wishes to work collaboratively with Derby City Council to bring forward a development that supports the city's economic and environmental objectives.

2. Site Location and Context

The site lies to the east of Meadow Lane and sits adjacent to railway land operated by Network Rail.

The surrounding area is characterised by rail infrastructure, industrial and infrastructure uses, and areas of underutilised land.

The site is strategically located close to Derby city centre and within reach of the city's major industrial and manufacturing base.

Currently the land is largely undeveloped and vegetated.

Access to the site is presently available via Meadow Lane; however, discussions are underway regarding potential access arrangements via Chequers Road which could provide improved access for future development.

Strategic Infrastructure Opportunity

The proximity of the site to rail infrastructure operated by **Network Rail** provides an additional strategic advantage. Rail-adjacent locations are increasingly recognised as suitable for energy and infrastructure developments due to their ability to support sustainable logistics, infrastructure delivery and potential future low-carbon transport fuels. The site therefore represents an opportunity to deliver clean energy infrastructure in a location that benefits from existing transport and infrastructure connectivity while minimising potential impacts on residential areas.



3. Proposed Development Concept

Soterion Limited is exploring the development of a clean energy infrastructure facility on the site.

Potential components of the development may include:

- Hydrogen production facilities
- Energy generation and storage
- Waste-to-energy or resource recovery infrastructure
- Facilities supporting industrial decarbonisation
- Alternative fuel infrastructure for transport and industry

The intention is to create infrastructure that supports the transition to a low-carbon energy system while providing economic benefits to the local area.

4. Strategic Policy Context

National policy increasingly emphasises the importance of delivering infrastructure that supports the transition to a low-carbon economy.

Key strategic priorities include decarbonisation of industry, development of hydrogen production capacity, energy security and resilience, and sustainable economic growth.

Derby has a strong engineering and advanced manufacturing sector, and the availability of low-carbon energy sources such as hydrogen will be important in supporting the long-term competitiveness of these industries.

The promotion of energy infrastructure on suitable urban sites therefore aligns with both national policy direction and local economic priorities.

5. Site Suitability

The Meadow Lane / Chequers Road site possesses several characteristics that make it suitable for energy and infrastructure uses.

Infrastructure location – The site is situated adjacent to railway infrastructure and within an established infrastructure corridor.

Limited residential sensitivity – The surrounding land uses are predominantly industrial and infrastructure-related.

Regeneration opportunity – The site currently represents underutilised land and provides an opportunity to bring the area back into productive use.

Strategic accessibility – Potential future access arrangements could provide controlled access suitable for infrastructure uses.

6. Deliverability

The site is in single ownership and available for development.

Soterion Limited is actively investigating the feasibility of delivering hydrogen production and related infrastructure on the site.

This demonstrates a clear intention to bring forward development within the Local Plan period.

Subject to appropriate planning allocation and access arrangements, the site could represent a deliverable opportunity for strategic energy infrastructure.



7. Economic and Environmental Benefits

Development of clean energy infrastructure on the site could generate several benefits for Derby, including:

- Support for net-zero carbon objectives
- Infrastructure to assist industrial decarbonisation
- Attraction of investment in clean technologies
- Creation of skilled employment opportunities
- Regeneration of underutilised land

8. Planning Opportunity

The site represents a rare opportunity within the urban area to deliver strategic energy infrastructure on land that is appropriately located within an infrastructure corridor, available for development, and capable of supporting the city's transition to a low-carbon economy.

Recognition of this opportunity within the Local Plan could help enable investment in clean energy technologies within Derby.

9. Conclusion

The land at Meadow Lane / Chequers Road represents a significant opportunity to support Derby's transition toward a sustainable and low-carbon future.

Its location, availability and strategic characteristics make it well suited for allocation as a Strategic Low-Carbon Energy Infrastructure Site.



Strategic Hydrogen Demand Context – Derby

This note has been prepared to support the Regulation 18 representation submitted to Derby City Council regarding land at Meadow Lane / Chequers Road, Derby (Land Registry titles DY361450 and DY367684).

It outlines the strategic context for hydrogen and low-carbon energy infrastructure in Derby and the surrounding region.

1. Industrial Hydrogen Demand in the Derby Area

Derby sits at the centre of a significant advanced manufacturing corridor within the East Midlands. Several major engineering and manufacturing companies operate within close proximity to the site, including Rolls-Royce in Derby, Toyota Motor Manufacturing UK at Burnaston, and Alstom's rail manufacturing facilities.

These industries are under increasing pressure to decarbonise their operations and transition toward lower-carbon energy sources. Hydrogen is widely recognised as a potential solution for decarbonising industrial heat, heavy transport and certain manufacturing processes.

2. Transport and Logistics Demand

The Derby area is also well positioned within the Midlands transport network. The M1 motorway and the A50 corridor provide strategic road connections for logistics and freight movement.

Hydrogen is increasingly being explored as a fuel for heavy goods vehicles, buses and rail freight where battery technologies may be less practical.

A hydrogen production and distribution facility located within Derby could therefore support the development of low-carbon transport infrastructure across the wider region.

3. Regional Energy Transition

The East Midlands region is undergoing a broader transition toward a low-carbon energy system. Key infrastructure assets nearby include the Ratcliffe-on-Soar energy site and the emerging East Midlands Freeport, which includes East Midlands Airport and major logistics zones.

These developments highlight the growing importance of clean energy infrastructure within the region and the potential role of hydrogen in supporting industrial decarbonisation and sustainable economic growth.



4. Strategic Opportunity for Derby

The presence of advanced manufacturing, engineering expertise and strategic transport infrastructure makes Derby well positioned to support investment in hydrogen and clean energy technologies.

A hydrogen production facility located within the city could support local industry, enable the decarbonisation of transport and attract investment in emerging energy technologies.

5. Relevance to the Meadow Lane / Chequers Road Site

The site promoted by Soterion Limited is located close to rail infrastructure and within reach of Derby's industrial and transport networks. These characteristics make it a potentially suitable location for strategic low-carbon energy infrastructure.

The development of a hydrogen production facility on this site could therefore contribute to the wider transition toward a low-carbon economy while supporting industrial activity within Derby and the surrounding region.

Prepared to accompany the Regulation 18 representation submitted by Soterion Limited.

These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

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This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.

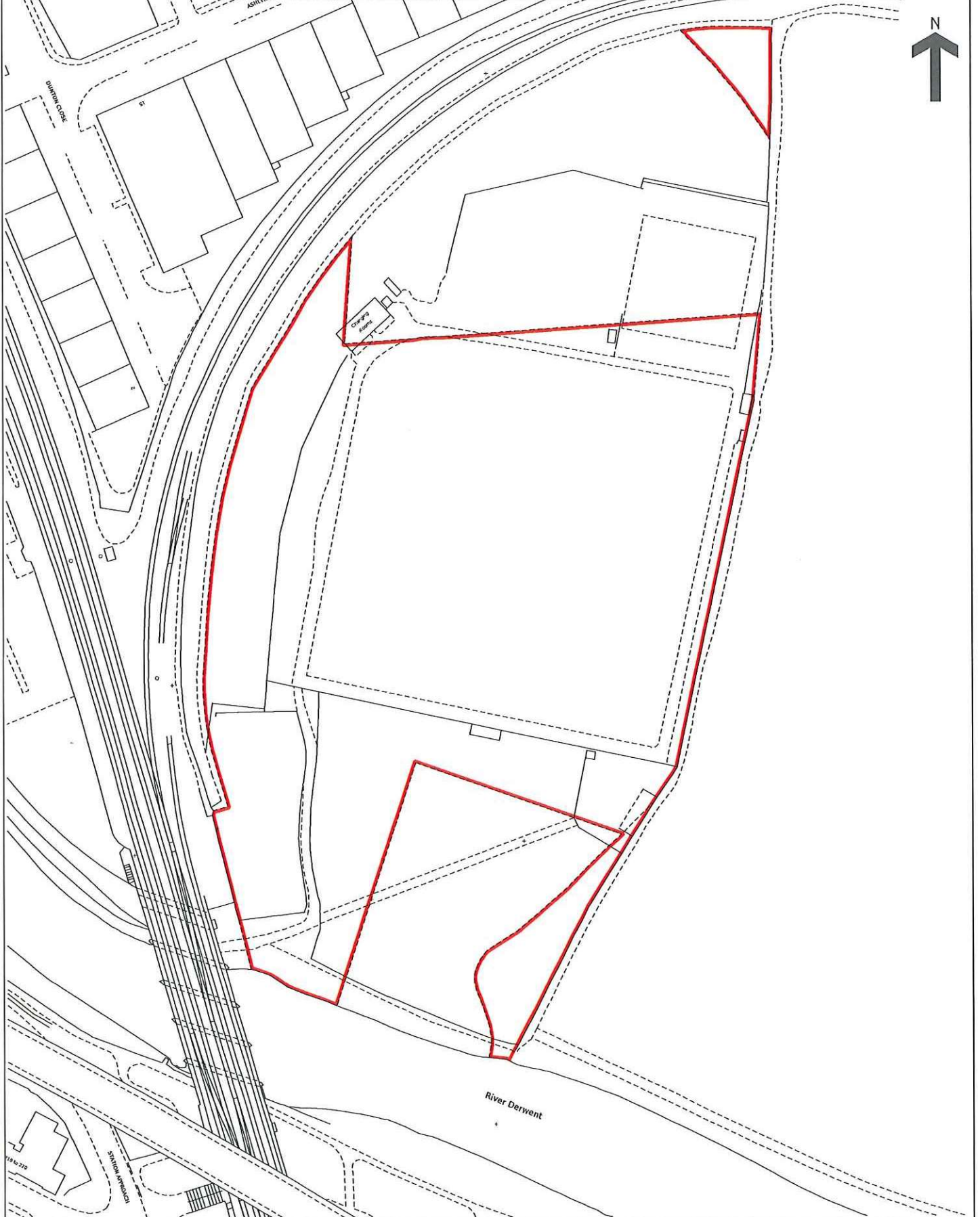
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Official copy of
title plan

Title number **DY361450**
Ordnance Survey map reference **SK3636SW**
Scale **1:1250**
Administrative area **City of Derby**



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Ordnance Survey map reference **SK3636SW**
Scale **1:1250**
Administrative area **City of Derby**



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Derby City Council

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

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☒ Yes

☐ No



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☒ a representative of a public sector organisation?

☐ a representative of a private sector organisation?

☐ a representative of a community / voluntary organisation?

☐ an agent responding on behalf of your client?

☐ other?

3. Name

Stuart Morgans

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

Sport England

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

Principal Planning Manager

6. Address*

SportPark
3 Oakwood Drive
Loughborough

7. Postcode*

LE11 3QF

8. e-mail address*

Stuart.morgans@sportengland.org

9. Telephone number*

07810180561

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

- ☒ The Draft Local Plan for Derby
- ☐ The Draft Sustainability Appraisal
- ☐ The Draft Habitats Regulations Assessment
- ☐ The Evidence Base

11. Please tell us which section, paragraph, policy, diagram or table your comment relates to.
EN1 : Green and Blue Infrastructure

12. Do you agree with this part of the strategy? Please ☒ one option.

- ☒ Yes ☐ No

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

Sport England supports this policy which seeks to safeguard the role of Derby's green and blue infrastructure network as this relates well to Sport England's policies and guidance to protect, enhance and provide places and spaces for sport and physical activity. We would specifically wish to support part g) of the policy that refers to taking available opportunities for recreation, though we would recommend amending the wording here to "*sport and recreation*". We would also wish to support part i) of the policy which makes reference to encouraging healthy and active lifestyles. We would wish to encourage the Council to cross reference this policy with policy GD6 health and well-being.

Please continue on a separate sheet if necessary.

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

16. Are you... Please ☒ one box only.

☐ Male

☐ Female

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

☐ Yes

☐ No

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

☐ Asian or Asian British - Indian

☐ Dual Heritage - White and Black African

☐ Asian or Asian British - Pakistani

☐ Dual Heritage - White and Asian

☐ Asian or Asian British - Bangladeshi

☐ Any other Dual Heritage background

☐ Asian or Asian British - Chinese

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

☐ Any other Asian background

☐ White - Irish

☐ Black or Black British - African

☐ White - Gypsy or Irish Traveller

☐ Black or Black British - Caribbean

☐ Any other White background

☐ Any other Black background

☐ Other ethnic group - Arab

☐ Dual Heritage - White and Black
Caribbean

☐ Any other ethnic group

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

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

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11. Please tell us which section, paragraph, policy, diagram or table your comment relates to.
EN3 Open Space, Sport and Recreation Buildings

12. Do you agree with this part of the strategy? Please ☒ one option.

- ☐ Yes ☐ No

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

Sport England broadly supports this policy. Parts a-c) of the policy are consistent with para 104 of the Framework, which is consistent with Sport England's Playing Fields Policy and Guidance which can be found here: [Playing fields policy | Sport England](#)

Sport England supports the reference in part f) of the policy, that in implementing this policy regard will be had to the Council's Playing Pitch Strategy, and to the contents of the associated paragraph 443 in the reasoned justification, though reference should be added to keeping this evidence robust and up to date in line with para 103 of the Framework.

As per our comments on policy GD9 (Infrastructure and Developer Contributions), the Council does not currently have a robust and up to date Playing Pitch Strategy as required by paragraph 103 of the Framework with the existing PPS being 8 years old and having not been updated. Sport England would wish to work with the Council to support them undertaking a new playing pitch and outdoor sports strategy (PPOSS), and would encourage the Council to utilize Sport England's Active Environments Framework to procure this work. [Active Environments Framework | Sport England](#)
Failure to put in place an appropriate evidence base in the form of a new playing pitch and outdoor sports strategy to provide a robust and up to date evidence base to support the application of this policy could lead to Sport England objecting to the soundness of the plan.

Please continue on a separate sheet if necessary.

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☐ Female

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☐ No

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☐ Any other Dual Heritage background

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☐ White - Irish

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☐ Any other White background

☐ Any other Black background

☐ Other ethnic group - Arab

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- ☐ The Evidence Base

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

Policy GD6 : Health and Well-Being

12. Do you agree with this part of the strategy? Please ☒ one option.

- ☒ Yes ☐ No

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

Sport England generally supports this policy which relates well to Sport England's Active Design Guidance as referenced in our comments on policy GD1 Placemaking principles, and also to our 12 Planning for Sport Principles which can be found here: [Our planning role, guidance and tools | Sport England](#). This guidance is intended to be applicable at all levels of the planning system, including plan making, to help enable and support healthy lifestyles, deliver community and cultural facilities and services to meet local needs and to give everyone the chance to get active. The 12 principles are split into four categories, overarching, protect, enhance and provide.

Sport England is particularly supportive of part c) that references providing high quality, attractive and safe environments which encourage social interaction and promotes physical activity, and part e) which references access to open space and leisure, recreation and play facilities as this relates well to the above guidance. However, we would encourage the Council to replace the word "*leisure*" with the word "*sport*" as this would be a more appropriate term to use in this context. We are also supportive of part g) of the policy that references facilities such as community halls, spiritual buildings and cultural facilities as these can be important places to undertake physical activity within the community. We would recommend the wording be amended that such facilities will be "*protected, enhanced and provided*" to ensure they can be accessed by sustainable transport modes.

We would encourage the Council to include a suitable cross reference within the policy to policy GD1 Placemaking principles, since they are inter-related in respect of promoting good design principles to embed Active Design for the benefit of Health and Well-being.

We would encourage the Council to reference both Active Design and Planning for Sport Guidance within the reasoned justification of the policy as relevant reference sources for the policy.

Please continue on a separate sheet if necessary.

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Policy GD1 ; Placemaking Principles

12. Do you agree with this part of the strategy? Please ☒ one option.

- ☒ Yes ☐ No

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

Sport England broadly supports the policy which places an importance on good urban design principles to ensure high quality development.

Sport England has worked with Active Travel England and the Office for Health Improvement and Disparities (OHID) to produce the 3rd version of our Active Design Guidance. Our guidance explains that where we live, travel and play has a major role in shaping our activity choices. By applying Active Design's 10 principles to our built and natural environments, we can create active environments that encourage people to be active through their everyday lives. [Active Design | Sport England](#)

Sport England would encourage the Council to strengthen some of the place making principles so that they appropriately relate to the ten principles of Active Design. For instance, the movement theme could be strengthened to reference creating walkable communities, providing connected active travel routes and by co-locating facilities. The Nature theme could be strengthened where there is reference to open space to ensuring this provides a network of multi-functional open space to provide opportunities to be physically active. The streets and spaces theme could be strengthened to reference good wayfinding and encouraging activity. Throughout the themes we would encourage the Council to place further emphasis on creating high quality spaces and places for all linking to our foundational theme of Activity for All.

We would then encourage the Council to make reference to Sport England's Active Design guidance within the policy and/or reasoned justification thereby citing the guidance as a reference to the policy. We would encourage the Council to add a reference to promoting the use of our Active Design checklist by applicants and developers as a means of demonstrating how developments have been designed to apply the principles within the guidance.

To support this guidance, Sport England has prepared guidance on preparing Design Codes. The guide follows the same structure as the National Model Design Code (NMDC) relating the Active Design principles to each relevant section of the NMDC. This way we are seeking to help those writing codes to see exactly how Active Design fits into coding. [Active Design | Sport England](#). Where the reasoned justification makes reference to design coding in para 117, we would encourage the Council to also reference our Design Coding guidance so that the preparation of design codes can be suitably influenced to embed opportunities for physical activity through good placemaking principles.

These amendments would relate well to the overarching vision and objectives of the Plan that make specific reference to tackling health inequalities within the City by utilizing physical activity to improve the physical and mental health and well-being of Derby residents through good urban design.

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Policy GD3 Amenity

12. Do you agree with this part of the strategy? Please ☒ one option.

- ☒ Yes ☐ No

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

Sport England supports this policy which is consistent with and specifically references the 'agent of change' principle as currently set out in para 200 of the NPPF. The Framework is clear that existing businesses and community facilities (such as...sports clubs) should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse impact on new development in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.

In the case of existing sports facilities such impacts can include matters such as noise from the use of pavilion spaces for social activity during noise sensitive periods, use of sports lighting and associated noise from the use of floodlit sports facilities during noise sensitive periods, and ball strike impacts from sighting new developments close to existing sports facilities such as cricket pitches and golf courses etc. We would encourage the Council to expand the reasoned justification in para 135 to make it clear that such impacts fall within the scope of the 'agent of change' principle to be covered by this policy.

Please continue on a separate sheet if necessary.

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Policy GD4 Accessible Places

12. Do you agree with this part of the strategy? Please ☒ one option.

- ☒ Yes ☐ No

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

Sport England supports this policy as this relates well to our Foundational Principle of “Activity for All” within our Active Design guidance referred to in our representations on policy GD1 Placemaking principles.

We would encourage the Council to cite Sport England’s Active Design Guidance within the policy and/or reasoned justification as this would tie in well with the wording of the policy that expects applicants to have regard to current best practice. A link to our Active Design Guidance is provided here [Active Design | Sport England](#). We would also wish to reference our Accessible facilities guidance which can be found here: [Accessible and inclusive sports facilities | Sport England](#)

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GD9 : Infrastructure and Developer Contributions

12. Do you agree with this part of the strategy? Please ☒ one option.

- ☒ Yes ☐ No

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

Sport England broadly supports this policy that includes reference to securing developer contributions via s106/CIL or successor regulations/guidance towards provision of sports facilities to meet the needs of proposed major new developments. Sport England would encourage the Council to amend the wording of the policy to make it expressly clear that this includes both indoor and outdoor facilities for sport, including playing fields.

The policy is silent on the method of calculating such contributions in both the policy text and reasoned justification. This should be addressed either by setting out how such contributions are to be calculated within the Plan, or to identify that further details will be set out within a SPD or similar. Sport England notes that the Council currently has an adopted planning obligations SPD (2018) that includes green space provision, but does not expressly reference how contributions for provision of playing pitches would be calculated, and includes provision for built sports facilities, where Sport England's Sports Facilities calculator tool is helpfully referenced. We note that this was updated with Appendix B for 2025/26 to set out current contribution rates. We would wish to see such provision for calculating contributions to built sports facilities to also be carried over into this policy.

In respect of provision of playing fields, Sport England would wish to work with the Council to develop the policy by referencing that the Council will take into account the findings and recommendations of a robust and up to date evidence of need (as per para 103 of the Framework) in the form of a new Playing Pitch and Outdoor Sports Strategy (PPOSS), which should be commissioned without delay to be completed alongside the preparation and adoption of the Plan, and that the Council will then utilize Sport England's Playing Pitch Calculator Tool or similar, which utilizes the data from the PPOSS to calculate the demand generated by the proposed development. This tool can then be used alongside the PPOSS to establish the most appropriate means of meeting that demand, which could include the provision of new pitches and associated ancillary facilities, or potentially through improvements to existing provision. **Failure to put in place an appropriate evidence base in the form of a new Playing Pitch and Outdoor Sports Strategy and to apply this to this proposed policy for securing developer contributions could lead to Sport England objecting to the soundness of the plan.**

The policy should also include reference to the timing of delivery of developer contributions to ensure that such provision, whether in kind or via financial contributions is fully delivered on a "just in time" basis to ensure that such new community infrastructure is available for use when needed, this is particularly important for phased developments. Sport England would also encourage the forward provision of such infrastructure at early stage of development where this can assist in establishing

good placemaking in line with policy GD1.

The reference to the IDP in the reasoned justification is noted. The IDP should draw from the findings and recommendations of the PPOSS in respect of meeting the City's needs for provision of playing fields and other outdoor sports facilities. Reference should be made in the reasoned justification to keeping the evidence base up to date in accordance with relevant guidance.

Please continue on a separate sheet if necessary.

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☐ No

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☐ Asian or Asian British - Bangladeshi

☐ Any other Dual Heritage background

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☐ White - Irish

☐ Black or Black British - African

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☐ an agent responding on behalf of your client?

☐ other?

3. Name

Stuart Morgans

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

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

Principal Planning Manager

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- ☐ The Evidence Base

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

HA1 Ryknield Road, Littleover

12. Do you agree with this part of the strategy? Please ☒ one option.

- ☐ Yes ☐ No

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

Sport England recommends that the policy wording is amended in part j) to reference the provision of public open space, including playing fields to be provided on site consistent with policy EN3

Please continue on a separate sheet if necessary.

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12. Do you agree with this part of the strategy? Please ☒ one option.

- ☐ Yes ☒ No

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

Sport England notes the current wording of the policy references the presence of a marked out football pitch and states that *“ideally this should be replaced elsewhere in the locality or if possible, retained on site”*. The proposed wording causes concern to Sport England that policy EN3, para 104 of the Framework and Sport England’s Playing Fields policy is not being appropriately applied in this case.

The correct application of policy EN3, para 104 of the Framework and Sport England’s Playing Fields policy would be to replace the “playing field” not the “playing pitch”, and that such replacement should be equitable or better in quantity and quality in a suitable location. To address this, we would recommend the following amended wording to replace the third paragraph:

“The site constitutes existing playing field which will be required to be replaced in accordance with policy EN3 of the plan.”

Please continue on a separate sheet if necessary.

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HA15 Kitchener Avenue/Browning Street

12. Do you agree with this part of the strategy? Please ☒ one option.

- ☐ Yes ☒ No

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

Whilst Sport England is not aware of any evidence that the affected area of land has been previously marked out to provide a playing pitch, we note that the proposed allocation does form part of a wider area of land that does contain at least one pitch, since there is a football pitch marked to the east.

Since the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended) establishes that the definition of “playing field” is the whole of a site that contains at least one playing pitch, the allocated site should therefore be treated as playing field land for which policy EN3 of the draft local plan, Para 104 of the Framework and Sport England’s Playing Fields Policy applies.

This being the case the wording of the policy should be amended to add the following text;

“Since the site forms part of a playing field, it will be necessary to demonstrate that the proposed development meets with policy EN3”

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Policy IC1 ; Social and Community facilities

12. Do you agree with this part of the strategy? Please ☒ one option.

- ☒ Yes ☐ No

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

Sport England supports part c) of the policy that references exploiting opportunities for dual use including use of school facilities for community sporting activities. This relates well to the Council's health and well-being objectives. Education sports facilities including playing fields form an important part of the community available supply to meet the City's demand for sport and physical activity.

Sport England supports part e) of the policy which advocates a "just in time" approach to the provision of social infrastructure to meet the needs of new development. We also would support opportunities to deliver new social infrastructure at an early stage in new developments where this helps assist with good place making in line with our Active Design principles. [Active Design | Sport England](#)

We welcome the reference to meeting development needs either on site or through off site financial contributions. For outdoor sport, including playing fields we would advocate using our playing pitch calculator tool and applying this to the findings and recommendations of a new playing pitch strategy as referenced in our representations to policies GD9 and EN3. For indoor sport, we would advocate the use of our Sports facilities calculator tool and note this is referenced in the existing Planning Obligations SPD. [Calculators | Active Places Power](#)

In respect of the application of parts f) and g) of the policy, paragraph 612a) of the reasoned justification should make it clear that in respect of education and training facilities, that this does not relate to education sports facilities including playing fields, for which policy EN3 applies. This is important because the viability criteria in part f) of the policy does not accord with para 104 of the Framework nor Sport England's Playing Fields Policy and Guidance.

Please continue on a separate sheet if necessary.

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Principal Planning Manager

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

Policy IC3 Education provision

12. Do you agree with this part of the strategy? Please ☒ one option.

- ☐ Yes ☐ No

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

Sport England broadly supports this policy which promotes the role of education provision to meet local need as this relates well to the health and well-being related objectives.

To ensure consistency with other policies in the plan, including policy EN3 which relates to the protection of sport facilities including playing fields, we recommend a minor wording change to the 2nd paragraph to read as follows:

“Development proposals that enhance education and skills provision, whether through new construction, expansion of existing facilities, or re-purposing for education use will be supported, subject to compliance with other relevant policies in the plan”

Noting the reference in the 3rd paragraph of the policy which states that the loss of education facilities will be dealt with in accordance with policy IC1, Sport England considers that this is acceptable providing the amendments recommended by Sport England to policy IC1 and the associated justification are agreed to make it clear that it is policy EN3 that is to be applied in cases involving loss of playing field, and to make it clear in policy IC1 and the associated justification that policy IC1 is not a relevant policy to be applied to cases involving the loss of playing fields. This is important to ensure consistency with para 104 of the Framework and Sport England’s Playing Fields Policy and Guidance.

Sport England supports the reference in the final paragraph of the policy to maximizing the extended or multiple use of education facilities for community or recreational purposes, and also to co-location, as this relates well to Sport England’s planning for sport objectives for communities to maximise opportunities to be physically active and to our Active Design Guidance which promotes co location as one of our 10 key principles. [Active Design | Sport England](#). We would welcome adding a footnote reference to our Active Design guidance in the reasoned justification.

We would recommend adding reference to securing such usage through community use agreements to the wording of the policy, and to add reference to Sport England’s guidance on community use agreements within the reasoned justification : [Community Use Agreements | Sport England](#)

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Policy IC4 Higher and Further Education

12. Do you agree with this part of the strategy? Please ☒ one option.

- ☒ Yes ☐ No

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

Sport England broadly supports this policy subject to amending the policy wording to add reference that establishes that the Council will support such developments subject to compliance with other relevant policies in the plan, thereby ensuring that the existing sports facilities including playing fields at higher and further education sites are appropriately protected in line with policy EN3, paragraph 104 of the Framework and Sport England's Playing Fields Policy.

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Derby City Vision 3.1.1 and Plan Objectives

12. Do you agree with this part of the strategy? Please ☒ one option.

- ☐ Yes ☒ No

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

Vision

The vision for Derby City as set out in paragraphs 42-53 does not adequately address the aim to make Derby a healthy city by referencing the role of the City's green spaces to undertake sport and physical activity. Whilst para 42 includes the word healthy, this paragraph is largely about employment, technology and the arts. Para 46 references protecting and improving the City's open spaces, yet it is silent on the role such open spaces play in supporting the health and well-being of Derby residents through physical activity. Para 48 that relates to green belt, green wedges and green gaps is also silent on the role of these areas for sport and physical activity.

This is surprising given the preceding paragraphs 29-30 which set out the challenges to addressing health inequalities within the City, and specifically mentions physical activity.

We would therefore encourage the Council to strengthen the vision paragraphs to make explicit reference to the role of sport and physical activity in tackling identified health inequalities within the City, linking this to the role of the City's open space to undertake sport and recreation.

This would also help provide a stronger interlinkage with the plan objectives referenced below

Plan Objectives

Overall, Sport England would question the need for 16 objectives which seems too many to provide a focused set of objectives. We note that the Government's latest thinking as set out in the NPPF consultation (Policy PM2:Local Plans part 1a) is for Local Plans to have no more than ten measurable outcomes within the vision.

Sport England supports objectives OBJ2 (Stronger, safer communities), OBJ7 (protect and improve the natural environment), OBJ8 (Enhance and strengthen green wedges and green gaps), OBJ9 (increase opportunity to socialize, play, be physically active and lead healthy lifestyles), (OBJ11 promote equality and community cohesion, healthy and active lifestyles and community safety), OBJ13 (active travel) as these all relate well to promoting sport and physical activity to address physical and mental health and well-being inequalities. However, we consider that some of these objectives seem to duplicate in certain areas and could be reduced to a tighter set of fewer objectives, without losing the importance of these themes.

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Our ref: Q100621
Your ref:
Email: johnathan.welton@quod.com
Date: 23 February 2026



Planning Policy
Derby City Council
The Council House, Corporation Street
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By Email

Dear Officers

Consultation on the Draft Local Plan for Derby (Regulation 18) Representations Submitted on behalf of St James Securities

On behalf of our client, St James Securities (SJS), please find enclosed representations to the Draft Local Plan for Derby (Regulation 18) in relation to land known as Becketwell ("the Site").

Site Background

Alongside their partners, SJS are behind the regeneration of Becketwell, which now includes The Condor residential scheme and the Vaillant Live performance venue.

The Site benefits from an extant outline permission (19/01245/OUT) for further mixed-use development including leisure, office and residential uses.

The adopted Local Plan includes saved policy CC4 which identifies Becketwell as a major mixed-use regeneration opportunity to deliver a range of uses consistent with the function of the City Centre. Policy AC2 (Delivering a City Centre Renaissance) and AC1 (City Centre Strategy) both support the regeneration of the Site through a mix of uses.

Representations

Policy CC4 of the Draft Local Plan (Residential Led, Mixed Use Site Allocations) places more of a focus on residential uses, along with appropriate other uses such as office / workspaces, retail, food and drink, leisure and education. Specifically, part h) of the policy relates to Becketwell:

h) Remaining Land at Becketwell – This site has already successfully delivered 259 new homes, as well as the new performance venue. There remains significant potential to deliver further residential development, providing a minimum of 150 new homes, alongside potential for new office space, hotels and leisure. Appropriate consideration should be given to the potential for archaeological remains (see Policies EN11 and EN18)



SJS object to the requirement in the policy to deliver a “minimum” of 150 new homes and request that it be removed from the draft policy. It undermines flexibility, and prejudices the future redevelopment of the Site.

In due course, it may be the case that more than 150 dwellings are delivered across the remainder of the Site. However, this will be market driven, being mindful that any successful development that supports investment and drives footfall in the city centre will deliver against Local Plan objectives.

Requiring a minimum of 150 homes would not be an appropriate step in order to ensure comprehensive regeneration is achieved over the Plan period. Flexibility is required to ensure long-term delivery of a key site in the heart of the City Centre and this must be reflected in emerging policy.

We trust the above will be taken into consideration during the consultation process. Should you have any queries regarding the representations made please do not hesitate to contact us.

Yours sincerely

Johnathan Welton
Planner

Summary of key points raised by CHAC members – 26/02/2026

- Positive to see that heritage considerations have been woven into the document throughout. General support for the range of allocations given challenging housing targets
- Emerging plan as drafted adequately addresses key heritage issues, however heritage policies should have their own chapter, rather than being part of the wider Environment chapter
- Some concerns about repetition of national policy
- Would be beneficial if the Spatial Portrait section could highlight the important role that heritage plays in creating attractive living environments
- Policy H7 relating to HMOs would benefit from making more overt reference to consideration of impacts of such development on heritage assets, although it was noted that Policy EN17 (Uses within buildings of architectural or historic importance) to extent covers this issue
- Check wording of Policy EN19 – specifically use of the terms ‘designed’ and ‘designated’. Also remove reference to development not in accordance with national policy not being supported – as not necessary – check other policies for similar
- General support for the proposed tall buildings policy (CC6), considered to be a generally robust approach and will help with dealing with density pressures
- Approach to Railway Quarter (CC14) generally supported - particularly redevelopment of the ‘Bubbles’ block
- It was mentioned that it could be useful to make reference to the ‘attributes’ that underpin the OUV of the DVMWHS – potentially in policy and / or within the supporting text. References to use of UNESCO / ICOMOS HIA toolkit within policy supported
- Good that there are several instances where the plan goes beyond national policy and adds value, such as the Darley Abbey Mills policy and references to the need for a new bridge
- Positive to see references to adverts / vinyl wraps
- Support for the references to not accepting dilution of design quality as set out in GD1 and also introduction of references to consideration of urban grain. Noted that the 3D model / digital twin will aid consideration of this in future
- Important to ensure that the policies map is eventually available as interactive map / GIS (as opposed to static PDFs)